

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

Appeal No. 32 of 2024(WZ)

M/s SHCHEM CORPORATION ... APPELLANT

**Versus**

GUJARAT POLLUTION CONTROL BOARD ... RESPONDENT

**INDEX**

SR NO	ANNE XURE	PARTICULARS	PAGE NOS.	
			From	To
1.		Index	351	352
2.		Rejoinder	353	384
3.		Affidavit in Support	385	386
4.	<b>A-1</b>	Copy of the order dated 20 <sup>th</sup> May 2024	387	389
5.	<b>A-2</b>	Copy of the Notice of Entry dated 14.10.2020.	390	391
6.	<b>A-3</b>	Copy of the reply to the closure order	392	396
7.	<b>A-4</b>	Copy of the reply vide letter No. 004 dated 28.11.2020.	397	399
8.	<b>A-5</b>	Copy of the Notice of Entry dated 12.02.2021.	400	404
9.	<b>A-6</b>	Copy of the Notice of Entry dated 17.03.2021.	405	410
10.	<b>A-7</b>	Copy of the vide letter No. 019 dated 31.03.2021.	411	413

11.	<b>A-8</b>	Copy of the Board's Acknowledgement of 17.07.2022.	414	417
12.	<b>A-9</b>	Copy of the vide their letter number "003" dated 17.07.2022 and letter number "004" dated 29.07.2022.	418	421
13.	<b>A-10</b>	Copy of the photographs of the flooded factory plot	-	422
14.	<b>A-11</b>	Copy of the A compliance visit was undertaken by the officers of the Respondent Board on 07.11.2022.	423	424
15.	<b>A-12</b>	Copy of the Board's Acknowledgement of 09.06.2023.	425	430
16.	<b>A-13</b>	Copy of the pictures of three phase motors,	431	437
17.	<b>A-14</b>	Copy of the Notice Of Entry dated 10.06.2023.	438	441
18.	<b>A-15</b>	Copy of the DGVCL disconnected the single phase power supply on 23-08-2023.	-	442
19.	<b>A-16</b>	Copy of the Appellant reply with the Respondent, vide letter No. 007 dated 03.08.2023	443	450
20.	<b>A17</b>	Copy of the Revocation of Closure Directions vide letter No.008 dated 06.09.2023.	451	466
21.	<b>A-18</b>	Copy of the notice of entry dated 14.10.2023.	467	470
		<b>LAST PAGE NO.</b>		<b>470</b>

PUNE

DATE: 05/07/2024



ADVOCATE FOR THE APPELLANT

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**REJOINDER ON BEHALF OF APPELLANT**

**MAY IT PLEASE THE HON'BLE TRIBUNAL**

Rejoinder on behalf of the abovenamed Appellant is as under: -

1. At the outset, the Appellant herein denies all the contentions and averments, made in the Affidavit in Reply. The Appellant, not dealing with any statements, shall not be deemed to be admitted.

**(I) CONDUCT OF THE RESPONDENT**

2. The conduct of the Respondent, in the present case, has all along been to harass the Appellant, by all means. The present Appeal was listed before this Hon'ble Tribunal on 3<sup>rd</sup> May 2024, wherein the Hon'ble Tribunal enquired with the Respondent, explanation regarding any order being passed in the present case. The case was further listed on 6<sup>th</sup> May 2024, wherein no explanation was given and again time was

sought to file a detailed response. The case was further listed on 21<sup>st</sup> May 2024, wherein time was sought to oppose the delay condonation application. The case was further listed on 28<sup>th</sup> May 2024, wherein for the first time a statement was made by the Respondent that a formal order has been passed on 20<sup>th</sup> May 2024. However, being true to its reputation, the Respondent did not serve a copy upon the Appellant. The Hon'ble Tribunal directed the Respondent to serve the same on the Appellant. The copy of the order was served upon the Appellant only on 28<sup>th</sup> May 2024. The Appellant wishes to point out the conduct of the Respondent, in handling the present case, which is purely harassment for the last 4 years.

3. The Appellant is in receipt of the order dated 20<sup>th</sup> May 2024, wherein the contents of the impugned order are forming part of. Perusal of the order dated 20<sup>th</sup> May 2024 clearly shows that there has been ignorance on the observance of the principles of natural justice, equity and fair play. The Respondent has issued the order mechanically and without following the due process of law. The order is passed without assigning any reasons. Copy of the order dated 20<sup>th</sup> May 2024 is annexed hereto and marked as **ANNEXURE – A-1**.

