

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

APPEAL NO. 17 / 2023

Appeal under Sec. 16 r/w Sec. 18 of the NGT Act, 2010

[Appeal against the order dated 21-03-2023 passed by the Gujarat Pollution Control Board u/s. 33A of the Water (Prevention and Control of Pollution) Act, 1974]

Dhanlaxmi Orgo Chem

Through Mr. Gautamkumar Patel, Proprietor ... Appellant

v.

Chairman,

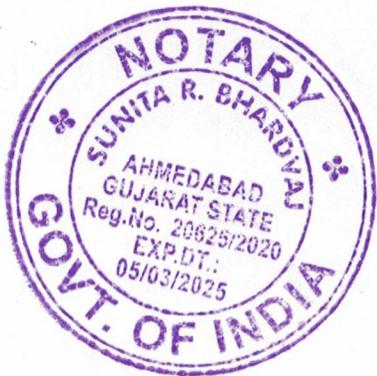
Gujarat Pollution Control Board & Anr.

... Respondents

Objections to the Joint Committee Report submitted by GPCB

I, Gautamkumar Patel, Age : 60 years, proprietor of Dhanlaxmi Orgo Chem having office Plot No. 328/01, Vaduchi Mata Road, Lunej – 388 620, Tal. Khambhat, District Anand, Gujarat do hereby state on solemn affirmation as under:

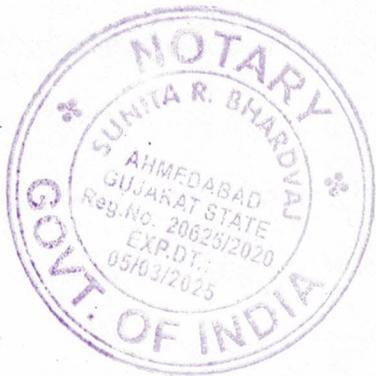
1. I am the proprietor of the Appellant Unit i.e., Dhanlaxmi Orgo Chem in the present appeal and as such am fully conversant to the facts and circumstances of the present appeal and I am competent to swear the present affidavit.
2. I am challenging the closure order dated 21-03-2023 issued by GPCB against my unit by way of filing of this appeal.
3. On 31-05-2023, this Hon'ble Tribunal constituted a Joint Committee consisting of representatives from CPCB, GPCB and District Collector. The said committee was to give an advanced notice to the Appellant unit before the visit.
4. **However, no sooner, this Hon'ble Tribunal passed the order on 31-05-2023, within couple of hours; GPCB team arrived at the Appellant unit, without giving any prior notice. They conducted a visit from 12:45 PM till 18:00 PM. Hon'ble Tribunal had directed the Committee to conduct a visit, however, GPCB in utter disregard of this Hon'ble Tribunal's directions visited the Appellant unit unilaterally, for the reasons best known to them.**
5. This Appellant had removed the disputed underground pipeline approximately more than 2 years ago and a small part of the pipe, approximately 2 feet in length, which was under the boundary wall of the unit whose base is on mud, it was left near the wall. It wasn't removed as it could have





imbalanced the boundary wall which could fall, therefore the Appellant unit covered & tied the opening of the small pipe outside the wall with first plastic bag and then with cement concrete, sealing it completely. Thereafter there was NO scope for Appellant unit to affect any illegal discharge through the said pipe piece.

6. GPCB officers (two) who visited on 31-05-2023, while doing the digging work, removed the outer cement concrete seal on the opening of the pipe and found that it was further closed with plastic bag by tying with plastic string as mentioned above. GPCB officers (two) themselves have made Panchnama on 31-05-2023 in presence of the manager of the Appellant Unit and two Directors one each of Technichem Organics Pvt. Ltd., Lunej and Kush Intermediates, Neja. However the said Panchnama is not produced on record in the Joint Committee Report. **The Panchnama states that "while digging black coloured the digging work, removed the outer cement concrete seal HDPE pipeline was found coming outside the wall of the unit at approximately 2 feet far from the wall it was found sealed with plaster (cement concrete). When these plaster (cement concrete) was broken, then inside one end of the pipeline was sealed & tied with plastic bag. Hence these pipeline was found coming out from**



the wall of the unit. Further digging after the end of the pipeline NO further pipeline was found”.

This clearly confirms that even though approximately two feet black coloured HDPE pipe piece was found, BUT there was NO continuation of this HDPE pipe piece further leading to any illegal pipeline existing for disposal outside the unit.

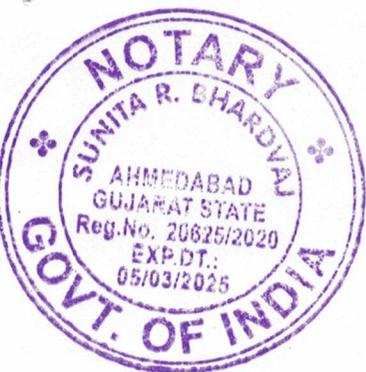
Copy of the Panchnama dated 31-05-2023 and its English translation thereof is marked and annexed as **Annexure 1.**

7. GPCB issued a Notice of Entry dated 31-05-2023 and i) observed that from inside the wall coming outside a black coloured HDPE pipeline was visible, its outside end is currently sealed with plastic bag. During digging that pipe end was also found plastered (masonry). ii) Inside the premises at the area between ETP collection tank & Filter Press of Production Plant in the center area two underground 200 liters capacity HDPE barrels with acidic (pH 2.0-4.0) waste water was found. Give clarification of the same. At the time of visit sample of acidic waste water was collected. iii) Submit the reply of query raised in your online revocation application. Iv) Strictly follow the closure directions issued by GPCB. Copy of NOE dated 31-05-2023 is marked as **Annexure 2.**



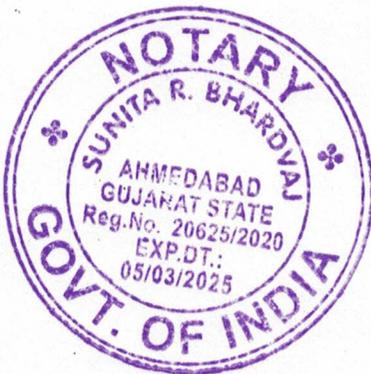
8. Appellant Unit gave reply to the NOE on 02-06-2023, stating, the underground HDPE pipe found was a piece approx. 2 feet outside our 175 feet long wall as it was based on muddy surface. If removed totally, the 175 feet long wall may fall after removal of underground pipeline as per the verbal instruction issued by the then R.O., GPCB, Anand Mrs. Rekhaben. We had submitted the photographs and videography of then removal vide our reply dated 15/05/2023 **(Annexure-3A)** to GPCB letter dated 15/05/2023 **(Annexure-3B)**. Today also five recent photographs parallel shot at the time of above visit were submitted which clearly matches with earlier submitted photographs confirming removal of pipeline before two years.

9. Regarding underground two 200 Kgs. capacity HDPE barrels we have mentioned that they were used as day tanks for addition of out sourced raw material HCl used in manufacture of 4 Sulpho Hydrazone & PAABSA **(Annexure-4A)**, we also enclose the last purchase bill copy of outsourced raw material HCl dated 18/01/2023 **(Annexure-4B)**. BUT, since quite some time we are NOT manufacturing 4 Sulpho Hydrazone & PAABSA, hence the storage tank of outsourced HCl placed besides the two HDPE barrels is removed & these two non-use barrels are



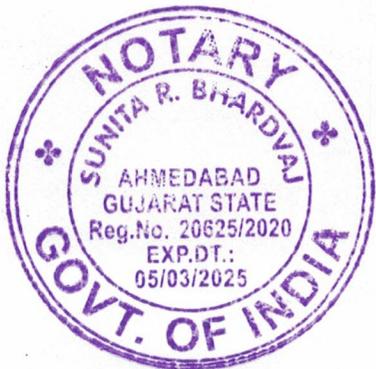
partly filled with rain water & cement debris besides leftover HCl. The sample was collected by GPCB (A.R. **Annexure-4C**) & us simultaneously. We have submitted NABL laboratory report (**Annexure-4D**). Both the above analytical reports, the details of raw materials consumption ratio for our above mentioned two CC&A granted products; the last purchase bill copy dated 18/01/2023 of outsourced purchase bill copy of HCl confirms the presence of ONLY HCl in the two barrels. We also enclose the data of Product wise Spent Acid (Sulphuric Acid) generation & consumption (**Annexure-4E**) which confirms that the issue is about illegal disposal of Spent Acid (Sulphuric Acid) through underground HDPE pipeline & NOT of outsourced purchased HCl. The distance from these two barrels towards the wall in question is approximately 170 feet.

10. The Appellant received advanced intimation from the GPCB about the Committee visit scheduled on 05-06-2023. Committee Members didn't come together. The District Magistrate alone visited at 09:00 A.M. We submitted acknowledged copy of our compliance dated 02/06/2023 of earlier GPCB visit dated 31/05/2023 for his reference & consideration. The District Magistrate left within five minutes after we showed him both inside premises & outside our unit near our wall the existing HDPE pipe piece.

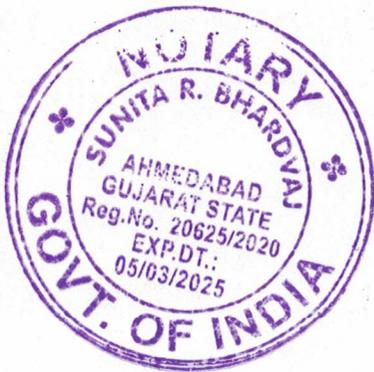




11. At 10:00 A.M. CPCB and three GPCB officials came to our unit. We submitted to both the acknowledged Xerox of our compliance dated 02/06/2023 of earlier GPCB visit dated 31/05/2023 for their reference & consideration.
12. On the day of the visit, GPCB issued NoE dated 05-06-2023 observing that, ii) during visit from your boundary wall 2 feet & 10 inches pipeline found towards outside which was closed tied with plastic bag. iii) Inside the unit, due to RCC slab for underground status of pipeline get GPR study. iv) Submit last one year's consumption of neutralization agent along with challan used to neutralize effluent. v) Submit electric bill, log book, energy meter reading details of Spray Dryer operation. vi) Submit last three years Env. Statement Form-V, Annual Report Form IV, production details Spent Acid generation and management.
13. On the same NoE at the bottom proprietor Mr. Gautam Patel the Appellant Proprietor noted down his objection that the GPCB officers when visited on 31/05/2023 had removed the cement concrete seal from the plastic bag on the HDPE pipe piece of the pipeline which was originally removed two years back BUT they didn't seal the same with cement concrete after their alleged visit dated 31/05/2023. Copy of the NoE dated 05-06-2023 & its English translation is marked and annexed as Annexure 5.



14. They went on the backside of our unit near the wall where the earlier GPCB team on 31/05/2023 had dug up the area near our wall & found loosely tied ONLY with plastic bag the HDPE pipe piece BUT was NOT properly plastered with cement concrete which was there since more than two years BUT was removed on 31/05/2023 by visiting GPCB officers.
15. They measured the diameter & length of that leftover HDPE pipe piece & they also dug further to find if any discharge line is there or not even though the GPCB officials visit dated 31/05/2023 had already verified about its nonexistence which was also mentioned in the Panchnama. Even the District Magistrate during his short time of five minutes also verified the same today.
16. As they couldn't find any authentic existence of underground pipeline BUT ONLY piece of approximately 2 feet 10 inches, they then concentrated on the non-use two HCl storage day tanks of 200 kgs. capacity each by instructing our present three labourers to empty both barrels. As they were taking time to empty the barrels, the GPCB R.O. Mrs. Nehalben requested nearby DTC industries manager to provide more labourers to finish faster the complete emptying of both drums.



