

11 NOV 2021

BEFORE THE NATIONAL GREEN TRIBUNAL  
WESTERN ZONE BENCH, AT PUNE

**APPEAL No. 21 OF 2021**

IN THE MATTER OF:

RECYCLING SOLUTIONS PRIVATE LIMITED

... APPELLANT

VERSUS

GUJARAT POLLUTION CONTROL BOARD

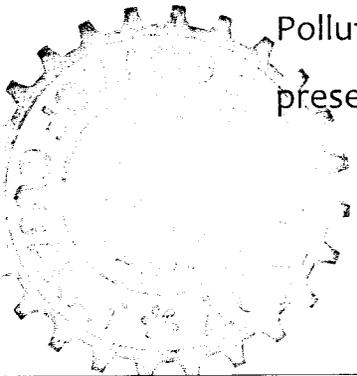
... RESPONDENT

AFFIDAVIT OF RESPONDENT - GUJARAT POLLUTION  
CONTROL BOARD

I, Devang Mahipatlal Thaker, adult, having my office at Paryavaran Bhavan, Sector 10-A, Gandhinagar, Gujarat do hereby solemnly affirm and state on oath as under:

1. I am presently serving as Environmental Engineer with the Gujarat Pollution Control Board - respondent in the present appeal. I have read copy of the appeal filed by the appellant and the orders passed by this Hon'ble Tribunal on the appeal. I am conversant with the facts of the case having perused the record pertaining to the case available in my office. I am authorised to swear the present affidavit on behalf of Gujarat Pollution Control Board and am otherwise competent to make the present affidavit.

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2. The appellant has filed the present appeal seeking the following principal reliefs:

- “i. Allow the instant Appeal and set aside the impugned order dated 10.12.2020 passed by the Respondent wherein Environment Damage Compensation to the tune of Rs. 25,00,000/- (Rupees Twenty-Five Lakhs Only) has been imposed upon the Appellant, **AND/OR**
- ii. Direct the Respondent to refund the Environment Damage Compensation to the tune of Rs. 25,00,000/- (Rupees Twenty-Five Lakhs Only) deposited by the Appellant in compliance if impugned order dated 10.12.2020 passed by the Respondent.”

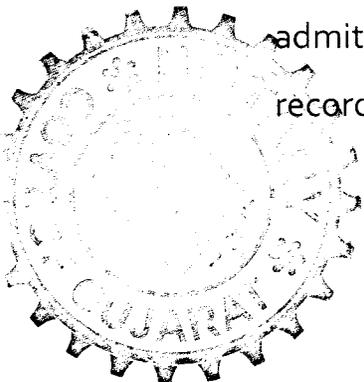
The appellant is principally aggrieved by the decision of the Gujarat Pollution Control Board in levying Environment Damage Compensation of Rs. 25 lacs, and has assailed the said decision mainly on the ground that:

- no adverse or negative impact has been reported to any statutory authority regarding flora, fauna, agriculture or any water bodies due to operation of industrial plant;
- no opportunity of hearing has been accorded prior to determination of the quantum of Environment Damage Compensation.

The appeal laying a challenge to the decision of levy of Environment Damage Compensation of Rs. 25 lacs on these grounds is misconceived, both in facts and in law, and deserves to be dismissed by the Hon'ble Tribunal.

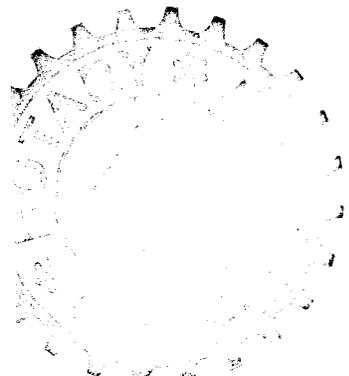
3. The basic factual matrix is not in dispute between the parties. The admitted facts, which otherwise can be verified from the documentary record, are:

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- (i) Appellant is a 'pre-processing facility for producing Alternate Fuel Resource from Hazardous Waste for use in co-processing'. As part of its business operation, appellant receives industrial waste, including hazardous waste, from different types of industries. Appellant processes the received waste and converts the industrial waste into fuel.
- (ii) Appellant sought and obtained license under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 and Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 read with Rule 5(4) of Hazardous Waste (Management, Handling and Transboundary Movement) Rules, 2008. A Consolidated Consent and Authorisation, valid up to 13.10.2024, has been issued to the appellant by the Gujarat Pollution Control Board. The permission contains various conditions, and they need to be strictly adhered to and complied with by the unit.
- (iii) On 30.09.2020, an inspection was carried out at the industrial unit of the appellant company. During inspection, it was noticed that appellant was not carrying out its work in compliance with environmental norms and conditions of license. I say that one of the primary non-compliances was that the unit was not maintaining Zero Liquid Discharge ('ZLD'), a treatment process designed to reduce wastewater economically and produce clean water that is suitable for reuse. The water samples collected at the site also disclosed high levels of contamination. Copy of inspection report is annexed herewith and marked as **Annexure R-1**.
- (iv) Detailing these violations observed during inspection, a notice was issued to the appellant company on 30.09.2020.
- (v) In response to the aforesaid notice, a compliance report was submitted by the appellant company on 5.10.2020. The appellant accepted that there was alkaline water discharge from the liquid section area, and explained that "during the monsoon and heavy rains the pump installed in the pump farm was under maintenance

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and hence a alternate arrangement was done to pump the water to the ETP. Due to some leakages in the pump installed; cooling water got accumulated outside the dyke area. The leakage was from the pipeline which has now been rectified.” The company also accepted that scrubber of liquid area was not working at the time of inspection, and stated that “scrubber system in Liquid area was in the working condition but due to heavy rain, it had developed some maintenance issue. This has been attended & it is in working condition at present”. A copy of compliance report submitted by appellant under cover letter dated 5.10.2020 is annexed herewith and marked as **Annexure R - 2**.

- (vi) Noticing serious infirmities and non-compliances in the inspection, the Board issued following directions to the appellant in exercise of powers available to the Board under Section 33-A of the Water (Prevention and Control of Pollution) Act, 1974:

“1. To prohibit manufacturing activity on 15<sup>th</sup> day at Plot No. 208/2, GIDC Estate, Panoli, Dist- Ankleshwar, Ankleshwar- 394116.

2. To stop operation of D.G set and CPP on 15<sup>th</sup> day (if any).

3. To close the operation of your industrial plant on the abovementioned on 15<sup>th</sup> day.

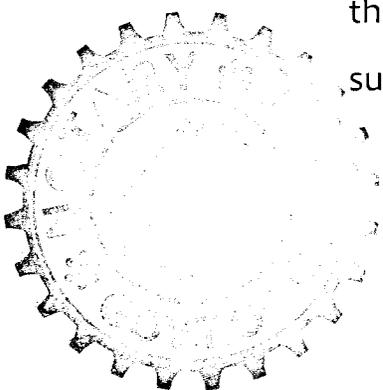
4. To direct the concerned authority to stop supply of electricity and water on 15<sup>th</sup> day.

5. This order will be effective with 15<sup>th</sup> day.”

Copy of communication dated 3.11.2020 directing closure of unit has been annexed by the appellant as Annexure A-6.

- (vii) Appellant, on 7.11.2020, made an application for revocation of closure order and submitted a reply to the Board. The reply has been annexed by appellant as Annexure A-7. Again, there was no denial about the non-compliances and/or violations noticed during the inspection undertaken on 30.09.2020, and the compliance submitted on 5.10.2020 was reiterated by the appellant company.

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Additionally, it was stressed that the non-compliances were not intentional.

(viii) A fresh inspection was carried out on 6.11.2020. The inspecting team recorded that:

- “1. Unit has provided fixed pump with fixed pipeline in liquid section area.
2. Final ETP treated water reused line repaired
3. ETP was found in operation during visit and logbook of ETP operation is maintained
4. No waste water discharge found during visit
5. During visit two stage alkali scrubber pH was found alkaline during visit
6. Unit provided two stage alkali scrubber and activated carbon tower in liquid section area
7. Unit has lifted about 53.18 KL contaminated waste water from storm water drain and transferred to ETP
8. No any contaminated wastewater ponding observed during visit. Unit has cleaned the storm water drain and levelled with fresh soil.”

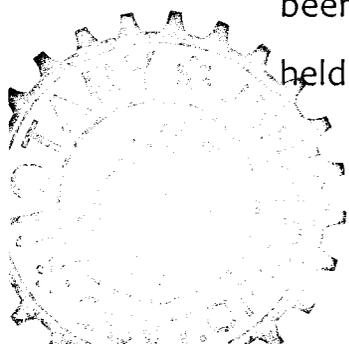
Basis the findings recorded during inspection held on 6.11.2020, the Board took a decision to allow revocation of closure direction issued to the appellant for a period of three months' subject to the following conditions:

- “I. Unit shall strictly comply all the points mention in the undertaking submitted as action plan for closure compliance on dated 30/11/2020.
- II. Unit shall strictly comply under taking dated 09/11/2020 regarding short term period revocation.
- III. Unit shall comply ZLD & CCA conditions.”

Copy of letter dated 14.12.2020 granting stay over closure direction is annexed by the appellant as Annexure A-9.

4. I submit that the material on record clearly reveal infraction of conditions or non-adherence to the prescribed environmental norms. There has been no challenge to the findings of breach recorded during inspection held on 30.09.2020. It is not and cannot be the case of appellant that the

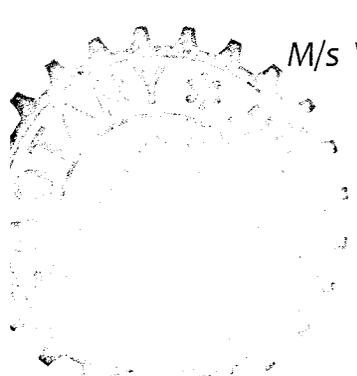
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findings of the team which carried out inspection on 30.09.2020 are faulty or erroneous. On the contrary, the appellant has accepted the findings of inspection and submitted a statement reporting remediation of each highlighted deficiency.

