BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 1375 OF 2024

IN THE MATTER OF:

New item titled "Four endangered crocodile found dead in Rajasthan River experts wonder if pollution to blame" appearing in the Indian Express dated 06.12.2024

INDEX

	True copy of the reply dated 05.05.2025.	

RAJASTHAN STATE POLLUTION CONTROL BOARD

Through its Counsel

Nishant Awana/Ekta Kundu
Advocates
A-320, First Floor, Defence Colony, New Delhi-110024
Ph- 011-35550654, +91-7838760760
mail@nmalawchambers.in/nishantawana@outlook.com

Date: 19.05.2025
Place: New Delhi

NOTARY
ISHAQ MOHAMMED
Area KOTA (Raj.)
Regd. No. 1077
Exp. Dt. 16-01/2030
GOVT. OF INDIA

SERIAL NO. 9313
DATE : 19.12.25

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
IN
ORIGINAL APPLICATION NO. 1375 OF 2024

IN THE MATTER OF:

New item titled "Four endangered crocodile found dead in Rajasthan River experts wonder if pollution to blame" appearing in the Indian Express dated 06.12.2024

REPLY ON BEHALF OF RESPONDENT NO.2, I.E, RAJASTHAN STATE POLLUTION CONTROL BOARD

MOST RESPECTFULLY SHOWETH:

1. The present Reply is being filed by the Authorized Representative of the Respondent No.2 – Rajasthan State Pollution Control Board **(hereinafter referred to as "the Respondent Board")** in compliance with the directions passed by this Hon'ble Tribunal vide order dated 25.02.2025, arising out of the present Original Application.

2. The present Original Application has been registered "*suo moto*" by this Hon'ble Tribunal on the basis of news item titled as "Four endangered crocodile found dead in Rajasthan River experts wonder if pollution to blame" appearing in the Indian Express dated 06.12.2024, highlighting the unfortunate deaths of four endangered crocodiles in a river in Rajasthan, allegedly due to water pollution.

ATTESTED
19/12/25
ISHAQ MOHAMMAD
NOTARY, KOTA (RAJ.)

क्षेत्रीय अधिकारी
राजस्थान राज्य प्रदूषण
नियन्त्रण मण्डल, कोटा

3. In furtherance of the directions contained in the order dated 25.02.2025, the Respondent Board issued a letter dated 26.03.2025 to the Commissioner, Nagar Nigam (North/South), Kota, following by a reminder letter dated 12.05.2025, enclosing a copy of the said order and calling upon the authorities to expedite the completion of household sewage connections and ensure the diversion of all sewage drains to the Sewage Treatment Plant (STP), so as to avoid any discharge of untreated sewage into the Chandraloi River, which ultimately joins the Chambal River. A true copy of the letter dated 26.03.2025 and the reminder letter dated 12.05.2025are annexed herewith as **Annexure R2/1 (Colly)**.

4. Additionally, the Respondent Board issued communications to major industrial stakeholders in the vicinity. Letters dated 18.03.2025 and 19.03.2025, were sent to M/s Shriram Fertilizers & Chemicals, M/s Shri Ram Rayons (all plants), and M/s Shriram Vinyl & Chemicals (all plants), respectively, advising them to explore all possibilities for maximum reuse and recycling of treated wastewater, which is presently being discharged into the Kansua Nallah (a tributary of the Chandraloi River), and to submit a time-bound action plan accordingly. True copies of the said letters are annexed as **Annexure R2/2** and **Annexure R2/3**, respectively.

5. In response, M/s Shriram Fertilizers & Chemicals and M/s Shriram Vinyl & Chemical submitted replies dated 27.03.2025, wherein it was informed that the units have significantly reduced freshwater consumption and effluent discharge over the last several years. Specifically:

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NOTARY, KOTA (RAJ.)