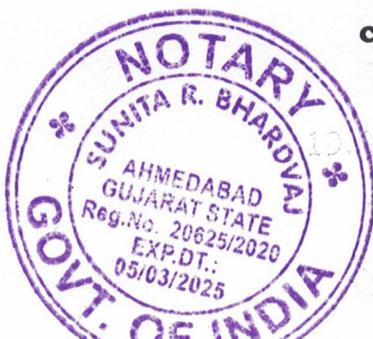
17. After the drums were emptied, approximately 75 liters liquid HCl was filled in another empty HDPE barrel & sixteen bags (approximate weight 474 Kgs.) of acidic construction debris were filled. After both the drums were emptied NO hole for connection of pipeline AND any existence of any pipeline was found BUT were found intact one piece.

I am enclosing photographs confirming the correctness of what we have mentioned as **Annexure 6**.

18. The Appellant Unit gave the task of doing the Ground Penetrating Radar study from Geo Carte Radar Technology Private Limited., IIT Gandhinagar. The said agency also does GPR work on instructions of GPCB & hence are approved by GPCB.

19. The GPR report on page No. 5 Point 2 "The Scope of Project includes the mapping of all the underground utilities (including the Black colour HDPE pipeline which was visually observed outside the premises, and expected to be the Ghost pipe carrying the acidic effluent from the industry into the nearby canal, up to the depth of 3m using non-destructive Ground Penetrating Radar (GPR) technology."

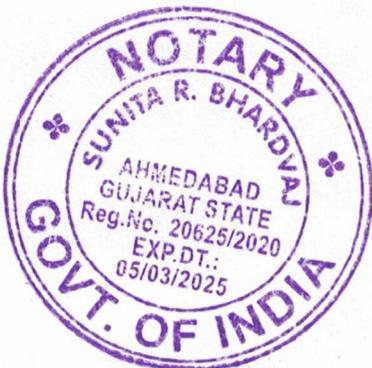
20. **The result Underground Utility Mapping report by them clearly states that no utility (including HDPE pipe) have**



been found in the surveyed area. The surveyed area was around 120 sq.m. inside the Appellant Unit.

21. After receipt of GPR Report on 12-06-2023, the same day I have duly submitted personally the compliance of first three relevant points related to Committee findings to the NoE dated 05-06-2023 along with the GPR report to the Committee Members including GPCB, Gandhinagar, Anand & District Magistrate, Anand and to CPCB, Vadodara next day morning (**Annexure 7**). The Affidavit submitted by the Unit Head (Anand), GPCB, Gandhinagar dated 14/06/2023 has NOT included our compliance submission dated 12/06/2023 along with GPR report & other submissions & also not mentioned correct facts about their visit dated 31/05/2023. They also tampered the existing cement concrete seal applied on the plastic bag tied onto the HDPE pipe piece. Similarly the GPR report confirms non-existence of HDPE pipeline inside our premises beneath the RCC slab.

22. **Both the above Panchnama & GPR report confirm non-existence of underground HDPE pipeline BUT existence of HDPE pipe piece ONLY two feet ten inches sealed with plastic bag & tied with plastic string with NO connection on either end of it neither towards inside premises nor outside premises.**





Google definition of Pipeline: - A long pipe, typically underground, for conveying oil, gas etc., over long distances.

23. I have already deposited the entire sum of Rs. 25 lakhs with the GPCB, the interim Environment Damage Compensation computed by them, under protest, subject to the final decision in the present appeal.

24. I have made all compliances as demanded by GPCB. Therefore I am requesting the Hon'ble Tribunal to direct GPCB to issue restart order to my Unit.

Whatever is stated is true and correct to the best of my knowledge, ability and belief and I affirm it to be true.



Deponent
Gautamkumar Patel
Gautamkumar Patel

Place: - Ahmedabad.

Date; - 01/07/2023.



SIGNED BEFORE ME

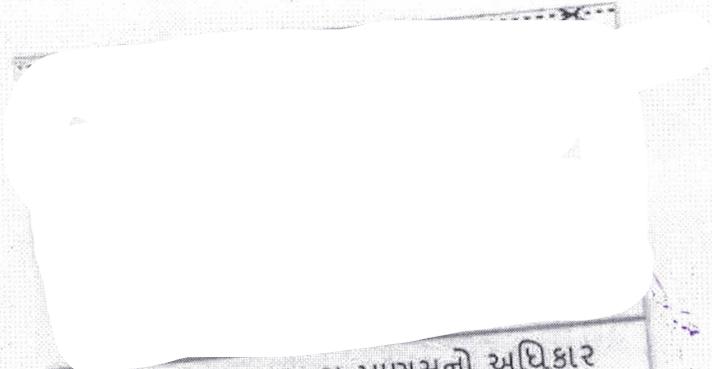
Sunita R. Bhardvaj
SUNITA R. BHARDVAJ
NOTARY
GOVT. OF INDIA

- 1 JUN 2023

RG. SERIAL No. 992
DATE 17/7/2023
BOOK No. 1
PAGE No. 123

Sunita R. Bhardvaj
SUNITA R. BHARDVAJ
NOTARY
GOVT. OF INDIA





આધાર - સામાન્ય માણસનો અધિકાર



આવરી ના. 39/04/2023 ના રીજીસ્ટ્રેશન કલેક્ટર
 એમોની એ સહી કરનાર ની દ્વારા મે. ધનલક્ષ્મી ઓર્ગેનિક્સ
 કંપનીની, વડી કચેરી, ગાંધીનગર ના સંદર્ભે છે. કરવામાં
 આવેલ વિગતિત દસ્તાવેજ, કંપનીની દક્ષિણ દિશામાં, 22° 20' 54" N2
 નથા 72° 35' 0" EL પર આવેલ સ્થળ પર કે વહીવટી
 મંદિર સહી પર આવેલ છે. આ ખોદકામ કરવાં, આ HDPE ની
 દ્વારા કરવાની માધ્યમ લાઇન, આ સંદર્ભેની દિશામાં સંદર્ભે
 બંધારની લાગુ કરી નીકળતી સેવા મળેલ અને દિશામાં સંદર્ભે
 ની કુટના સંદર્ભે તેના પર લાગુ કર (સહાયક) કરીને સીલ
 કરેલ સેવા મળેલ. જેને (લાગુ) ને લોકાવતા આ સંદર્ભે
 માધ્યમ લાઇન નો ઘોડો લાગુ કરીની કોચવા થી સીલ કરેલ સેવા
 મળેલ. આમ આ માધ્યમ લાઇન આ સંદર્ભેની દિશામાં
 નીકળતી સેવા મળેલ. આ માધ્યમ લાઇન ના ઘોડો પછી ખોદકામ
 કરવાં, આ આ માધ્યમ લાઇન સેવા મળેલ નથી.

સંદર્ભે કંપની મે. ધનલક્ષ્મી ઓર્ગેનિક્સ, લોર નં. 328/01, વહીવટી મંદિર
 સહી, મ. ભુવેશ્વર, ના. ખંભા નથા શુભો સહીમાં આવેલ છે.

(1) શ્રી. જી. મહાલા - *Mahala*
 શ્રી. વ. મ.
 ઝ. પ્ર. નિ. લોડ, આગ્રા

(2) શ્રી. એમ. પટેલ - *Patel*
 શ્રી. વ. મ.
 ઝ. પ્ર. નિ. લોડ, આગ્રા

(3) શ્રી દિવેશ સહાયક નાથ પર **For, Dhanlaxmi Orgo Chem**
 મેનેજર શ્રી, મે. ધનલક્ષ્મી ઓર્ગેનિક્સ. *Hup*
 મ. ભુવેશ્વર **Authrised Sign.**

(4) શ્રી પ્રિયુષભાઈ મગનલાલ નથવાણી - *Nathvani*
 ડાયરેક્ટર, મે. ટેકનીકેમ ઓર્ગેનિક્સ પ્રા. લી.
 મ. ભુવેશ્વર

(5) શ્રી દેવલાલ દિવેશભાઈ પટેલ - *Patel*
 પાર્ટનર, મે. કુશ ઇન્ડીયા પ્રા. લી.
 મ. નેમ. *પટેલ દેવલાલ દિવેશભાઈ*

1. Panch Nama on plain paper.

Today on 31/05/2023 at 14.45 hours we the below mentioned signatories as per the order of H.O., GPCB, Gandhinagar with reference to the visit on the occasion of visit by order of head office GPCB, Gandhinagar on the southern wall, 22 20' 54" NL & 72 35' 0" EL site which is located at Vaduchi Mata Mandir Road while digging black coloured HDPE pipeline was found coming outside the wall of the unit & at approximately 2 feet far from wall it was found sealed with plaster (cement concrete). When these plaster (cement concrete) was broken then inside the end of the pipeline was sealed with plastic bag. Hence these pipeline was found coming out from the wall of the unit. Further digging after the end of the pipeline NO further pipeline was found.

The above mentioned unit Dhanlaxmi Orgo Chem, Plot No. 328/01, Vaduchi Mata Mandir Road, Dist. Anand is located.

Name	Signed
(1) M. J. Makwana (SSA), GPCB, Anand.	
(2) K. M. Patel. (SSA), GPCB, Anand.	
(3) Hiren Chandrakantbhai Patel.	For, Dhanlaxmi Orgo Chem, Authorized Sign.
(4) Piyushbhai Maganlal Nathwani, Director, Technichem Organics Pvt. Ltd., Lunej.	
(5) Dhavalbhai Dineshbhai Patel. Partner, Kush Intermediates, Neja.	

સ્થળ તપાસની નિરીક્ષણ નોંધ

Annexure 2

આઈ ડી નં. 29636 કેટેગરી/સ્કેલ : R/S Latitude / Longitude : 22-20 52 / 72-34 54

શ્રીમાન,

આપશ્રીને જણાવવાનું કે આજ તા. 31/05/23 ના રોજ આપશ્રીના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઈન્સપેક્શન કરેલ છે. જે દરમ્યાન હવા/પાણી/જોખમી કચરા/ ના 0/01 / 0 / ના નમુના પૃથ્થકરણ અર્થે એકત્રીત કરેલ છે.

આપશ્રીના એકમની મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ / ક્ષતિઓ જોવા/જાણવા મળેલ છે. જે આધારે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને / અથવા કાયદાકીય પગલાં લેતા અને / અથવા પર્યાવરણ નુકશાન વગતર લેતા પહેલા કુદરતી ન્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખીતમાં સ્થળસ્થિતિ / મુદ્દાઓ / સૂચનાઓ આપવામાં આવે છે.

આ પરત્વે આપશ્રી નીચે લેખીતમાં રજુઆત કરી શકો છો અથવા લેખીત ખુલાસો/સ્પષ્ટતા/પુર્ણતા અહેવાલ કામકાજના દિન-03 માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખીતમાં અથવા XGN પર અથવા E-mail થી રજુ કરવા નોટીસ આપવામાં આવેલ છે.

સ્થળ તપાસ દરમ્યાન જોવા મળેલ સ્થળસ્થિતિ / ત્રુટીઓ / ક્ષતિઓ / ખામીઓ.