## **(II) PARAWISE DENIALS**

4. With respect to the contents of para 2, the same are denied by the Appellant. The Appellant submits that no material facts have been suppressed by the Appellants. On the contrary, the Appellants have

brought on record, all the Notices of Entry (**except Notice of Entry dated 15.04.2022 which was never received by the Appellants**) and their corresponding replies with photographic proofs, as the Appellant's evidences.

5. With respect to the contents of para 3 (ii) the same are denied by the Appellant. The Appellant submits that officers of Respondent Board were called by the NCT Team to visit the unit of the Appellant. In response to the observations made in the Notice Of Entry dated 14.10.2020, the Appellant filed reply with the Respondent, vide letter No. 001 dated 17.10.2020. Copy of the said letter is annexed hereto and marked as **ANNEXURE – A-2**. The Appellant submits that after the receipt of the Closure Directions, the Appellant filed reply with the Respondent. The Appellant pointed out the following :-
  - (a) Treated Effluent Tank is located at the North East corner of the factory plot and the point in the Storm water drain, from where the sample was taken, is at the South West corner of the factory plot. The distance between the two is at least 70 metres (230 feet).
  - (b) Officers of the Respondent carried out a detailed inspection of the premises to ascertain the existence of any ghost connection for illegal discharge of the effluent in the Storm water drain. **No such thing was found.**
  - (c) The house-keeping of the factory premises was a bit improper; especially the area around the E.T.P. was not up to the mark. This was because the entire open area of the Appellant's factory plot was not concretized and hence the loose earth made the plot appear poorly maintained. The same has since been concretized.

(d) In above mentioned reply, in the interest of natural justice, the Appellant requested for a personal hearing. However, the Appellant was served with a closure order without affording an opportunity of personal hearing. Copy of the reply to the closure order is annexed hereto and marked as **ANNEXURE – A-3**.

6. The Appellant wishes to point out major contradictions in the observations made in the inspection report on **page “3” of Annexure-R1 and the Test Reports on page “12” and “13” of Annexure-R1**. Whereas in the observations, made in the inspection report, it is stated “Unit is jointly visited with NCT team member regarding discharge of w/w outside premises by this unit. This unit was traced out for the reason yellowish coloured water observed in natural open khadi within GIDC Ankleshwar. During visit brownish coloured w/w observed in GIDC open drain near the boundary wall of the unit & the stretch of this w/w was found to be @80-90 feet. One sample of w/w was collected from this GIDC open drain having brownish colour & pH @ 10 on pH strip.” “ETP was found not in operation but w/w is observed in settling tank. Colour of this w/w was observed brownish & pH @ 9-10 on pH strip. One sample of w/w was collected from settling tank.” “Looking to the site situation within premises as well as outside premises, it was observed that the unit discharges their waste water into GIDC open storm water drain in odd hours instead of treatment & disposal as per CCA conditions.”

7. The Appellant now wishes to point out to the **Test Reports appearing on page No. 12 and page No. 13 of Annexure-R1**. The Test Report on page 12 is that of the sample drawn from settling tank of the ETP unit and the test report on page 13 is that of the sample drawn from storm water drain near boundary wall of the unit. The difference in results of various parameters viz pH, Colour, TDS, C.O.D., B.O.D. is so high that in no way they are comparable. The test results of all the parameters of the sample drawn from the storm water drain are very high as compared to those of the sample drawn from the settling tank of the ETP. **This is actually the reverse of natural logic because the sample drawn from the storm water drain is diluted by the upstream water.** This conclusively proves that the sample drawn from the storm water drain is not from the unit of the Appellant. Thus, it can be concluded that the closure directions were issued to the Appellant based on a wrong assumption. Finally, the last line on **page number 11 of Annexure-R1**, states that no live discharge was found at the time of the visit. This is important because the entire case has been based on the assumption that waste water is being discharged by the Appellants, without treatment, directly into the storm water drain at odd hours.
8. With respect to the contents of para “3 (iii)” it is submitted that the same are denied in toto. The Appellant submits that the officers of Respondent Board were called by the NCT Team to visit the unit of the Appellant. In response to the observations made in the Notice Of Entry dated 27.11.2020, the Appellant filed its reply vide letter No.