5. The inspecting team noticed violations of environmental norms during inspection carried out on 30.09.2020; however, they could not decisively determine the nature and extent of damage that may have been caused to the environment because of the violations noticed during inspection carried out on 30.09.2020. But, once it is *prima facie* established that a particular industrial unit has not strictly adhered to the prescribed conditions and/or violated environmental norms, such unit stands liable, both in fact and in law, to paying compensation.
6. The amount of compensation is ordinarily calculated on the basis of formula prescribed by the Central Pollution Control Board. However, in the present case, as the extent of damage was unascertainable, the State Pollution Control Board levied damage as per guidelines issued by the Pollution Control Board based on the directions contained in the orders passed by this Hon'ble Tribunal in *Paryavaran Suraksha Samiti & Anr. v. Union of India* (Original Application No. 593 of 2017) and *Aryavart Foundation v. M/s Vapi Green Enviro Limited & Others* (Original Application No. 95 of 2018).
7. The contention of appellant that the imposition of Environmental Damage Compensation is arbitrary and unreasonable is wrong and denied. I submit that I submit that the levy of damage compensation by the Board is just and reasonable. The amount of compensation determined by the Board is not arbitrary, but is based on the calculations indicated by this Hon'ble Tribunal in the case of *Aryavart Foundation v. M/s Vapi Green Enviro Limited & Others* (Original Application No. 95 of

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2018), especially in cases where the extent of actual damage to the environment cannot be decisively determined.

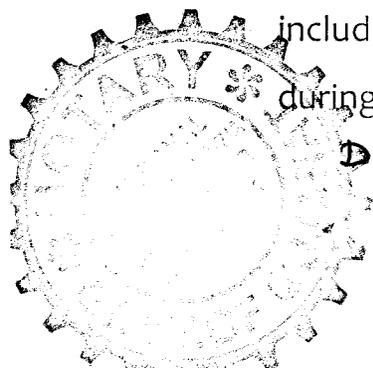
8. I submit that contention of appellant that there has been no damage to the environment is fallacious, and based on no evidence. Except for a bald statement that there has been “no adverse effect or negative impact upon flora, fauna, agriculture or any water bodies due to operation of Industrial Plant in the inspection conducted on 30.09.2020”, no material has been placed on record either before the Board or this Hon’ble Tribunal by the appellant conclusively proving that no damage could have been caused to the environment or that no damage has actually been caused to the environment because of the non-compliances reported in the inspection carried out on 30.09.2020.
9. The contention of the appellant that the lapses notice during inspection carried out on 30.09.2020 are only marginal and that the same have been rectified or remedied immediately by the appellant does not eradicate the fact that the unit of the appellant was found to be non-compliant on the date of inspection. All that has to be seen by the authority is whether there has been strict adherence to the specified conditions and stringent compliance of the prescribed norms. In the instant case, the authority did notice several instances of non-compliance to the prescribed conditions and environmental norms. The non-compliance of certain conditions has not been disputed by the appellant, and the appellant has submitted a report acknowledging the deficiency and reporting rectification. The gravity or puniness of the infraction may, at best, have some bearing on the amount of compensation that may be levied by the authority.
10. The contention of appellant that the Board has imposed damage compensation without giving an opportunity of hearing and without following principles of natural justice is misconceived. In the case of

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Chairman, Board of Mining Examination & Anr. Vs. Ramjee, reported in 1977 (2) SCC 256, the Hon'ble Supreme Court has observed that "natural justice is no unruly horse, no lurking land mine, nor a judicial cure all. If fairness is shown by the decision maker to the man proceeded against, the form, features and the fundamentals of such essential processual propriety being conditioned by the facts and circumstances of each situation, no breach of natural justice can be complained of. Unnatural expansion of natural justice, without reference to the administrative realities and other factors of a given case, can be exasperating. We can neither be finical nor fanatical but should be flexible yet firm in this jurisdiction." In the present case, the Board did bring to the notice of the appellant the infractions. The Board also considered the compliance report submitted by the appellant and finding rectification or remediation of deficiencies noticed and pointed out during inspection carried out on 30.09.2020 revoked the closure order and permitted resumption of functioning by the industrial unit. The Board has acted fairly and reasonably, and it cannot be said that the action of the Board in imposing compensation is harsh or arbitrary or violative of law.

11. Without prejudice to the submission that the decision has been taken by the Board by adopting a fair procedure, the Board is willing to present another opportunity to the appellant to submit its response prior to passing final order assessing the environment damage compensation. I submit that the entire exercise shall be conducted in accordance with law, and shall be completed by the Board within a period of 10 weeks. This shall be subject to the condition that the appellant shall keep the amount of Rs. 25 lacs already deposited by it with the Board till the passing of final order on the quantum of compensation by the Board.
12. The State Pollution Control Board shall also take necessary action, including penal action, against the appellant for the breaches noticed during the inspection carried out on 30-09.2020. Such action, as may be

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initiated by the Board, shall be independent of the determination of environment damage compensation that shall be calculated by the Board after following due process of law.

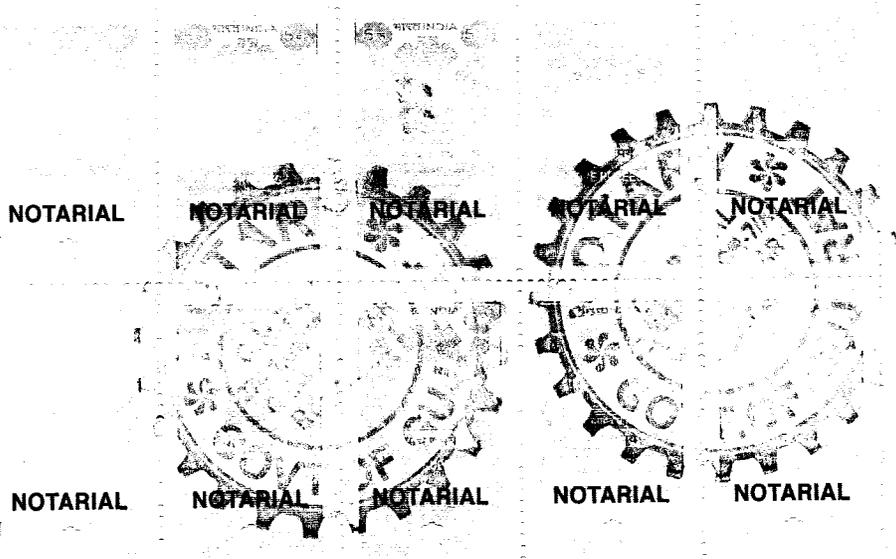
13. I submit that for these and other reasons that may be argued at the time of hearing, the present appeal is devoid of any merits and deserves to be dismissed by the Hon'ble Tribunal. It is therefore humbly prayed that the Hon'ble Tribunal may be pleased to dismiss the appeal filed by the appellant with costs.
14. I submit that the Board remains committed to performing its statutory duties and assures that all necessary actions will be taken by the Board against the erring industrial unit. I submit that the Board shall abide by any and all reasonable directions or orders that may be issued in this behalf by the Hon'ble Tribunal.

D. M. Thaker.

DEPONENT

VERIFICATION

Verified at Gandhinagar on this 11<sup>th</sup> day of November 2021 that the contents of the above affidavit are true and correct, nothing stated therein is false and nothing material has been concealed therefrom.



D. M. Thaker.

DEPONENT

Solemnly Affirmed

(C. M. P. WAL)

NOTARY

Govt of Gujarat

11 NOV 2021

Annexure - R1



## Gujarat Pollution Control Board

PCB Id: 66336
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( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