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नियन्त्रण मण्डल, कोटा

a. *Freshwater consumption has been reduced from approximately 1600 m³/hr (2006–07) to 900 m³/hr (2024–25).*

b. *Effluent discharge has been reduced from 550 m³/hr (2006–07) to 250 m³/hr (2024–25).*

6. The said replies also detailed several wastewater reduction and recycling initiatives adopted in the last 5–10 years, including:

a. *Replacement of old power units with Zero Liquid Discharge (ZLD) compliant systems.*

b. *Installation of RO systems in various plants.*

c. *Internal reuse of treated wastewater in manufacturing processes, cooling towers, and horticulture.*

d. *Automation to regulate water consumption.*

e. *Increased Cycles of Concentration (COC) in cooling towers to reduce blowdown*

7. The industries have also proposed a phased plan to achieve ZLD status as follows:

Target Effluent Discharge	**Target Date**
Reduction to 200 m³/hr	March 2028
Further to 125 m³/hr	March 2031
Complete ZLD	March 2035

True copies of the replies dated 27.03.2025 are annexed as **Annexure R2/4.**

8. Similarly, M/s Shri Ram Rayons, in its reply dated 31.03.2025, informed that the unit has reduced freshwater consumption from 10,000 KLD to 6500–7500 KLD over the past 10 years. The current wastewater generation is approximately 5000 KLD, of which 1200–1500 KLD is recycled within the unit, and the remaining 3600–3800

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19/5/25
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KLD is discharged into Kansua Nallah. The following initiatives are being undertaken:

a. **Water Recovery Project** (350 KLD capacity) expected to reduce effluent generation by 315 KLD, to be completed by 31.07.2025.

b. **In-house Water Conservation Projects** aimed at saving 250 KLD through process optimization by 31.12.2025.

A copy of the reply dated 31.03.2025 is annexed as **Annexure R2/5**.

9. Subsequently, M/s Shri Ram Rayons submitted an additional reply dated **05.05.2025** to the Regional Officer, RSPCB, Kota, reiterating its commitment to reducing wastewater discharge and achieving Zero Liquid Discharge (ZLD). It was submitted that the unit has already reduced fresh water consumption from **10,000 KLD to 7,500 KLD** over the past decade, and currently generates approximately **5,000 KLD** of wastewater. Out of this, around **1,200 KLD** is being recycled/reused in cooling towers, process activities, and horticulture. The remaining discharge of approximately **3,800 KLD** is stated to be within the permissible limits under the Consent to Operate (CTO).

10. To further reduce wastewater generation, the unit has initiated two following major initiatives:

I. A **350 KLD Water Recovery Project** using membrane filtration and reverse osmosis (RO) technology, with civil work underway and completion targeted by **31.07.2025**. This system is expected to recover at least **315 KLD**, reducing wastewater discharge accordingly.

ATTESTED
19/5/25
ISHAQ MOHAMMAD
NOTARY, KOTA (RAJ.)

प्रतिलिपि
क्षेत्रीय अधिकारी
राजस्थान राज्य प्रदूषण
नियन्त्रण मण्डल, कोटा

II. Multiple **in-house water conservation measures**, expected to save an additional **250 KLD** by **31.12.2025** through process modifications.

11. Furthermore, the unit has proposed the following **phased targets** to achieve ZLD status:

I. Reduction from **3,925 KLD to 2,000 KLD** by **May 2030**,

II. Further reduction to **1,000 KLD** by **May 2035**, and

III. Achievement of **ZLD by May 2040**.

A true copy of the reply dated 05.05.2025 is annexed herewith as **Annexure R2/6**.

12. It is, however, respectfully submitted thatdespite issuance of the letter dated 26.03.2025, followed by a reminder letter dated 12.05.2025, by the Respondent Board, Nagar Nigam (North/South), Kota has not submitted any response or compliance report till date.

13. The present reply is being filed bona fide and in compliance with the directions of this Hon'ble Tribunal. The Respondent Board has proactively engaged with relevant stakeholders, issued appropriate directions, and continues to monitor the situation with utmost seriousness. The Board remains committed to ensuring that no untreated effluent or sewage is discharged into the natural water bodies, and that all environmental safeguards are implemented in letter and spirit.

14. The Respondent Board undertakes to provide any further information, documents, or affidavits as may be required or directed

ATTESTED
ISHAQ MOHAMMAD
NOTARY, KOTA (RAJ.)

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by this Hon'ble Tribunal and prays for liberty to do so at a later stage, if necessary.

