BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL
WESTERN ZONAL BENCH, PUNE
ORIGINAL APPLICATION NO. 58 OF 2022

IN THE MATTER OF:

Aryavart Foundation ...**Company**

Versus

M/s RIA CETP Co-Op Society Ltd & Ors. **... Respondents**

INDEX

Serial No.	Exhibit	Particulars of Document	Page Nos.	
			From	To
1	-	Index	A	A
2	-	Affidavit of Reply on behalf of Respondent No. 5 to the Original Application	1024	1031
3	A	Copy of the letter addressed by Company dated 12th September, 2016	1032	1032
4	B	Copy of the amended Consent to Operate dated 13th December, 2019	1033	1044
5	C	Copy of the amended Consent to Operate dated 22nd December, 2021	1045	1062
6	D	Copy of the No-Objection dated 4th July, 2016 issued by MIDC (Respondent No. 4)	1063	1063
7	E	Copy of the No-Objection dated 13th July, 2016 issued by MPCB (Respondent No. 2)	1064	1065
8	F	Copy of the letter dated 16th February, 2016 addressed by RIA-CETP Co-Operative Society (Respondent No. 1)	1066	1066
9	G	Copy of the letter issued by Company dated 12th September, 2016 intimating about the resignation as a member of RIA-CETP Co-Operative Society	1067	1067
10	H	Copy of graphic diagram showing movement of treated effluents at CETP run by RIA-CETP Co-Operative Society	1068	1068
11	I	Copy of MOEF and CC Guidelines	1069	1076
12	J	Copy of the Report for the period 2018 to 2023 obtained from the server of MPCB (Respondent No. 2)	1077	1078

NOTARY
P. J. YELWANDE
REGD. NO. 1728
PUNE
Exp. Dt. 26/6/2026
GOVERNMENT OF INDIA

13	K	Copy of Minutes of the Meeting dated 31st May, 2022 of MIDC Officials with representatives of the Applicant	1079	1084

For Company

Advocate for the Company

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONAL BENCH, PUNE

ORIGINAL APPLICATION NO. 58 OF 2022

M/s. Sudarshan Chemicals Limited ...**Company**

IN THE MATTER OF:

Aryavart Foundation ...**Company**

Versus

M/s RIA CETP Co-Op Society Ltd & Ors. **... Respondents**

AFFIDAVIT OF REPLY ON BEHALF OF RESPONDENT NO. 5 TO THE ORIGINAL APPLICATION

I, Shri Mandar Velankar, Age 45, General Counsel and Company Secretary of Respondent No.5 (hereinafter referred to as the "**Company**"), and having my office at 7th Floor, Eleven West Panchshil, Survey No. 25, Near PAN Card Club Road, Baner, Pune, Maharashtra 411069. I am authorised to submit on behalf of the Company as follows:

1. I have read the present Original Application dated 24th May 2022 read with amended memo of parties dated 1st April 2023 ("**Original Application**"). In the said Original Application, the following pleadings have been served upon the Company:

   (i) Joint Committee Report dated October 2022;

   (ii) Additional Report of Joint Committee dated July 2023.

2. I am conversant with the facts and averments made in the Original Application and hence I am able to depose to the same. The present Affidavit is being filed in compliance with Order dated 16th October 2023 to set out the relevant facts demonstrating non-involvement of the Company in Respondent No.1. I crave leave of this Hon'ble Tribunal to file further Affidavit, if necessary.

3. The Company is wrongly arrayed as a party Respondent in Original Application due to the following reasons:

(i) The Original Application does not make out any case against the Company. There is neither any averment nor any relief claimed against the Company. Company's name is merely added as Respondent No. 5 in the amended memo of parties. In absence of any case made out, Company is neither a proper party nor a necessary party;

(ii) The Company is not a member industry in Respondent No. 1 since 2016. The Company resigned as a member of Respondent No.1 on 12th September, 2016, much prior to the period of violations asserted in the present proceedings i.e. 2017 to 2023. A copy of the letter dated 12th September 2016 addressed by Company and acknowledged by Respondent No. 1 is annexed as **Exhibit 'A'** herein.

(iii) The Company has no role to play in the management or operations of Respondent No. 1.

(iv) The Company treats its own effluent in the in-house full-fledged effluent treatment plant ("**ETP**") and discharges treated effluent within the parameters prescribed in the consent to operate issued by MPCB ("**MPCB norms**"). The Company's ETP is self-sufficient for treating the effluents and therefore the Company is not required to discharge its effluent into the CETP for treatment. A copy of the amended consent to operate dated 13th December 2019 and 22nd December 2021 is annexed as **Exhibit 'B'** and **Exhibit 'C'** respectively.

(v) After receiving the direct discharge permissions from Respondent No.2 and Respondent No. 4 in the year 2016, the Company started directly transmitting the treated effluents from its ETP (in compliance with the MPCB norms) through the holding tank into the CETP outlet from where the effluents get pumped and further transmitted into the MIDC disposal tank for final disposal in the Kundalika river at the location approved by the NIO. A copy of the no-objection dated 4th July 2016 and 13th July 2016 issued by Respondent No. 4 and Respondent No. 2 respectively is annexed as **Exhibit 'D'** and **Exhibit 'E'** herein.

(vi) Respondent No. 4 requested the Company to agree to a dilution arrangement in writing. As a matter of fact, Company's treated effluent is being used to dilute the highly concentrated effluents of member industries of Respondent No. 1,in order to achieve the disposal standards by Respondent No.1.

(vii) Respondent No. 1 has been attempting to falsely implicate the Company in the RIA CETP liabilities and wrongdoings.

(viii) The Additional Report of the Joint Committee dated July 2023 clearly holds responsible Respondent No.1 and M/s R&B Infra Projects Pvt. Ltd, Hydroair Tectonics (PCD) Ltd. for violations during the year 2017 and 2023.

RELEVANT FACTS:

1. The Company is engaged in the business of Pigments, Intermediates for Pigments and other related products since the year 1971-72 and was one of the first companies to establish its manufacturing plant in MIDC Estate, Dhatav, Roha, District Raigad, Maharashtra ("**Roha MIDC**"). The Company in order to carry on its business, requires fresh water consumption for its operations and to treat effluents in its ETP in accordance with the norms laid down by Respondent No. 2.

2. Since there are several small, medium and large-scale industries in Roha MIDC industrial area which generate effluents, there was a need to set up Common Effluent Treatment Plant ('**CETP**'). The purpose of the CETP was to collect and treat effluents from individual industries unit and then treat it fully and discharge it at the designate point as per the prescribed limits.

3. Accordingly, RIA-CETP Co-operative Society ("**Respondent No.1**") was formed as a special purpose vehicle to establish and operate CETP for the Roha Industrial Area. Upon its formation, Respondent No.1 assumed responsibility of maintaining and operating the infrastructure of the CETP.

4. The Company was a member of the Roha CETP during 2005 to 2016 and was treating and discharging its effluents through the Respondent No.1. The Company was constrained to resign from being a member industry on account of Respondent No.1's refusal to accept additional booking capacity of 5 MLD to the Company. A copy of the letter dated 16th February 2016 addressed by Respondent No. 1 is enclosed as **Exhibit 'F'**.

5. Owing to the refusal of Respondent No.1 to increase Company's effluent output from 7.5 MLD to 12.5 MLD, the Company requested Respondent No.4 and Respondent No. 2 for permission to allow direct discharge of its fully treated effluents from the ETP to the outlet of CETP through the MIDC disposal pipeline.

6. In 2016, Respondent No. 4 and Respondent No.2 gave their no objection to the Company for direct discharge of the treated trade effluents at the outlet of CETP through dedicated effluent disposal pipeline provided by MIDC.

7. As the Company upgraded its in-house ETP and received direct discharge permission, there was no requirement for the Company to route its treated effluent through the CETP process. The CETP process includes neutralization, flocculation, primary sedimentation, equilization, bio-reaction, secondary clarifier and then it would be pumped out from the MIDC disposal tank into the creek ('hereinafter referred to as '**CETP process**'). Therefore, the Company resigned as a member of the Respondent No.1 vide its letter dated 12th September, 2016. Copy of the letter dated 12th September 2016 is enclosed as **Exhibit 'G'** and copy of graphic diagram showing the route taken by the treated effluents of the Company is annexed as **Exhibit 'H'**.

8. Since the Company resigned as a member of Respondent No.1 in the year 2016 and was treating its own effluents, the Company continued to pay proportionate charges only towards pumping and water consumption to MIDC (at the rate of Rs 1.50 per m3 prevailing up-to 30th September 2017).

9. Respondent No.1 was aware that the Company no longer pays for (i) CETP process charges (forming part of hydraulic costs) and (ii) organic costs which are generally paid to fully treat the effluents. As the Company only continued to pay charges towards pumping and water consumption, Respondent No.1 was faced with a situation of inadequate funds to run the CETP operations. In order to overcome the shortfall, Respondent No.1 arbitrarily decided to increase the hydraulic charges manifold without any basis in an attempt to target and extort monies from the Company.

10. Company cannot be a part of the CETP because of the guidelines barring 17 categories of high polluting large scale industries to be a part of CETP as per MoEF & CC Guidelines. A copy of the MOEF and CC guidelines are annexed as **Exhibit I** herein.

11. Between 2017 to 2020, RIA CETP increased the hydraulic charges from 1.5 per cubic meter to Rs.13 per cubic metre without any basis. The capacity of the CETP was enhanced from 10MLD to 22.5 MLD in September 2017.

12. From the record, it appears that Respondent No.2 issued directions to Respondent No. 1 under Section 33A of Water (Prevention and Control of Pollution) Act 1974 between 2017-2022 including letter dated 6th February 2017 issued for non-performance of the CETP.

13. On 1st February 2020, owing to the failure of Respondent No.1 to comply with disposal standards prescribed by Respondent No. 2, Respondent No. 4 was compelled to take over the operations and maintenance of CETP as per the directions of Respondent No. 2.

14. It appears that in 2021, show cause notice and prosecution notice was issued by Respondent No. 2 to Respondent No.1 for closure under Section 33A and Section 41(2) of the Water (Prevention & Control of Pollution) Act, 1974. These notices were issued to Respondent No. 1 and M/s. R&B Infra Projects Pvt. Ltd. and Hydroair Tectonics (PCD) Ltd. (JV).

15. The CEPT was further handed over to M/s. R&B Infra Projects Pvt. Ltd. Hydroair Tectonics (PCD) Ltd. (JV) for upgradation and Operation & Maintenance. The entire rehabilitation and up-gradation work was to be commissioned by 31.01.2023.

16. In December 2021, Company received amendment in consent to operate for expansion from Respondent No. 2. Under the terms, it is envisaged that the Company shall recycle treated effluents to the maximum extent and the remaining shall be discharged at the CETP outlet sump through dedicated pipeline after confirming to the standards. However, the present effluent quantity generated is 7.5MLD.

17. The Company has installed Online Continuous Monitoring System for pH, TSS, BOD, COD at the outlet of its own ETP and inlet of MIDC Disposal Tank. These monitoring systems run on real time basis and are connected to the server of MPCB. The treated effluents of the Company are discharged within the applicable MPCB norms. A copy of the Report for the period 2018 to 2023 obtained from the server of Respondent No.2 is annexed as **Exhibit 'J'**.

18. The Company in order to ensure its compliance with the MPCB norms as stipulated by Respondent No. 2, discharges its effluents through a dedicated pipeline leading into a collection/holding tank. Furthermore, the effluents are subsequently pumped into disposal tank under the control and responsibility of Respondent No. 4, for final disposal.

19. As a part of Roha industries family and to enhance sustainability of CETP, Respondent No.4 requested the Company to consider paying Rs.3.55 per cubic out of Rs.23.40 per cubic meter as O&M charges, for allowing Company's treated 6.5 MLD effluent to be mixed with the concentrated effluents of CETP members ("**proposal**"). A copy of the minutes of the Meeting dated 31st May, 2022 is enclosed as **Exhibit "M".**

LIABILITY TO PAY:

20. As per the Report of October 2022 submitted by Respondent No. 2, Respondent No.1 has to pay environment compensation due to continuous non-compliance of discharge standards.

21. As per the Additional Report of July 2023 of Respondent No. 2, Respondent No. 1 and Respondent No.4 through M/s. R&B Infra Projects Pvt. Ltd., and Hydroair Tectonics (PCD) Ltd. are responsible and liable to pay environment compensation.

22. None of the Reports saddle any compensation liability on the Company, as the Company is not involved in the functioning or operation of the CETP.

23. **REPORTS:**

The following reports/results are on record:

(i) The Inspection Reports are annexed at Annexure A-3 of the Original Application(pages 88 to 110) ("**Inspection Reports**"). The period of the Inspection Reports is between 28th September 2020 to 31st January 2022. As per Inspection Reports, site visits were carried out in the premises of Respondent No. 1. The Inspection Reports set out the factual data and shortcomings of the CETP.