- ૧) સુખ્ણ સ્ટેડમની દક્ષિણ દિવાલમાં, $22^{\circ} 20' 54'' N$ તથા $72^{\circ} 35' 0'' E$ પર સુખ્ણ સ્તર પર કે જે વડુસીમાના મંદિર સેડ પર સુખ્ણ દોર્યા સ્ટેડમની દિવાલની સંદર્ભે બહારની બાજુએ નીકળતી કાચા કાચની HDPE Pipeline જોવા મળેલ છે. જેનો દોરો કાલમાં કાચરીક ની કોષ્ટકોથી સીલ કરવામાં આવેલ છે. જેનો દોરો કાચરીક કાચરીક (ચકાચ) કરેલ કાચરીક.
- ૨) સુખ્ણ સ્ટેડમની પ્રિમાવસીતમાં ETP કાચરીક રેન્ક તથા પ્રોડક્શન રાજીવના હિલ્ટર પ્રેસ ની વચ્ચેની જગ્યાએ બી સંદર્ભે ગાઉન્ડ: 200 લી. ની ડ્રેપેરીની ના HDPE લાઇનમાં કાચરીક (PH 9.2 to 4.5 PH Strip પર) લાઇન વોટર જોવા મળેલ છે. જેનો ખુલાસો કરવો. મુલાકાત દરમ્યાન આ લાઇનમાંથી કાચરીક/સિડિસ લાઇન વોટર નો નમુનો લેવામાં આવેલ છે.
- ૩) સુખ્ણ સ્ટેડમની કાચરીક રેન્કની કાચરીક રેન્કમાં સુખ્ણ કાચરીકો જોવા મળેલ છે.
- ૪) લોડે સુખ્ણ કાચરીક રેન્કની કાચરીક રેન્કમાં સુખ્ણ કાચરીકો જોવા મળેલ છે.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડના નામે અને વતી :
 અધિકારીઓના નામ, હોદ્દો અને સહી :

[Signatures]
 K-m. Patel (SSA) M-J. Maheshwari (SSA)

મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનીધીની રજુઆત : (જે લાગુ પડે તેની સામે સહી કરવી)

મુલાકાત દરમ્યાન અધિકારીશ્રીઓએ 4 મુદ્દાઓ માટે સ્થળસ્થિતિ/સૂચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે. જેમાં

(૧) આ સ્થળસ્થિતિ / સૂચનાઓ સાથે હું નીચે સહી કરનાર સંપૂર્ણ સહમત છું.

(૨) જેમાં દર્શાવેલ સ્થળસ્થિતિ / સૂચનાઓમાંથી મુદ્દા નં. 1 સાથે હું નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજુઆત છે.

મુદ્દા નં. ૨ માં વચ્ચેની પાણી તથા મલના લાઇનના તપાસ જોવા મળેલ છે.

એકમના પ્રતિનિધિ/આ નોંધ મેળવનારનું નામ, હોદ્દો અને સહી :

તા. 31/05/2023

[Signature]
 Mr. Hiren C. Patel (Manager)
 Authorised Sign.

મુદ્દા નં. 1: ઉપર દર્શાવેલ તપાસ લાઇન, રૂપર જુની લાઇન રી. તેની નીચે...

તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

નં :

પાણી અધિનિયમ ૧૯૭૪ ની કલમ - ૨૩, હવા અધિનિયમ ૧૯૮૧ ની કલમ - ૨૪ અને પર્યાવરણ (સુરક્ષા) અધિનિયમ-૧૯૮૬ ની કલમ - ૧૦ હેઠળ અમોને મળેલ સત્તાની રૂએ અમો નીચે સહી કરનાર અમોને જરૂરી લાગે તેની સહાય લઈને તમામ સમયે નીચેના હેતુઓ માટે આપની જગ્યામાં દાખલ થવાનો અને તપાસ કરવાનો અધિકાર ધરાવીએ છીએ.

- (૧) અમોને સોંપેલા રાજ્ય બોર્ડ-કેન્દ્ર સરકારનાં કાર્ય બજાવવાના હેતુ માટે.
- (૨) આવા કોઈ કાર્યો બજાવવાના છે કે કેમ અને તેમ હોય તો કઈ રીતે તે બજાવવાના છે અથવા આ અધિનિયમ અથવા તે હેઠળ કરેલા નિયમોની અથવા આ અધિનિયમ હેઠળ બજાવેલી કોઈ નોટીસની, કરેલા કોઈ હુકમની, આદેશની અથવા આપેલા કોઈ અધિકારપત્રની કોઈ જોગવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે.
- (૩) કોઈ સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુની તપાસ કરવા અને તેની કસોટી કરવાના હેતુ માટે અથવા જે જગ્યામાં તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલા નિયમો મુજબ કોઈ ગુનો કરવામાં આવ્યો છે અથવા થવાની તૈયારીમાં છે, તેવી કોઈ જગ્યાની ઝડતી લેવા માટે અને તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલ નિયમો હેઠળ શિક્ષાપાત્ર કોઈ ગુનો કર્યાનો પુરાવો, તેવા સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય મહત્વની વસ્તુ કબજે લેવા માટે અમે નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ / કારખાનામાં દાખલ થવાનો સમય : સવારના / સાંજના 12-45 તા. 31/05/2023

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે -

૧. K. M. Patel (CSA)
૨. /
૩. /

ID - 29636

પ્રતિ

Dhanlaxmi Orgochem

P No 328/01, Vadodhi mode Rd,

At: Luney, Tal: Khambhat, Dist: Anand

બે નકલ મળેલ છે.

સહી :-

અધિકારીનું નામ :- M. J. Makwana
(CSA)

હોદ્દો :-

આ સૂચના (નોટીસ) મેળવનારની સહી :-

Mr. Hiren C. Patel (Manager)
(Hiren. C. Patel)

Translation Notice Of Entry Dated 31/05/2023 Page-1.

Entry time 12.45 dated 31/05/2023.

Name K.M. Patel (SSA)

ID-29636

Dhanlaxmi Orgochem

Sign

P No. 328/01, Vaduchi Mata Rd.

Name of Officer: - M.J.Makwana

At: Lunej, Ta. Khambhat, Dist. Anand.

Designation: - (SSA)

Signature of the person receiving Notice: -

Mr. Hiren C. Patel (Manager)

Page-2. Note of Site Inspection

I.D. No. 29636 Category/Scale: R/S Latitude/Longitude: 22.2052/72.3454

Visit Dated 31/05/2023 Sample Collected Air/Water: Haz. Waste: 0/1/0.

- 1) On the southern direction wall of your unit, 22 22' 54" NL & 72 35' 0" EL place which is situated Vaduchi Mata Mandir Road there from inside the wall coming outside a black coloured HDPE pipeline was visible & its outside end is currently sealed with plastic bag. During digging that pipe end was also found plastered (masonry).
- 2) Inside the premises at the area between ETP collection tank & Filter Press of Production Plant in the center area two underground 200 liters capacity HDPE barrels with acidic (pH 2.0-4.0) waste water was found. Give clarification of the same. At the time of visit sample of acidic waste water was collected.
- 3) Submit the reply of query raised in your online revocation application.
- 4) Strictly follow the closure directions issued by GPCB.

Signed.

Signed.

K.M.Patel (SSA)

M.J.Makwana (SSA).

The mention of above 4 noting were issued after site inspection.

(2) I don't agree with Point No. 1. Point No.2 HCl measuring barrels were filled with rain water & lot of garbage.

Date 31/05/2023

For, Dhanlaxmi Orgo Chem,

Signed.

Mr. Hiren C Patel.

Authorized Sign.

Point No. 1) The above mentioned pipeline is 2 years old which please note.



258
GUJARAT POLLUTION CONTROL BOARD

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

Annexure 3A

NO: GPCB/CCA-AND-1(5)/ID-29636/

BY R.P.A.D.
Dated: /05/2023

To,
M/s. Dhanlaxmi Orgo Chem (Old Name: Dinesh Allorga Ltd.),
Plot No. 328/01, Vaduchi Mata Road,
Lunej-388620,
Tal:-Khambhat, Dist:-Anand.

Sub: - Closure Direction issued under section 33-A of Water Act-1974 dated 21/03/2023.
Ref: - 1) Your revocation application inward at HO dated 03/05/2023.
2) Inspection report dated 09/05/2023.

Sir,

With reference to above, you are directed to submit following documents for further necessary actions.

- 1) Submit Bank Guarantee of Rs 4,00,000/- (Four Lac) with one year validity.
- 2) To submit revocation format with point wise compliance i.e remedial measures taken, date of completion of measures, which compliance required more than 7 days time, likely date of its completion.
- 3) To submit videography/ photographs of removal of illegal effluent discharge pipeline within and outside premises.
- 4) To submit EMS adequacy certificate of schedule-1 auditor.

**For and on behalf of
Gujarat Pollution Control Board**


(Ashok Chauhan)
Unit Head

Outward No: 742024, 15/05/2023

Clean Gujarat Green Gujarat

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

**DHANLAXMI ORGO CHEM**

SURVEY NO. : 328/1, Vaduchi Mata Road, AT. : LUNEJ, KHAMBHAT - 388 620. DIST. : ANAND

To, MOBILE : 98250 34098 | EMAIL - dhanlaxmiind4@gmail.com | Website - www.dhanlaxmiindustries.com | 15/05/2023.

The Unit Head,

Gujarat Pollution Control Board,

Paryavaran Bhavan,

Sector-10/A,

Gandhinagar- 382010.

Kind Attention: - Mr. Ashok Chauhan.

Sub: - Compliance of query NO: GPCB/CCA-AND-1(5)/ID-29636/Outward No : 742024,
15/05/2023.

Respected Sir,

With reference to above we submit our compliance as follows: -

- 1) In the past also when you have charged EDC on confirmed erring industries of Khambhat you have collected ONLY EDC & NOT collected Bank Guarantee, hence please justify & issue the revocation order immediately.
- 2) We already have submitted revocation format (Annexure-I) along with revocation application dated 01/05/2023 (Annexure-A) wherein all the mentioned compliances have been submitted.
- 3) We enclose the videography along with six photographs of the already removed underground pipeline approximately two years back when Mrs. Rekhaben was R.O.
- 4) Same as mentioned in 1) above, if you have received from above mentioned industries then we will also submit the same.

In light of above kindly issue revocation order & oblige. Thanking you in anticipation.

For,

Dhanlaxmi Orgo Chem,

Gautam
Gautam Patel.