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नियन्त्रण मण्डल, कोटा

RAJASTHAN STATE POLLUTION CONTROL BOARD

Through its Counsel

Nishant Awana/Ekta Kundu
Advocates
A-320, First Floor, Defence Colony, New Delhi-110024
Ph- 011-35550654, +91-7838760760
mail@nmalawchambers.in/nishantawana@outlook.com

Date: 19.05. .2025
Place: New Delhi

IDENTIFIED BY

ATTESTED
19/5/25
ISHAQ MOHAMMAD
NOTARY, KOTA (RAJ.)

SERIAL NO. ...
DATE : ... 19/5/25

NOTARY
ISHAQ MOHAMMED
Area KOTA (Raj.)
Regd. No. 1077
Exp. Dt. 16-01/2030
GOVT. OF INDIA

BEFORE THE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

IN

ORIGINAL APPLICATION NO. 1375 OF 2024

IN THE MATTER OF:

New item titled "Four endangered crocodile found dead in Rajasthan River experts wonder if pollution to blame" appearing in the Indian Express dated 06.12.2024

AFFIDAVIT

I, Yogyata Singh, D/o Sh. Sarvesh Kumar Singh, aged about 39 years, working as Regional Officer, RSPCBhaving office at Kota do hereby solemnly affirm and declare as under:

1. That I am the Officer in Charge for the above noted matter and have been duly authorized in this regard. I am well conversant with the facts of the case, and, hence, competent to affirm this affidavit.

2. That the contents of the accompanying reply have been drafted by my counsel under my instructions. Facts stated therein are true to my knowledge and the legal submissions made therein are based on the advice received and believed to be correct. Nothing material has been concealed therein.

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राज्य प्रदूषण
नियन्त्रण मण्डल, कोटा

DEPONENT

Verification:

IDENTIFIED BY

Verified at Kota on this 19th day of May2025, that the contents of the above affidavit are true and correct to my knowledge and belief and as per the official records available. I say that no part of it is false and nothing material has been concealed therefrom.

ATTESTED
19.5.25
ISHAQ MOHAMMAD
NOTARY, KOTA (RAJ.)

योग्यता
क्षेत्रीय अधिकारी
राज्य प्रदूषण
नियन्त्रण मण्डल, कोटा

DEPONENT

Rajasthan State Pollution Control Board
Headquarter, 4, Institutional Area, JhalanaDoongri, Jaipur-302004
Phone :0141-2711263,2716802 e-mail : member-secretary@rpcb.nic.in
RSPCB HelpLineNo. :0141-2710877

LiFE Lifestyle for Environment

Registered Post

F.14(Gen-69)/ RPCB/STP/Kota 1422-1424 Date: 26/3/2025

Commissioner,
Nagar Nigam Kota (North/ South),
Kota
Email: nnnorth.kota@rajasthan.gov.in
nnksouth@gmail.com

Sub.:- Expedite the completion of household sewage connection and divert all drains to STP- Reg.

Ref.:- i. Directions under section 33A of Water Act, 1974 issued vide letters dated 08.06.2022 & 15.02.2024
ii. Hon'ble NGT order dated 25.02.2025 in O.A number 1375/2024 (PB).

Sir,

As per the News item titled "Four endangered crocodile found dead in Rajasthan river expert wonder if pollution to blame" Hon'ble NGT has suo-moto taken the cognizance and registered the original application O.A number 1375/2024 (PB) and vide order dated 25.02.2025 has directed RSPCB to *"7. 9. .....Instruct Municipal Corporation, Kota to expedite the completion of household sewage connections and divert all drains to the STP. This will ensure that city sewage is properly treated and not discharged into the Chandraloi River, thereby improving water quality."*

Earlier, State Board in exercise of powers conferred under Section 33A of Water (Prevention and Control of Pollution) Act, 1974 (hereinafter referred to as the "Water Act") and in compliance of Hon'ble NGT order dated 02.01.2024 had issued directions to Nagar Nigam, Kota (North/ south) vide letters dated 08.06.2022 & 15.02.2024 with respect to the following:

i. To provide the adequate capacity of Sewage Treatment Plants (STP's) to cater the need of Kota district.
ii. To trap all the untrapped drains and divert them to STP's.
iii. Stop discharging the domestic sewage water treated/ untreated in chambal River or its tributaries.

However, the authorities have failed to comply with the directions and still untreated sewage is being discharged in chambal River or its tributaries. As per the report raw sewage is entering the Chandraloi River (which ultimately flows into Chambal River). Despite having sewerage treatment capacity, gaps in household connection leads to pollution.