NOTARY
P. J. YELWANDE
REGD. NO. 1723
PUNE
Exp. Dt. 26/6/2025
GOVERNMENT OF INDIA

(ii) The Analysis Reports are annexed at Annexure A-4 of the Original Application (pages 111 to 240) ("**Analysis Reports**"). The period of the Analysis Reports is between 5th October 2020 to 10th March 2022. As per the Analysis Reports, the samples are collected from the outlet of CETP.

(iii) Annexure – VII of the Joint Committee Report of October 2022 sets out the analysis results of sampling carried out at the inlet and outlet of CETP for the period January 2021 to August 2022.

(iv) The Joint Committee Report of July 2023 sets out analysis results for the period 2017 to 2023 from the inlet and outlet of the CETP (page 863, 878-889 of the Report).

The said results/reports are not applicable to the Company as the Company does not transmit its treated effluent through the inlet or outlet of CETP.

24. On 31st March 2023, Respondent No. 1 made oral submissions and misled this Hon'ble Tribunal by submitting that Company's effluent is going to the collection tank of the CETP and therefore the Company is a necessary party. In fact as a matter of practice, Respondent No.1 has been channelling Company's treated effluents into the CETP at its own accord and benefit, to dilute the highly concentrated effluents of the member industries. On one hand Respondent No. 1, at its own volition and benefit, has been using Company's treated effluents for dilution purposes and on the other hand Respondent No. 1 has sought to maliciously shift the liability on the Company by misleading this Hon'ble Tribunal.

25. In light of the aforesaid, the Company has no role to play in the operation or maintenance of CETP. It is respectfully submitted that the Company has not contributed to polluting the environment in any manner whatsoever. In absence of any case made out, the Company is liable to be deleted as a party to these proceedings.

Solemnly affirmed at Mumbai)

On this 7th day of February 2024)

DEPONENT

VERIFICATION

I, Shri Mandar Velankar, Age 45, General Counsel and Company Secretary of Sudharshan Chemicals, the Respondent No. 5 abovenamed, do hereby solemnly declare that what is stated in paragraphs 1 to 25 of the above Affidavit is true and correct, being based on my knowledge and based on information received by me and is believed to be true.

DEPONENT

Place: Pune

Date: 7th February 2024

BEFORE ME

P. J. YELWANDE
NOTARY GOVT. OF INDIA
PUNE.

7 FEB 2024

Noted and Registered at Serial Number 308

Date 7.02.2024

NOTARIAL NOTARIAL NOTARIAL NOTARIAL NOTARIAL

A

57

EXHIBIT "A"

SUDARSHAN

Sudarshan Chemical Industries Limited
46, MIDC Estate, Dhatav, Roha,
Dist. Raigad 402116, India
Tel.: +91 2194 263 531 Fax:+91 2194 263 602

12th September, 2016

NOTARY
P. J. YELWANDE
REGD. NO. 1723
PUNE
Exp. Dt. 26/3/2025
GOVERNMENT OF INDIA

To,

RIA CETP,

Dhatav, Roha

Attn: Mr. P P Bardeshkar

Sub: Discontinue our membership to the CETP

Dear Sir,

We would like to inform you that we have been treating our effluent which meets all parameters as mandated by Pollution Control Board and are granted permission by MPCB and MIDC to directly discharge our effluent in the MIDC disposal line. With regards to this, we want to discontinue our membership to the CETP with immediate effect.

We thank you for the cooperation given to us during our association with CETP.

Regards

Yours Truly,

For Sudarshan chemical Industries Ltd

B N Kadam

General Manager --Works

Received
12/09/2016
RIA-CETP CO-OP. SOCIETY LTD.
C/o. : R.I.R.C., Plot No. 6,
MIDC, Dhatav-Roha,
Dist. Raigad, 402116.

Sudarshan Chemical Industries Limited
Global Head Office :
162 Wellesley Road, Pune - 411 001, India
Tel: +91 20 260 58 888 Fax: +91 20 260 58 222
Email : contact@sudarshan.com
www.sudarshan.com

EXHIBIT "B"

B

42

NOTARY * GOVERNMENT OF INDIA * P. J. YELWANDE REGD. NO. 1723 PUNE Exp. DL. 26/8/2021

MAHARASHTRA POLLUTION CONTROL BOARD

Phone : 24010437/24020781/ 24037124/24035273
Fax : 24044532/24024068/ 24023516
Email : ast@mpcb.gov.in
Visit At : http://mpcb.gov.in

Kalpataru Point, 3rd & 4th floor, Sion-Matunga Scheme Road No. 8, Opp. Cine Planet Cinema, Near Sion Circle, Sion (E), Mumbai - 400 022

Consent order No. Format 1.0/BO/CAC-Cell/UAN No. 0000001048/Amend/17th CAC-1912000014
Date- 13/12/2019

To,
M/s Sudarshan Chemical Industries Ltd.,
Plot Nos. 44, 44(part), 45, 46, 46(part), MIDC Dhatav,
Tal. Roha, Dist. Raigad – 402 116.

Subject: Grant of amendment in Consent to Operate under Red/LSI category.

Ref.: 1. Existing Consent No. Format 1.0/BO/CAC-Cell/UAN No. 20673/11th CAC-1801000769 dtd. 19/01/2018 valid up to 31/07/2020.
2. Minutes of Consent Appraisal Committee meeting held on 15 & 25/11/2019.

Your application UAN No. 0000001048
Dated: 25/07/2018
For: Grant of amendment in Consent to Operate under Section 25 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 6 of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules 2016 is considered and the Consent is hereby granted subject to the following terms and conditions and as detailed in the schedule I, II, III & IV annexed to this order:

1. The Consent to Operate is granted for a period up to 31/07/2020.
2. The actual capital investment of the industry is Rs. 551.48 Crs as per C.A. Certificate submitted by industry.
3. The Consent is valid for the manufacturing of

Sr. No.	Product Name	Maximum Quantity & UOM
1	Pigments. (Organic pigments, Inorganic pigments, pearl pigments, pigment preparation , Fluorescent pigments, High performance pigments, HP dyes & intermediates)	30744 MT/A
2	Intermediates (For Pigments, Agro Chemicals & Fine Chemicals)	4824 MT/A
3	Pesticides Technical (Organo Phosphorous Pesticides, insecticides, herbicides, fungicides, bio products, rodenticides, plant growth regulators, herbicides)	5958 MT/M
4	Pesticide Formulation (Liquid)	5000 KL/A
5	Pesticide Formulation (Solid)	1200 MT/A
6	Co-generation plant	10 MW

4. Conditions under Water (P&CP), 1974 Act for discharge of effluent:

Sr. No.	Description	Permitted quantity of discharge (CMD)	Standards to be achieved	Disposal of treated effluent
1	Trade effluent	7412	As per Schedule-I	Outlet of CETP
2	Domestic effluent	208	As per Schedule-I	Outlet of CETP

1033

5. Conditions under Air (P& CP) Act, 1981 for air emissions:

Sr. No.	Description of stack / source	Number of Stack	Standards to be achieved
1	Boiler-1 (Coal/ FO)	1	As per Schedule-II
2	Incinerator	1	As per Schedule-II
3	Boiler-2 (Coal)	1	As per Schedule-II
4	D.G. Sets (250, 624, 1000 & 1150 KVA)	4	As per Schedule-II
5	Process Stacks	36	As per Schedule-II
6	Boiler	1	As per Schedule-II
7	D.G. Set (250 KVA)	1	As per Schedule-II

6. Conditions about Non-hazardous Wastes:

Sr. No.	Type Of Waste	Quantity & UoM	Treatment	Disposal
1	Paper, Plastic seepages, Fibre Drums	212 MT/A	NA	Onsite Incineration
2	Mica waste (dry)	3,500 MT/A	NA	Sale to offsite recycling/ CHWTSDF
3	Canteen Waste	6 MT/A	NA	Used in Biogas plant/ Compost
4	Rubber, Handgloves, PVC Shoes, Tarpaulin, Hose Pipes	7 MT/A	NA	Sale to offsite recycling/ CHWTSDF
5	Broken Discarded Glass	2 MT/A	NA	Sale to offsite recycling/ CHWTSDF
6	Boiler Soot	2 MT/A	NA	Sale to offsite recycling/ CHWTSDF
7	Insulating Material/ Thermocol	7 MT/A	NA	Sale to authorized vendor/ CHWTSDF
8	Iron Scrap	300 MT/A	NA	Sale to authorized vendor for offsite recycling
9	Plastic (Non Metallic Scrap)	300 MT/A	NA	Sale to offsite recycling/ CHWTSDF
10	Paper	100 MT/A	NA	Sale to offsite recycling/ CHWTSDF
11	Electric Scrap	7 MT/A	NA	Sale to offsite recycling/ CHWTSDF
12	Wooden Scrap	100 MT/A	NA	Sale to offsite recycling
13	Boiler Ash	106 MT/D	NA	Sale to Brick Making Units/ Landfill
14	Excess Biomass from ETP	50 MT/M	NA	Use as bio-fertilizer/ compost/ Fuel in Boiler/ CHWTSDF/ sale to other ETPs
15	Discarded Barrels	700 Nos/A	NA	Sale
16	Process Potatoes waste	80 Kg/D	NA	Biogas/ Vermin Compositing

7. Conditions under Hazardous & Other Wastes (M & TM) Rules 2016 for treatment and disposal of hazardous waste:

Sr. No.	Type Of Waste	Category	Quantity	UOM	Treatment	Disposal

1	Spent solvents	20.2	2000	MT/A	Recycle	Sale to authorized pre-processors/ Onsite recycle-reuse
2	Distillation residues	20.3	12	MT/A	Incineration	CHWTSDF/ Incinerator
3	Process waste sludge/ residue	26.1	30	MT/A	Recycle	Sale to authorized recycler/ manufacturers & supplier
4	Process Waste residue	29.1	215	MT/A	Incineration	Incinerator/ CHWTSDF
5	Chemical containing residue	34.1	1	MT/A	Incineration	Incinerator/ CHWTSDF
6	Discarded containers/ barrels/ liners	33.1	4000	Nos./A	Recycle	Sale to authorized party
7	Discarded Containers/ barrels/ liner	33.1	40	MT/A	Recycle	Sale to authorized party/ CHWTSDF
8	Discarded Containers/ barrels/ liner	33.1	4	MT/A	Incineration	Incinerator /CHWTSDF
9	Flue Gas cleaning residue	37.2	4	MT/A	Secured Landfill	CHWTSDF
10	Toxic metal containing residue from water purification	35.2	0.5	MT/A	Secured Landfill	CHWTSDF
11	Chemical sludge from waste water treatment	35.3	3500	MT/A	Secured Landfill	CHWTSDF
12	Filters and filter material which have organic liquid	36.2	13	MT/A	Recycle/ Incineration	Sale to authorized recyclers/ CHWTSDF
13	Sludge & filters contaminated with oil	3.3	200	Kg/A	Secured Landfill	CHWTSDF
14	Discarded asbestos	15.2	1	MT/A	Secured Landfill	CHWTSDF
15	Waste/residue containing oil	5.2	300	Ltrs/A	Incineration	CHWTSDF/ Onsite Incineration
16	Discarded Containers/ barrels/ liners	33.1	8000	Nos/A	Recycle	Returned to suppliers/ authorized recyclers
17	Date expired and off specification pesticides	29.3	4	KL/A	Incineration	CHWTSDF/ Onsite Incineration
18	Ash from incineration	37.2	8	MT/A	Secured Landfill	CHWTSDF
19	Spent Carbon	36.2	8	MT/A	Incineration/ Secured Landfill	CHWTSDF
20	Pesticide residue	29.1	200	MT/A	Incineration	CHWTSDF/Onsite Incineration

21	Used/ Spent Oil	5.1	800	Ltr/M	Recycle	CHWTSDF/ Sale to authorized party approved by MPCB/ CPCB
22	Phosphoric acid (12-15%)	--	250	MT/M	Recycle	Sale to Auth. Party/Recycler/ Re-processor/CHWTSDF
23	Recovered Pigments	--	6	MT/M	Recycle	

The applicant shall ensure disposal to actual user having permission under Rule 9 of Hazardous & Other Wastes (M&TM) Rules, 2016.

8. The Board reserves the right to review, amend, suspend, revoke etc. this consent and the same shall be binding on the industry.
9. This consent should not be construed as exemption from obtaining necessary NOC/permission from any other Government authorities.
10. Industry shall operate online monitoring system to monitor the parameters such as pH, BOD, COD at the final outlet of ETP and at the disposal point at CETP outlet.
11. Industry shall comply with the conditions of Environment Clearance issued vide letter No. SEAC-2015/CR-86/TC-2 dtd. 24/01/2016.
12. This Consent is issued with the overriding effect on earlier Consent to Operate No. Format 1.0/BO/CAC-Cell/UAN No. 20673/11th CAC-1801000769 dtd. 19/01/2018.