W.D.P
15/5/2023
Gujarat Pollution Control Board
Head Office
Sector No.-10-A,
Gandhinagar-382010

Raw Materials

No.	Name of Product	Name of Raw Material	Existing (M.t.)	Proposed (M.t.)
1	Para Chloro Meta Cresol (PCMC)	Meta Cresol	3.81	0
		Sulphuryl Chloride	5.19	0
2	4/5 Sulpho Hydrozone	4/5 sulpho Anthralic acid	11.5	11.5
		Benzaldehyde	3	3
		Sodium Bisulphite	1.5	1.5
		Sodium Nitrite	1	1
		Sodium Hydroxide (Caustic flakes)	1	1
		HCl	2	2
3	2,2-Benzenedene Disulphonic Acid (B.D.S.A)	Nitrobenzene	11.7	11.7
		Oleum 65%	6	6
		Soda Ash Light (Na ₂ CO ₃)	2.5	2.5
		Sodium Hydroxide (Caustic flakes)	2.5	2.5
		Formaldehyde	2.5	2.5
		Dichlone	0.08	0.08
		Spent Sulphuric Acid	40.28	40.28
4	Para Nitro Toluene Ortho Sulphonic Acid (PNTOSA)	Para nitro Toluene (P.N.T.)	15	15
		Oleum 23%	23	23
		Spent Sulphuric Acid	13	13
5	Dinitro Stilbene Disulponic acid (DNSDA)	PNTOSA	10	10
		Sodium Hydroxide (Caustic flakes)	10	10
		Soda Ash Light (Na ₂ CO ₃)	2.5	2.5
		Chlorine Gas	10	10
6	(2-pyridone)	Ethyl Cyno Acetate	9.4	9.4
		Mono Ethyl Amine	5	5
		Aceto Aceticmethyl Easter	4.5	4.5
		Sulphuric Acid 98%	10	10
		Spent Sulphuric Acid	40	40
		Aniline	3.982	3.982
		Sodium Bisulphite	2.5	2.5

7	PAABSA	Formaldehyde	2	2
		Sulphanilic Acid	3	3
		Sodium Nitrite (NaNO ₂)	1.2	1.2
		Sodium Bicarbonate	1.8	1.8
		Spent Sulphuric Acid	15	15
		HCL	0.5	0.5
8	Sulpho (V.S. OR O.A.V.S.)	V.S. (Acetanilide Base OR Ortho Anisedene)	0	3.8920
		KCL	0	1
		Oleum Acid 65%	0	0.5
		Sulphuric Acid 98%	0	2.2147
TOTAL			251.662	250.2687

202

Annexure 4B



Hariom Acid & Chemical Pvt. Ltd.

Acid & Chemicals Traders

CIN : U74999GJ2020PTC114111

GSTIN : 24AAFCH2992C1ZR

PAN : AAFCH2992C

TAX INVOICE

(ORIGINAL FOR RECIPIENT)

HARIOM ACID & CHEMICAL PRIVATE LIMITED Plot 12 & 15, Amba Estate, Opp. Chhach Kendra, Vinzol Patiya, Ahmedabad-382445. GSTIN/UIN: 24AAFCH2992C1ZR State Name : Gujarat, Code : 24 E-Mail : hariomacid2020@gmail.com		Invoice No. 3156/2022-23	Dated 18-Jan-23
Consignee (Ship to) Dhanlaxmi Industries U - II Survey No.328/1, Village - Lunej, Shokhda, G. I.D.C, Khambhat, Gujarat GSTIN/UIN : 24ACTPP0478N1ZU PAN/IT No : ACTPP0478N State Name : Gujarat, Code : 24		Delivery Note 3156/2022-23	Mode/Terms of Payment 30 Days
Buyer (Bill to) Dhanlaxmi Industries U - II Survey No.328/1, Village - Lunej, Shokhda, G. I.D.C, Khambhat, Gujarat GSTIN/UIN : 24ACTPP0478N1ZU PAN/IT No : ACTPP0478N State Name : Gujarat, Code : 24 Place of Supply : Gujarat		Buyer's Order No.	Dated
		Dispatch Doc No.	Delivery Note Date 18-Jan-23
		Dispatched through	Destination YOUR FACTORY
		Bill of Lading/LR-RR No.	Motor Vehicle No. GJ27TT9008
		Terms of Delivery	
			IRN : cacb6d69b5568801d378a5304-7994d02088817c63062bec5404-ebd571ff0f5fe Ack No. : 162313192005571 Ack Date : 18-Jan-23

Description of Goods	HSN/SAC	GST Rate	Quantity	Rate	per	Amount
HYDROCHLORIC ACID	28061000	18 %	20.910 MT.	15.00	MT.	313.65
						28.23
						28.23
						(-).0.11
PAID CASH / CHQ. / RTGS No. 01703 Dt. 13-3-23 Rs. 1,257/- Bank. JAGI						
Less :						
CGST (CENTRAL TAX) SGST (STATE TAX) Round Off						
Total						₹ 370.00

Amount Chargeable (in words)

E. & O.E

Rupees Three Hundred Seventy Only

Company's Bank Details

A/c Holder's Name : HARIOM ACID & CHEMICAL PVT LTD

Bank Name : HDFC Bank Ltd

A/c No. : 50200049872731

Branch & IFS Code : RAMOL CROSS ROAD & HDFC0000971

Company's PAN : AAFCH2992C

Declaration

We declare that this invoice shows the actual price of the goods described and that all particulars are true and correct. Interest @18% p.a. will be charged on the amount remaining unpaid after due date.

Our MSME UDYAM-GJ-01-0034807.

for HARIOM ACID & CHEMICAL PRIVATE LIMITED

Digitally signed by PATEL MITESHKUMAR CHIMANLAL

Date: 2023.01.19 08:31:10 +05:30

Reason: I Approve

Location: Ahmedabad

Authorised Signatory

SUBJECT TO AHMEDABAD JURISDICTION

This is a Computer Generated Invoice



Sample ID:388190 - Analysis Completion:06/06/2023

Dyes and Dye- Intermediates / LAB Inward : 48083

TC-5287

NABL Accredited Testing Laboratory Vide Certificate Number : TC-5287

TEST REPORT

Annexure 4C

Test Report No. : 48083

Date: 08/06/2023

1. Name of the Customer : Dhanlaxmi Orgo Chem (Old Name: Dinesh Allorga Ltd.) - 29636
 2. Address : 328/01,Vaduchi Mata Road,-
 Lunej-388620, Taluka : Khambhat, District : Anand, GIDC : Not In Gidc
 3. Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)
 4. Sample Collected By : M.J.Makwana,SSA
 5. Quantity of Sample Received : 05 Liter.
 6. Code No. of the Sample : 388190
 7. Date & Time of Collection & Inwarding : 31/05/2023 , (1700 to 1700) & 01/06/2023
 8. Date of Start & Completion of Analysis : 01/06/2023 & 06/06/2023
 9. Sampling Point : From two u/g HDPE barrels located between W/w collection tank & Filter press
 10. Flow Details (Remarks) within premises ~
 11. Mode of Disposal : ---
 12. Ultimate Receiving Body : ---
 13. Temperature on Collection : Evaporated into spray dryer
 14. Carboys Nos for : 30 & pH Range on pH Strip :@2 - 4
 15. Water Consumption & W.W.G (KLPD) : As per barcode & Color & Appearance :Dark brown-Turbid
 16. Parameter : Ind :17.600 , Dom :15.800 & Ind :13.900 , Dom :2.000

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	Temperature	Centigrade	IS: 3025 (Part – 9) – 1984(Reaffirmed 2006)	Ambient oC - 60 oC	30
2	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2017	1 – 14 pH value As or	2.05
3	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 – 200000 mg/L	234655
4	Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 – 10000 mg/L	4980
5	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Standa	1 - 2000 mg/l.	143.36
6	Chloride	mg/l	Argentometric method. (4500 Cl ⁻ B APHA Standard N	1 - 50000 mg/l	141547
7	Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	399
8	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	8023
9	Oil & Grease	mg/l	Liquid – Liquid Partition Gravimetric method. (5520 B	01 – 1000 mg/l	10.8
10	Phenolic Compounds	mg/l	4 Amino Antipyrene method without Chloroform Extra	0.1 – 50 mg/l	1.8
11	B.O.D (3 Days 27oC)	mg/l	3 – Day BOD test. (IS 3025 (Part 44) 1993 Reaffirm	05-50000 mg/l	2010

Laboratory Remarks : APPROVED. By:327-r.o_327 Dt.: 08/06/2023**B.M.PARMAR,SO**

Note :

- The results refer only to the tested samples and applicable parameters. Endorsement of products is neither inferred nor implied.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- 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.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
- Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
- Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



Sample ID:388190 - Analysis Completion:06/06/2023

Dyes and Dye- Intermediates / LAB Inward : 48083

TEST REPORT

Test Report No. : 48083

Date: 08/06/2023

1. Name of the Customer : Dhanlaxmi Orgo Chem (Old Name: Dinesh Allorga Ltd.) - 29636
2. Address : 328/01,Vaduchi Mata Road,-
Lunej-388620, Taluka : Khambhat, District : Anand, GIDC : Not In Gidc
3. Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)
4. Sample Collected By : M.J.Makwana,SSA
5. Quantity of Sample Received : 05 Liter.
6. Code No. of the Sample : 388190
7. Date & Time of Collection & Inwarding : 31/05/2023 , (1700 to 1700) & 01/06/2023
8. Date of Start & Completion of Analysis : 01/06/2023 & 06/06/2023
9. Sampling Point : From two u/g HDPE barrels located between W/w collection tank &
10. Flow Details (Remarks) : Filter press within premises ~
11. Mode of Disposal : ---
12. Ultimate Receiving Body : ---
13. Temperature on Collection : Evaporated into spray dryer
14. Carboys Nos for : 30 & pH Range on pH Strip :@2 - 4
: As per barcode & Color & Appearance :Dark brown-Turbid
15. Water Consumption & W.W.G (KLPD) : Ind :17.600 , Dom :15.800 & Ind :13.900 , Dom :2.000

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 23rd edi. 2017	2 - to 99 Hazen & 1-50	400
2	% ACIDITY	MG/L	-	-	50000 mg/l

Laboratory Remarks : APPROVED. By:327-r.o_327 Dt.: 08/06/2023

B.M.PARMAR,SO

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.



Annexure 4D

Certificate No. TC-10420

Test Report / Certificate		F/OPN/07 Issue No.: 01- Page 1 of 1	
Chemical Analysis Waste Water / Water			
Report / Certificate No.	SA/WAT/062301	Date and Time Of Sampling	01/06/2023
Date of Issue	02/06/2023	Sampling Location	---
Date of Test	02/06/2023	Sampling By	client
Date of receipt of sample	01/06/2023	Condition of the sample during the receipt	Satisfactory
Name and address of customer	M/s. DHANLAXMI ORGOCHEM PVT. LTD. Plot No. 328/01, Vaduchi Mata Road, Lunej, Khambhat, Dist. Anand.	Environment condition during the sampling	39.7 °C
Environment Condition during the test	25.5 °C	Sample Id	012306
Sample description	Waste water (Highly Acidic water)	Sample Packing	Plastic bottle
Sample Volume	2.0 lit		
Test Results			
Parameters	Test Method	Test Results	Unit
Acidity	IS 3025, Part-22	24.8	%
Total Suspended Solids	APHA 2540 D 23 rd Edition 2017	4.3	%
Chlorides (Cl)	APHA 4500 Cl B 23 rd Edition	20.7	%
Sulphate	APHA 4500 SO4 E 23 rd Edition	1.2	%
Remarks →			
<ul style="list-style-type: none"> • Test results relates to the sample tested only. • Test Report shall not be reproduced except in full, without written approval of the Laboratory. 			