In view of the above, you are directed *to expedite the completion of household sewage connections and divert all drains to the STP so as to ensure that city sewage is properly*

Rajasthan State Pollution Control Board
Headquarter, 4, Institutional Area, JhalanaDoongri, Jaipur-302004
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RSPCB HelpLineNo. :0141-2716877

treated and not discharged into the Chandraloi River (which ultimately flows into Chambal river), thereby improving water quality."

You are also directed to submit an action taken report covering status of house hold connection with the STP, Installed and utilization capacities of all 8 STPs along with supporting documents/evidence to this office before **09.04.2025.**

Yours sincerely,

(Sharda Pratap Singh)
Member Secretary

Copy to:-

i. P.S to the Principal Secretary, Local Self Government Department, GoR, Jaipur for information please.
ii. Master file, STP, RPCB, Jaipur.

Member Secretary

Rajasthan State Pollution Control Board

Headquarter, 4, Institutional Area, JhalanaDoongri, Jaipur-302004

Phone :0141-2711263,2716802 e-mail : member-secretary@rpcb.nic.in

RSPCB HelpLineNo. :0141-2716877

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F.14(Gen-69)/ RPCB/STP/Kota 186-189 Date: 19-05-2025

Reminder-1

Commissioner,
Nagar Nigam Kota (North/ South),
Kota
Email: nnnorth.kota@rajasthan.gov.in
nnksouth@gmail.com

Sub.:- Expedite the completion of household sewage connection and divert all drains to STP- Reg.

Ref.:- i. Directions under section 33A of Water Act, 1974 issued vide letters dated 08.06.2022 & 15.02.2024
ii. Hon'ble NGT order dated 25.02.2025 in O.A number 1375/2024 (PB).
iii. This office letter no. 1422 dated 26/03/2025

Sir,

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Rajasthan State Pollution Control Board

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RSPCB HelpLineNo. :0141-2716877

You are again directed to submit an action taken report covering status of house hold connection with the STP, Installed and utilization capacities of all 8 STPs along with supporting documents/evidence to this office before **16.05.2025.**

Yours sincerely,

-sd-
(Sharda Pratap Singh)
Member Secretary

Copy to:-

i. P.S to the Principal Secretary, Local Self Government Department, GoR, Jaipur for information please.
ii. Master file, STP, RPCB, Jaipur.

9/5/25
Member Secretary

Rajasthan State Pollution Control Board

Headquarter, 4, Institutional Area, Jhalana Doongri, Jaipur-302004
Phone : 0141- 2716804, 2716800 e-mail : member-secretary@rpcb.nic.in
Helpline No. : 0141-2716877

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F.Tech/PDF/ (Kota - 08)/ RPCB/ 301 Date: 18-03-25

M/s Shriram Fertilizers & Chemicals
Shriram Nagar, Tehsil-Ladpura,
District-Kota
Email – ddchaturvedi@dcmshriram.com

Sub: - i) Regarding NGT Original Application No. 1375/2024(PB), Suo Moto V/s State of Rajasthan & Ors.
ii) CTO issued on 16.12.2021.

Sir,

With reference to the above subject, in reference to NGT Original Application No. 1375/2024 (PB), Suo Moto V/s State of Rajasthan & Ors., it was directed that the industries shall explore the possibility of reuse/recycle of the treated waste water up to the maximum extent which is at present discharged into kansua nallah.

In view of the above, you are directed to submit time bound action plan to be adopted for reuse/recycle of the treated wastewater within 15 days of issuance of this letter.

Yours sincerely,

(Shashi Choudhary)
SEE & GIC (PDF)

Copy to:-
RO, RSPCB, Kota for information and necessary actions please.

SEE & GIC (PDF)

Rajasthan State Pollution Control Board

Headquarter, 4, Institutional Area, Jhalana Doongri, Jaipur-302004
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Helpline No. : 0141-2716877

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F.Tech (Gen-17) RPCB/CD/ 294-296 **Date:** 19/03/2025

1. **Shri Ram Rayons (All Plants)**
   Shri Ram Nagar, Tehsil Ladpura, Distt. Kota

2. **Shri Ram Vinyl & Chemical (All Plants)**
   Shri Ram Nagar, Tehsil Ladpura, Distt. Kota

Sub:- Regarding NGT Original Application No. 1375/2024(PB), Suo Moto V/s State of Rajasthan & Ors.