For and on behalf of the
Maharashtra Pollution Control Board

(E. Ravendiran, IAS)
Member Secretary

Received Consent fee of –

Sr. No.	Amount (Rs.)	DD/DR/NEFT/RTGS/TRAN No.	Date	Drawn On
1	Rs. 9,05,842/-	TXN1702000625	04/02/2017	--
2	Rs. 14,34,246/-	TXN1801000416	04/01/2018	--

Copy to:

1. Regional Officer (Raigad)/ Sub-Regional Officer (Raigad-II), M.P.C. Board.
   -They are directed to ensure the compliance of the Consent conditions.
2. Chief Accounts Officer, M.P.C. Board, Mumbai.
3. CC/CAC desk for record & website updating purposes.

Schedule-I

Terms & conditions for compliance of Water Pollution Control:

1) A] As per your application, you have proposed to provide the Combined Effluent Treatment Plant (ETP) with the design capacity of 8000 CMD consisting of neutralization tank, equalization tank, flocculation tank, primary clarifier, aeration tank and secondary clarifiers.

B] The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent & domestic effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent:

Sr. No.	Parameters	Standards prescribed by Board (If any)
		Limiting Concentration in mg/l, except for pH
1	pH	6.5-8.5
2	Oil & Grease	10
3	BOD (3 days 27oC)	30
4	Total Suspended Solids	100
5	Bioassay Test	90% survival of fish after first 96 hrs in 100% effluent
6	Suspended Solids	100
	Specific Pesticides	
1	Benzene Hexachloride	10
2	Carbonyl	10
3	DDT	10
4	Endosalfan	10
5	Diamethoate	450
6	Fenitrothion	10
7	Malathoin	10
8	Phorate Methyl	10
9	Methyl Parathion	10
10	Penathoate	10
11	Pyrethrums	9600
12	Copper Sulphate	50
13	Ziram	1000
14	Sulphur	30
15	Paraquat	2300
16	Proponil	7300
17	Nitogen	780
	Heavy Metals	
1	Copper	1
2	Maganese	1
3	Zinc	1
4	Mercury	0.01
5	Tin	0.1
6	Any other metal like Nickel etc.	Shall not to exceed 5 times the drinking water standards of BIS
	Organics	
1	Phenol and Phenolics as C6H5	1

47

	d) In organics	
1	Arsenic (as As)	0.2
2	Cyanide (as CN)	0.2
3	Nitrate (as NO_3)	50
4	Phosphates (as P)	5

C] The treated effluent shall be discharged into the outlet of CETP through dedicated effluent disposal pipeline provided by MIDC.

2) As per your consent application, the domestic effluent shall be treated in ETP.

3) The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or and extension or addition thereto.

4) The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.

5) The Applicant shall submit Water Cess Returns in Form-I and pay the Water Cess charges for period up to 30/06/2017 as per the provisions of the Water (Prevention & Control of Pollution) Cess Act, 1977. Industry shall install water meters for consuming water as follows:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1	Industrial Cooling, spraying in mine pits or boiler feed	1038
2	Domestic purpose	288
3	Processing whereby water gets polluted & pollutants are easily biodegradable	7663
4	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	300
5	Gardening	110

6) The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.

1038

Schedule-II

Terms & conditions for compliance of Air Pollution Control:

1. As per your application, you have provided the Air pollution control (APC) system and erected following stack(s) and observe the following fuel pattern-

Sr. No.	Stack Attached To	APC System	Height in Mts.	Type of Fuel	Quantity & UoM	S%	SO2 Kg/Day
1	Boiler-1 (Coal/FO)	Cyclone Separator	45	FO/ Coal	475 Kg/Hr	4.5/ 0.2	1026/ 45
2	Incinerator (100 Kg/Hr)	5% Caustic venture scrubber	35	LDO	15 Kg/Hr	1.8	13
3	Boiler-2 (Coal)	ESP	45	Coal	3800 Kg/Hr	0.2	316
4	DG Set 624 KVA	Acoustic enclosure	6	HSD	124 Kg/Hr	1	60
5	DG Set 1000 KVA	Acoustic enclosure	6.5	HSD	125 Kg/Hr	1	60
6	DG Set 1150 KVA	Acoustic enclosure	6.7	HSD	230 Kg/Hr	1	110
7	DG Set 250 KVA	Acoustic enclosure	4	HSD	30 Kg/Hr	1	24
8	Process stack for HPP Ammonia	Caustic Scrubber	20	NA	NA	NA	NA
9	Process stack for scrubber for organic pigment	Caustic water Scrubber	20	NA	NA	NA	NA
10	Process stack for scrubber for Inorganic pigment	Caustic water scrubber	20	NA	NA	NA	NA
11	Process stack for scrubber for Lead Dissolution pigment	Water J scrubber	20	NA	NA	NA	NA
12	Process stack for scrubber for Calcinations	Caustic scrubber	20	NA	NA	NA	NA
13	Process stack for scrubber for Cadmium/ Dissolution	Caustic Scrubber	20	NA	NA	NA	NA
14	Process stack for scrubber for Cadmium	Caustic Scrubber	20	NA	NA	NA	NA
15	Air wash unit TTK-300162	Water Scrubber	16	NA	NA	NA	NA
16	Air wash unit TTK-300163	Water Scrubber	16	NA	NA	NA	NA
17	MCP reaction	Caustic/ Water Scrubber	25	NA	NA	NA	NA
18	PMN reaction	Water Scrubber	25	NA	NA	NA	NA
19	Process stack for common scrubber	Caustic & water	25	NA	NA	NA	NA

	Cl2 2925	scrubber					
20	Boiler	ESP	78.5	Coal	12264 Kg/Hr	0.8	4709
21	DG Set 250 KVA	Acoustic enclosure	6.7	HSD	50 Kg/Hr	1	24
22	Batch Making New Azo Pigment	Caustic Scrubber	20	NA	NA	NA	NA
23	Batch Making New Benz Pigment	Caustic Scrubber	20	NA	NA	NA	NA
24	Rubine CDR 300001	Dust collector	20	NA	NA	NA	NA
25	RLC CDR 300002	Dust collector	20	NA	NA	NA	NA
26	Yellow CDR 300003	Dust collector	20	NA	NA	NA	NA
27	Rubine CDR 300004	Dust collector	2	NA	NA	NA	NA
28	Mica ABS 300013	Dust collector	8	NA	NA	NA	NA
29	Mica Air Wash TTK 300282	Dust collector	20	NA	NA	NA	NA
30	Mica ABS 300046	Dust collector	8	NA	NA	NA	NA
31	White Plant ABS 300009	Dust collector	14	NA	NA	NA	NA
32	White Coating ABS 300010	Dust collector	14	NA	NA	NA	NA
33	White Air Washer AWU 300001	Dust collector	16	NA	NA	NA	NA
34	IOC ABS 300014	Water Scrubber	14	NA	NA	NA	NA
35	Pearl Plant (PA-341101)	Water Scrubber	13	NA	NA	NA	NA
36	Arylamide Yellow Batch making	Caustic & water scrubber	20	NA	NA	NA	NA
37	Rubine Toner Batch making	Caustic & water scrubber	20	NA	NA	NA	NA
38	QA Plant	Caustic Scrubber	20	NA	NA	NA	NA
39	Sumicos Absorber Unit ABS 300063	Air wash Unit	15	NA	NA	NA	NA
40	Sumicos Air wash Unit AWU 300012	Water Scrubber	18	NA	NA	NA	NA
41	Azo DCS CD-300005 Dust collector	Dust collector	3	NA	NA	NA	NA
42	Azo DCS CD-300006 Dust collector	Dust collector	2	NA	NA	NA	NA
43	Azo DCS Bx	Caustic	7	NA	NA	NA	NA

	Making	Scrubber					
44	Pilot Plant Scrubber	Caustic Scrubber	25	NA	NA	NA	NA

2. The Applicant shall provide Specific Air Pollution control equipment as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

3. The applicant shall operate and maintain above mentioned air pollution control system, so as to achieve the level of pollutants to the following standards:

Total Particulate matter	Not to exceed	150 mg/Nm^3
SO_2	Not to exceed	50 ppm
HCl	Not to exceed	20 mg/Nm^3
Cl_2	Not to exceed	5 mg/Nm^3
H_2S	Not to exceed	5 mg/Nm^3
P_2O_5 (as H_3PO_4)	Not to exceed	10 mg/Nm^3
NH_3	Not to exceed	30 mg/Nm^3
Particulate matter with pesticides compounds	Not to exceed	20 mg/Nm^3
CH_3Cl	Not to exceed	20 mg/Nm^3
HBr	Not to exceed	5 mg/Nm^3

4. Standards for Emissions of VOC Pollutants:

Sr. No.	Compounds	Maximum emission limit (mg/Nm^3), dry basis
1	MA, PA, Phenol	20
2	Ethyl benzene (EB), Styrene, Toulene, Xylene, Aromatics, EG, PG	100
3	Non-methane HC (Paraffin), Acetone, olefins	150

5. Industry shall operate the incinerator as per the CPCB guidelines.

6. The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement well before its life come to an end or erection of new pollution control equipment.

7. The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

51

Schedule-III

Details of Bank Guarantees

Sr. No.	Consent (C to E/O/R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C to R	Rs. 10 lakh	Existing	Towards O&M of pollution control systems and towards compliance of Consent conditions	31/07/2020	30/11/2020

Schedule-IV

General Conditions:

1) The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.
2) If the MIDC pipeline is broken/ overflowing chamber, in such cases industry shall not discharge their treated effluent into MIDC drain, it shall be sent to CETP by tanker.
3) Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.
4) The applicant shall provide ports in the chimney/(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
5) Whenever due to any accident or other unforeseen act or even, 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. In case of failure of pollution control equipment, the production process connected to it shall be stopped.
6) The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
7) The firm shall submit to this office, the 30th day of September every year , the Environmental Statement Report for the financial year ending 31st March in the prescribed Form-V as per the provisions of rule 14 of the Environment (Protection) (Second Amendment) Rules, 1992.
8) The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the Hazardous & Other Waste (M&TM) Rules, 2016, which can be recycled/processed/reused/recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
9) The industry should comply with the Hazardous& other Waste (M,H& TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous & other Waste (M,H & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
10) An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
11) The applicant shall make an application for renewal of the consent at least 60 days before the date of the expiry of the consent.
12) Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act,1981 and Environmental Protection Act,1986 and industry specific standard under EP Rules, 1986 which are available on MPCB website(www.mpcb.gov.in).
13) The industry shall constitute an Environmental cell with qualified staff/personnel/agency to see the day to day compliance of consent condition towards Environment Protection.
14) Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
15) Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.

1043

16) The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.

17) Conditions for D.G. Set
   a) Noise from the D.G. Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
   b) Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
   c) Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper sitting and control measures.
   d) Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
   e) A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
   f) D.G. Set shall be operated only in case of power failure.
   g) The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.
   h) The applicant shall comply with the notification of MoEF dated 17.05.2002 regarding noise limit for generator sets run with diesel.

18) The industry should not cause any nuisance in surrounding area.

19) The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.

20) The applicant shall maintain good housekeeping.

21) The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a statement on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end, with the Environment Statement.

22) The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.

23) The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipment provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.

24) The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.

25) The industry shall submit official e-mail address and any change will be duly informed to the MPCB.

26) The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification dtd. 16.11.2009 as amended.

-----000-----

EXHIBIT "C"

NOTARY P. J. YELWANDE REGD. NO. 1728 PUNE Exp. DL 26/8/2024 GOVERNMENT OF INDIA

MAHARASHTRA POLLUTION CONTROL BOARD

Tel: 24010706/24010437
Fax: 24023516
Website: http://mpcb.gov.in
Email: cac-cell@mpcb.gov.in

Kalpataru Point, 2nd and 4th floor, Opp. Cine Planet Cinema, Near Sion Circle, Sion (E), Mumbai-400022

Date: 22/12/2021

RED/L.S.I ()
No:- Format1.0/CAC/UAN No.MPCB-BY_PRODUCT-0000000019/CO-2112000003

To,
M/s Sudarshan Chemical Industries Limited,
Plot Nos. 44, 44 part, 45, 46 & 46 part, MIDC Dhatav,
Tal. Roha, Dist. Raigad - 402116.

लोकसेवा हक्क कायदा
Right to Public Service Act
Your Service is Our Duty

Sub: Grant of Amendment in Consent to Operate for expansion (part).

Ref:
1. Environment Clearance accorded by Env. Dept., GoM vide No. SEAC-2015/ CR-86/ TC-2 dtd. 02/02/2017.
2. Environment Clearance for proposed change in Product Mix/ Process Change & CPP installation accorded by Env. Dept., GoM vide No. SIA/ MH/ IND2/ 51683/ 2013 dtd. 31/03/2020.
3. Previous Consent to Operate accorded vide No. Format 1.0/ CAC/UAN No. 0000094213/ CO-2107000988, dtd. 16/07/2021, valid upto 31/07/2025.
4. Minutes of committee Meeting for By product and Hazardous Waste categorization held on 02/09/2021.