Kinjal Patel
 Kinjal Patel
 (Authorized Signatory)

Report No.: SE/Liquid/062301**Date** : 02-06-2023**HYDROCHLORIC ACID ANALYSIS REPORT****Name Of The Company** : M/S. DHANLAXMI ORGOCHEM PVT.
LTD.**Address** : Plot No. 328/01, Vaduchi Mata Road,
Lunej, Khambhat, Dist. Anand.**Details of sample** : Hydrochloric acid**Sampling date** : 01.06.2023**Sample Collected By** : Client**Result**

SR. NO.	PARAMETER	UNIT	RESULTS
1.	Purity	%	27.6
2.	Acidity	%	24.8
3.	TSS (Total Suspended Solid)	%	4.3
4.	Chloride	%	20.7
5.	Sulphate	%	1.2

**FOR SUPREME ENVIROCARE****AUTHORIZED SIGNATORY**

E. PRODUCT WISE SPENT ACID GENERATION & REUSE

Sr. No.	Name of Product	Spent Acid Reuse			Spent Acid Generation		
		Existing (M.T.)	Change (M.T.)	Proposed (M.T.)	Existing (M.T.)	Change (M.T.)	Proposed (M.T.)
1	PCMC	0.00	0.00	0.00	5.69207	-5.69207	0.00
2	4/5 Sulpho Anthranilic Acid Hydrazone	0.00	0.00	0.00	0.00	0.00	0.00
3	BDSA	15.00	0.00	15.00	0.00	0.00	0.00
4	PNTOSA	13.00	0.00	13.00	26.00	0.00	26.00
5	DNSDA	0.00	0.00	0.00	0.00	0.00	0.00
6	2-PYRIDONE	12.60	0.00	12.60	7.60	0.00	7.60
7	PAABSA	15.0	0.00	15.00	0.00	0.00	0.00
8	Sulpho V.S./ O.A.V.S.	0.00	0.00	0.00	0.00	+5.6065	5.6065
	Total K.L./Month	55.60	0.00	55.60	39.29207	-0.08535	39.2065

N.B. The Reuse of Spent Acid is more than The Generation of Spent Acid.

સ્થળ તપાસની નિરીક્ષણ નોંધ

Annexure 5

આઈ ડી નં. 29636 કેટેગરી/સ્કેલ : R/S Latitude / Longitude : 22.348183/72.581644

શ્રીમાન,

આપશ્રીને જણાવવાનું કે આજ તા. 05/06/2023 ના રોજ આપશ્રીના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઈન્સપેક્શન કરેલ છે. જે દરમ્યાન હવા/પાણી/જોખમી કચરા/ - ના 0/0/0/- ના નમુના પૃથ્થકરણ અર્થે એકત્રીત કરેલ છે.

આપશ્રીના એકમની મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ / ક્ષતિઓ જોવા/જાણવા મળેલ છે. જે આધારે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને /અથવા કાયદાકીય પગલાં લેતા અને / અથવા પર્યાવરણ નુકશાન વળતર લેતા પહેલા કુદરતી ન્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખીતમાં સ્થળસ્થિતિ / મુદ્દાઓ / સૂચનાઓ આપવામાં આવે છે.

આ પરત્વે આપશ્રી નીચે લેખીતમાં રજુઆત કરી શકો છો અથવા લેખીત મુલાકાતો/સ્પષ્ટતા/પુર્તતા અહેવાલ કામકાજના દિન-03 માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખીતમાં અથવા XGN પર અથવા E-mail થી રજુ કરવા નોટીસ આપવામાં આવેલ છે.

સ્થળ તપાસ દરમ્યાન જોવા મળેલ સ્થળસ્થિતિ / ત્રુટીઓ / ક્ષતિઓ / ખામીઓ. (Co.A.No. 17/2023)

- 1) સંદર મુલાકાત તા. 31/5/23 ના NCT order સંદર્ભે જિલ્લા મેજિસ્ટ્રી અને સ્ટ્રી પ્રોપીયટર, દે. CPCB ની હાજરીમાં કરવામાં આવેલ (0.76 m) અવધિ
- 2) મુલાકાત દરમ્યાન આપના એકમની બાહિરીવલમાંથી 2.10" ફુટ ની પાઈપલાઈન બહાર તરફ આવતી જોવા મળેલ જેને પાસ્ટીકો કોથલીથી બંધ કરેલ જોવા મળેલ.
- 3) એકમની સંદર પ્લાન્ટમાં RCC સ્લેબ નરેલ રાઈ પાઈપલાઈનનું વ્ગ સ્ટ્રેસ્ટર મળવા માટે CFR study કરાવવો.
- 4) EHV ન્યુટ્રલાઈઝર કરવા વપરાતા ન્યુટ્રલાઈઝરેશન એજન્ટના વપરાશની વિગતો ચલાવવા સાથે આપવી. (છેલ્લા એક વર્ષની)
- 5) સ્પ્રેડાયર એપરેશન માટે - ele. bill, logbook, energy meter રાજીતની વિગતો આપવી.
- 6) છેલ્લા ત્રણ વર્ષના Env. સ્ટ્રેસ્ટર form 7, Annual report form 4 ઉત્પાદનની વિગતો અને સ્પેન્ડ એરિસ રજીસ્ટ્રેશન અને સેનસરની વિગતો આપવી.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડના નામે અને વતી :
 અધિકારીઓના નામ, હોદ્દો અને સહી :

N. D. Ajmera
 Regional officer

મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનિધીની રજુઆત : (જે લાગુ પડે તેની સામે સહી કરવી)

મુલાકાત દરમ્યાન અધિકારીશ્રીઓએ 6 મુદ્દાઓ માટે સ્થળસ્થિતિ/સૂચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે. જેમાં

(૧) આ સ્થળસ્થિતિ સૂચનાઓ સાથે હું નીચે સહી કરનાર સંપૂર્ણ સહમત છું.

(૨) જેમાં દર્શાવેલ સ્થળસ્થિતિ / સૂચનાઓમાંથી મુદ્દા નં. 2 સાથે હું નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજુઆત છે.

એકમના પ્રતિનિધિ/ આ નોંધ મેળવનારનું નામ, હોદ્દો અને સહી :
 Mr. Gautambhai Pate

તા. 05/06/2023 રચના દાવજી રજીસ્ટ્રેશન નં. 2023/2023 (Proprietor)
 મિ. ગૌતામભાઈ પટેલ, રજીસ્ટ્રેશન નં. 2023/2023, પા. 1/5, Dhanlaxmi Orgo



તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

નં :

FD- 29636

પાણી અધિનિયમ ૧૯૭૪ ની કલમ - ૨૩, હવા અધિનિયમ ૧૯૮૧ ની કલમ - ૨૪ અને પર્યાવરણ (સુરક્ષા) અધિનિયમ-૧૯૮૬ ની કલમ - ૧૦ હેઠળ અમોને મળેલ સત્તાની રૂએ અમો નીચે સહી કરનાર અમોને જરૂરી લાગે તેની સહાય લઈને તમામ સમયે નીચેના હેતુઓ માટે આપની જગ્યામાં દાખલ થવાનો અને તપાસ કરવાનો અધિકાર ધરાવીએ છીએ.

- (૧) અમોને સોંપેલા રાજ્ય બોર્ડ-કેન્દ્ર સરકારનાં કાર્ય બજાવવાના હેતુ માટે.
- (૨) આવા કોઈ કાર્યો બજાવવાના છે કે કેમ અને તેમ હોય તો કઈ રીતે તે બજાવવાના છે અથવા આ અધિનિયમ અથવા તે હેઠળ કરેલા નિયમોની અથવા આ અધિનિયમ હેઠળ બજાવેલી કોઈ નોટીસની, કરેલા કોઈ હુકમની, આદેશની અથવા આપેલા કોઈ અધિકારપત્રની કોઈ જોગવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે.
- (૩) કોઈ સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુની તપાસ કરવા અને તેની કસોટી કરવાના હેતુ માટે અથવા જે જગ્યામાં તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલા નિયમો મુજબ કોઈ ગુનો કરવામાં આવ્યો છે અથવા થવાની તૈયારીમાં છે, તેવી કોઈ જગ્યાની ઝડપી લેવા માટે અને તેને એમ માનવાને કારણ હોય કે આ કાયદા કે તે હેઠળ કરેલ નિયમો હેઠળ શિક્ષાપાત્ર કોઈ ગુનો કર્યાનો પુરાવો, તેવા સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય મહત્વની વસ્તુ કબજે લેવા માટે અમે નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ / કારખાનામાં દાખલ થવાનો સમય : સવારના / સાંજના 10 : 00 AM તા. 05/06/2023

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે -

1. D. S. Gadhvi (District Collector)
(CIAS)
2. Pradeep Rey (SEE - CPCB)
3. D. N. Chhuchhar (Att, GPCB)
4. M. J. Makwana (SSA, GPCB)

પ્રતિ

.....
Dhanlaxmi Orgo Chem
Survey No. 328/1, At - Lunji
Vaduchi Mata Road,
Khambhat-388 620.
.....

બે નકલ મળેલ છે.

સહી :-

અધિકારીનું નામ :- N. D. Ajmer

હોદ્દો :- Regional Officer

આ સૂચના (નોટીસ) મેળવનારની સહી :-

Mr. Gantambhai Maneklal Patel
Proprietor.

TRANSLATION OF NOTICE OF ENTRY DATED 05/06/2023.**First Page**

ID-29636

Entry Time 10.00 A.M.

dated 05/06/2023 Exit Time 2.30 P.M.

1. Mr. D. S. Gadhvi (District Collector) (IAS)
2. Pradeep Raj (SEE-CPCB)
3. D. N. Chhuchhar (AEE, GPCB)
4. M. J. Makwana (SSA, GPCB)

Dhanlaxmi Orgo Chem

Signed

Address Khambhat

Name of Officer: - N. D. Ajmera

Mr. Gautam Maneklal Patel

Designation: - Regional Officer

Signed.

TRANSLATION OF NOTICE OF ENTRY DATED 05/06/2023.**Second Page**

I.D. No. 29636 Category/Scale: R/S Latitude/ Longitude: 22.348183/72.581644

During site visit noticed site position/defects/Discrepancies. (O.A. No. 17 of 2023)

- 1) This visit is with reference to order dated 31/5/23 of NGT in presence of District Magistrate & Shri Pradeep Raj, SEE, CPCB.
- 2) During visit from your boundary wall 2feet & 10 inches pipeline found towards outside which was closed & tied with plastic bag.
- 3) Inside the unit due to RCC slab for underground status of pipeline get GPR study.
- 4) Submit last one year's consumption of neutralization agent along with challan used to neutralize effluent.
- 5) Submit electric bill, log book, energy meter reading details of Spray Dryer operation.
- 6) Submit last three years Env. Statement Form-V, Annual Report Form IV, production details & Spent Acid generation and management.

Signed.

N. D. Ajmera
Regional Officer

At the time of visit 6 issues are mentioned out of which

- (1) I totally agree with the above noting.
- (2) I do not agree with Point No. 2 & my corresponding submission is as follows:
- (3) The plastic bag closed & tied to the pipeline was earlier sealed with cement concrete since more than 2 years due to verbal instruction of the then R.O., GPCB, Anand Mrs. Rekhaben which was broken by the GPCB officers on visit dated 31/05/2023 & ONLY the pipeline closed & tied with plastic bag was left at the place.

Signed.

Gautambhai Patel

Proprietor

M/s. Dhanlaxmi Orgo Chem.

ਬੇ ਪ੍ਰਮ ਸਾਂਚਾ.

ਕਾਇਕਸ਼ਾਨ ਪਾਗਲ

ਸੇਰੀ ੨੬.

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Annexure 7

DHANLAXMI ORGO CHEM

SURVEY NO. : 328/1, Vaduchi Mata Road, AT. : LUNEJ, KHAMBHAT - 388 620. DIST. : ANAND

MOBILE : 98250 34098 | EMAIL - dhanlaxmiind4@gmail.com | Website - www.dhanlaxmiindustries.co.in

12/06/2023.

To,
The Nodal Officer (Regional Officer),
NGT Appointed Committee,
C.O. Gujarat Pollution Control Board,
2nd Floor,
Bardanwala Complex,
Dr. Cook Road,
Anand.