004 dated 28.11.2020. Copy of the said letter dated 28.11.2020 is annexed hereto and marked as ANNEXURE – A-4. The following issues were pointed out:-

- (a) The colour of the sample drawn from our Treated Effluent Tank was yellowish whereas the colour of the sample drawn from the storm water drain was greenish. Treated Effluent Tank is located at the North East corner of the factory plot and the point in the Storm water drain, from where the sample was taken, is at the South West corner of the factory plot. The distance between the two is at least 70 metres (230 feet). The difference in the colour of the two samples prove that the effluent found in the storm water drain is not the same as that found in the treated effluent tank.
- (b) The officers of the Respondent Board carried out a detailed inspection of the premises to see whether any illegal means were employed by the Appellant to discharge their effluents into the GIDC's storm water drain. **The Appellant asserts that no irregularities were found.**
- (c) Three phase Power supply to the Unit was disconnected by DGVCL (power supply company) on November 25, 2020 as per the Closure Direction under Section 33-A of the Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 on 10<sup>th</sup>. November 2020. This has been confirmed by the officers of the Respondent in their inspection report on **page 3 of Annexure-R3**.
- (d) Since the unit's three phase power supply was disconnected on November 25, 2020, all the equipments had to be cleaned. Not cleaning would have led to corrosive damage of the equipments. Since the unit did not have enough capacity to hold all this waste water, the same was stored in open drums. The waste water in the

open drums was treated with necessary cleaning chemicals, by recycling the same using 0.5 HP single phase motor.

- (e) The drain carrying waste water from the plant to the ETP was made of mastic lined Bricks. It was definitely not “kachcha drain” as stated.
- (f) The Test Reports appearing on page No. 9 and page No. 10 of Annexure-R3. The Test Report on page 9 is that of the sample drawn from storm water drain near boundary wall of the unit and the test report on page 10 is that of the sample drawn from the settling tank of the ETP. The results of colour parameter reinforces the claim of the Appellant that the two are not the same. **The result of the colour parameter of the sample drawn from the storm water drain is “3000” whereas that of the sample drawn from the settling tank of the ETP is “1500”. The sample drawn from the storm water drain is diluted by the upstream domestic water and its colour index should be lower than the colour index of the sample drawn from the settling tank of the ETP.** This conclusively proves that the sample drawn from the storm water drain is not from the unit of the Appellant. The Appellant further reiterates that no live discharge from the unit was found at the time of the visit.
9. With respect to the contents of para 3(iv) are the Appellant submits that it filed the first revocation application of the Closure Directions, vide application no. SC/GPCB/2020-21 dated 18-12-2020. Thereafter, the unit was inspected on 23.12.2020 and 08.02.2021 for compliance. The unit had complied and fulfilled with, all the conditions stipulated, in the inspection reports dated 23.12.2020 and 08.02.2021. Consequently, revocation of the Closure Order was

approved, on trial basis, subject to payment of Rs.4,40,000=00 (Rs. Four lac forty thousand only) as Interim Environment Damage Compensation. The above was communicated to the Appellant, vide e-mail annexed hereto as **“Annexure-R4”**. The Appellants were unable to deposit the said Interim Environment Damage Compensation, due to (i) hospitalization of Mr. Vijay R. Sheth, Managing Partner, of the Unit. The Managing Partner was hospitalized for a total of eight months in a period of eighteen months, on two different occasions on account of Covid and (ii) due to financial inability. However, after perusing the results of the Test Reports at **page number “12” and “13” of “ANNEXURE-R1”**, it is proved beyond doubt that the Appellant has not committed any act that caused harm to the environment and hence were not liable to pay Interim Environment Damage Compensation.

The closure directions issued were based on a wrong assumption. It may be noted that the Appellant was never provided with any Test Reports by the Respondent thus far. The Appellant has perused them only from the Affidavit in Reply filed by the Respondent.

10. With respect to the contents of para 3(v), the same are denied in toto and not admitted. The Appellant submits that in response to the observations made in the Notice Of Entry dated 12.02.2021, the Appellant had filed its reply with the Respondent, vide letter No. 016 dated 15.02.2021, copy of which is annexed hereto and marked as **ANNEXURE – A-5**. The Appellant had pointed out the following :-