<b>1</b>	<b>Industry Details</b> Recycling Solutions Private Limited	<b>Outward No:</b> 36360-12/10/2020
	Email : jvm@rs-pl.com	PLOT NO., Plot No. 208/2, GIDC Panoli, Ankleshwar, , Panoli - 394116
	Telephone : 0	DIST : Ankleshwar, TAL : Ankleshwar, SIDC : Panoli
	Inspection Id : 579554 ( Routine Visit )	Ro Name : Ankleshwar
<b>2</b>	<b>Type / Scale / Sector / Status :</b> RED / MEDIUM / Common treatment and disposal facilities(CETP, TSDF, Ewaste recycling, CBMWTF, effluent conveyance project, incinerator, solvent/acid recovery plant, MSW sanitary landfill site) / In Operation	
<b>3</b>	<b>Inspection Dt &amp; Time :</b> 30/09/2020 15:45 / Air , Water , Hazd <b>Person Contacted :</b> Girish Prajapati- EHS Manger	
<b>4</b>	<b>Env Audit Detail : Sch : 1 , , Year : , On Dt :</b>	
	Commissioned Dt : 31/03/2019	Production Start Dt : 01/04/2019
	Applicability of CRZ Rules : No	
<b>5</b>	<b>Water Consumption in Kilo Lts Per Day</b>	Ind : 5.000      Dom : 5.000 <b>Borewells: 0</b>
<b>6</b>	<b>Waste Water generation / Discharge (klpd) :</b>	Ind : 0.000      Dom : 0.000 <b>Tubewells: 0</b>
<b>7</b>	<b>Consumer No.(Electric Meter):</b>	<b>Source of Water Supply:</b> GIDC
<b>8</b>	<b>Disposal Mode of Industrial / Domestic :</b>	Zero Discharge / Zero Discharge
<b>9</b>	<b>Discharge Pt / Final Receiving Body (Ultimate):</b>	Zero waste water discharge facility / 0
<b>10</b>	<b>Status of water consent Under the Water Act,1974:</b> AWH-108362-13/10/2024 Last Inward:172069-16/02/2020[DEX]	
<b>11</b>	<b>Effluent Treatment plant (ETP) : Units, if provided and status :</b>	
	ETP Details : P-Chemical Dousing Tank,P-Collection Tank,P-Equalization Tank,P-Filter Press,P-Flash Mixer,P-Lamella Settler,P-Pri Settling Tank,S-Settling Tank	
<b>12</b>	<b>Whether Industry is a member of CETP ?</b> No	
<b>13</b>	<b>Boilers=0 , DG Sets=0 , Flue Gas =0 , Process =0 , ETP Cap = 160 , Capacity of All =</b>	
	No Data	
	No Data	
	No Data	
<b>14</b>	<b>TSDF Name :</b> Not Regd with any TSDF	
<b>15</b>	<b>Lab Charges Pending :</b> Rs. 2820.00	<b>Water Cess Charges Pending :</b> NIL
<b>16</b>	<b>Last Env. Form V :</b> 2015-2016	<b>Water Cess Return :</b> <b>HW Monthly Return :</b> 2020-01
<b>17</b>	<b>Last 3 Legal Action :</b>	
	<b>Monthly Patrak Data : Last Return : 202008      HAZD Waste Disposal : NO DATA</b>	
	<b>Electricity Units Consumed in month</b>	<b>Water Consumed in month</b>
	Production - 58097, ETP - 0, APCM - 0	Meter Reading - 0, Kilo Litre - 230
	<b>Effluent Discharged in month</b>	
	Meter Reading - 0, Kilo Litre - 0	
12/10/2020	1/7 ( Through XGN )	<b>N I C</b>



## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air, Water, Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

### One Time Updatons

o	Air - Water - Hazd ACTs Applicability ?	Air, Water, Haz	
e	Electric Company Name (Power Supply)	DGVCL	
p	On East Direction of the location of the Company	GIDC Plot	
p	On North Direction of the location of the Company	GIDC Plot	
p	On South Direction of the location of the Company	GIDC Road	
p	On West Direction of the location of the Company	GIDC Road	
o	Production since (Date) or Proposed	01/04/2019	
g	Nos of Stacks ( Flue Gas & Process )	1, 2	
k	<b>Recycler Registration Valid ??</b>	Yes	
j	Name & Address of MAIN Re-Cycler	N.A	
h	Regd with T.S.D.F	----Not Regd with any TSDF	
i	Recyclable Hazd Waste Disposal to	Within State	
f	Display Board Provided at the Entrance ?	Yes	
l	CETP Name	----NOT a CETP Member	
n	Nos of Flow-Meters - W.C / W.W.G / ETP =	0. 0. 0	
d	Is Industry ZERO DISCHARGE Catg (If Yes, HOW ?)	Yes	
m	W.W.G Treatment thru Pri / Sec / Tertiary / N.A :	Primary	

### General Observation

a	R.O File No	-	
a	Is the Industry in Operation ??	Yes	
b	<b>Industry Operating without CCA</b>	No.	
c	<b>Has Production exceeded (last 3 MTHs) than CCA-Qty</b>	No.	
d	<b>Any products-NOT in CCA, manufactured-Last 3 MTHs</b>	No.	
e	<b>Foul Odour/Fugitive Emission/Bye Pass in Premises ??</b>	Yes	as per crux
f	Industry Name CHANGED in recent times ??	No.	
g	<b>Has Regn with CETP or TSDF expired ??</b>	No.	
h	Seperate Energy Meter for A.P.C.M ?	No.	
h	Provision of any STAND-BY Pump ??	No.	

### Air Related

a	<b>Fuel Type confirmitive with CCA ?</b>	Yes	
b	<b>Av. Fuel Consumption EXCEEDING CCA limits</b>	No.	
c	<b>APC Measures confirmitive with CCA conditions ??</b>	No.	as per crux
d	ALL APCMs are in operation	No.	
e	SMF availability	Provided	
f	<b>Thick Smoke observed in Flue Gas/Processes ??</b>	No.	
g	<b>ph of Scrubbing Media as per requirement ??</b>	Yes	
h	Ultimate Disposal of Scrubbing Media	ETP	
i	Nos of Samples : Stack & Ambient	0, 0	

### GEM

18	Where Authorization Under BMW Rules 2016 obtained ? Provide Authorization No. / Date	Yes	NA
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### Haz Waste Related

a	<b>Haz waste Catg confirmitive with CCA</b>	Yes	
b	<b>H.W generation exceeding CCA limits</b>	No.	
c	<b>Collection, Storage, Treatmnt, Disposal Facility Adequate ??</b>	Yes	
d	Reusing or Recycling of Haz Waste by Industry ?	No	
e	LogBook / XGN Manifests / Disposal Records TALLYING ??	Fully	
f	Stock of Haz-Waste @ premises/Whether EXCESS ?	--	

12/10/2020

2/7 ( Through XGN )

N I C



## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

g	- Recycler/ Actual user has valid Authorization under rules 6 or 9 of HOWR-2016?	Yes	NA
h	- Installed capacity of the plant based on machinery installed (Capacity of Machine, No. of Batch/Day, Annual Capacity)	--	
i	- Technical capability and equipment complying with the SOP/Guideline?	Yes	
j	- Is unit complying the conditions gives in SOP/Guidelines?	Yes	
k	- Facility is adequate for the applied process	Yes	
l	- Passbook is maintained?	Yes	NA
m	- Details of PLI, if applicable	--	
n	- Details of safety specs provided by the facility	--	
o	- Separate storage area for Haz. Waste for the utilization or generation from the process is provided?	Yes	
p	- Quantity of Hazardous waste procured as per CCA?	Yes	
<b>Water Parameter</b>			
b	- Source of Water Supply	GIDC	
c	- W.W.G is EXCEEDING the CCA Limits	No.	
d	- W.W Disposal as per the Consent Conditions ?	No.	as per crux
e	- Was the ETP in operation ?	No	
f	- Treatment System ADEQUATE to handle existing effluent	Repair/Main Reqd	
g	- Did u observe ANY ILLEGAL Discharge ??	Yes	as per crux
h	- Nos of Samples collected	2	

Remarks :

Note: EIA 2006 / SEIAA / E.C / MOEF Applicable : Yes

**Site Observations during Inspection, PCB-ID: ( 66336 )**

12/10/2020

3/7 ( Through XGN )

N I C



## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air, Water, Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

This common facility is inspected with N.M. Tholiya-APE w.r.to routine monitoring. Unit has obtained CC&A valid up to 13/10/2024 for Waste mix processing facility for following waste to prepare fuel for co-processing a) Waste Mix solid=140M T/Day, b) Waste Mix liquid=100 MT/Day. During inspection unit is observed in operation & processing for Mixed Solid & Mix Liquid products is going on. Unit has provided online VOC, CO, HC and H2S analyzer in solid mixing plant. Air Section: In liquid Storage area, unit has provided five tanks 1 nos. of mixing vessel tank, 1 nos. of Raw Material Tank & 3 nos. of Product tanks. All storage tanks connected with air extraction system followed by alkali scrubber during inspection & it is found not in operation. Unit has installed only single stage alkali scrubber. But, unit has not installed APCM (two stage scrubber followed by activated carbon tower) as per the CC&A. Water Section: During the inspection, alkaline w/w is discharge into open area behind the plant by a bypass line from the liquid section pump area & w/w sample is collected from this bypass line. In additional treated water line of ETP has been found broken and its waste water found to have gone into the open area behind the ETP & sample is collected from this location. The waste water from both the incidents is found to mix & going into kachi storm water drain within premises & ultimately this w/w is disposed into outside of GIDC storm water drain through hole. During the inspection ETP has observed in idle condition. Photograph taken during inspection uploaded doc. File. Unit has obtained agreement with M/s Anas Green Environment Pvt Ltd, Valsad for sending contaminated drums. Unit has disposed 26.04 MT- June-2020, 24.03 MT- July-2020 54.15 MT- Aug-2020 of discarded drums. Housekeeping of unit is very poor. Handling procedure of Hazardous waste is also very poor. During inspection, instruction is given to the unit as per written instruction note. [453]-06/10/2020

~ RO Comments/Reply :Strict actions recommended-12/10/2020

W.C Notings: -----[453-DEE]~

### Specific Instructions given to Industry at the time of visit , for Pt to Pt Compliance

- ૧) એકમ દ્વારા Liquid Section એરિયામાં બાયપાસ લાઈન દ્વારા અલ્કલાઇન ગંદુ પાણી પ્લાન્ટની બાહ્ય આવેલ ખુલ્લી જગ્યામાં નાખવામાં આવેલ છે જે પ્રવૃત્તિ તાત્કાલિક બંધ કરવી. સદર જગ્યાએથી પાણીનો નમુનો લીધેલ છે.
- ૩) મુદ્દા નંબર ૧ અને ૨ નું વેસ્ટ વોટર આગળ પ્રીમાઈસીસની અંદર આવેલ કાચી સ્ટોર્મ વોટર ડ્રેઈન દ્વારા બહાર GIDCની સ્ટોર્મ વોટર ડ્રેઈનમાં ગયેલું હોવાનું જણાય આવેલ છે તાત્કાલિક આપના ETPમાં લઈ નિયમોનુસાર નિકાલ કરવો.
- ૪) આપના એકમનો ETP બંધ હાલતમાં આઈડલ કંડીશનમાં જોવા મળેલ છે જે તાત્કાલિક કાર્યરત કરવો.
- ૫) આપના એકમમાં સ્થિત Liquid Process area ની નજીક આવેલ Scrubber બંધ હાલતમાં જોવા મળેલ અને Single Stage Caustic Scrubber લગાડેલ છે જેમાં કન્સેન્ટ પ્રમાણે આવેલ APCMની વ્યવસ્થા ઉભી કરવી.
- ૨) ETPની treated waterની લાઈન તૂટી ગયેલ જણાયેલ છે અને તેમાંનું વેસ્ટ વોટર ખુલ્લી જગ્યામાં ગયેલું જોવા મળેલ છે. સદર જગ્યાએથી પાણીનો એક નમુનો લીધેલ છે.
- ૬) છેલ્લા ૩ મહિનામાં આપના એકમમાં લાવવામાં આવતા Solid & Liquid Waste ની માહિતી અને જનરેશન અને નિકાલ તથા Co-processing માં મોકલવામાં આવતા મટીરીયલ્સની માહિતી અને હેઝાર્ડસ વેસ્ટની માહિતી આધારસૂત પુરાવા સાથે રજુ કરવી.