Sub: - Corrective compliance of the Notice of Entry issued during the above referred committee visit dated 05/06/2023 as per Hon'ble NGT Order dated 31/05/2023 in I.A. No. 129/2023 of O.A. No. 17/2023.

Ref: - Earlier GPCB R.O. officers visit dated 31/05/2023 within one & half hour immediately after dictation of order by Hon'ble NGT Legal Expert & our compliance submission dated 02/06/2023 handed over personally to all three committee members during above visit dated 05/06/2023.

Kind Attention: - Mrs. Nehal Ajmera.

Respected Madam,

With reference to the above we submit our compliance as follows: -

- 1) Yes the above visit was after the above referred order of Hon'ble NGT in august presence of Hon'ble District Magistrate Mr.D.S.Gadhvi, CPCB SEE Mr. Pradeep Raj, GPCB, Anand R.O. officers Mrs. D.N.Chhuchar (A.E.E.) & Mr. M.J.Makwana (S.S.A.).
- 2) The mentioned pipeline from outside our boundary wall which was tied with plastic bag was originally also sealed with cement/concrete which the R.O. officers broke on 31/05/2023. This sealed end with plastic bag was totally dry & NO further outlet pipeline ahead of that end outside our premises was NOT found. We enclose approximately 13 photographs from different angles confirming that approximately 2 feet 10 inch pipe piece tied with plastic bag had NO further continuity as mentioned



DHANLAXMI ORGO CHEM

SURVEY NO. : 328/1, Vaduchi Mata Road, AT. : LUNEJ, KHAMBHAT - 388 620. DIST. : ANAND

MOBILE : 98250 34098 | EMAIL - dhanlaxmiind4@gmail.com | Website - www.dhanlaxmiindustries.co.in

above. We were shocked when earlier visit dated 31/05/2023 was hurriedly done & which also didn't leave the pipeline end as it was existing since more than two years after disconnection, removal after instruction of the then R.O. Mrs. Rekahben.

As NO notable evidence of the existence of the pipeline was possible they started finding other probable noncompliance mainly they instructed our labour to empty the nonuse day tank consisting of two underground HCL HDPE drums. As due to closure since more than two months ONLY three labourers were available, hence the R.O. used her good office & got more three outside labourers from another nearby factory.

After approximately three hours both the above drums were emptied & NO noncompliance was found. We enclose twelve photographs & combined video of both above. The analytical report of the sample of both the drums filed in another drum is HCl (Annexure-A) as shown in the photographs & videography are enclosed. This proves the vindictive attitude & vengeance towards our industry.

- 3) As per the instruction we have approached & entrusted the GPR study to Geo Carte Radar Technology Pvt. Ltd., Research Park, IIT Gandhinagar & we enclose the report of even date for your consideration which clearly mentions **nonexistence** of any black coloured HDPE pipeline inside our premises. We enclose the Xerox of report & one loose page along with it.

In light of above kindly submit the committee report to The Hon'ble NGT & oblige.

Thanking you,

For,

Dhanlaxmi Orgochem,

Gautam,
Gautam Patel.

12/06/23
Gujarat Pollution Control Board
Head Office
Sector No.-10-A,
Gandhinagar-382010

S.R.P
12/6/23
POST RECEIVED
GUJARAT POLLUTION CONTROL BOARD
ANAND

C.C.: -

- Respected District Magistrate Mr. D.S.Gadhvi
- S.E.E./ CPCB, Vadodara Mr. Pradeep Raj.
- Unit Head (Anand), GPCB, Gandhinagar.

Received copy

केन्द्रीय प्रदूषण नियंत्रण बोर्ड
(पर्यावरण, वन एवं ज.प. मंत्रालय, भारत सरकार)
क्षेत्रीय निदेशालय (पश्चिम), "परिवेश भवन,
वार्ड कार्यालय नं.10 के पास, सुभानपुरा,
वडोदरा-390 023.

12/6/23
पी.ओ.डु क्लेक्टर, आणंद



Certificate No. TC-10420

Test Report / Certificate	F/OPN/07 Issue No.: 01 Page 1 of 1
Chemical Analysis Waste Water / Water	

Report / Certificate No.	SA/WAT/062305	Date and Time Of Sampling	05/06/2023 01:30 pm
Date of Issue	06/06/2023	Sampling Location	---
Date of Test	06/06/2023	Sampling By	client
Date of receipt of sample	05/06/2023	Condition of the sample during the receipt	Satisfactory
Name and address of customer	M/s. DHANLAXMI ORGOCHEM PVT. LTD. Plot No. 328/01, Vaduchi Mata Road, Lunej, Khambhat, Dist. Anand.	Environment condition during the sampling	38.6 °C
Environment Condition during the test	25.2 °C	Sample Id	052306
Sample description	Waste water (Highly Acidic water)	Sample Packing	Plastic bottle
Sample Volume	2.0 lit	Test Results	
Parameters	Test Method	Test Results	Unit
Acidity	IS 3025, Part-22	22.6	%
Total Suspended Solids	APHA 2540 D 23 rd Edition 2017	3.9	%
Chlorides (Cl)	APHA 4500 Cl B 23 rd Edition	18.5	%
Sulphate	APHA 4500 SO4 E 23 rd Edition	1.1	%
Remarks →			
<ul style="list-style-type: none"> • Test results relates to the sample tested only. • Test Report shall not be reproduced except in full, without written approval of the Laboratory. 			



Kinjal Patel
(Authorized Signatory)

Report No.: SE/Liquid/062303**Date** : 06-06-2023

HYDROCHLORIC ACID ANALYSIS REPORT

Name Of The Company : M/S. DHANLAXMI ORGOCHEM PVT. LTD.

Address : Plot No. 328/01, Vaduchi Mata Road, Lunej, Khambhat, Dist. Anand.

Details of sample : Hydrochloric acid

Sampling date : 05.06.2023

Sample Collected By : Client

Result

SR. NO.	PARAMETER	UNIT	RESULTS
1.	Purity	%	26.8
2.	Acidity	%	22.6
3.	TSS (Total Suspended Solid)	%	3.9
4.	Chloride	%	18.5
5.	Sulphate	%	1.1

**FOR SUPREME ENVIROCARE****AUTHORIZED SIGNATORY**

REPORT
ON
UNDERGROUND UTILITY MAPPING
USING GPR

AT DHANLAXMI ORGOCHEM

KHAMBHAT GUJARAT



GEOCARTE RADAR TECHNOLOGY
PRIVATE LIMITED



Contents

1	Introduction	1
2	Scope of Project	5
3	Layout of Study Area	5
4	Methodology	8
4.1	Data Acquisition	8
4.2	Data Processing	8
4.3	Feature Interpretations	9
4.3.1	Feature Interpretation	11
5	Conclusion	13
	Annexure I	14



List of Figures

1	Electromagnetic spectrum presenting GPR frequency range	1
2	Working principle of GPR	2
3	Components of GPR System	3
4	General layout depicting locations of area surveyed	6
5	Sample layout of survey execution at M/S Dhanlaxmi Orgochem, Lunej village, Khambhat, Gujarat	7
6	Plan view with marked interpretations at M/S Dhanlaxmi Orgochem, Lunej village, Khambhat, Gujarat	12
7	Subsurface radargrams depicting reflection corresponding to the observed fea- tures at M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat	15



1 Introduction

Ground Penetrating Radar (GPR)

Ground Penetrating Radar is one of the useful non-destructive geophysical method for sub-surface investigation. It is based on Electromagnetic technique and provides high resolution subsurface profiles which is used to detect subsurface features. It can be used to detect metallic or non-metallic objects in various domains like, soil, water, ice, concrete etc. GPR utilizes high frequency electromagnetic waves and occupies the specific portion of the electromagnetic spectrum as shown in Fig 1. The depth of penetration for a GPR ranges from a few cen-

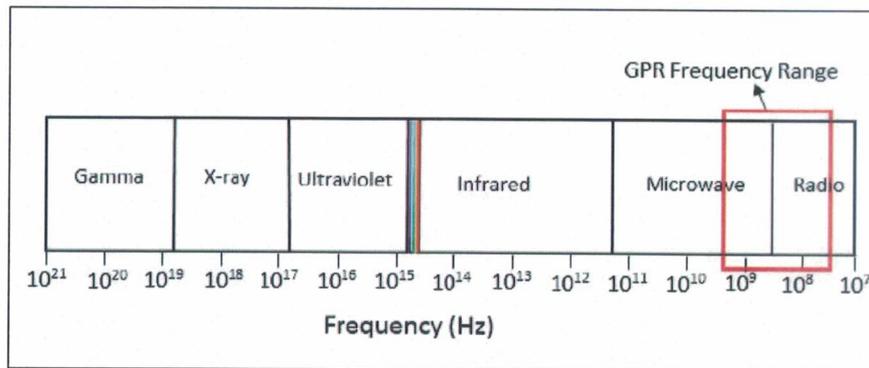


Figure 1: Electromagnetic spectrum presenting GPR frequency range

timeters to larger depth of around 15-20 meters. The success of the GPR survey to a great extent depends on soil condition like, clay content, sediment mineralogy, moisture content, depth of target, electromagnetic interference, etc. GPR can be effectively used for the survey with adequate understanding, the modifications in data acquisition and processing according the site conditions.





Working Principle of GPR

GPR operates by transmitting microwave electromagnetic energy down into the subsurface. When EM waves encounter the interface having different electric or magnetic properties, the portion of the wave is reflected, refracted and rest is transmitted. The pictorial form of the basic principle of GPR is represented in Fig 2.

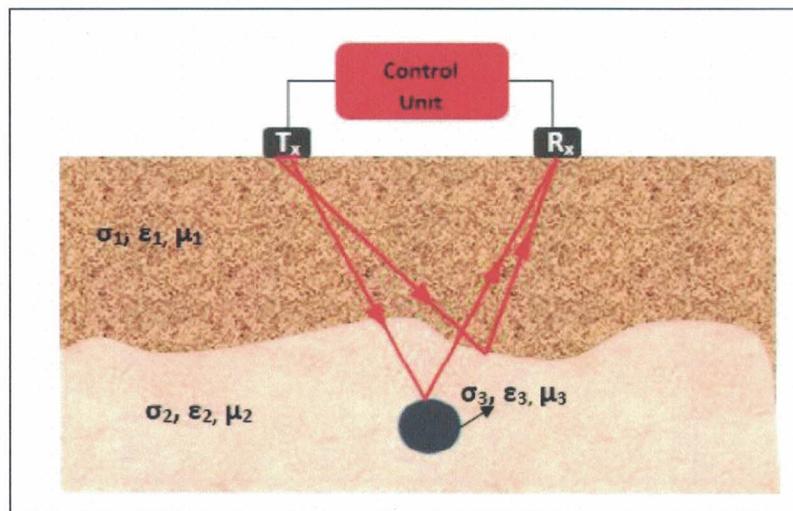


Figure 2: Working principle of GPR

The electric and magnetic properties include the electrical conductivity (σ), the magnetic permeability (μ) and the dielectric permittivity (ϵ). Electrical conductivity is responsible for the attenuation of the wave in the medium, hence controls the depth of penetration of EM waves. Dielectric permittivity is the most important property responsible for the reflection of the EM waves. Moreover, the amplitude of the reflected wave at the interface is directly proportional to the reflection coefficient given by Equation: (1.1). It is clear from the equation that the amplitude of the reflected wave at the interface is directly proportion to the dielectric contrast.

$$R = \frac{\sqrt{\epsilon_1} - \sqrt{\epsilon_2}}{\sqrt{\epsilon_1} + \sqrt{\epsilon_2}} \quad (1)$$

where, R is the reflection coefficient whereas ϵ_1 and ϵ_2 are the dielectric constant of medium



one and two, respectively. The reflected signal will be recorded as the two-way travel time vs. amplitude by receiving antenna. The recorded two-way travel time can be converted to depth using medium velocity. Medium velocity can be calculated using equation (2)

$$\nu = \frac{c}{\sqrt{\epsilon}} \quad (2)$$

where, c is velocity of light ($3 \times 10^8 \text{m}=\text{sec}$) and ϵ is the dielectric constant of the medium. Typically GPR system consists of control unit with computer screen, antenna, and power supply.