Your application No.MPCB-BY_PRODUCT-0000000019 Dated 03.07.2020

For: grant of Consent to Operate under Section 26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 6 of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules 2016 is considered and the consent is hereby granted subject to the following terms and conditions and as detailed in the schedule I, II, III & IV annexed to this order:

1. **The consent to operate is granted for a period up to 31/07/2025**
2. **The capital investment of the project is Rs.867.6553 Crs. (As per C.A Certificate submitted by industry Existing C.I. is Rs. 551.48 Crs + Expansion/ Increase in C.I. - Rs. 316.17 Crs)**
3. **Consent is valid for the manufacture of:**

Sr No	Product	Maximum Quantity	UOM
Products			
1	Pigments (Organic, Inorganic-Metallic/ EPD, Pearl, Pigment Preparation, Fluorescent, High Performance Pigments/ HP Dyes & Intermediates)	45473	MT/A
2	Co-generation Plant	20	MW
By Products			
3	Phosphoric Acid (12-15%) or Di-calcium Phosphate	3159	MT/M

Sr No	Product	Maximum Quantity	UOM
4	Recovered pigment	6	MT/M
5	POCl3	10	MT/M

3* Quantity of Phosphoric Acid (12-15%) or Di-calcium Phosphate shall not exceed 1215 MT/M or 1944 MT/M respectively

4. **Conditions under Water (P&CP), 1974 Act for discharge of effluent:**

Sr No	Description	Permitted (in CMD)	Standards to	Disposal Path
1.	Trade effluent	14335	As per Schedule-I	Recycle treated effluent into process, for cooling tower make up and for utility purposes to the maximum extent and discharge remaining at CETP outlet sump
2.	Domestic effluent	72	As per Schedule-I	Sent to ETP

5. **Conditions under Air (P& CP) Act, 1981 for air emissions:**

Sr No.	Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
1	S-1 & S-2	Boiler-1 (Coal-15 TPH) & Boiler-2 (Coal-29 TPH)	1	As per Schedule -II
2	S-3	Process stack for scrubber for organic Pigment	1	As per Schedule -II
3	S-4	Process stack for scrubber for Inorganic pigment	1	As per Schedule -II
4	S-5	Process stack for scrubber for Lead Dissolution pigment	1	As per Schedule -II
5	S-6	Process stack for scrubber for Calcinations	1	As per Schedule -II
6	S-7	Process stack for scrubber for Cadmium/Dissolution	1	As per Schedule -II
7	S-8	Process stack for scrubber for Cadmium	1	As per Schedule -II
8	S-9	Air wash unit TTK-300162	1	As per Schedule -II
9	S-10	Air wash unit TTK-300163	1	As per Schedule -II
10	S-11	Process stack for PY138 (Ammonia)	1	As per Schedule -II
11	S-12	Process stack for PY138 (SO2 scrubbber)	1	As per Schedule -II
12	S-13	Incinerator	1	As per Schedule -II
13	S-14	Process stack for common scrubber Cl2 2925	1	As per Schedule -II
14	S-15	DG Set (1150 KVA)	1	As per Schedule -II
15	S-16	DG Set 1000 KVA	1	As per Schedule -II

Sr No.	Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
16	S-17	DG Set 1750 KVA	1	As per Schedule -II
17	S-18	DG Set 250 KVA	1	As per Schedule -II
18	S-19	DG Set 625 KVA	1	As per Schedule -II
19	S-20	Process stack for HPP Ammonia	1	As per Schedule -II
20	S-21	Batch Making New Azo Pigment	1	As per Schedule -II
21	S-22	Batch Making New Benz Pigment	1	As per Schedule -II
22	S-23	Rubine CDR 300001	1	As per Schedule -II
23	S-24	RLC CDR 300002	1	As per Schedule -II
24	S-25	Yellow CDR 300003	1	As per Schedule -II
25	S-26	Rubine CDR 300004	1	As per Schedule -II
26	S-27	Mica ABS 300013	1	As per Schedule -II
27	S-28	Mica Air Wash TTK 300282	1	As per Schedule -II
28	S-29	Mica ABS 300046	1	As per Schedule -II
29	S-30	Boiler-3 (Coal-62 TPH)	1	As per Schedule -II
30	S-31	White Plant ABS 300009	1	As per Schedule -II
31	S-32	White Coating ABS 300010	1	As per Schedule -II
32	S-33	White Air Washer AWU 300001	1	As per Schedule -II
33	S-34	IOC ABS 300014	1	As per Schedule -II
34	S-35	Iron Oxide (H2S scrubber)	1	As per Schedule -II
35	S-36	QA-65 Stack 1	1	As per Schedule -II
36	S-37	QA-65 Stack 2	1	As per Schedule -II
37	S-38	QA Plant	1	As per Schedule -II
38	S-39	Pilot Plant Scrubber	1	As per Schedule -II
39	S-40	Sumicos Absorber Unit ABS 300063	1	As per Schedule -II
40	S-41	Sumicos Air wash Unit AWU 300012	1	As per Schedule -II
41	S-42	Azo DCS CD-300005 Dust collector	1	As per Schedule -II
42	S-43	Azo DCS CD-300006 Dust collector	1	As per Schedule -II
43	S-44	Azo DCS Bx Making	1	As per Schedule -II
44	S-45	Boiler-4 (Coal-62 TPH)	1	As per Schedule -II
45	S-46	Boiler-5 (Coal-28 TPH)	1	As per Schedule -II
46	S-47	DG Set 1750 KVA	1	As per Schedule -II
47	S-48	DG Set (New) 1750 KVA	1	As per Schedule -II

Sr No.	Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
48	S-49	Primary paddle Dryer	1	As per Schedule -II
49	S-50	Secondary paddle Dryer	1	As per Schedule -II
50	S-51	AHR stack	1	As per Schedule -II

6. **Non-Hazardous Wastes:**

Sr No	Type of Waste	Quantity	UoM	Treatment	Disposal
1	HDPE bags	200	Kg/Day	NA	Sale to Auth. Party/ Vendor/ CHWTSDF
2	Paper, Plastic, Sweepage, Fiber drum	212	MT/A	NA	Onsite Incineration/ CHWTSDF
3	Mica waste (Wet)	10000	MT/A	NA	Sale to Auth. Party for offsite recycling/ CHWTSDF
4	Canteen waste	20	MT/A	Biogas/ Vermin Compositing	Used as manure for gardening
5	Rubber, Hand gloves, PVC shoes, Tarpaulin, Paper bags, Hose pipes	15	MT/A	NA	Sale to Auth. Party for offsite recycling/ CHWTSDF
6	Broken discarded glass	5	MT/A	NA	Sale to Auth. Party for offsite recycling/ CHWTSDF
7	Boiler soot	2	MT/A	NA	Sale to Auth. Party for offsite recycling/ CHWTSDF
8	Wooden Scrap	300	MT/A	NA	Sale to Auth. Party/ Vendor
9	Insulating material/ Thermocol	15	MT/A	NA	Sale to Auth. Party for offsite recycling/ CHWTSD
10	Excess biomass	2500	MT/A	NA	Sale to Auth. Party/ waste water treatment plant
11	Iron scrap	800	MT/A	NA	Sale to Auth. Party/ Vendor
12	Plastic/ Non metallic scrap	300	MT/A	NA	Sale to Auth. Party/ Recycler/ CHWTSDF
13	Paper	200	MT/A	NA	Sale to Auth. Party/ Vendor/ CHWTSDF
14	Electric scrap	18	MT/A	NA	Sale to Auth. Party/ Recycler
15	Boiler Ash	500	MT/Day	NA	Sale to Brick Making Units/ Landfill

Sr No	Type of Waste	Quantity	UoM	Treatment	Disposal
16	Excess biomass (Dry)	300	MT/M	NA	Used as bio-fertilizer/ compost/ CHWTSDF/ Sale to other ETPs
17	Discarded barrels	28800	Nos./Y	NA	Sale to Auth. Party/ Recycler after Decontamination

7. **Conditions under Hazardous & Other Wastes (M & T M) Rules 2016 for treatment and disposal of hazardous waste:**

Sr No	Category No./ Type	Quantity	UoM	Treatment	Disposal
1	5.1 Used or spent oil	20	KL/A	Recycle	Sale to Auth. Party/ CHWTSDF
2	15.2 Discarded asbestos	11	MT/A	Secured Landfill	CHWTSDF
3	20.2 Spent solvents	4500	MT/M	Recycle/ Incineration	Sale to Auth. Party/ CHWTSDF
4	20.3 Distillation residues	1200	MT/A	Incineration	CHWTSDF
5	26.1 Process waste sludge/residues containing acid, toxic metals, organic compounds	35	MT/A	Incineration	CHWTSDF
6	29.1 Process wastes or residues	20	MT/A	Incineration	CHWTSDF
7	34.1 Chemical-containing residue arising from decontamination.	1	MT/A	Secured Landfill after treatment/ Incineration	CHWTSDF
8	33.1 Discarded Barrels/ Containers/ Liners	18000	Nos./Y	Recycle	Sale to Auth. Party/ CHWTSDF
9	36.2 Spent carbon or filter medium	3	MT/A	Secured Landfill after treatment/ Incineration	CHWTSDF
10	33.1 Discarded Liners	20	MT/A	Recycle/ Incineration	Sale to Auth. Party/ CHWTSDF
11	35.1 Exhaust Air or Gas cleaning residue	3	MT/A	Secured Landfill after treatment/ Incineration	CHWTSDF
12	35.2 Spent ion exchange resin containing toxic metals	0.5	MT/A	Incineration	CHWTSDF
13	35.3 Chemical sludge from waste water treatment	7000	MT/A	Secured Landfill	CHWTSDF
14	37.3 Concentration or evaporation residues	5600	KL/A	Secured Landfill after treatment	CHWTSDF

Sr No	Category No./ Type	Quantity	UoM	Treatment	Disposal
15	Filter &Filter material which have organic liquid	20	MT/A	Recycle/ Incineration	Sale to Auth. Party/ CHWTSDF
16	5.2 Wastes or residues containing oil	200	Ltr/A	Incineration	CHWTSDF
17	37.2 Ash from incinerator	12	MT/A	Secured Landfill	CHWTSDF
18	29.5 Spent catalysts	5	MT/A	Recycle/ Secured Landfill	Sale to Auth. Party/ CHWTSDF

The applicant shall ensure disposal of by-products to Actual user having permission under Rule 9 of Hazardous and Other Wastes (Management & Transboundry Movement) Rules 2016.

8. **Conditions under Batteries (Management & Handling) Rules, 2001:**

Sr No	Type of Waste	Quantity	UoM	Disposal Path
1	Used Batteries other than lead Acid	200.00	Kg/Annum	Sale to Auth. Party/ Recycler

Specific Conditions for used Batteries:

i. The applicant shall ensure that used batteries are not disposed of in any manner other than by depositing with the authorized dealer/ manufacturer/ registered recycler/ importer/ re-conditioner or at the designated collection center.

ii. The applicant shall file half-yearly return in Form VIII to the M.P.C. Board.

iii. Bulk consumers to their user units may auction used batteries to registered recyclers only.

9. The Board reserves the right to review, amend, suspend, revoke this consent and the same shall be binding on the industry.

10. This consent should not be construed as exemption from obtaining necessary NOC/ permission from any other Government authorities.

11. Industry shall operate & maintain ETP to achieve BOD standard 30 mg/l. Industry shall recycle treated effluent into process, for cooling tower make up and for utility purposes to the maximum extent and remaining shall be discharge at CETP outlet sump as per EC condition.

12. Industry shall explore the possibility to increase recycling of treated effluent into process, for cooling tower make up and for utility purposes.

13. Industry shall make provision to stop immediately the discharge of treated effluent at the CETP Outlet Sump, in case, if quality of the treated effluent doesn't meet the Consented standards.

14. Industry shall comply with the conditions stipulated in EC dtd. 02/02/2017 & 31/03/2020.

15. Industry shall ensure that OCEMS data at the ETP Outlet & at the disposal point in CETP Outlet Sump are connected to Board's Servers uninterruptedly.

16. Industry shall submit separate application with full details about disposal of by-products/ Hazardous waste for reviewing before Board's By-product Committee.

17. Bank Guarantee of Rs. 2 Lakh is forfeited towards exceeding JVS results. Industry shall top up BG with double amount totalling BG of Rs. 14 Lakh. Industry shall extend all existing BGs towards operation and maintenance of the Pollution Control Systems and towards compliance of the EC & Consent conditions.
18. This consent is issued with overriding effect on earlier Consent to Operate granted by the Board vide No. Format 1.0/ CAC/UAN No. 0000094213/ CO-2107000988, dtd. 16/07/2021, valid upto 31/07/2025.