### Compliance Observed in this Inspections.

12/10/2020

4/7 ( Through XGN )

N I C



## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

Instructions in Previous Visits and Reply	Insp Det	Instruction Status
5. એકમમાંથી ઉદભવતા discarded containers/ barrels ને કવર્ડ શેડમાં સંગ્રહ કરવા તથા નિયમોનુસાર નિકાલ કરવા.; Discarded container / barrels are stored in identified covered shade. All Discarded Container / Barrels are disposed to GPCB approved Agency M/s. Anash Green. Details of GPCB authorised Scrap vendor along with manifest details of dispatch during last 3 months attached in Annexure 3. (11/10/2020)	569370(29/06/20)	Still Pending
૫.આપના એકમના storage shed માં જુદા જુદા વેસ્ટ store કરવામાં આવે છે તે Hazardous waste storage & Handling guide lines ની તમામ શરતો નુ ચુસ્ત પણે પાલન કરવું.; We are following the CPCB guideline for storage which covers the following: @\$• We have pucca storage shed with concrete flooring covered with four-sided wall and roofing. @\$• The floor is above high flood level as per the storage guideline. @\$• We do not store waste material in open area. @\$• Separate tank farm with dyke wall and other safety features. @\$• Segregation of Waste and its identification system @\$• SOP, Recipe, Compatibility system with production order etc.. @\$• Flame proof lighting & fittings @\$• Gas sensor & Alarm, Smoke detector, FHS system @\$• Spillage Collection kit @\$• Good House keeping, Compliance photo Annexure : 5 (11/10/2020)	569370(29/06/20)	Still Pending
૨.આપના એકમ દ્વારા મેમ્બર સભ્યો પાસેથી જે વેસ્ટ ડ્રો-પ્રોસેસીંગ માટે લેવામાં આવે છે તે લીધા બાદ તેને લેવામાં આવેલ priority તરીકે પ્રમાણે Co-processing માટે લેવા.; • We are lifting material as per our plant processing capacity. @\$• We have to follow strict lifting plan to comply with cement criteria. @\$• We have SOP for FIFO and our average storage period is less than 7 days. • Details of material storage attached in photos. Process Flow chart attached in Annexure : 2 @\$ (11/10/2020)	569370(29/06/20)	Still Pending
૧. હાલની વરસાદી ઋતુને ધ્યાને રાખી એકમમાંથી કોઈપણ પ્રકારનું chemical contaminated પાણી એકમની બહાર નજાય તેની તકેદારી રાખવી.; • We have pucca storage shed with concrete flooring covered with four-sided wall and roofing. @\$• The floor is above high flood level as per the storage guideline. @\$• We do not store waste material in open area. @\$• The vehicles are covered with roll on roll off cover during the monsoon. @\$• Storm water is collected in a sump, which is regularly monitored and had provision for transfer to ETP, Compliance Photo Annexure : 4 @\$ (11/10/2020)	569370(29/06/20)	Still Pending
3. Liquid material storage tanks જોડે લગાવવામાં આવેલ Scrubber ની vent ના outlet પર VOC meter લગાડી તેનો record નિભાવવો. સદર storage tanks માટે Nitrogen blanketing માટે ની શક્યતા ચકાસવી.; • We have already completed the purchase process and issue PO for VOC meter. @\$• Delivery and installation will be done within 2-3 weeks. @\$• Most of waste is having Flash point is above 65 Deg C. We have provided adequate safety mechanism at site to address fire hazards. • They are Static electricity protection, isolation valves for each system, Vent value scrubbing system, Fire hydrant system etc.. • There is no CPCB guideline for NB system, however we would like to explore the suggestion for better safety. @\$• We are working with our project team and external consultant to work out the technical feasibility. @\$ (11/10/2020)	569370(29/06/20)	Still Pending
4. Waste Mix Solid માટેની જે નવી pit construction નો progress report જમા કરાવવો.; New Solid Pit construction, Erection , Commissioning work in progress as per attached Annexure No-01., Compliance Photo Annexure No-1.1 (11/10/2020)	569370(29/06/20)	Still Pending
5) Submit last three month raw materials receipt & product, dispatch along with its supporting document.	558954(20/02/20)	Still Pending
1) Maintain printed bounded logbook with page number for operation of ETP, APCM/ Scrubber & deodorant spraying system.	558954(20/02/20)	Still Pending

12/10/2020

5/7 ( Through XGN )

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## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

3) Submit SOP for vehicle/ transportation for ensuring GPS tracking, online manifest system, spill control kit etc.	558954(20/02/20)	Still Pending
4) Considering the fire hazard, ensure to give proper training to persons involve in processing, handling etc. and maintain training record regarding the same & ensure the use of PPE's.	558954(20/02/20)	Still Pending
2) Provide proper storm water drainage network in premises.	558954(20/02/20)	Still Pending
૧. એકમમાં આપના દ્વારા લિક્વીડ સ્ટોરેજ એરિયામાં બનાવેલ લિચેટ/ સ્પિલેજ કલેક્શન સિસ્ટમમાં કલેક્શન સમ્પનુ કાર્ય પ્રોસેસમાં હોય તેમ જણાયેલ છે. તેમજ તેની સાથે લગાવવામાં આવેલ ડિક્ષ પાઇપલાઇનનો બીજો છેડો જે ETP માં જાય છે. તેનું કનેક્શન પણ ખોલી નાખેલું જોવા મળેલ છે. તેથી, સદર ઉપરોક્ત કામગીરી તાત્કાલીક પુર્ણ કરીને અત્રેની કચેરીમાં જાણ કરવી.	547049(13/11/19)	Still Pending
૨. બોર્ડમાંથી સીસીએ મેળવ્યા બાદ જ ઉત્પાદન પ્રક્રિયા શરુ કરવી.	547049(13/11/19)	Fully Complied

12/10/2020

6/7 ( Through XGN )

N I C



## Gujarat Pollution Control Board

PCB Id: 66336

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

### Annexure Details - Air,Stack,Hazardous Waste & Samples PCB-ID: (66336)

#### A Sample Details

Sr	Act	Ph/Temp/Air Sampled	Time	Type	Sampling Point	Col-Cond
1	W-6	9-10 on ph strip / 29	1550-1550	REP	w/w sample collected from bypass line from liquid section pump area ~	brown
2	W-6	7-8 on ph strip / 29	1600-1600	REP	w/w sample collected from ponding within premises at back side ~	grey turbid

#### B Process Stacks

#### C Flue gases Stacks

Sr	Stack attached to	Mts	Remark	SMF	APCM	Fuel	Consp-Unit	Insp Remk
1	Fugitive Emission	15	Attached to Air Extraction system	N.A			Mixing Area	

#### D Details about Hazardous Waste Management :

Sr	Source of Hazardous Waste	Catg	Qty/Year	HW Disposal Management
1	Any process or distillation residue	1 -36.1	2040.000-M.T	DSS,STO
2	Concentration or evaporation residues	1 -37.3	0.000-M.T	DST
3	Empty barrels/containers/liners contaminated with hazardous chemicals /wastes	1 -33.1	2700.000-M.T	CIW,COL.DCO,REU,STO,DST
4	Chemical sludge from waste water treatment	1 -35.3	2.000-M.T	CIW,COL.CYC,STO,DST

#### E Products :

Sr	Product Name	NOC Qty	CCA Qty	Applied Qty	Inspection Remark
1	alternate fuel from hazardous waste	25000.000	50000.000 - M.T	25000.000 Monthly qty	
2	Alternate fuel from non-hazardous waste	10000.000	20000.000 - M.T	10000.000 Monthly qty	
3	Waste Mix Liquid	7340.000	4500.000 - M.T	0.000 Monthly Qty	
4	waste mix solid	4200.000	4000.000 - M.T	0.000 Monthly Qty	

#### F Raw material :

Sr	Raw Material Name	Capacity - Unit / Month
1	hazardous waste	9500.000 - M.T
2	non hazardous waste	0.000 - M.T

#### G Water Consumption & Generation Break up

Sr	Water Code (Qty in klpd - Kilo Ltr per Day)	WC : 10.000	WWG : 0.000	Water Source	Remark
1	Domestic Purpose	5.000	0.000	SIDC	
2	Wash Water	5.000	0.000	SIDC	

#### H Solid Waste

Inspection Team : N H PARMAR,SSA

I hereby affirm, that all the PDF, Data mentioned above, fees paid has been checked & certified.