Sir,

With reference to the above subject, in reference to NGT Original Application No. 1375/2024(PB), Suo Moto V/s State of Rajasthan & Ors., it has been directed by Hon'ble Court that the industries shall explore the possibility of reuse/recycle of the treated waste water upto the maximum extent which is at present discharged into kansua nallah.

In view of the above, you are directed to submit time bound action plan to be adopted for reuse/recycle of the treated waste water within 15 days.

Yours sincerely,

प्रतिभा 19/03/25
(Pratibha Singh)
EE & GIC (CD)

Copy to RO, RSPCB, Kota for information and necessary action please. O/C

प्रतिभा 19/03/25
EE & GIC (CD)
O/C

Ref. No.: SFC/EPC/2.1/763 **Date: 27.03.2025**

The Member Secretary,
Rajasthan Pollution Control Board,
4, Jhalana Institutional Area,
Jhalana Doongri, Jaipur-302004, Rajasthan.

Kind Attn: Ms. Pratibha Singh, EE & GIC (CD)

Sub: Submission of Action Plan for Reuse/Recycle of Treated Wastewater

Ref: 1. NGT Original Application No. 1375/2024 (PB), Suo Moto V/s State of Rajasthan & Ors.
2. RPCB Letter No. F. Tech/(Gen-17)/RPCB/CD/294-296 dated 19.03.2025

Respected Madam,

With reference to the above subject and in compliance with the Hon'ble NGT's directive regarding the reuse/recycling of treated wastewater that is currently discharged from factory outlet, we would like to submit that our facility has undertaken significant measures to reuse and recycle water within our plants over last few years which has consequently led to significant reduction in freshwater consumption and effluent discharge.

We are pleased to inform that through various steps initiated, we have been able to reduce the fresh water and effluent discharge as follows.

- Freshwater consumption reduced from ~1600 m^3/hr (in 2006-07) to ~900 m^3/hr (2024-25).
- Effluent discharge reduced from ~550 m^3/hr (in 2006-07) to ~250 m^3/hr (2024-25).

In addition to above, the freshwater withdrawal agreements with Irrigation Deptt of Rajasthan Govt. have also been reduced from **25.0 Cusecs** / 2548 m3/hr (2013-14) to **11.995 Cusecs** / 1223 m3/hr KLD (2022-23).

Our facility has undertaken several, significant measures in past 05-10 years to reuse / recycle and reduce wastewater streams and to minimize freshwater consumption. The key highlights of our existing initiatives include:

- Replacement of old power plant units (P30 & P10) with new P66 featuring ZLD.
- Installed RO system (36 m^3/hr) in the Power Plant for effluent treatment and reuse.
- Expansion of Chlor-Alkali, PVC, Carbide and Fenesta plants without increasing water requirement.
- Installed RO system (25 m^3/hr) for effluent treatment and reuse / recycle Chlor-Alkali plant
- Increased recycling & reuse of wastewater within various plants. e.g.
    - Use of treated PVC wastewater in the carbide acetylene purification process, reducing freshwater consumption.
    - Use of Fertilizer plant wastewater in Acetylene generation & deashing of fly ash in power plant
    - Treated wastewater being used in coal dust suppression and horticulture
- Enhanced cooling tower efficiency by increasing Cycles of Concentration (COC).
- Use of treated STP water for gardening & horticulture
- Automation of processes to regulate water consumption effectively.

We are continuously evaluating the various measures for further increasing the reuse / recycle to water within our plants and have developed a time-bound action plan for implementing effective wastewater management strategies.

We are presently implementing following measures to reduce effluent generation from the factory from existing 250 m3/hr level to a level of 200 m3/hr by March 2028.

- **Increase recycling in carbide acetylene generator** (Utilization of treated effluent)
- **Optimize water use in cooling towers** (Water quality optimization to increase COC & reducing blowdown water)
- **Reduce effluent from acetylene generation** (Modify process parameters to minimize water requirement)
- **Membrane filtration in PVC plant for acidic effluent reduction**
- **Increase utilization of RO system in Chlor-Alkali plant**
- **Process water optimization through reuse / recycle /automation**

We are committed to bring down effluent generation the level of 200 m3/hr through implementation of all above proposed schemes.