For and on behalf of the
Maharashtra Pollution Control Board.

(Ashok Shingare IAS),
Member Secretary

Received Consent fee of -

Sr.No	Amount(Rs.)	Transaction/DR.No.	Date	Transaction Type
1	8676553.00	MPCB-DR-0855	13/07/2020	RTGS

Copy to:

1. Regional Officer, MPCB, Raigad and Sub-Regional Officer, MPCB, Raigad II
- They are directed to ensure the compliance of the consent conditions.
2. Chief Accounts Officer, MPCB,Sion, Mumbai
3. CC-CAC Desk- for record & website updating purpose.

SCHEDULE-I

Terms & conditions for compliance of Water Pollution Control:

1. A] As per your application, you have provided Effluent Treatment Plant (ETP) of total designed capacity 15,000 CMD consisting of Fenton's Treatment (For HPP/ HP Dyes effluent stream), Primary Treatment - Clari-flocculators, primary clarifier, Anaerobic Hybrid Reactor (For HPP/ HP Dyes effluent stream), equalization tank, Secondary treatment- Aeration Tanks, Secondary clarifiers, Tertiary treatment, Activated Glass media filter for the treatment of 14,335 CMD industrial effluent & 72 CMD domestic effluent.

B] The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent:

Sr.No	Parameters	Limiting concentration not to exceed in mg/l, except for pH
(1)	pH	5.5 to 9.0
(2)	Oil & Grease	10 mg/l
(3)	BOD (3 days 27°C)	30 mg/l
(4)	Total Suspended solids	100
(5)	Bioassay Test	90 % survival of fish after frist 96 hours in 100%effluent
(6)	Mercury	0.01 mg/l
(7)	Total Chromium	2 mg/l
(8)	Chromium(Cr^{6+})	0.10 mg/l
(9)	Lead	0.10 mg/l
(10)	Copper	2 mg/l
(11)	Phenolics(C_6H_5OH)	1.0
(12)	Zinc	5 mg/l
(13)	Nickel	3 mg/l
(14)	Manganese	2 mg/l
(15)	Cadmium	0.2 mg/l
(16)	Colour (Hazen Unit)	400
(17)	COD	250 mg/l
(18)	TAN	50 mg/l

C] The Industry shall ensure connectivity online monitoring system at the ETP outlet and at the inlet of CETP treated effluent/ outlet sump to the MPCB server including separate energy meter for pollution control system.

D] Industry shall recycle treated effluent into process, for cooling tower make up and for utility purposes to the maximum extent and remaining shall be discharged at CETP outlet sump through dedicated pipeline after confirming to the standards. In no case, effluent shall find its way for gardening / outside factory premises.

2. A] As per your application, domestic effluent is sent to Secondary treatment of Effluent Treatment Plant for further treatment & disposal.

   B] Industry shall comply prescribed standards & disposal path as prescribed at Sr. No. 1 B & C of schedule I.

3. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification there of & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.

4. The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.

5. The Applicant shall comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and as amended, by installing water meters and other provisions as contained in the said act:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1.	Industrial Cooling, spraying in mine pits or boiler feed	2273.00
2.	Domestic purpose	288.00
3.	Processing whereby water gets polluted & pollutants are easily biodegradable	14070.00
4.	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	0.00
5.	Gardening	10

6. The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

SCHEDULE-II

Terms & conditions for compliance of Air Pollution Control:

1. As per your application, you have provided the Air pollution control (APC) system and erected following stack (s) to observe the following fuel pattern:

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-1	Boiler-1 (Coal-15 TPH)	ESP followed by common stack for 15 & 29 TPH Coal fired Boilers	45.50	Coal 3500 Kg/Hr	0.5	SO2	840 Kg/Day
						PM	150 Mg/Nm^3
S-2	Boiler-2 (Coal-29 TPH)	ESP followed by common stack for 15 & 29 TPH Coal fired Boilers	45.50	COAL 5536 Kg/Hr	0.5	SO2	1329 Kg/Day
						PM	150 Mg/Nm^3

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-3	Process stack for scrubber for organic Pigment	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						HCl	35 Mg/Nm^3
						NOx	50 Select
S-4	Process stack for scrubber for Inorganic pigment	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						HCl	35 Mg/Nm^3
						NOx	50 Select
S-5	Process stack for scrubber for Lead Dissolution pigment	Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						HCl	35 Mg/Nm^3
						NOx	50 Select
S-6	Process stack for scrubber for Calcinations	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Select
						NOx	50 Select
						H2S	5 Mg/Nm^3
S-7	Process stack for scrubber for Cadmium/ Dissolution	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Select
						NOx	50 Select
						H2S	5 Mg/Nm^3
S-8	Process stack for scrubber for Cadmium	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Select
						NOx	50 Select
						H2S	5 Mg/Nm^3
S-9	Air wash unit TTK-300162	Water Scrubber	16.00	-	-	PM	150 Mg/Nm^3
						HCl	35 Mg/Nm^3
S-10	Air wash unit TTK-300163	Water Scrubber	16.00	-	-	PM	150 Mg/Nm^3
						HCl	35 Mg/Nm^3
S-11	Process stack for PY138 (Ammonia)	Caustic Water Scrubber	8.00	-	-	NH3	30 Mg/Nm^3

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-12	Process stack for PY138 (SO2 scrubbber)	Water Scrubber	8.00	-	-	SO2	50 Select
						TPM	150 Mg/Nm^3
S-13	Incinerator	Caustic Ventury Scrubber	35.00	LDO 15 Kg/Hr	1.8	PM	50 Mg/Nm^3
						SO2	200 Mg/Nm^3
						HCl	50 Mg/Nm^3
						CO	100 Mg/Nm^3
						TOC	20 Mg/Nm^3
						Mixture of (As, Sb, Co, Cr, Cu, Pb, Ni, V, Mn, TOC, CO, CH3Cl)	1.5 Mg/Nm^3
S-14	Process stack for common scrubber Cl2 2925	Caustic Water Scrubber	25.00	-	-	Cl2	5 Mg/Nm^3
S-15	DG Set (1150 KVA)	Acoustic Enclosure/ Stack	6.70	HSD 230 Kg/Hr	1	SO2	110 Kg/Day
S-16	DG Set 1000 KVA	Acoustic Enclosure/ Stack	6.70	HSD 125 Kg/Hr	1	SO2	60 Kg/Day
S-17	DG Set 1750 KVA	Acoustic Enclosure/ Stack	12.00	HSD 218.78 Kg/Hr	1	SO2	105 Kg/Day
S-18	DG Set 250 KVA	Acoustic Enclosure/ Stack	6.70	HSD 50 Kg/Hr	1	SO2	24 Kg/Day
S-19	DG Set 625 KVA	Acoustic Enclosure/ Stack	6.00	HSD 125 Kg/Hr	1	SO2	60 Kg/Day
S-20	Process stack for HPP Ammonia	Caustic Water Scrubber	20.00	-	-	NH3	30 Mg/Nm^3
S-21	Batch Making New Azo Pigment	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Mg/Nm^3
						NOx	50 Mg/Nm^3
S-22	Batch Making New Benz Pigment	Caustic Water Scrubber	20.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Mg/Nm^3
						NOx	50 Mg/Nm^3

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-23	Rubine CDR 300001	Dust Collector	20.00	-	-	PM	150 Mg/Nm³
S-24	RLC CDR 300002	Dust Collector	20.00	-	-	PM	150 Mg/Nm³
S-25	Yellow CDR 300003	Dust Collector	20.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-26	Rubine CDR 300004	Dust Collector	2.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-27	Mica ABS 300013	Dust Collector	8.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-28	Mica Air Wash TTK 300282	Dust Collector	20.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-29	Mica ABS 300046	Dust Collector	8.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-30	Boilr-3 (Coal-62 TPH)	ESP	73.50	Coal 12264 Kg/Hr	0.5	SO2	2943 Kg/Day
						PM	150 Mg/Nm³
						NOx	50 Mg/Nm³
						CO	50 Mg/Nm³
S-31	White Plant ABS 300009	Dust Collector	14.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-32	White Coating ABS 300010	Dust Collector	14.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-33	White Air Washer AWU 300001	Dust Collector	15.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-34	IOC ABS 300014	Water Scrubber	14.00	-	-	PM	150 Mg/Nm³
						HCl	35 Mg/Nm³
S-35	Iron Oxide (H2S scrubber)	Water Scrubber	9.50	-	-	H2S	5 Mg/Nm³

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-36	QA-65 Stack 1	Caustic Water Scrubber	7.00	-	-	PM	150 Mg/Nm^3
						NOx	50 Mg/Nm^3
						HCl	35 Mg/Nm^3
S-37	QA-65 Stack 2	Caustic Water Scrubber	10.00	-	-	PM	150 Mg/Nm^3
						NOx	50 Mg/Nm^3
						HCl	35 Mg/Nm^3
S-38	QA Plant	Caustic Water Scrubber	20.00	-	-	HCl	35 Mg/Nm^3
						P2O5	10 Mg/Nm^3
S-39	Pilot Plant Scrubber	Scrubber	25.00	-	-	HCl	35 Mg/Nm^3
						NOx	50 Mg/Nm^3
S-40	Sumicos Absorber Unit ABS 300063	Air Wash Unit	15.00	-	-	PM	150 Mg/Nm^3
S-41	Sumicos Air wash Unit AWU 300012	Air Wash Unit	18.00	-	-	PM	150 Mg/Nm^3
S-42	Azo DCS CD-300005 Dust collector	Dust Collector	3.00	-	-	PM	150 Mg/Nm^3
S-43	Azo DCS CD-300006 Dust collector	Dust Collector	2.00	-	-	PM	150 Mg/Nm^3
S-44	Azo DCS Bx Making	NaOH Scrubber	7.00	-	-	PM	150 Mg/Nm^3
						NOx	50 Mg/Nm^3
						HCl	35 Mg/Nm^3
S-45	Boiler-4 (Coal-62 TPH)	ESP	73.50	Coal 12264 Kg/Hr	0.5	SO2	2943 Kg/Day
						PM	150 Mg/Nm^3
						NOx	50 Mg/Nm^3
						CO	50 Mg/Nm^3
S-46	Boiler-5 (FO-28 TPH)	ESP	45.00	FO 2500 Kg/Hr	4.5	SO2	5400 Kg/Day
						PM	150 Mg/Nm^3
						NOx	50 Mg/Nm^3
						CO	50 Mg/Nm^3

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-47	DG Set 1750 KVA	Acoustic Enclosure/ Stack	14.50	HSD 218.78 Kg/Hr	1	SO2	105 Kg/Day
S-48	DG Set (New) 1750 KVA	Acoustic Enclosure/ Stack	14.50	HSD 218.78 Kg/Hr	1	SO2	105 Kg/Day
S-49	Primary paddle Dryer	Water Scrubber	12.90	-	-	PM	150 Mg/Nm^3
						SO2	50 Mg/Nm^3
						NOx	50 Mg/Nm^3
S-50	Secondary paddle Dryer	Water Scrubber	9.00	-	-	PM	150 Mg/Nm^3
						SO2	50 Mg/Nm^3
						NOx	50 Mg/Nm^3
S-51	AHR stack	Gas Flare	12.24	-	-	PM	50 Mg/Nm^3

2. The Applicant shall provide Specific Air Pollution control equipments as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.

3. The applicant shall operate and maintain above mentioned air pollution control system, so as to achieve the level of pollutants to the following standards:

Parameters	Standards (mg/l)

4. The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.

5. The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

SCHEDULE-III
Details of Bank Guarantees:

Sr. No.	Consent (C2E/ C2O /C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C2R (With Expansion)	800000	Existing	Towards O & M of pollution control system & compliance of consent to operate	31.07.2025	30.11.2025

Sr. No.	Consent (C2E/ C2O /C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
2	C2R (With Expansion) - Top up BG	400000	Within 15 days	Towards O & M of pollution control system & compliance of consent to operate	31.07.2025	30.11.2025

****Existing BG obtained for above purpose if any, may be extended for period of validity as above.**

BG Forfeiture History

Srno.	Consent (C2E/C2O/C2R)	Amount of BG imposed	Submission Period	Purpose of BG	Amount of BG Forfeiture	Reason of BG Forfeiture
1	C2O	1000000	Existing	O&M of Pollution Control Systems and compliance of Consent conditions	200000	Towards exceeding JVS results.