Signature By(N H PARMAR,SSA)

12/10/2020

7/7 ( Through XGN )

N I C



ANALYSIS REPORT FOR  
WATER / WASTE WATER SAMPLE

Gujarat Pollution Control Board  
Bharuch  
C-1/119/3, GIDC Phase-2  
Narmadanagar  
Bharuch-392015  
Tele:(0264)2246333

Sample ID:289689 - Analysis Completion:20/10/2020

Common treatment and disposal facilities(CETP, TSDF, Ewaste recycling, CBMWTF, effluent conveyance project, incinerator, solvent/acid recovery plant, MSW sanitary landfill site) / LAB Inward : 42144

TEST REPORT

Test Report No. : 42144

Date: 20/10/2020

1. Name of the Customer : Recycling Solutions Private Limited - 66336
2. Address : ,Plot No. 208/2, GIDC Panoli, Ankleshwar,  
Panoli-394116, Taluka : Ankleshwar, District : Ankleshwar, GIDC :
3. Nature of Sample : REP-Representative/Grab, (Insp Type : ROU-Routine Visit)
4. Sample Collected By : N H PARMAR,SSA
5. Quantity of Sample Received : 2.5 lit
6. Code No. of the Sample : 289689
7. Date & Time of Collection & Inwarding : 30/09/2020 , (1550 to 1550) & 05/10/2020
8. Date of Start & Completion of Analysis : 06/10/2020 & 20/10/2020
9. Sampling Point : w/w sample collected from bypass line from liquid section pump area ~
10. Flow Details (Remarks) : -
11. Mode of Disposal : on open land within premises
12. Ultimate Receiving Body : 0
13. Temperature on Collection : 29 & pH Range on pH Strip :9-10 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance :brown  
: Ind :5.000 , Dom :5.000 & Ind :0.000 , Dom :0.000
15. Water Consumption & W.W.G (KLPD) : 6 ,Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 – 14 pH value As or	8.24
2	Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	85
3	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 – 200000 mg/L	3210
4	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH <sub>3</sub> B & C APHA Standai	1 - 2000 mg/l.	95.2
5	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2(	5.0- 50000 mg/l	991
6	Phenolic Compounds	mg/l	4 Amino Antipyrene method without Chloroform Extra	0.1 – 50 mg/l	3.63

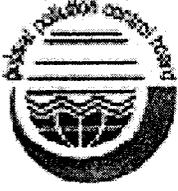
**Laboratory Remarks** : Approved By:236-lab\_236 Dt.: 20/10/2020

*D. N. Vasadia*

D. N. Vasadia, Lab Head

Note :

1. The results refer only to the tested samples and applicable parameters. Endorsement of products is neither inferred nor implied.
2. Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
3. This report is not to be reproduced wholly or in part or used in any advertising media without the permission of the Board in writing.
4. The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
5. Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
7. Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
8. Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



ANALYSIS REPORT FOR  
WATER / WASTE WATER SAMPLE

Gujarat Pollution Control Board  
Bharuch  
C-1/119/3, GIDC Phase-2  
Narmadanagar  
Bharuch-392015  
Tele:(0264)2246333

Sample ID:289690 - Analysis Completion:20/10/2020

Common treatment and disposal facilities(CETP, TSDF, Ewaste recycling, CBMWTF, effluent conveyance project, incinerator, solvent/acid recovery plant, MSW sanitary landfill site) / LAB Inward : 42145

TEST REPORT

Test Report No. : 42145

Date: 20/10/2020

1. Name of the Customer : Recycling Solutions Private Limited - 66336
2. Address : ,Plot No. 208/2, GIDC Panoli, Ankleshwar,  
Panoli-394116, Taluka : Ankleshwar, District : Ankleshwar, GIDC :
3. Nature of Sample : REP-Representative/Grab, (Insp Type : ROU-Routine Visit)
4. Sample Collected By : N H PARMAR,SSA
5. Quantity of Sample Received : 2.5 lit
6. Code No. of the Sample : 289690
7. Date & Time of Collection & Inwarding : 30/09/2020 , (1600 to 1600) & 05/10/2020
8. Date of Start & Completion of Analysis : 06/10/2020 & 20/10/2020
9. Sampling Point : w/w sample collected from ponding within premises at back side ~
10. Flow Details (Remarks) :
11. Mode of Disposal : leading to GIDC storm water drain
12. Ultimate Receiving Body : 0
13. Temperature on Collection : 29 & pH Range on pH Strip :7-8 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance :grey turbid  
: Ind :5.000 , Dom :5.000 & Ind :0.000 , Dom :0.000
15. Water Consumption & W.W.G (KLPD) : 6 ,Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.80
2	Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	150
3	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method 10 - 200000 mg/L		1554
4	Ammonical Nitrogen	mg/l	1). Titrimetric method (4500 NH3 B & C APHA Standar	1 - 2000 mg/l.	56
5	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2(	5.0- 50000 mg/l	427
6	Phenolic Compounds	mg/l	4 Amino Antipyrene method without Chloroform Extra	0.1 - 50 mg/l	0.015

**Laboratory Remarks** : Approved By:236-lab\_236 Dt.: 20/10/2020

*D. N. Vasadia*

D. N. Vasadia, Lab Head

Note :

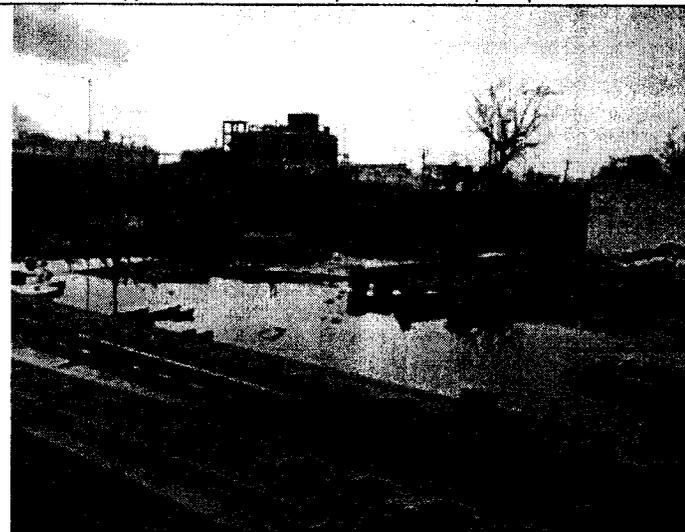
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6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
7. Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23rd Edition by APHA.
8. Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



bypass line in the liquid section pump area



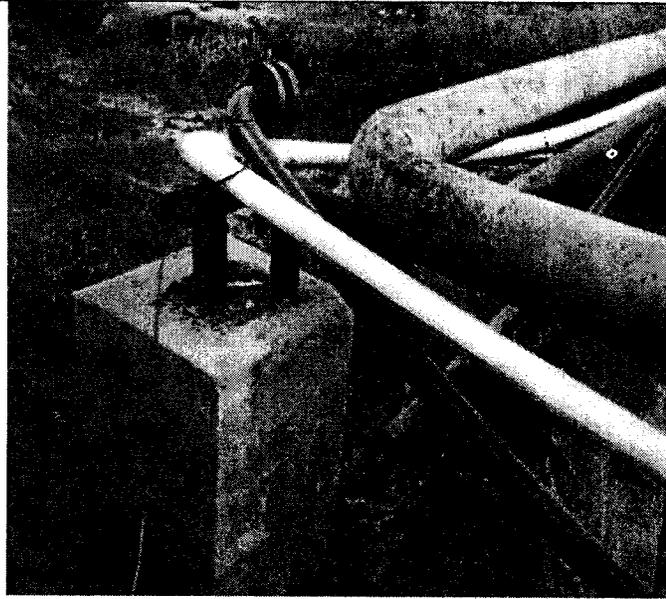
w/w sample is collected from bypass line



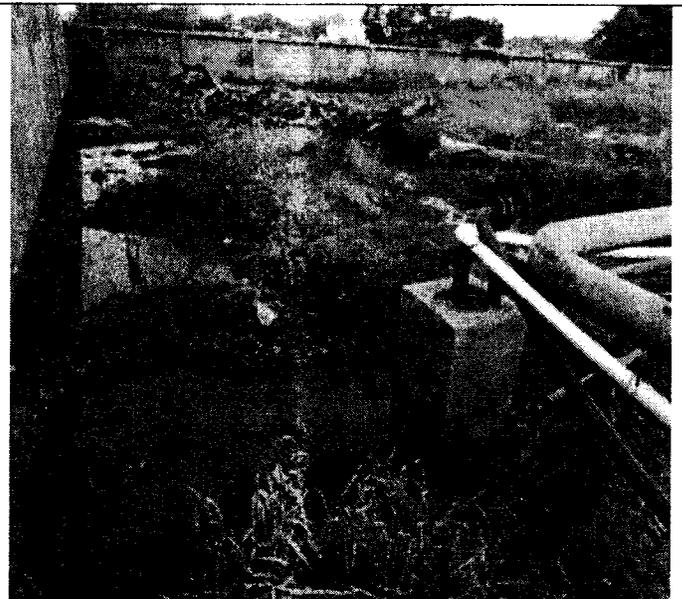
alkaline w/w is discharge into open area behind the plant