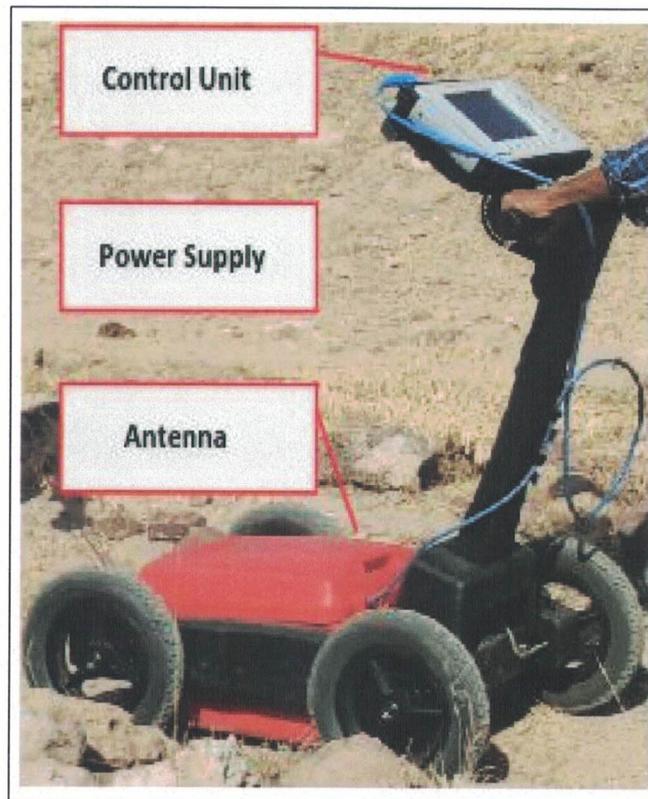


Figure 3: Components of GPR System



Although GPR is found to be advantageous for subsurface investigation for numerous purposes. However, various factors limit the GPR capability in investigating subsurface. Some-



GeoCarte Radar Technology Pvt. Ltd.

times signal strength is too weak to locate the target in time domain even after conventional processing using the best of available tools. Therefore, a new method is being developed to localize the target object in weak signal GPR profile, which cannot be localized otherwise in profile after conventional processing.





2 Scope of Project

The GPR survey has been carried out at the proposed area of approximate 120 sq. m. inside M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat in the month of June 2023. The scope of the project includes the mapping of all the underground utilities (including the Black color HDPE pipeline which was visually observed outside the premises and expected to be the Ghost pipe carrying the acidic effluent from the industry into the nearby canal), upto the depth of 3 m using non-destructive Ground Penetrating Radar (GPR) technology.

Considering the client's requirements and the expected depth of the utilities, the area has been surveyed using 400 MHz center frequency antenna mounted with GSSI SIR 3000 GPR system to cover the depth up to 3 m with a fair resolution. The results after analysis and interpretation of the data from the survey executed are discussed in this report. This report contains the layout of the area surveyed, data collection on-site, data processing, and few sample radargrams showing a few prominent reflections observed in the data.

3 Layout of Study Area

The survey was executed at the storage shed (10.4 m X 11 m) of M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat using 400 MHz center frequency antenna mounted with GSSI SIR 3000 GPR system to cover the appropriate depth with a fair resolution. The general layout suggesting the location of the area surveyed has been shown in Figure 4. The sample layout of the area surveyed including the details of the survey execution has been shown in Figure 5. The orange lines in the figure represent the transect profiles of 400 MHz data. The numbers on these profiles represent the profile numbers and their position depicts the start point of the profile. Data was collected at an approximate effective spacing of 1 m up to maximum accessibility.

Appropriate PPE and barricade were used for the safety of the team and machine on site.



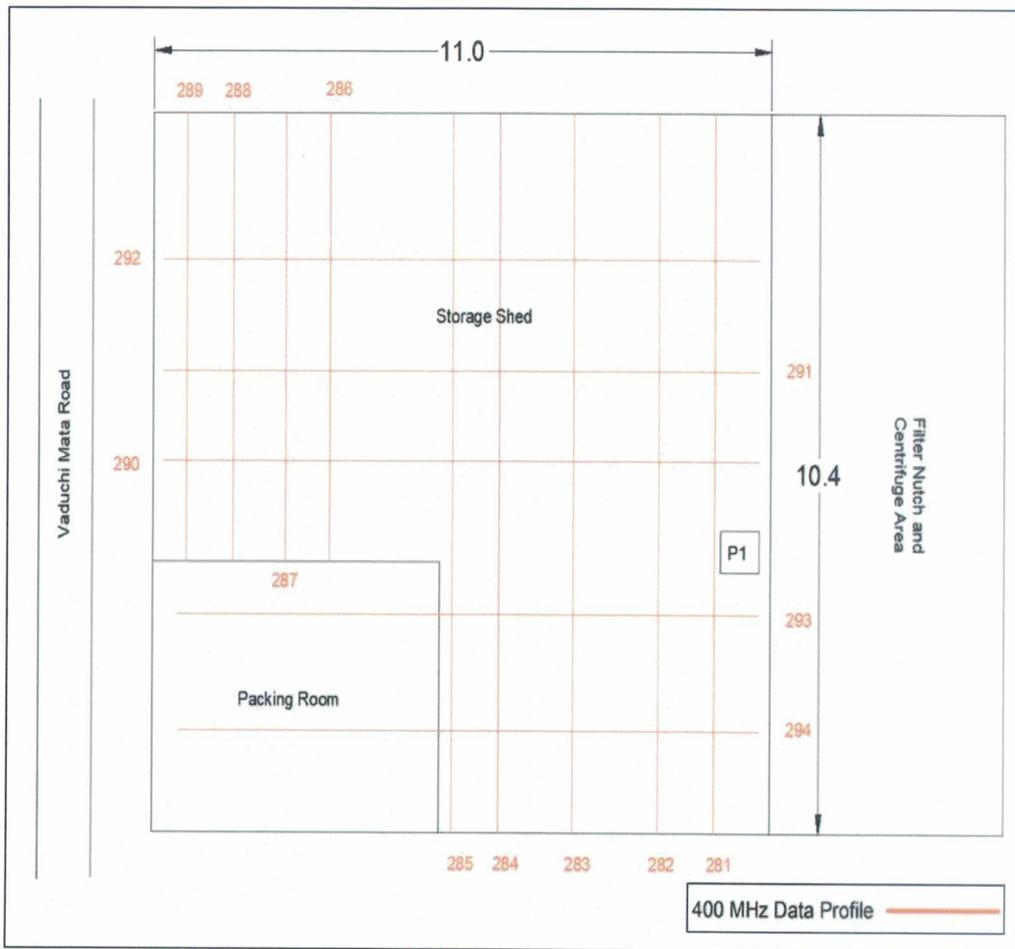


Figure 5: Sample layout of survey execution at M/S Dhanlaxmi Orgochem, Lunej village, Khambhat, Gujarat





4 Methodology

The whole GPR survey of the area was conducted by adopting the following steps:

1. Data acquisition
2. Data processing
3. Features interpretation

Each of the above steps has been discussed in detail in the subsequent sections.

4.1 Data Acquisition

The proposed site has been surveyed using GPR in the month of June 2023 using the GPR system, to map all the existing underground utilities. The area was scanned using 400 MHz and 200 MHz antennas equipped with GSSI SIR-4000 GPR system, to achieve the appropriate depth of penetration with a fair resolution. The expected depth of penetration with 400 MHz and 200 MHz antennas is around 6 m with fair resolution. With 400 MHz antenna, data was collected in distance mode with the time window of 60 ns, scans per unit 80, and transmission rate of 100 kHz, with the antenna in mono-static mode. The survey wheel was calibrated every time on the field to ensure the least possible error in the location of any underground target.

4.2 Data Processing

The acquired data from the field was in the raw form and could not be interpreted directly. Therefore, the raw data was processed adequately to make it interpretative. The data acquired in the field is processed using commercially available software RADAN 7. Primarily, time zero correction and background removal were applied to the whole acquired data. Besides, band pass filters of around 80 MHz-780 MHz for 400 MHz antenna which is decided based on the dominant frequency content obtained from spectrum in RADAN 7. Additionally, range gain





was applied along the depth appropriately to amplify the weak deeper reflections, using the commercial software RADAN 7 (GSSI).

The calibration of EM wave velocity for depth estimation is done by using Kirchoff's migration in Radan by fitting Ghost hyperbola. Hence, the dielectric constant of the medium is obtained to be around 6.2. The estimated velocity is fed to obtain the depth of the observed features. The whole data collected using respective antennas has been processed with respective specifications in similar fashion for the whole surveyed area.

4.3 Feature Interpretations

After the processing of the acquired data, each and every profile is analyzed to observe the feature reflections from the underground objects. The observed features of specific reflection pattern and depth are marked on its locations in the plan view. The repeating points of similar reflection pattern at particular depth were joined by a line to obtain the alignment of the utility. The interpretation of the location is discussed in next section in detail.

The number of utilities are interpreted and marked based on the GPR data, visible surface features and from gathered information from the people. These marked utilities can be categorized into different quality levels, QL-B, QL-C and QL-D, as per ASCE-3802 for SUE.

There are total 4 Quality levels defined in ASCE-3802, they are as follow:

1. Quality Level D (QL-D): Information derived from existing records or oral recollections from local people.
2. Quality Level C (QL-C): Information obtained by surveying and plotting visible above-ground utility features (like manholes) and by using professional judgment in correlating this information to quality level D information.
3. Quality Level B (QL-B): Information obtained through the application of appropriate subsurface non-destructive geophysical methods (like GPR) to determine the existence and approximate alignment and depth of subsurface utilities.





4. Quality Level A (QL-A): Precise horizontal and vertical location of utilities obtained by the actual exposure (or verification of previously exposed and surveyed utilities).

In this study, since the utilities are interpreted and mapped on the basis of the GPR survey data and on field observed surface features, all the observed utilities have been classified as QL-B, and QL-C utilities only. The sample Radargrams (subsurface profiles) showing different reflection patterns, which correspond to various interpreted utilities, are shown in the Annexure I.





4.3.1 Feature Interpretation

Figure: 6 shows the plan view of area surveyed with marked interpreted utilities. Following inferences can be made out from the figure:

- It can be observed from the figure 6, no utility (including the Black color HDPE pipe) has been found in the surveyed area.
- Further, two high amplitude features have been observed, and are marked with magenta color hatch in the drawing.
- These features have been named as H1 and H2 in the drawing and are found at the depth of 0.3 m and 0.5 m respectively, from the ground surface.
- However, there is a possibility of these feature being some kind of boulder, void, scrap material or any other target object as its reflections are not observed in parallel GPR profiles.
- Sample radargrams corresponding to these observed features have been presented in Figure 7 in Annexure I.