- (a) The Appellant confirmed that it had sold 20 drums (4600 kgs. of Sodium Bromide solution) to Meet Chemo Pharma, Ankleshwar through its trading firm, M/s Organix (at the same address) on 23<sup>rd</sup>. December, 2020, vide invoice number 2020-21/F/20072 and had enclosed copy of the same. The Appellant had also stated in the said letter that it had replaced Di Methyl Formamide (DMF) used as a catalyst in the Friedel Crafts' reaction with N-Propyl Bromide, as a catalyst, for higher conversion. There was no change in other reactants viz. Benzene, Thionyl Chloride, Aluminium chloride etc. in the said Friedel Crafts' reaction to convert 3-Nitro 4-Chloro Benzoic Acid to 3-Nitro 4-Chloro Benzophenone. After the coupling reaction takes place, the entire reaction mass is quenched in chilled water to isolate the product. The organic layer contains the product and the aqueous layer contains small quantity of Sodium Bromide and Poly Aluminium Chloride which is stored in HDPE drums as "MB-III ML".
- (b) In the above letter the Appellant also confirmed that the entire quantity of 4600 kgs. of Sodium Bromide solution, sold to M/s Meet Chemo Pharma, was returned back on 09.01.2021. The entire stock is still lying with the Appellant. Thus there was no sale of sodium bromide solution.
- (c) In the aforementioned letter, the Appellant also confirmed that in view of the Closure Directions issued by Respondent Board, there was no production activity at the Unit. The inspecting officers of the Respondent Board confirmed the same.
- (d) In the said letter, the Appellant affirmed to the Respondent Board that in future, it shall not buy/sell/deal/trade in hazardous waste. The Appellant undertook to strictly comply with the hazardous waste management rules.

11. With respect to the contents of para 3(vi) it is submitted that the same are denied and not admitted. The Appellant submits that as stated the Officers of Respondent Board were called by the NCT Team to visit the Appellant Unit. In response to the observations made in the Notice Of Entry dated 17.03.2021, the Appellant submitted its reply to the Respondent, vide letter No. 018 dated 18.03.2021 copy of which is annexed hereto and marked as **ANNEXURE – A-6**. The Appellant pointed out the following :-

- (a) The inspecting officers, from the Respondent Board, have mentioned that the production plant was not found in operation. This reinforces the fact that the Appellant unit was strictly observing the Closure Directions issued by the Respondent board.
- (b) Once again the officers of the Respondent Board were called by officials of NCT to inspect the Appellant unit under the pretext that they (NCT) suspected acidic effluent flowing from the Appellant unit into the storm water drain. This was the **third time** the Respondent board's officers were called by NCT officers. Despite no effluent generated in the Appellant unit, NCT officials continued to complain against the unit. **The Appellant would like to place on record that despite multiple detailed inspections of the Appellant unit by the Respondent, no illegal or ghost connections were ever found.**
- (c) The Appellant agrees to the fact that it had procured 39 MT of Stable Bleaching Powder and 21 MT of Caustic Lye of GACL make.
- (d) Since the unit was under closure since November 25, 2020, the Appellant started trading activity with a view to generate some

income. Trading activity did not generate any pollutants and helped generate some income to meet the regular expenses. The Appellant was required to invest huge amount to construct a Tank Farm, so that the multiple drums containing raw materials, intermediates and recovered solvents could be stored in respective tanks. The Appellant was also required to deposit Rs.4.40 lacs towards Interim Environment Damage Compensation for revocation of the Closure Directions.

- (e) The Appellants shared the list of Raw Materials, intermediates and recovered solvents with the Respondent so that the stocks would act as an additional evidence of no manufacturing activity.
- (f) Tanker number GJ-16-X-8412 containing Hydrochloric Acid, was being emptied in to HDPE drums, for retail sales. Relevant documents pertaining to the consignment were submitted to the Respondent Board. A Sample was drawn from the tanker and results appear in Test Report at **page number “10” of “Annexure-R6”**. Another sample was drawn from the storm water drain and its results appear in Test Report at **page number “11” of “Annexure-R6”**. Comparison of Results of the two samples prove beyond doubt that they are not the same. **Further, no one has ever found live discharge of any effluent from the Unit’s premises.**

12. With respect to the contents of para 3 (vii) it is submitted that the same is denied in toto. In response to the observations made in the Notice Of Entry dated 31.03.2021, the Appellant filed its reply with the Respondent Board, vide letter No. 019 dated 31.03.2021, which is annexed hereto and marked as **ANNEXURE A-7**. The Appellant pointed out the following :-