w/w ponding observed behind the ETP



Treated water line of ETP has found broken



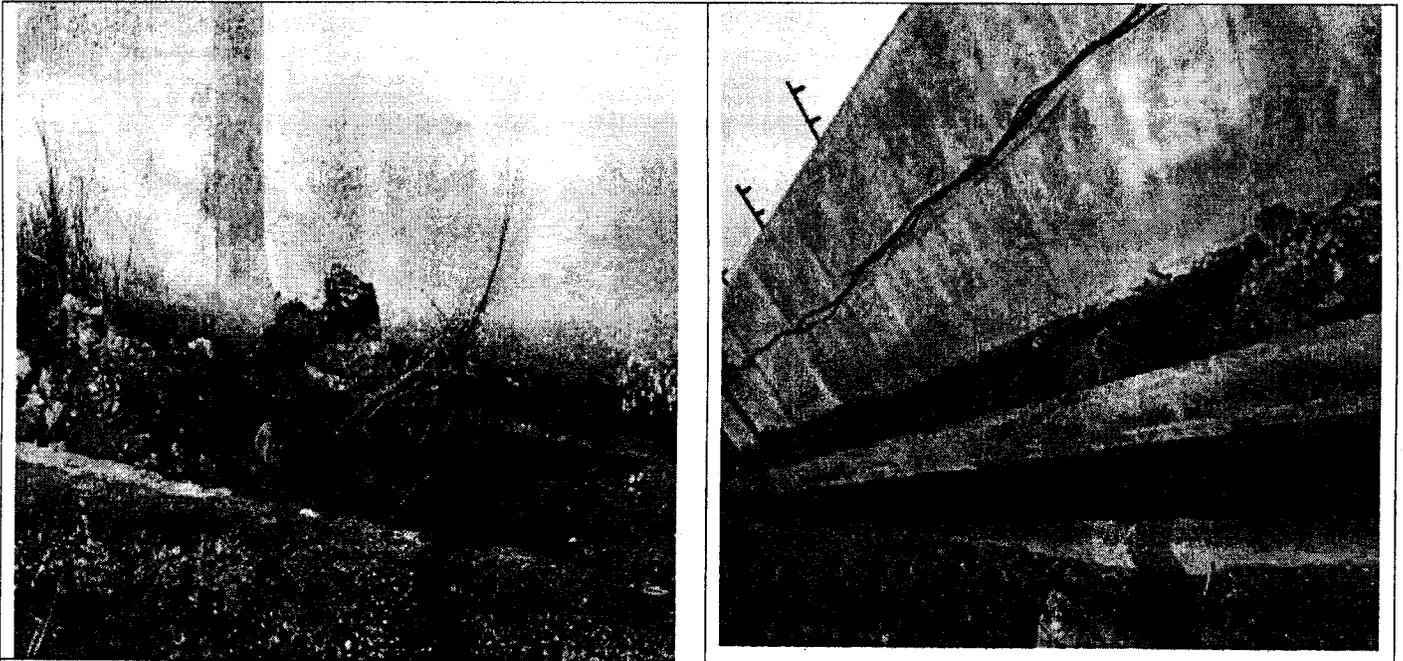
Waste water found to gone into the open area



Both the incidents is found to mix & going into kachi storm water drain within premises

M/s. Recycling Solutions Private Limited (PCB ID: 66336)

visit date: 30-09-2020



w/w is disposed into outside of GIDC storm water drain through hole



Annexure - R-2

200



GPCB ID: 66336/562261

Date: 05.10.2020

To,  
The Regional officer,  
Gujarat Pollution control board,  
First Floor, Plot no 1501, GIDC Estate,  
Ankleshwar,  
District Bharuch, Pin-393002

Dt-16/10/20  
(Resubmitted)

To The Unit Head  
Hazardous Cell  
GPCB, Gandhinagar  
K. Ath - Mr. Jeyan Thaker

Subject: Submission of Compliance report of GPCB Visit

Respected Sir,

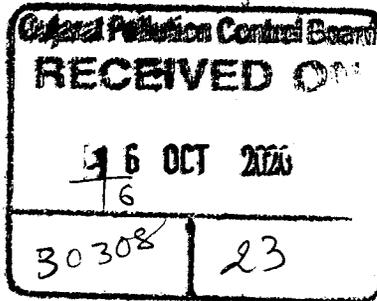
Referring to the above subject we are submitting compliance report of GPCB Visit of dated: 30-09-2020 of RSPL, Unit-02- PANOLI.

Please consider this Compliance of GPCB Visit for your office record.

Do the needful.

Thanking You.

For,  
Recycling Solutions Private Limited,



Director/Authorized Signatory

DERE  
19/10  
putup with file  
19/10/2020

Site Address  
Plot No. 223, GIDC Estate Panoli,  
Panoli 394 116 (Dist. Bharuch), Gujarat  
Phone : 02646272029

Registered office  
'370, S V P Road, Shop 8, Plot 384, Cigaretwala Bldg.,  
Opp. CBI, Prathna Samaj, Nr. Harkishandas Hospital,  
MUMBAI - 400004, Maharashtra, INDIA'

Email  
mail@rs-pl.com

Website  
www.rs-pl.com

13525  
19/10

*2021*

Sr Nos.	Observation Description	Action Plan	Annexure Nos.	Status
1	<p>Dirty - Alkaline Water discharge from Liquid Section area to open space area of plant by Dewatering pump temporary hose pipe, Water Sample collected.</p>	<p>a. The entire liquid section is being operated in the closed loop; wherein the liquid area pump farm is connected to the ETP and the ETP in turn is connected to the tank farm. Thereby any waste water being generated within the process is used internally for blending and Pre Processing. <u>We are a Zero Liquid Discharge (ZLD) facility.</u></p> <p>b. The specific area from where the sample was collected is the pump farm and the waste water generated is the cooling water from the pump. <u>Overall there is no significant amount of waste water generation at site except pump cooling water from gland leakage. Pumps are not continuously operated and its is intermittent application for transfer of liquid.</u></p> <p>b. The water consumption in pump cooling is less than 100 litre per day. Waste water is collected at impervious cemented dyke and transferred to sump and finally to ETP for further treatment and recycle.</p> <p>c. During the monsoon and heavy rains the pump installed in the pump farm was under maintenance and hence a alternate arrangement was done to pump the water to the ETP.</p> <p>d. Due to some leakages in the pump installed; cooling water got accumulated outside the dyke</p>	Annexure No-01.	Done

		<p>area. <u>The leakage was from the pipeline which has now been rectified. The spillage has been cleared and processed and the pictures of which are enclosed herein as Annexure – 1.</u></p> <p>e. <u>There by we would like to submit to your good office that there has been no discharge from the process in the open area. Contaminated soil is also scrapped and taken for waste blending.</u></p>		
2	Treated waste water line of ETP is observed in damaged condition and that water of ETP spread in around area. Water Sample Collected.	All the pump cooling water is received in the ETP and the same is taken back in process as when required. The Treated waste water line of ETP was damaged from the flange, which has been repaired & Fixed. Photo Enclose for your Reference as Annexure – 2.	Annexure No-02.	Done
3	Waste water of Point No 1 & 2 come out from company premises and mix in outside storm water drainage line. immediate collect water from line.	<p>1. <u>We are monitoring the quality of storm water within our premises. If the water quality is not within the acceptable range, the storm water is sent to ETP for treatment. We have provided a sump with transfer pump for this purpose. The lab analysis of storm water is enclosed herewith for your reference.</u></p> <p>4-2. <u>We would like to submit to your good office that; the surface run off within the plant premises have gotten accumulated between the boundary and the storm water drain due to some cracks and</u></p>	Annexure No-03.	Done

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		gaps in the boundary wall.  2-3. All such accumulated water has been subsequently collected and sent to ETP. The pictures of the same are enclosed as Annexure - 3.		
4.	ETP is not in working condition, immediate to be started.	<p>1. As a part of the process there is no liquid generation apart from pump cooling water. Pump cooling water is intermittently transferred to the ETP. ETP operations are carried out only when it is required in <u>batch mode</u> and not on routine basis.</p> <p>2. Hence during the visit the ETP was found to be not in working condition; how ever we will ensure to operate the same as per the need of our process. All the ETP equipments and components which includes transfer pump, dosing tank agitator, flow meter and instruments are in <u>working condition</u> which can be seen in the enclosed photographs.</p> <p>We are also enclosing herewith the copy of the ETP Log Book for your reference which indicates ETP operation data-</p>	Annexure No-04.	Done
5.	Scrubber of Liquid area not working condition and using of single caustic scrubber fixed, system implement as	Scrubber system in Liquid area was in the working condition but due to heavy rain, it had developed some maintenance issue. This has been attended & it is in	Annexure No-05.	Done

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	per APCM.	working condition at present.		
6	Submit Details of last 03 month inward & outward material of Solid and Liquid with records.	Monthly Data of Solid and Liquid are enclosed as Annexure - 6.	Annexure No-06.	Done

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Annexure No-01.



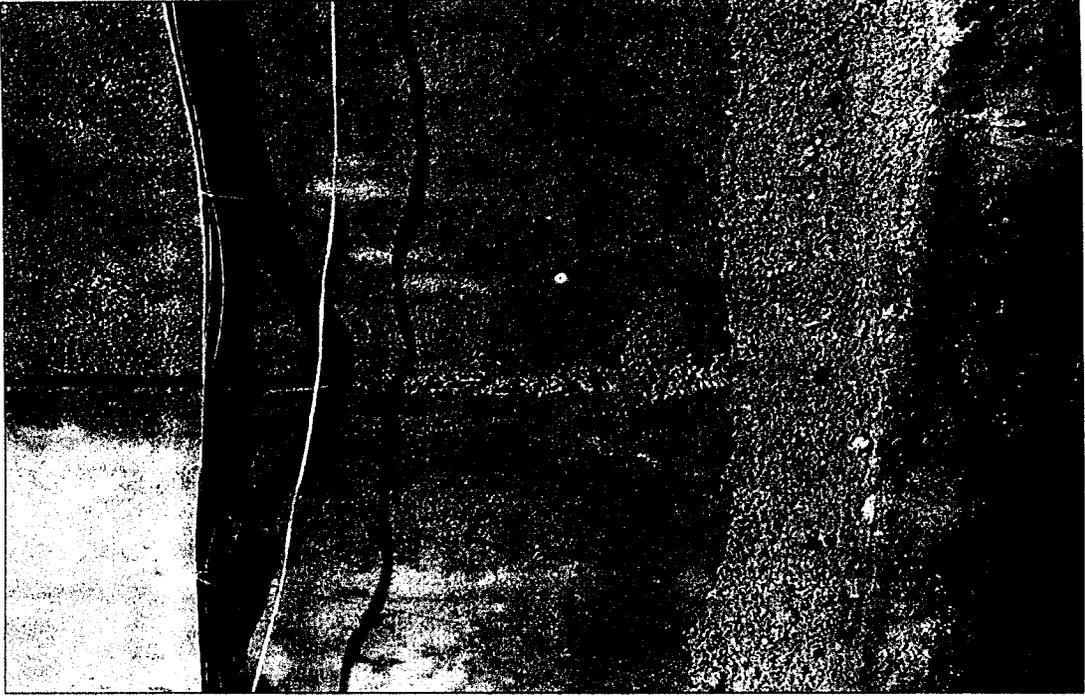
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Annexure No-02.