BG Return details

Srno.	Consent (C2E/C2O/C2R)	BG imposed	Purpose of BG	Amount of BG Returned
NA				

SCHEDULE-IV
General Conditions:

1. The Energy source for lighting purpose shall preferably be LED based
2. The PP shall harvest rainwater from roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial applications within the plant
3. Conditions for D.G. Set
   a) Noise from the D.G. Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
   b) Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
   c) Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper sitting and control measures.
   d) Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
   e) A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
   f) D.G. Set shall be operated only in case of power failure.
   g) The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.

h) The applicant shall comply with the notification of MoEFCC, India on Environment (Protection) second Amendment Rules vide GSR 371(E) dated 17.05.2002 and its amendments regarding noise limit for generator sets run with diesel. :

4. The applicant shall maintain good housekeeping.
5. The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.
6. The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipments provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.
7. The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.
8. The industry shall submit quarterly statement in respect of industries obligation towards consent and pollution control compliance's duly supported with documentary evidences (format can downloaded from MPCB official site).
9. The industry shall submit official e-mail address and any change will be duly informed to the MPCB.
10. The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification No. B-29016/20/90/PCI-L dated. 18.11.2009 as amended.
11. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.
12. The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
13. The PP shall provide personal protection equipment as per norms of Factory Act
14. Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.
15. Whenever due to any accident or other unforeseen act or even, 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. In case of failure of pollution control equipments, the production process connected to it shall be stopped.
16. The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
17. The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the Hazardous and Other Wastes (M & TM) Rules 2016, which can be recycled /processed /reused /recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
18. An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
19. Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act, 1981 and Environmental Protection Act, 1986 and industry specific standard under EP Rules 1986 which are available on MPCB website (www.mpcb.gov.in).

20. Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
21. Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.
22. The industry should not cause any nuisance in surrounding area.
23. The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.
24. The industry shall create the Environmental Cell by appointing an Environmental Engineer, Chemist and Agriculture expert for looking after day to day activities related to Environment and irrigation field where treated effluent is used for irrigation.
25. The applicant shall provide ports in the chimney/(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
26. The industry should comply with the Hazardous and Other Wastes (M & TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous and Other Wastes (M & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
27. The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.
28. The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a yearly statement by 30th September every year on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end.
29. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions.
30. The firm shall submit to this office, the 30th day of September every year, the Environment Statement Report for the financial year ending 31st March in the prescribed FORM-V as per the provisions of Rule 14 of the Environment (Protection) (second Amendment) Rules, 1992.
31. The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.
32. The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

33. The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.

For and on behalf of the
Maharashtra Pollution Control Board.

(Ashok Shingare IAS),
Member Secretary

NOTARY
P. J. YELWANDE
REGD. NO. 1723
PUNE
Exp. Dt. 26/6/2021
GOVERNMENT OF INDIA

D

39

EXHIBIT "D"

MAHARASHTRA INDUSTRIAL DEVELOPMENT CORPORATION

(A Government of Maharashtra Undertaking)

MIDC, Division Office, Nagdongri, Revas Road, Alibag, Dist. Raigad - 402 201.
Tel: 02141-222257 / 225116(P) Email - eealibaug@midcindia.org

No/EE(A)/IFMS/C08432/of2016
Office of the Executive Engineer,
M.I.D.C. Division, Alibag- 402 201.
Date: 04/07/2016

To,

M/s Sudarshan Chemical Industries Ltd.
Plot No.46,MIDC, Roha Indl. Area,
Dhatav,Roha.

Sub: Roha Indl. Area...
Direct Discharge of fully treated Effluent of M/s Sudarshan Chemicals to MIDC's effluent Line.

Ref: 1)Your letters No. NIL dtd.21/4/2015 & 22/4/2015.
2)This office letter No.B26824 dtd. 27/4/2015
3) Your letter No.Nil dtd.30/5/2016.

Dear Sir,

With reference to your above cited letters,it is to inform you that, MIDC has no objection to accept Existing plus Additional 5.0 MLD effluent quantity, which will be generated after your expansion, in MIDC's existing disposal pipeline system for final disposal point,subject to obtaining NOC from MPCB.

Thanking you,

Yours faithfully

(K.S.Bhandekar)
Executive Engineer,
M.I.D.C. Division, Alibag.

NOTARY P. J. YELWANDE REGD. NO. 1728 PUNE Exp. Dt. 26/6/2020 GOVERNMENT

1063

E

EXHIBIT "E"

40

Fax: 24024068 / 24023515		Opp. Cine Planet Cinema,
Website: http://mpcb.gov.in		Near Sion Circle, Sion (E),
E-mail: ta@mpcb.gov.in		Mumbai-400 022.

No. BO/MPCB/CAC-cell/ 2797

Date: 13/07/2016 ~~/06/2016~~

To,

M/s Sudarshan Chemicals Industries Ltd,
46, MIDC Dhatav, Roha,
Dist: Raigad 402116

Sub: Permission for direct disposal of treated effluent of M/s Sudarshan Chemical Industries, Roha for existing unit at the outlet of CETP through dedicated effluent disposal pipeline into MIDC disposal pipeline.

Ref: 1] Your letter for permission for direct disposal of treated effluent to MIDC disposal pipeline.
2] Minutes of Personal hearing regarding the permission for direct disposal of treated trade effluent at outlet of CETP extended to the industry before JD(WPC) & AS(T) on 20.02.2016
3] Minutes of the CAC meeting held on 22.03.2016.

Consequent upon your request for direct disposal of treated effluent to MIDC disposal pipeline vide above reference no. 1, personal hearing was extended to you before JD(WPC) & AS(T) on 20.02.2016. The minutes of the personal hearing were placed before CAC meeting held on 22.03.2016 and it was decided to give No Objection for the disposal of the treated trade effluent of M/s Sudarshan Chemical Industries Ltd, for existing unit to dispose off their treated effluent at the outlet of CETP through dedicated effluent disposal pipeline provided by MIDC subject to certain terms and conditions.

In the view of above, MPCB has no objection for the disposal of the treated trade effluent of M/s Sudarshan Chemical Industries Ltd, for existing unit to dispose off their treated effluent at the outlet of CETP through dedicated effluent disposal pipeline provided by MIDC subject to following terms and conditions:

1. Industry shall obtain the permission from MIDC.
2. Separate pipeline shall be provided from industry's premises upto outlet of CETP with the prior permission of MIDC.
3. Industry shall ensure the ETP operations so as to meet the Environment (Protection) ACT, 1986 standards of 30 mg/l BOD concentration at the outlet.

5. The MIDC shall ensure the disposal of treated effluent at the location as suggested by NIO.
6. At present, the consented standards of BOD is 100 mg/l, hence needs to be amended accordingly for BOD 30 mg/l considering disposal in the Creek.

The consent to operate will be amended after the compliance of the above conditions.

(P.K. Mirashe)
Member Secretary

Copy to: 1. LO, MPCB, Mumbai: For information
2.Regional Officer, MPCB, Raigad/Sub-Regional Officer, MPCB, Mahad: For information.

F

EXHIBIT "F" 38

Bhowtar

RIA - CETP

CO - OPERATIVE SOCIETY LIMITED
(Regn. No. RGD/RHA/GNL/(0)904/94 dtd 7.9.94)
RIRC Bldg., Plot No. 6, M.I.D.C. Dhatav, Roha - Raigad - 402 116.
Tel. : 02194 - 263599, Fax : 264594

16.2.2016

Sudarshan Chemical Industries Limited,
Plot No. 44, 45 & 46,
MIDC,
Roha.

Sub: Final Water Consumption Capacity Booking With CETP.

Sir,

This is to inform you that as per our records your unit has Final Water Consumption Capacity Booking in 22.5 MLD CETP is 7650 m3 per day.

This letter is issued to you for your information and records.

Thanking you.

Yours truly,
For RIA-CETP CO. SOC. LTD.,

P. P. BARDESKAR
HON. CHAIRMAN

R.I.A. CETP CO-OP. SOC. LTD. MIDC ROHA

EXHIBIT "G".

SUDARSHAN

Sudarshan Chemical Industries Limited
46, MIDC Estate, Dhatav, Roha,
Dist. Raigad 402116, India
Tel.: +91 2194 263 531 Fax:+91 2194 263 602

NOTARY * GOVERNMENT OF INDIA
P.J. VELHANDE
REGD. NO. 1728
PUNE
EXP. DT. 26/6/2022

12th September, 2016

To,

RIA CETP,

Dhatav, Roha

Attn: Mr. P P Bardeshkar

Sub: Discontinue our membership to the CETP

Dear Sir,

We would like to inform you that we have been treating our effluent which meets all parameters as mandated by Pollution Control Board and are granted permission by MPCB and MIDC to directly discharge our effluent in the MIDC disposal line. With regards to this, we want to discontinue our membership to the CETP with immediate effect.

We thank you for the cooperation given to us during our association with CETP.

Regards

Yours Truly,

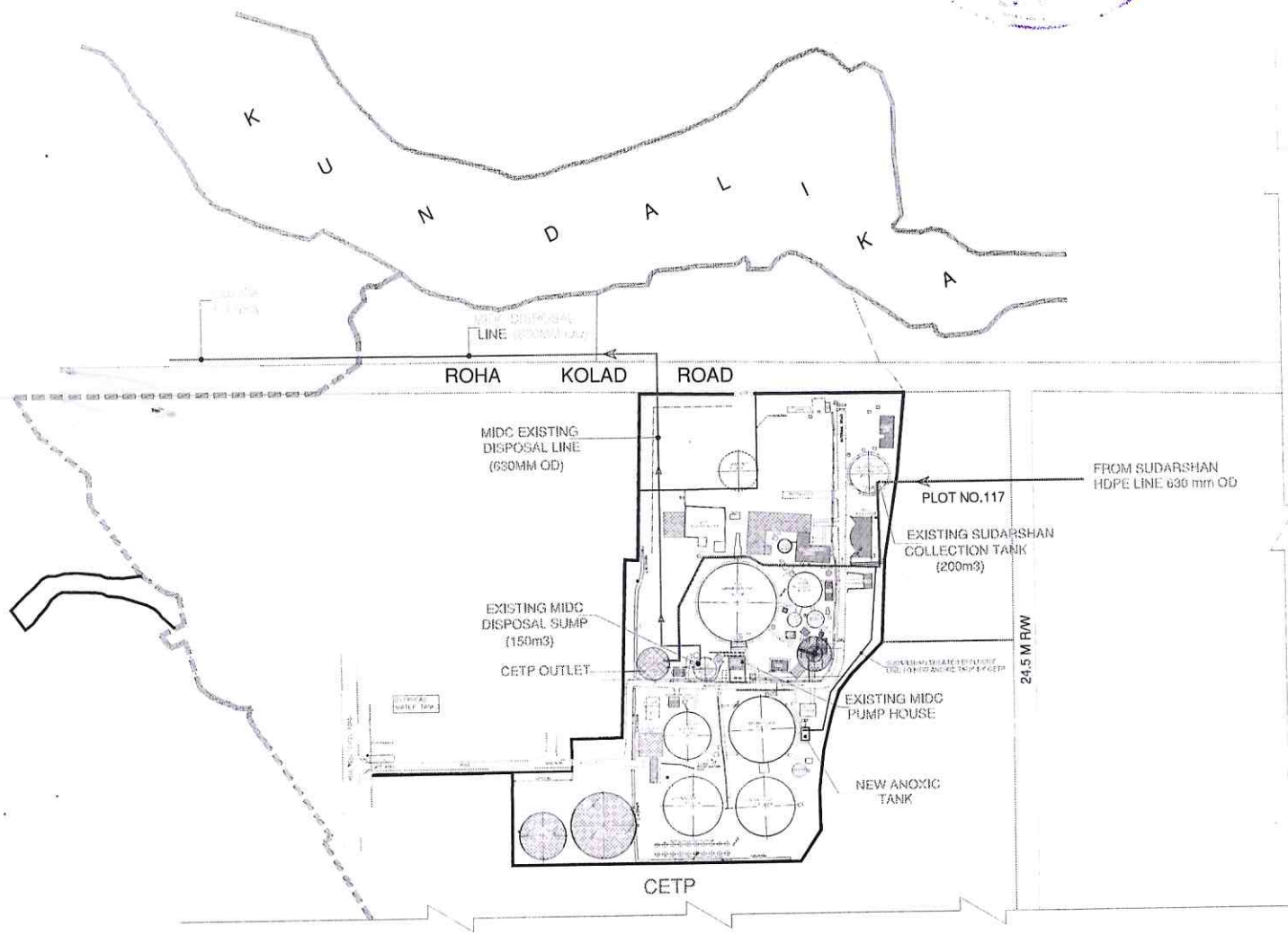
For Sudarshan chemical Industries Ltd

B N Kadam

General Manager --Works

Received
12/09/2016
RIA-CETP CO-OP. SOCIETY LTD.
C/o. : R.I.R.C., Plot No. 6,
MIDC, Dhatav-Roha,
Dist. Raigad, 402116.