Further in this regard, being a responsible corporate for conservation & protection of environment, we are endlessly exploring new schemes & treatment technologies for effluent reduction. We are hereby proposing following targets and time plan to achieve Zero Liquid Discharge status.

Treated Effluent Reduction	**Time Plan**
From 250 m3/hr to 200 m3/hr	March 2028
From 200 m3/hr to 125 m3/hr	March 2031
From 125 m3/hr to ZLD	March 2035

We are committed for ensuring all compliances with environmental norms / guidelines and for continuously enhancing our wastewater recycling and reuse capabilities.

This is submitted for your information and record please.

Thanking you,

Yours faithfully,

(Authorized Signatory)

CC.: RO, RSPCB, Kota

Ref. No.: SFC/EPC/2.1/764 **Date: 27.03.2025**

The Member Secretary,
Rajasthan Pollution Control Board,
4, Jhalana Institutional Area,
Jhalana Doongri, Jaipur-302004, Rajasthan.

Kind Attn: Ms. Shashi Choudhary, SEE & GIC (PDF)

Sub: Submission of Action Plan for Reuse/Recycle of Treated Wastewater

Ref: 1. NGT Original Application No. 1375/2024 (PB), Suo Moto V/s State of Rajasthan & Ors.
2. RPCB Letter No. F. Tech/PDF/(Kota-08)/RPCB/300 dated18.03.2025

Respected Madam,

With reference to the above subject and in compliance with the Hon'ble NGT's directive regarding the reuse/recycling of treated wastewater that is currently discharged from factory outlet, we would like to submit that our facility has undertaken significant measures to reuse and recycle water within our plants over last few years which has consequently led to significant reduction in freshwater consumption and effluent discharge.

We are pleased to inform that through various steps initiated, we have been able to reduce the fresh water and effluent discharge as follows.

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- **Reduce effluent from acetylene generation** (Modify process parameters to minimize water requirement)
- **Membrane filtration in PVC plant for acidic effluent reduction**
- **Increase utilization of RO system in Chlor-Alkali plant**
- **Process water optimization through reuse / recycle /automation**

We are committed to bring down effluent generation the level of 200 m3/hr through implementation of all above proposed schemes.

Further in this regard, being a responsible corporate for conservation & protection of environment, we are endlessly exploring new schemes & treatment technologies for effluent reduction. We are hereby proposing following targets and time plan to achieve Zero Liquid Discharge status.

Treated Effluent Reduction	**Time Plan**
From 250 m3/hr to 200 m3/hr	March 2028
From 200 m3/hr to 125 m3/hr	March 2031
From 125 m3/hr to ZLD	March 2035

We are committed for ensuring all compliances with environmental norms / guidelines and for continuously enhancing our wastewater recycling and reuse capabilities.

This is submitted for your information and record please.

Thanking you,

Yours faithfully,

(Authorized Signatory)

CC.: RO, RSPCB, Kota

SHRIRAM RAYONS
SHRIRAM NAGAR, KOTA 324 004 (RAJASTHAN) INDIA

DCM SHRIRAM

Date: - 31.03.2025

To,

The Group Incharge (CD),
Rajasthan State Pollution Control Board,
4, Institutional area, Jhalana Doongri,
Jaipur (Rajasthan)

Sub: - Reply to letter no. F Tech (Gen-17) RPCB /CD/294-296 dated 19.03.2025

Ref: - NGT Original Application No. 1375/2024 (PB), Suo Moto V/s State of Rajasthan & Ors, direction by Hon'ble Court that industries shall explore the possibility at maximum extent for re-use/recycle the treated water.

Dear Madam,

We would like to bring this into your kind notice that we have reduced our fresh water consumption from 10000 KLD to 6500 -7500 KLD within the tenure of last 10 years by using 3 'R' Philosophy in various process. Presently our waste water generation is about 5000 KLD, out which about 1200-1500 KLD is recycled/reused in cooling towers, Process and horticulture etc. and remaining about 3600-3800 KLD is discharged into Kanshua Nallah which is as per CTO condition.