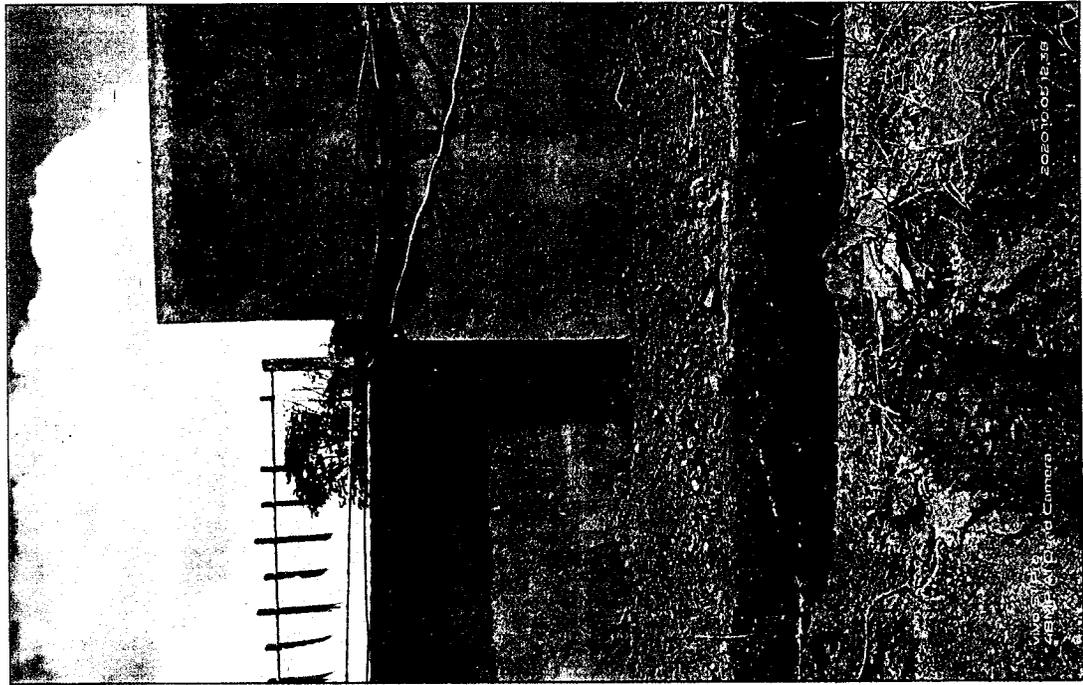
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Annexure No-03.1

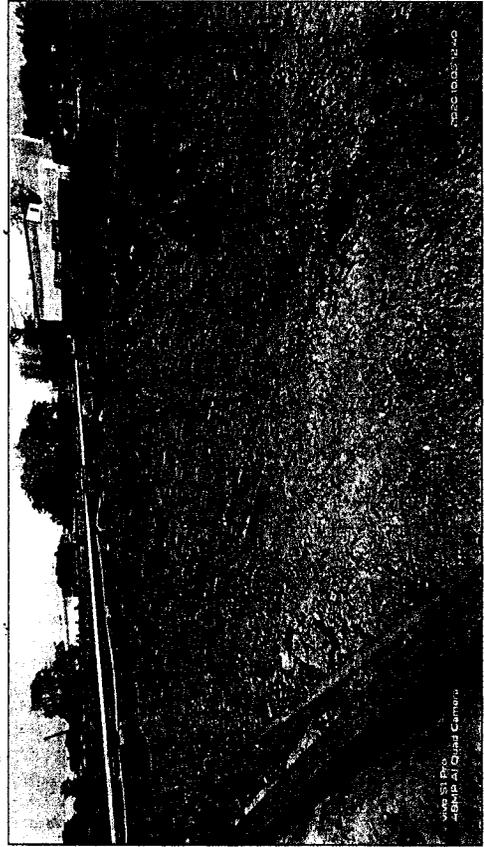
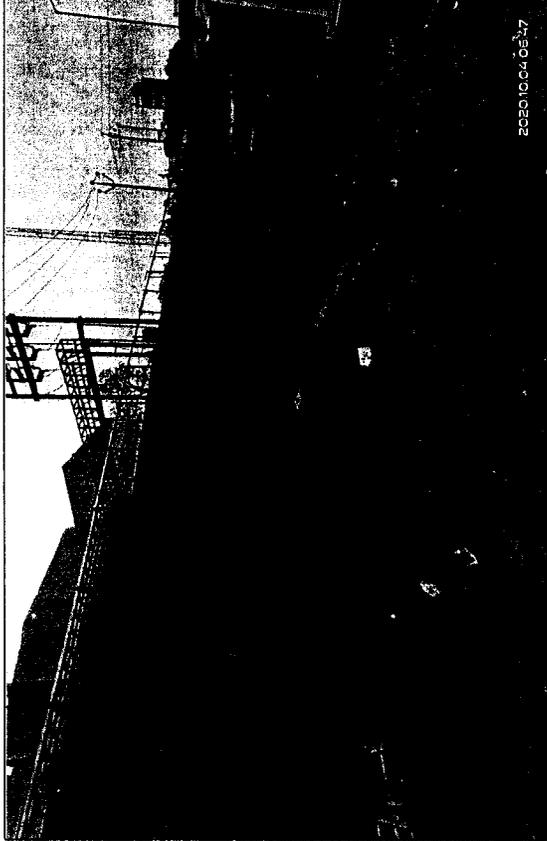


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Annexure No-03.2



Annexure No-03.3



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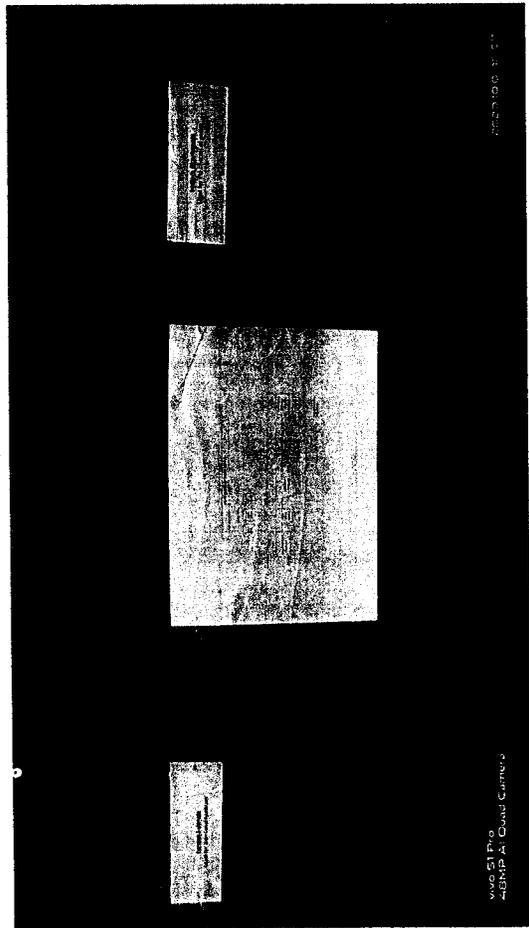
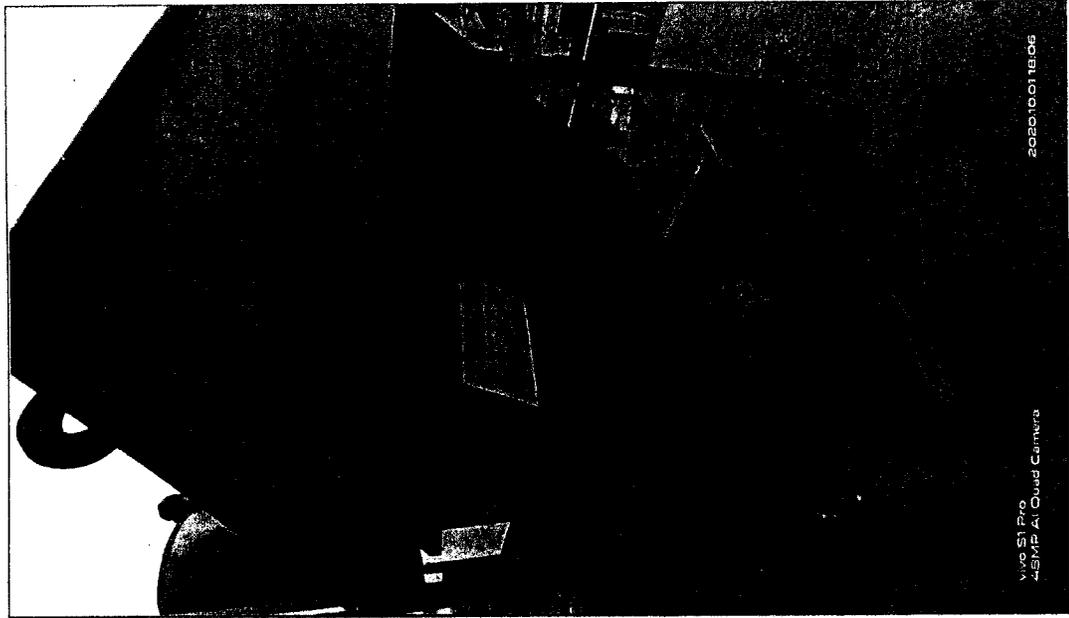
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Annexure No 3.4