- (a) Officers of the Respondent Board were yet again called by officials of NCT to inspect the Appellant unit under the pretext that they (NCT) suspected acidic effluent flowing from the Appellant unit into the storm water drain. This was the **fourth time** the Respondent Board's officers were called by NCT officers. Despite no effluent generated in the Appellant unit, NCT officials continued to complain against the unit. The Respondent Board officials summoned the managing partner of the Appellant Unit at about 02.30 hours on 31.03.2021. **The inspection report on page number "3" of "ANNEXURE-R7" states that Production Plant was not found in operation.**
- (b) Appellant had undertaken cleaning of certain vessels and HDPE Drums, by recycling and re-circulating necessary cleaning media. This was being done using 0.5 HP single phase motor. Please note that 3-phase power supply was disconnected since 25<sup>th</sup>. November 2020 and the unit only had single phase power supply. The Appellant required to neutralize all the acidic/alkaline waste water before the onset of the monsoons so as to ensure that all the waste water was neutralized.
- (c) The Appellant again expressed their concern with the Respondent Board officials that certain unscrupulous elements were illegally discharging highly polluting effluents into the storm water drain passing near the rear gate of the Appellant unit. **To the utter shock and dismay of all present, at about 03.00 hours, a tanker, showing label of Hydrochloric Acid, coming from the upstream direction, passed from the same spot where acidic waste water was found in the storm water drain. It is pertinent to note that NO TANKER MOVEMENT IS PERMITTED IN THE GIDC**

**ESTATE BETWEEN 10.00 PM TO 06.00 AM. There can be no bigger proof of the Appellant Unit's innocence than the above.**

- (d) The Appellant again shared the list of Raw Materials, intermediates and recovered solvents with the Respondent so as to act as an additional evidence of no manufacturing activity.
- (e) The Appellant reiterate that no live discharge from the unit was found at the time of the visit.
13. With respect to the contents of para 3 (viii) the same are denied and not admitted by the Appellant. Appellant unit had filed the reply to the Respondent Board's Officers visit on 12.02.2021 vide their letter number "016" dated 15.02.2021. The Board's Acknowledgement of 17.02.2021 is attached as **ANNEXURE – A-8**. The above is a detailed reply to all queries raised. Hence, it is incorrect to state that the Appellant unit had ignored the same as stated in "Annexure-R8" of Affidavit in reply.
14. With respect to the contents of para 3 (ix) the same are denied in toto and not admitted by the Appellant. The aforementioned paras are a testament of innocence of the Appellant unit. The Appellant Unit has countered every point raised in the Affidavit in Reply on the basis of the evidences / Test Reports submitted by the Respondent Board. It is also evident from the above details that certain vested interests were wanting to show the Appellant Unit in poor light. The age profile of the Partners of the Appellant Unit and serious illness (Covid) of the managing partner from April 2021 up to July 2022, made the Respondent unit vulnerable for a hostile takeover. For want of

documentary evidence, the Appellant unit is not naming certain industrialists and officers of the Respondent Board involved. It was therefore unfair on the part of the Respondent Board to approach the Ld. Collector of the District to seal the Appellant unit.

15. **POINT “3 (x)” OF AFFIDAVIT IN REPLY : Officers of Respondent Board were called by the NCT Team to visit the Appellant Unit.**

- (a) The Respondent Board has, till date, not served the Appellant Unit with Notice Of Entry dated 15-04-2022, if at all it was entered and inspected? The managing partner was neither called nor contacted by the Officer of the Respondent board whereas in the past, the managing partner was called by the same Respondent Board’s Officer even in the middle of the night. There is no justification for not serving the Notice of Entry to the Appellant Unit. The excuse that no one was present in the unit does not hold water. The Respondent Board’s Officer could have pasted the Notice Of Entry at a prominent place in the Unit.
- (b) It is important to note that the Appellant unit was inspected by the Respondent Board officials for the first time after March 31, 2021. This was the **fifth time** that the same Respondent Board’s officer (as reported in the inspection report) was called by the NCT team for inspection.
- (c) It is specifically stated in the inspection report on page number “3” of “Annexure-R10”, that “During visit production plant is not found in operation”. It is also mentioned that “During visit discharge of w/w is not observed hence w/w sample could not be collected. Unit has provide N.G. fired one boiler which is not found in operation”.

(d) Despite the above, the R.O.'s comments on page "3" of "Annexure-R10" were "Dist. Collector may be requested to seal the unit, & GEB to d/c single phase p/s also. Besides, we may jointly with NCT investigate further by digging for possibility of ghost connection, if any.-17/04/2022". It is evident from the RO's comments that the officers of the Respondent Board were prejudicial against the Appellant Unit.