Sudarshan Chemical Industries Limited
Global Head Office :
162 Wellesley Road, Pune - 411 001, India
Tel: +91 20 260 58 888 Fax: +91 20 260 58 222
Email : contact@sudarshan.com
www.sudarshan.com



REV.	REVISION	BY	APPD
		NAME	DATE
	SUDARSHAN Chemical Industries Limited.	DRN BY	VCS 15.09.2023
		CHD BY	VVN 15.09.2023
		APPD BY	CBJ
TITLE -	CETP LAYOUT	SCALE- 1:1000	FILE-

NOTARY
P. J. YELWANDE
REGD. NO. 1728
PUNE
EXP. DT. 26/6/2028
GOVERNMENT OF INDIA

EXHIBIT "H"

8991

EXHIBIT "I"

I

Ministry of Environment & Forests
(C.P. Division)

Revised Guidelines for the Centrally Sponsored Scheme of Common Effluent Treatment Plants (CETPs)

1. Introduction:

Under the Water (Prevention and Control of Pollution) Act, 1974, every industry has to provide adequate treatment of its effluents before disposal, irrespective of whether it is in stream, land, sewerage system of sea. The small scale industrial units (SSI), which are presently defined as units whose plant and machinery are valued at less than Rs. 5 Crore occupy an important place in the India economy. The SSIs are a major contributor to the total industrial pollution load of the country. However, only a small fraction of the effluent discharge from these units is estimated to be treated as on date.

SSIs, due to their limited size and scale of operations do not find it economically viable to install dedicated pollution control equipment and therefore the concept of Common Effluent Treatment Plants (CETPs) is suitable for them. CETPs help in achieving end-of-pipe treatment of combined wastewater of the SSIs at lower unit cost and also facilitate better monitoring by the State Pollution Control Boards (SPCBs) and Pollution Control Committees (PCCs).

The Ministry of Environment & Forests (MoEF) has been implementing a centrally sponsored scheme for CETPs since 1991. In the light of the operational deficiencies in the earlier scheme, the development of pollution control technologies over the year and also the financial constraints on the part of SSI proponents and the recommendations of SPCBs related thereto, a need was felt to revise the earlier guidelines for central assistance to CETPs.

2. Scope of central assistance for CETPs:

2.1 The Central assistance will be available for:

2.1.1 Establishment of new CETPs in an industrial estate or a cluster of SSIs.

2.1.2 Upgradation/modernization proposal for CETPs earlier financed through the MoEF shall be considered for one time funding. However, there has to be adequate justification for the same and the time interval between the commissioning of the existing CETP and the submission of proposal for

upgradation/ modernization to the Central Government should not be less than 7 years.

2.2 The project cost may include

2.2.1 Plant and Machinery for Primary, Secondary and Tertiary treatment.

2.2.2 On-site laboratory with standard set of instruments.

2.2.3 Zero Liquid Discharge (ZLD) and related technologies.

2.3 Large and Medium scale industries, other than those belonging to the 17 categories of heavily polluting industries, may join the CETP after the primary treatment or as considered necessary by the concerned SPCB for the purpose of hydraulic load and for the techno-economic viability of the CETP. However, it has to be ensured that the CETP primarily services the effluent discharged by the SSIs.

3. Pattern of financial assistance:

3.1 The financial assistance for a CETP project shall be as follows, subject to the conditions mentioned in 3.1.2 to 3.1.6 below:

3.1.1 The central assistance (subsidy) will be restricted to 50% of the total project cost. This shall be subject to a ceiling of Rs. 20 crore in projects without ZLD and Rs. 40 crore for projects with provision of ZLD. The Central funding shall also be restricted to Rs. 1.5 crore per MLD for a CETP project without ZLD. The State share shall be 25% of the total project cost. The project proponent's contribution shall be 25% out of which at least 15% shall be the contribution of the project proponent and the balance could be raised by the concerned project proponent from loan from Banks/Financial Institutions.

3.1.2 The Central assistance will be provide only to meet capital costs towards the items mentioned in para no. 2.2.

3.1.3 No assistance will be provided for meeting recurring or Operation and Maintenance costs.

3.1.4 The Central Government shall not have any liability towards time and cost over runs.

3.1.5 There is no provision for retrospective funding.

3.1.6 Central assistance cannot be used as seed money for the CETP.

4. Role of the Project proponent/Beneficiary:

4.1 In order to manage the CETP, there should be a Special Purpose Vehicle (SPV) registered under an appropriate statute.

4.2 A legal agreement between the SPV and its member units clearly delineating their relationship and mutual obligations should be executed and reflected in the feasibility report of the CETP project. The cost recovery formula developed for the CETP project should be ratified by all members.

4.3 An environment management plan should be prepared for the CETP and should be documented in the feasibility report.

4.4 The inlet and outlet effluent standards of the CETP should be complied with irrespective of the degree of treatment i.e primary, secondary or tertiary. Continuous flow meters should be installed at the outlet of the CETP to monitor the same.

4.5 The technical appraisal of the proposal should be done by reputed institutes like Indian Instituted of Technology (IITs) Engineering Colleges or relevant Council of Scientific and Industrial Research (CSIR) institutions.

4.6 Financial Appraisal of a CETP proposal shall be undertaken through a Nationalized Bank whether a loan is secured or not.

4.7 Adequate Linkage with Treatment, storage and Disposal Facility (TSDF) for disposal of hazardous waste generated from the facility should be ensured.

4.8 The proposal should incorporate a scientific sludge management plan based on the sludge characteristics (i.e hazardous or non-hazardous).

4.9 It may be operationally advantageous to link the CETP inlet with the municipal sewage system. In such cases the project proponent should enter into a suitable agreement, including cost sharing, with concerned agency.

4.10 The land for the CETP shall be arranged by the project proponent and the Central Government will not provide any assistance for this component.

4.11 The project proponent or the State Government shall provide backward and forward linkages for the CETPs.

4.12 There shall not be any multiplicity of funding from different Government Agencies for a CETP.

4.13 A Memorandum of Association (MoA) shall be executed between the CETP operator and the participating industrial units with the following components:

4.13.1 Member industries of a CETP shall carry the required primary treatment to meet inlet quality standards or design inlet quality parameters of CETP.

4.13.2 Member industries of a CETP shall monitor specified quality parameters and flow rate of the effluent on daily basis and submit the monitoring data to the CETP operator on regular basis.

4.13.3 Member industries of a CETP shall regularly pay their share towards meeting the treatment cost and operation and maintenance of a CETP.

5. Role of the State Government /SPCB/PCC:

5.1 The land for establishment of the CETP may be provided by the State Government or its agencies.

5.2 The SPCB/ State Government/ Union Territory Administration/PCC should ensure that forward and backward linkages are in place include proper conveyance system from the individual units to the CETP effluent. These could alternatively, be also provided by the State Government or it agencies.

5.3 Guarantee of performance at full design load should be ensured by the concerned SPCB/PCC upfront.

5.4 The SPCB/PCC should appraise the project proposal and forward it to the Ministry along with its technical recommendations.

5.5 The Project proposal/Detailed Project Report (DPR) must have the recommendation of the State Pollution Control Board/ PCC and also the consent to establish and Consent to operate the CETP.

5.6 The SPCB/ PCC should ensure adherence to the points mentioned in the Check List (Annexure-I) before forwarding any CETP

proposal to the Ministry. Any proposal which does not comply with the checklist will not be considered for sanction.

5.7 Central subsidy shall be released subject to two conditions: One, the State subsidy is made available to the CETP project; two, Bank guarantee for an equivalent amount has been procured by the SPCB/PCC.

5.8 Request of State for further installments of Central subsidy should be supported with updated physical and financial progress reports and Utilization Certificate/ Expenditure Statement duly audited and endorsed by the Concerned SPCB/PCC.

5.9 SPCBs should monitor the progress of the CETP Project and ensure its timely completion.

5.10 Outlet norms for the industry shall be prescribed by SPCB in Consent as a necessary condition. SPCBs shall also ensure that the outlet parameters for the individual industry and inlet parameters for CETP are in synergy.

5.11 Unspent balance at the end of the financial year should be reflected in the UC and ES forwarded by the SPCB/PCC.

5.12 A Memorandum of Association (MoA) shall be executed between the CETP operator and the SPCB/PCC units with the following components:

5.12.1 CETP shall be managed professionally.

5.12.2 SPCB shall be entitled, in case of repeated violation, to bring in new professional management / SPV.

5.12.3 Environmental audit shall be linked with financial audit (at the commissioning stage) at the cost of CETP.

5.12.4 CETP operator shall be responsible for compliance of inlet quality and flow from the contributing industries and shall provide status of non-complying units to SPCB for action on monthly basis.

5.12.5 CETP operator shall carry the required treatment to meet final effluent quality standards for CETPs.

5.12.6 CETP operator shall monitor specified quality outlet parameters and flow rate on daily basis and submit the monitoring data to the SPCB on regular basis. Parameters to be specified by SPCB shall be monitored by the CETP operator online at outlet of a CETP and IT based linkage shall be provided by the operator to the SPCB. The SPCB shall ensure that continuous 24 hour data is displayed on its website.

5.12.7 A three tier monitoring mechanism viz. at industry level, monitoring by SPCB and third party monitoring shall be undertaken.

6. Role of the Central Government / Central Pollution Control Board (CPCB):

6.1 Proposal for establishment/ upgradation of CETP forwarded by the SPCB/ PCC along with duly appraised DPR and the check list will be taken up for consideration by the Ministry of Environment and Forests.

6.2 The proposal shall be scrutinized by the Appraisal committee on CETPs chaired by the concerned Joint Secretary, Ministry of Environment and Forests.

6.3 Subsequent to the approval by the competent authority, funds (50%) shall be released by the Central Government commensurate with those released by the State Government (25%).

6.4 The concerned State Government/SPCB or the CPCB shall periodically review the progress of the CETP scheme and carry out mid course corrections, if required.

6.5 Post commissioning evaluation will be done by CPCB.

****

CHECKLIST FOR NEW/ UPGRADATION PROPOSALS OF CETPS

S.No.	Check List	Status	Comments
1.	Is the CETP Meant for an industrial estate or a cluster of small scale industrial units?		
2.	Whether no. of SSI provide?		
3.	Whether types of SSI provided?		
4.	Whether medium & large industries proposed alongwith SSI form part of 17 categories of highly polluting industries		
5.	Whether managing body for the CETP constituted and registered as a SPV?		
6.	Whether the proposal/DPR of the CETP for Central funding has been forwarded /recommended through the concerned SPCB/PCC?		
7.	Whether conveyance system proposed for the CETP?		
8.	Whether the CETP has a sludge management plan (SMP) in place?		
9.	Whether the consent to establish has been given by the concerned SPCB?		
10.	Whether an environment management plan (EMP) has been prepared and documented?		
11.	Whether a legal agreement between the SPV& its member units executed?		
12.	Whether necessary clearance obtained from the concerned SPCB for discharging the treatment efluent?		
13.	Whether hazardous waste disposal plan is in place & clearance obtained from concerned SPCB?		
14.	Whether the DPR has been		

NOTARY P. J. YELWANDE REGD. NO. 1728 PUNE Exp. Dt. 26/01/2025 GOVERNMENT OF INDIA

1075

	technically appraised?		
15.	Whether the DPR has been financially		
16.	Whether commitment of the State Govt. to bear 25% of the capital cost has been received?		
17.	Whether the cost recovery formula developed for the CETP project has been ratified by all member units?		
18.	Whether the level of treatment technologies has been identified?		
19.	Whether the land allotment deed is available?		
20.	Whether the CETP is a fresh case or an up gradation proposal? In case of Latter, is the time gap adequate?		
21.	Whether setting up of a laboratory is envisaged in The DPR?		
22.	Whether timeframe/ bar chart for the implementation of the CETP has been provided?		
23.	Whether the possibility of recycling/ reuse of treated effluent from the CETP has been explored & documented?		
24.	Whether any funds have been released by the State Government?		

EXHIBIT "J"

J

Maharashtra Pollution Control Board

Site Name: Sudarshan Chemicals Ltd.