To further reduce the wastewater generation following initiatives are being taken -

1. **Water recovery project (350 KLD)**

We are coming up with a 350 KLD water recovery project. The technology used in this project will be mainly membrane filtration / separation. The reject water from this project will be further treated though an RO system to recover up to 95% efficiency. In this whole system, we shall be able to recover at least 315 KLD of water. We shall use this water in our process systems. Civil work for the same has been started & expected date of completion is 31st Jul 2025. This will reduce our wastewater generation by 315 KLD.

2. **Water conservation through in-house initiatives**

We have initiated multiple in-process water recovery projects at our Plant. In this, we shall be able to conserve about 250 KLD of water through in-house process modifications. Expected date of completion is 31st Dec 2025. This will enable us to reduce our waste water generation by 250 KLD further.

Trust the above in order.

Thank You

Yours Faithfully

Chief Operating officer

Cc: -
The Regional Officer, KOTA
Rajasthan State Pollution Control Board,
Plot No. Special 2-A, Paryavaran Marg,
Road No. 6, Indraprastha Industrial Area,
Kota – 324005

SHRIRAM RAYONS
SHRIRAM NAGAR, KOTA 324 004 (RAJASTHAN) INDIA

DCM SHRIRAM

Date: - 05.05.2025

To,

The Regional Officer, KOTA
Rajasthan State Pollution Control Board,
Plot No. Special 2-A, Paryavaran Marg,
Road No. 6, Indraprastha Industrial Area,
Kota – 324005

Sub: - Submission of Action Plan for Reuse/Recycle of Treated Wastewater

Ref: 1. NGT Original Application No. 1375/2024(PB), Suo Moto V/s State of Rajasthan & Ors

2. RSPCB Letter No. F Tech (Gen-17) RPCB /CD/294-296 dated 19.03.2025

Dear Madam,

We would like to bring this into your kind notice that we have reduced our fresh water consumption from 10000 KLD to 7500 KLD within the tenure of last 10 years in various process. Presently our waste water generation is about 5000 KLD which treated in effluent treatment plant. About 1200 KLD treated water is recycled/reused in cooling towers, Process and horticulture etc. and remaining about 3800 KLD is discharged into Kanshua Nallah which is well within CTO condition (3925 KLD) .

To further reduce the wastewater generation following initiatives are being taken –

1. **Water recovery project (350 KLD)**

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We are coming up with a 350 KLD water recovery project. The technology used in this project will be mainly membrane filtration / separation. The reject water from this project will be further treated though an RO system to recover up to 95% efficiency. In this whole system, we shall be able to recover at least 315 KLD of water. We shall use this water in our process systems. Civil work for the same has been started & expected date of completion is 31st Jul 2025. This will reduce our wastewater generation by 315 KLD by December 2025. We will monitor its performance for next one year.

2. **Water conservation through in-house initiatives**

247 6/5/25

We have initiated multiple in-process water recovery projects at our Plant. In this, we shall be able to conserve about 250 KLD of water through in-house process modifications. Expected date of completion is 31st Dec 2025. This will enable us to reduce our waste water generation by 250 KLD further.

R 06/5/25

TEL. : +91-744-2480001, 2480002, 2480004, □ FAX: + 91-744-2480003, □ E-Mail : shriramrayons@dcmsr.com
A UNIT OF DCM SHRIRAM INDUSTRIES LTD, www.dcmsr.com □ CIN : L74899DL1989PLC035140
Regd. Office : KANCHENJUNGA BUILDING, 6th FLOOR, 18, BARAKHAMBA ROAD, NEW DELHI 110 001, INDIA, Tel. 011-23759300

After getting satisfactory result of abovesaid project (S.No. -1), we will move towards further reducing wastewater discharge in phase manner. We are hereby proposing following targets and time line to achieve Zero Liquid Discharge Status.

Treated Effluent Reduction	**Target**
From 3925 KLD (As per CTO) to 2000 KLD	May 2030
From 2000 KLD to 1000 KLD	May 2035
From 1000 KLD to ZLD	May 2040

We are committed for ensuring all compliances with environmental norms /guidelines for continuously enhancing our wastewater recycling and reuse capabilities.

Trust the above in order.

Thank You

Yours Faithfully

Chief Operating officer