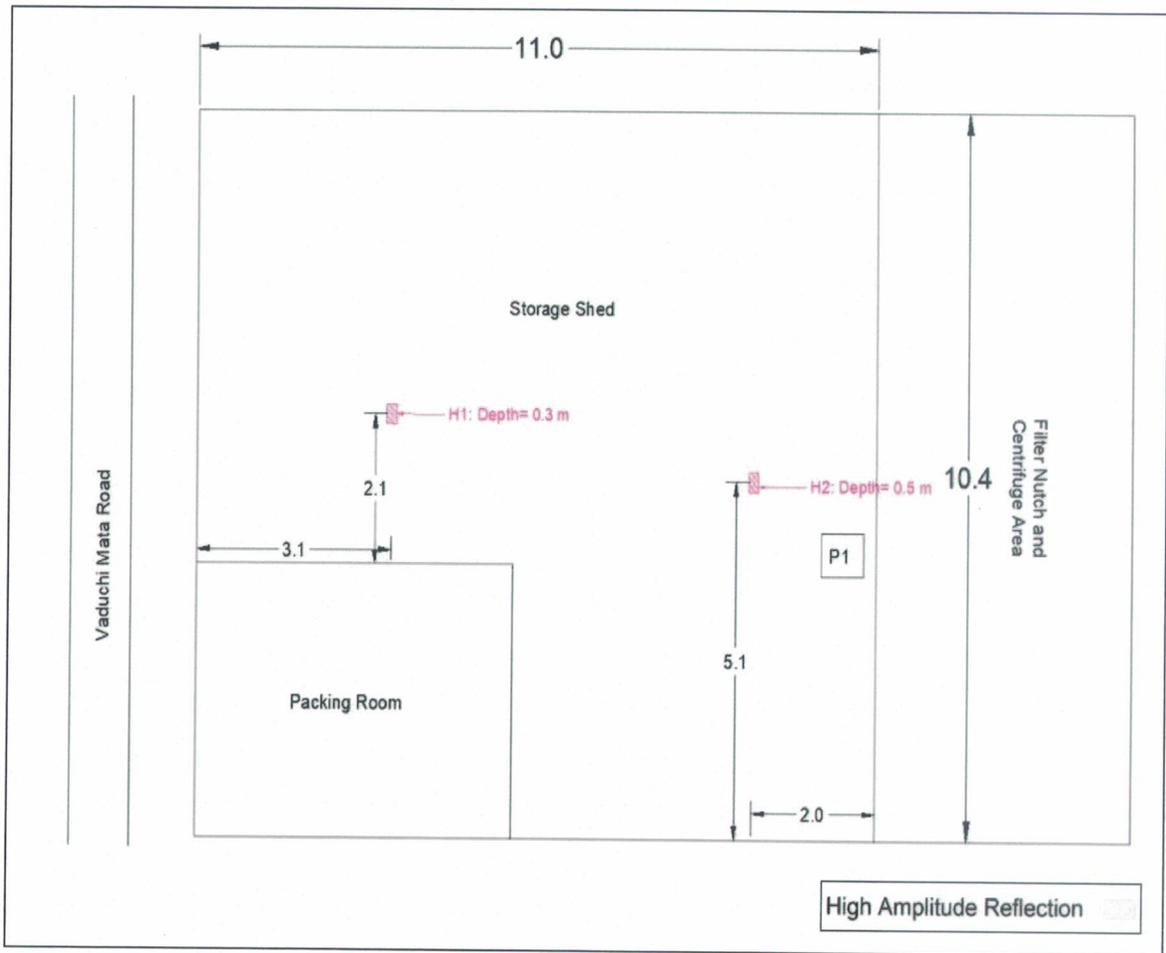


Figure 6: Plan view with marked interpretations at M/S Dhanlaxmi Orgochem, Lunej village, Khambhat, Gujarat





5 Conclusion

The GPR survey has been carried out at the proposed area of approximate 120 sq. m. inside M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat in the month of June 2023. The scope of the project includes the mapping of all the underground utilities (including the Black color HDPE pipeline which was visually observed outside the premises and expected to be the Ghost pipe carrying the acidic effluent from the industry into the nearby canal), upto the depth of 3 m using non-destructive Ground Penetrating Radar (GPR) technology.

The survey was conducted using 400 MHz antenna equipped with GSSI SIR-3000 GPR system. The data collected from the site has been processed appropriately and interpreted based on the observed features, surface features, and inputs from the local public and client-side. Following conclusions have been drawn from the survey results:

- No utility (including the Black HDPE pipe) have been found in the surveyed area.
- However, two high amplitude reflections have been observed at the depth of 0.3 m and 0.5 m, respectively from the ground surface.

Although the interpretations are made based on the available information and the observed features in GPR data, they do not imply the existence of those features with surety. Other methods like excavation need to be carried out at those located areas to confirm the existence of features.



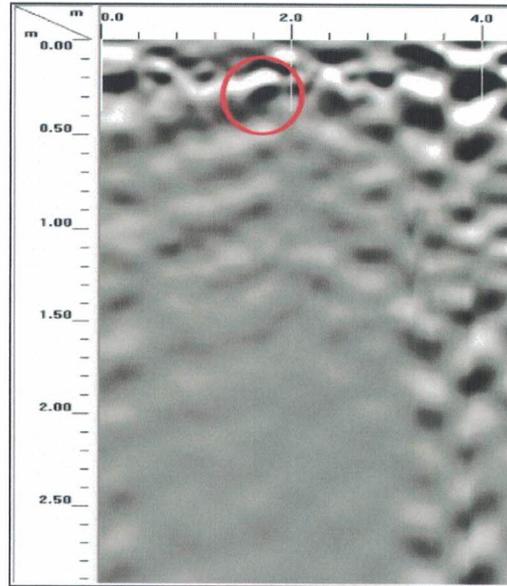


Annexure I

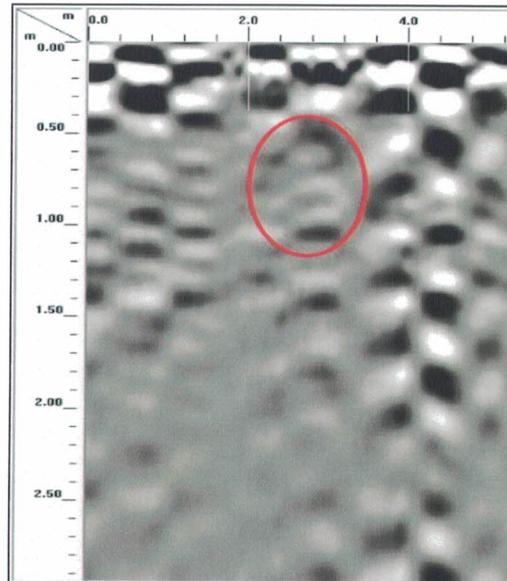
Sample Radargrams

Figure:7 represents the sample radargrams depicting the reflection patterns corresponding to the observed and interpreted features at M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat.





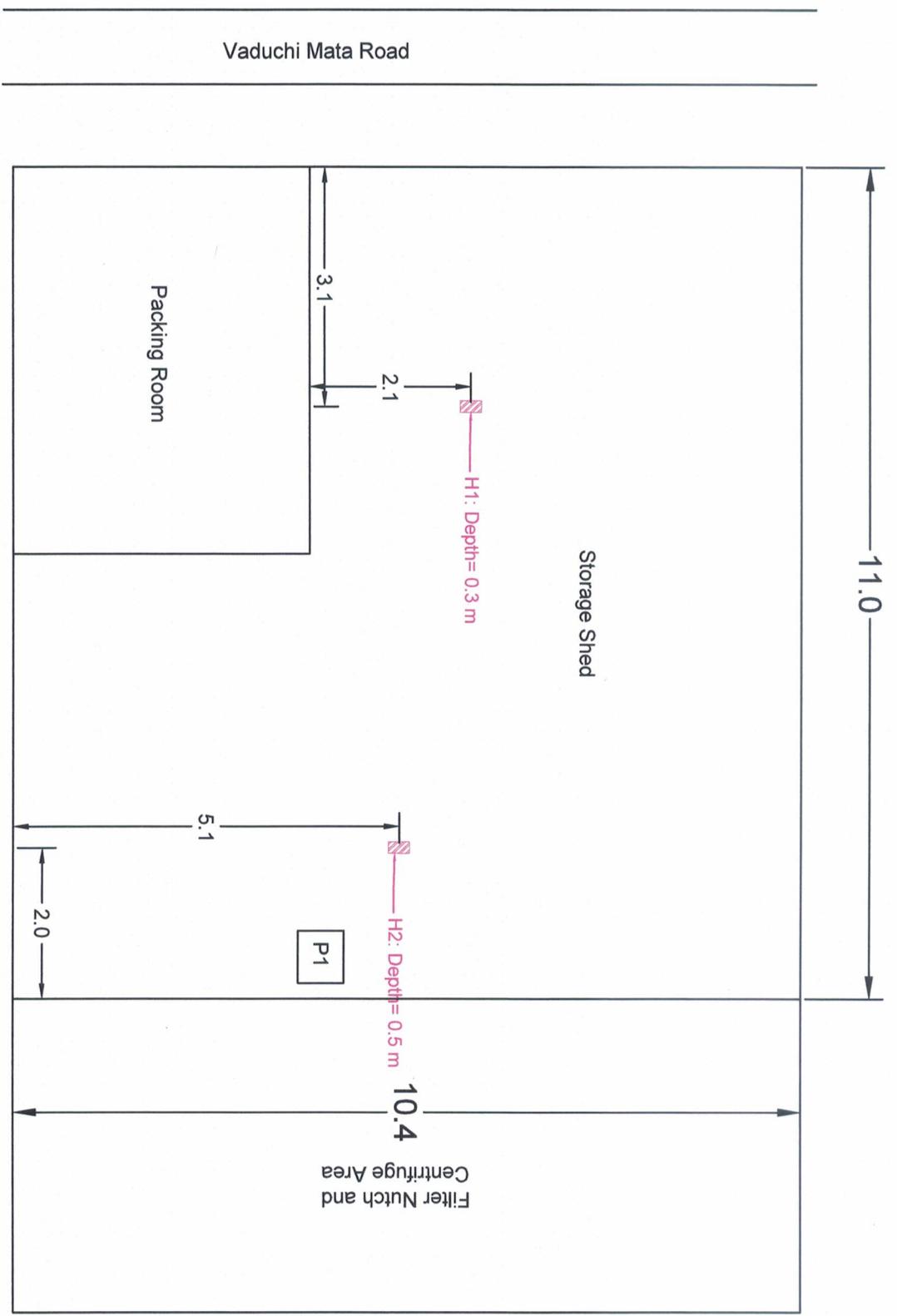
(a) H1



(b) H2

Figure 7: Subsurface radargrams depicting reflection corresponding to the observed features at M/S Dhanlaxmi Orgochem, village Lunej, Khambhat, Gujarat





LEGEND		
S. No	PARTICULARS	SYMBOL
1.	NON-METALLIC UTILITY	NM
2.	METALLIC UTILITY	M
3.	HIGH AMPITUDE REFLECTION	[Hatched Box]

 GEOCARTE RADAR TECHNOLOGY PVT. LTD.	
PROJECT NAME :-	UNDERGROUND UTILITY MAPPING USING GPR
CITY :-	Khamhat, Gujarat
PROPOSED LOCATION :-	M/S Dhanlaxmi Orgochem
CLIENT :-	M/S Dhanlaxmi Orgochem
DRG. NO. :-	GCRT-UT-DO-2023-001
DATE :-	12/06/2023