Report: Custom Report

From Date: 2018/08/01 00:00:00 To Date : 2023/11/30 00:00:00

Description	ETP-COD - (mg/l) Raw
Prescribed Standards	-
Maximum Data	241.35
Minimum Data	70.97
Geometric Mean	176.43
Median	182.45
Standard Deviation	32.6
Maximum Value At Time	2022-08-01
Minimum Value At Time	2023-09-01
Valid Data Points	61
Total Data Points	64
Data Availability %	95.31%

P. J. YELWANDE REGD. NO. 1728 PUNE Exp. Dt. 26/6/2025 GOVERNMENT OF INDIA

Sl No	Time	ETP-COD - (mg/l) Raw
1	2018-08-01	181.39
2	2018-09-01	174.81
3	2018-10-01	173.82
4	2018-11-01	185.56
5	2018-12-01	175.03
6	2019-01-01	168.11
7	2019-02-01	174.32
8	2019-03-01	176.39
9	2019-04-01	182.45
10	2019-05-01	186.41
11	2019-06-01	186.88
12	2019-07-01	185.26
13	2019-08-01	182.20
14	2019-09-01	176.88
15	2019-10-01	180.09
16	2019-11-01	181.62
17	2019-12-01	178.03
18	2020-01-01	188.73
19	2020-02-01	192.53
20	2020-03-01	192.17
21	2020-04-01	186.87
22	2020-05-01	194.18
23	2020-06-01	193.91
24	2020-07-01	190.25
25	2020-08-01	190.93
26	2020-09-01	NA
27	2020-10-01	NA

Sl No	Time	ETP-COD - (mg/l) Raw
28	2020-11-01	NA
29	2020-12-01	210.62
30	2021-01-01	201.43
31	2021-02-01	198.49
32	2021-03-01	194.68
33	2021-04-01	196.22
34	2021-05-01	218.92
35	2021-06-01	211.05
36	2021-07-01	190.52
37	2021-08-01	198.78
38	2021-09-01	194.11
39	2021-10-01	143.47
40	2021-11-01	124.03
41	2021-12-01	144.26
42	2022-01-01	161.10
43	2022-02-01	168.33
44	2022-03-01	179.92
45	2022-04-01	185.59
46	2022-05-01	204.02
47	2022-06-01	132.38
48	2022-07-01	238.46
49	2022-08-01	241.35
50	2022-09-01	192.69
51	2022-10-01	154.93
52	2022-11-01	187.86
53	2022-12-01	184.99
54	2023-01-01	173.26
55	2023-02-01	208.33
56	2023-03-01	164.54
57	2023-04-01	143.87
58	2023-05-01	138.25
59	2023-06-01	140.32
60	2023-07-01	134.90
61	2023-08-01	118.89
62	2023-09-01	70.97
63	2023-10-01	105.60
64	2023-11-01	96.11

Report Details: SUDARSHAN_P | 2023-12-01 09:04:07 | Custom Report

EXHIBIT "K"

Minutes Of Meeting

No/SE(K)/ C01888 /2022
Office of the Superintending Engineer,
MIDC Konkan Circle, Pnavel
Date:

Sub:-Minutes of the meeting convened on 31st May 2022 amongst MIDC, M/s Sudarshan Chemicals and Roha CETP consultants CH2M regarding "O&M charges related to M/s Sudarshan Chemicals for treating their effluent at Roha CETP"

As per the MIDC office order no. 523/2021 dated 11th August 2021, a committee comprising of Dy.CEO (Env), CAO, GM(Law), CE(HQ) and SE(K) was constituted to resolve the RIA CETP, Roha related issues with M/s Sudarshan Chemical Industries Limited, Roha.

The above committee in its report submitted to Hon'ble CEO, MIDC vide IFMS no. E-04823 dated 27/10/2021 and approved by Hon'ble CEO, MIDC on 28/10/2021, has instructed as per Sr.No-10,(10.21) of the Committee Report that since, the functioning of CETP(i.e. O&M) is also important and considering the technical and financial viability, it is suggested by MIDC that the treated effluent of M/s Sudarshan Chemical Industries Limited, Roha may be considered to be mixed with concentrated effluent of SSI members of RIA CETP. Hence, it was felt that M/s Sudarshan Chemical Industries Limited, Roha may consider to aid and accommodate the SSI members as a CSR activity in O&M of CETP. Therefore, the committee suggested to have a separate meeting by E&MD and work out a proposal for consideration of Sudarshan for proportionate hydraulic charges covering electricity, man power etc. from Anoxic tank to final discharge sump and request Sudarshan Chemical Industries to consider it and if felt appropriate, contribute the same as a CSR for the Control of Pollution and Betterment of Environment in and around Roha MIDC industrial area.

In compliance to above directives, I the undersigned convened a meeting at MIDC HQ to discuss "*O&M charges which may be charged to M/s Sudarshan Chemicals for mixing their treated effluent with the concentrated effluents of SSI members at Roha CETP, for the benefit of the SSI members*" on date 31st May 2022 in presence of the following MIDC/CH2M (consultants to MIDC for Roha CETP) and officials of M/s Sudarshan Chemical Industries, Roha.

1079

MIDC –

- Shri K.S Bhandekar SE(K)
- Shri S S Nanaware – EE(Alibaug)
- Shri S B Patil -OSD (Env)
- Shri Jadhav – DE (Roha)

Consultants CH2M –

- Shri Umesh Bhutkar- Project coordinator

M/s Sudarshan Chemicals –

- Shri Nagesh Kamat – EHS Head
- Shri Mandar Veankar– DGM Legal
- Shri Vaibhav Naik –DGM EHS
- Ms Komal Khushalani – From "Crawford Bayley& Co." Legal Advisors for M/s Sudarshan
- Ms Prerana Wagh - From "Crawford Bayley & Co." Legal Advisors for M/s Sudarshan

The other invitee i.e. representatives from RIA (Roha Industries Association) were not present in the meeting despite the fact that the said meetings was earlier rescheduled thrice as per the specific request of Shri P.P. Bhardeskar Chairman RIA CETP due to non-availability of either RIA Chairman or their office bearers/key members etc.

Meeting discussions

1. Meeting commenced with formal introduction of all the attendees
2. SE(K) mentioned that this meeting was taking place after about 3 earlier reschedules (25 Mar 2022, 10 May 2022, 23 May 2022) as per specific request of Chairman RIA CETP. The absence of Chairman, RIA CETP for this meeting on 31st May 2022 was taken note by MIDC.
3. MIDC requested CH2M to share brief Power Point presentation wrt design, process and tender aspects of Roha CETP, so as to make awareness among all regarding O&M of Roha CETP.
4. CH2M presented the Roha CETP tender highlights depicting the following aspects:
    - Pre-Tender Feasibility studies of Roha CETP

1080

- Background of tender and plant background (development of Ph I – 10 MLD and Ph – II 12.5 MLD)
- Inlet and Outlet design parameters of RIA CETP(wrt M/s Sudarshan's flows and other industries flows)
- Rehabilitation & Upgrade scheme
- Process Flow Diagram
- Treatment to TDS is not envisaged in the CETP etc.

5. CH2M explained specifically that as per the tender scheme.
   - Raw effluent from all industries other than M/s Sudarshan will receive preliminary, primary, biological and tertiary treatment in the RIA CETP
   - Whereas treated effluent from M/s Sudarshan will (upon merging with preliminary and primary treated effluent from above industries) receive Biological Treatment (Pre-Anoxic, Aeration, Clarifiers etc.) and tertiary treatment (PSF and ACF)
   - M/sSudarshan's6.5 MLD treated effluent may be mixed with the concentrated effluents of the SSI members in CETP process. This arrangement will dilute the effluents discharged by SSI to RIA CETP;
   - CAPEX of the CETP tender awarded by MIDC is Rs. 45 Cr and OPEX is Rs 23.40 per cum.

6. M/s Sudarshan expressed that;
   - Sudarshan is paying hydraulic charge at Rs. 1.50 per cubic meter whereas as actual usage only Rs. 1.17 per cubic meter is payable;
   - Drainage cess is being paid at 6.5 per cubic meter which includes pumping charges from MIDC disposal tank into the creek;
   - Sudarshan has already paid approx. 3 cr as capital cost under protest in Feb 2022; i.e. Rs.1.42 crores proportionate share of old expansion of RIA CETP and Rs. 1.75 crore proportionate capital cost of CETP up-gradation project taken over by MIDC;
   - Sudarshan cannot be a part of the CETP because of the guidelines barring 17 categories of high polluting large scale industries to be a part of CETP as per MoEF &CC Guidelines;
   - RIA CETP refused to accommodate additional capacity for Sudarshan in 2016 due to which Sudarshan was constrained to obtain permission for direct discharge from MPCB and MIDC.

- Sudarshan spent approx. Rs. 50 crore for in house Effluent Treatment Plant (ETP) expansion in 2016;
- Sudarshan incurs cost of approx. Rs. 67 per cubic meter for in house treatment of industrial effluent.
- Sudarshan has also been bearing significant costs for maintaining the exclusive tank from time to time.
- Sudarshan has already resigned as a member of CETP in the year 2016;
- Sudarshan has been contributing to CSR by way of promoting education, providing health care during COVID- 19 etc.
- If the dilution/mixing arrangement is agreed by Sudarshan, then:
  (a) it would have an adverse effect on the direct discharge permission granted by MIDC and MPCB in the past to Sudarshan and
  (b) SSI members will be indirectly encouraged to breach the prescribed limits set by MIDC and MPCB;
- If Sudarshan agrees to the dilution arrangement, then Sudarshan ought to be compensated;
- MIDC to furnish basis/break up of charging treatment costs which is approximately Rs. 13 per cubic meter;
- MIDC to provide a legal framework whereby the proposed dilution arrangement can be considered as CSR activity;
- MIDC should examine the financial audit statements of the SSI members as all of them are profitable and can self sustain themselves without any support from Sudarshan.
- MIDC to call upon RIA CETP to submit detailed break up of treatment charges(hydraulic and chemical charges) and audited financial statements with head wise break up as recorded in paragraph 11.6 of the Report;
- MIDC to furnish written statement of RIA CETP and statement referred to in paragraph 10.12 of the Report;
- MIDC to explain the basis and provide working/break up of charges levied under the water bill. MIDC should *interalia*reverse (i) the exorbitant and inflated amounts shown under the caption "*CETP Run by MIDC*" reflected in the past and present monthly water bill (ii) delayed payment charges and (iii) GST component thereon.

1082

7. Upon patiently hearing M/s Sudarshan's views, SE MIDC expressed that;
   - Although Sudarshan is not a member of the RIA CETP and not legally obligated to discharge its effluents into the Anoxic tank via the CETP process, Sudarshan may consider the dilution arrangement for the betterment and financial viability of CETP.
   - M/s Sudarshan's role as a pioneer industry in Roha area is appreciated.
   - CETP operating/functioning effectively and making it sustainable is need of the hour and also it is in the larger interest of all the industries in Roha area and more towards the betterment of environment
   - MIDC is keen to set up upgraded and rehabilitated CETP soon and obtain consensual approach of MPCB towards expansion plan and growth of the overall industries in the Roha area.
   - In these circumstances, modalities and process, M/s Sudarshan will definitely be a gainer in direct or indirect form.
8. In view of above, as part of Roha industries family and in the larger interest of all concerned/stakeholders and particularly to enhance sustainability of the CETP, MIDC requested M/s Sudarshan to consider paying certain O & M charges, out of Rs 23.40 per cum based on the following calculations, for allowing Sudarshan's treated effluent to be mixed with the concentrated effluents of SSI members in the CETP process as further planned.

Sr No	Description of charges	M/s Sudarshan can be levied partial cost per cum	Justification (in proportion to breakup of rate quoted by the CETP contractor)
1.	Electricity charges	Rs 1.85	6.5/16 X 50 % of 38.91 % of Rs 23.40) only 50 % considered as major power will be required for blower operations
2.	Water charges, Effluent testing, telecom and Miscellaneous charges	Rs 0.25	6.5/16 X 2.46 % of Rs 23.40

Sr No	Description of charges	M/s Sudarshan can be levied partial cost per cum	Justification (in proportion to breakup of rate quoted by the CETP contractor)
3.	Fixed cost (Manpower, Maintenance and Spares tools)	Rs 1.45	6.5/16 X 15.13 % of Rs 23.40
4.	Chemical and consumable charges	Nil	Not applicable
5.	Sludge disposal charges	Nil	Not applicable
	Total	**Rs 3.55**	

(Note – MIDC reiterated that considering the complexity of flows mixing dynamics and differentiation in the treatment it is not possible to precisely workout the charges applicable to M/s Sudarshan, but above calculation is based on certain assumptions only based on the rates quoted by the CETP contractor).

After reviewing the above calculations, Sudarshan enquired:

(a) the basis of arriving at the quantity of 6.5 MLD for the purposes of dilution;

(b) Whether the quantity of 6.5 MLD is fixed or would vary depending on the concentration levels of the effluents discharged by other SSI members.

While concluding the meeting Superintending Engineer (Konkan) MIDC Panvel took note of the aforesaid concerns and informed that the minutes of the meeting will be circulated and then Sudarshan may submit their written response in next 2 weeks after receipt of the minutes of the meeting.

Meeting ended with Vote of Thanks to the Chair.

16/06/25

Superintending Engineer (Konkan)
MIDC, Panvel

- Copy submitted to the CE(HQ), MIDC
- Copy submitted to the Dy. CEO (Env.)
- Copy to EE(Alibag)
- Copy to DE(Roha)
- Copy to CH2M / Jacobs (Consultant)
- Copy fwcs to M/s Sudarshan Chemicals, MIDC Roha.
- Copy fwcs to Chairman, RIA CETP Co-op Society Ltd, Roha.
- Copy to Guard file.

1084