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Annexure No-04.1



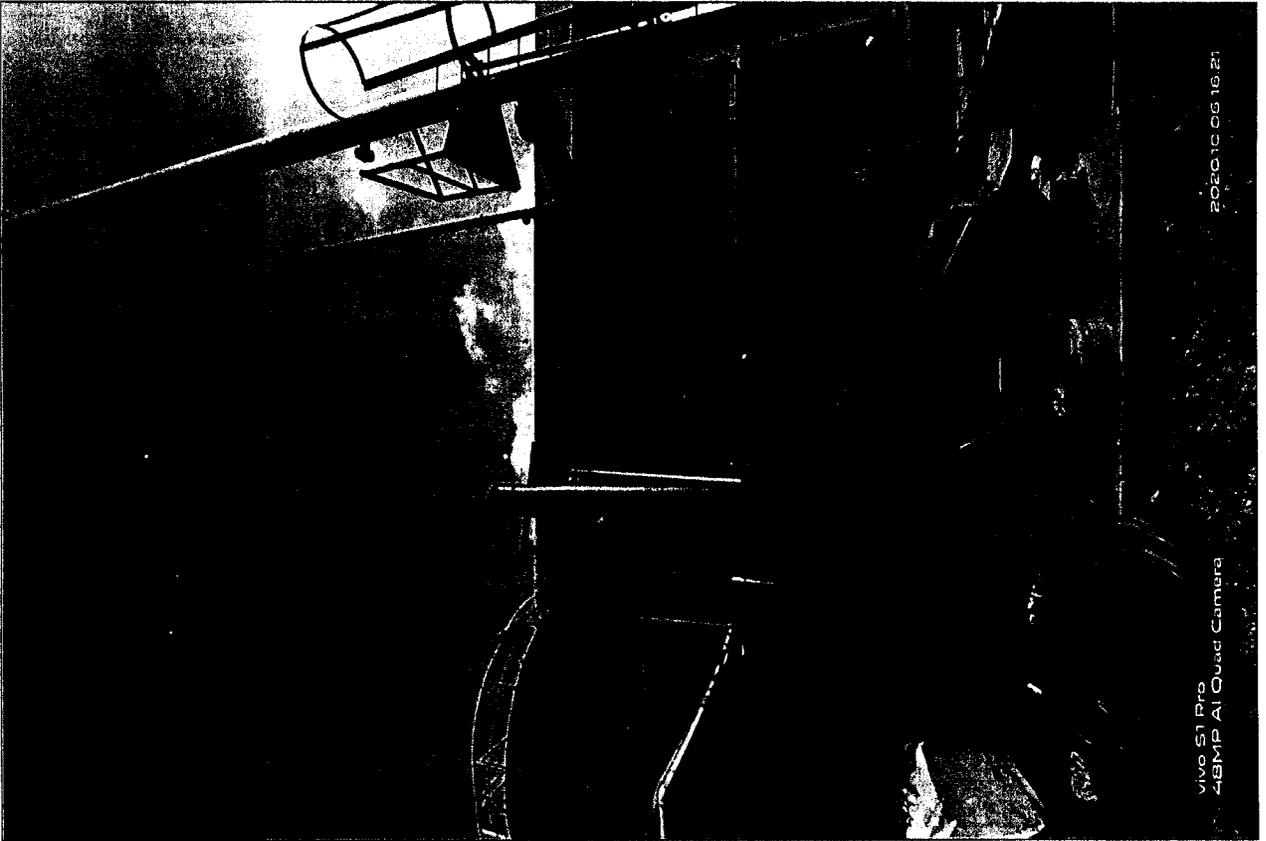
Annexure No-04.2



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Annexure No-05.



## Annexure-06

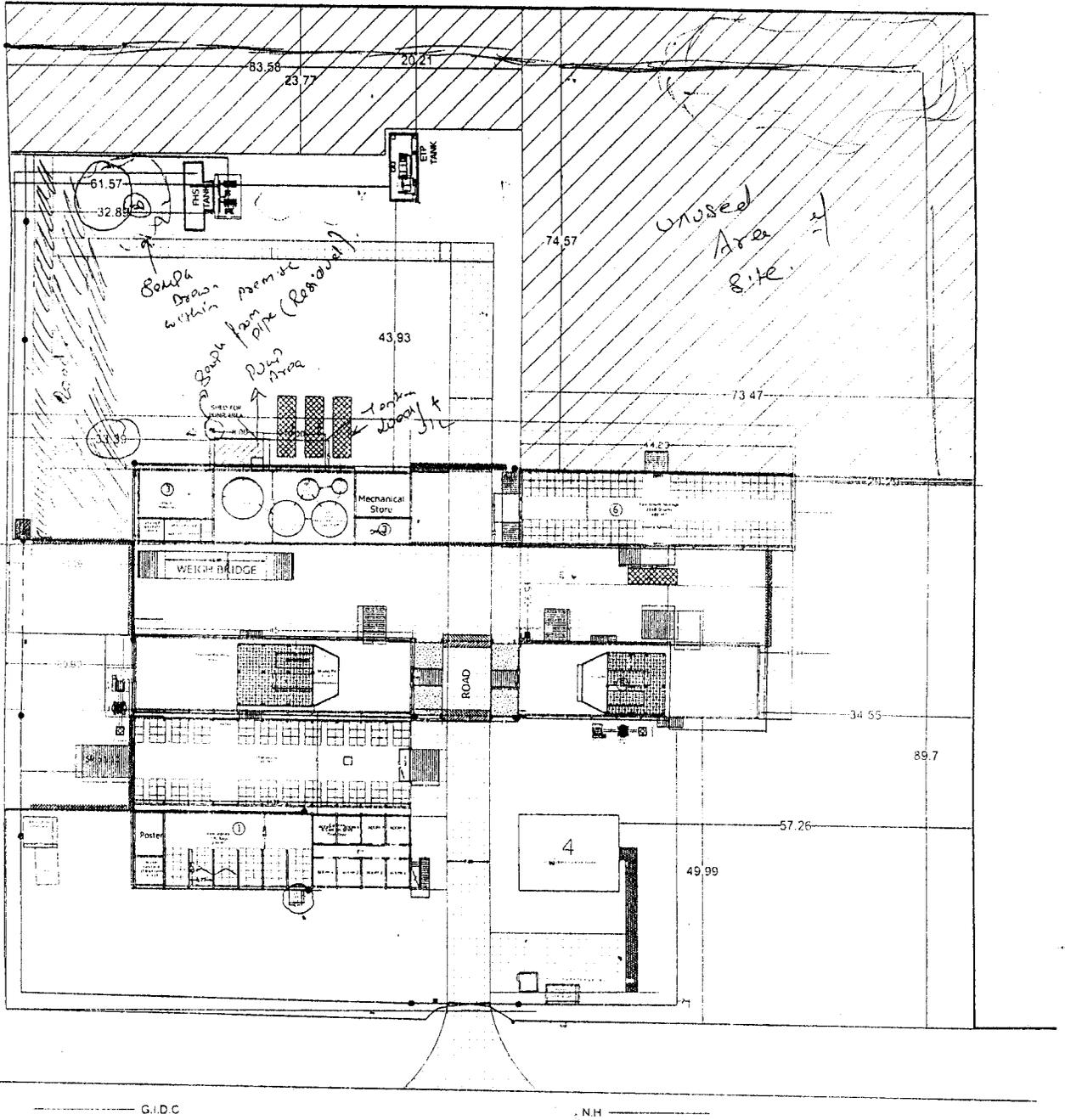
Month	Name & Address of the facility	Total Capacity of the facility (MT)	Stored Waste on the first day of this month (MT)	Total Waste received during this month (MT)	Total Waste Pre-processed in this month (MT)	Total Waste sent for co-processing in this month (MT) To: M/s. XYZ	Total Waste left at facility on the last day of this month (MT)
June-20	Recycling Solutions Pvt. Ltd., Unit-II	5250	871	2236	1160	1842	1265

Sr. No.	Name & Address of the facility	Total Capacity of the facility (MT)	Stored Waste on the first day of this month (MT)	Total Waste received during this month (MT)	Total Waste Pre-processed in this month (MT)	Total Waste sent for co-processing in this month (MT) To: M/s. XYZ	Total Waste left at facility on the last day of this month (MT)
1.	July-20 Recycling Solutions Pvt. Ltd.	5250	1265	3301	2152	3658	909

Sr. No.	Name & Address of the facility	Total Capacity of the facility (MT)	Stored Waste on the first day of this month (MT)	Total Waste received during this month (MT)	Total Waste Pre-processed in this month (MT)	Total Waste sent for co-processing in this month (MT) To: M/s. XYZ	Total Waste left at facility on the last day of this month (MT)
1.	August-20 Recycling Solutions Pvt. Ltd.	5250	909	3918	2532	3828	999

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PROJECT - GEPIL-PANOLI-2		REVISIONS				DRAWN BY -	
DWG TITEL - LAY OUT PLAN		S.NO.	R.NO.	DATE	DISCRPTION	BY	CHECK BY -
DATE: 28-11-2018							NORTH -
DWG NO.:							REVISION NO. - R0
SCALE -							