16. With respect to the contents of para 3 (xi) the same are denied by the Appellant. The Appellant unit had filed the reply to the Respondent Board's Officers visit on 02.07.2022 vide their letter number "003" dated 17.07.2022 and letter number "004" dated 29.07.2022. The Board's Acknowledgement of 18.07.2022 is annexed hereto and marked as ANNEXURE A-8 and that of 29.07.2022 is annexed hereto and marked as ANNEXURE A-9.

(a) The Appellant submitted that power and water supply to the unit was disconnected since November 2020 and continued to remain disconnected till date. Even on 02.07.2022 the Respondent Board Officers' have failed to show how power supply and water supply was made illegally available. There was, there is and there will be no evidence of tampering of the Power Supply and Water Supply seals affixed by the concerned authorities. This is because it has never been done.

(b) It was submitted that at the time of the visit of the Appellant unit on 02.07.2022 by the Respondent Board's officers, cleaning activity of SS Reactor (R-6) and Glass Lined Reactor (R-7) was going on. Rinsing and cleaning of the reactors, with relevant cleaning chemicals, using single phase 0.5 HP pump was going on. No other equipment or machinery was in operation. The officers of

the Respondent board have not produced any evidence of machinery in working condition, as claimed. **Please note that the Appellant unit does not have a D.G. Set and hence it is not possible to operate any machinery as all the machineries are fitted with three phase motors.**

- (c) The Appellant unit submitted a list of electricity bills which show minimum lighting consumption. Similarly, Notified Area Authority's list of water bills was submitted showing Nil consumption. It was also submitted that the Appellant unit has not filed any GST return ever since December 2020. This is the single biggest proof of no manufacturing / commercial activity ever since December 2020. It is just not possible to carry out any manufacturing or commercial activity without the knowledge of the GST authority.
- (d) The Appellant has also submitted the list of Raw Materials, semi-finished goods, Mother Liquor etc. which shows no change. This is an additional evidence of no manufacturing activity.
- (e) The Appellant submitted that solid waste (neutralization sludge) is stored in HDPE bags and these bags are kept in dedicated hazardous waste storage area. The solid waste was not accepted by BEIL at that time due to the monsoons but thereafter the same has been sent to secured land fill site.
- (f) The single biggest reason for entire factory plot to be filled with water, during monsoons, is excess rain water flowing from the adjoining plots as well as overflowing from the storm water drain. The entire open plot **was** about two to two and a half feet lower than that of the unit on the East (Shed No. A-2/4002) and the unit on the South (Shed No. A-1/4012). During the rains, all excess rain water, from the adjoining plots, flows into the Appellant's plot and

when the intensity of the rains increase, the water from the overflowing storm water drain flows into their plot from the West. This water also enters the factory shed. This is the single important reason for poor house-keeping. The officers of the Respondent Board are aware of this as it is obvious during the site visit. However, it is conveniently ignored and never mentioned in their visit report. Copy of the photographs of the flooded factory plot are annexed hereto and marked as **ANNEXURE – A-10**. There was heavy rain on June 30, 2022 and the unit was visited on July 02, 2022. There was a lot of pooling and ponding, even after the water receded, as the open plot had loose earth and it was not concretised. Samples were drawn from these pools of water. No waste water was generated in the unit since there has been no production activity since November 2020.

17. With respect to the contents of para 3 (xii) the same are denied in toto by the Appellant. The Respondent board sent a reminder to the Ld. District Collector for sealing the premises of the Appellant unit on 22.08.2022 and also sent a letter to the concerned Authority to disconnect water supply to the Appellant Unit. It needs to be stated that water supply was not active but they still chose to write such a letter to the concerned authority to show the Appellant unit in poor light. A letter was also sent to DGVCL to disconnect even the Single Phase Power supply to the Appellant Unit.

18. With respect to the contents of para 3 (xiii) the same are denied by the Appellant. The Appellant submits that on account of the efforts of the managing partner of the Appellant Unit and multiple visits to the Collector's office, the Circle Officer, Ankleshwar Taluka, District

Bharuch, finally agreed to visit the Appellant Unit. After verifying whether the Main Electric Switch was off, the Main Electric Panel Board was sealed and Manhole of each of the six reaction vessels were sealed. It is important to note that the three phase power supply was disconnected by DGVCL from the Transformer, situated outside the Appellant Unit since November 2020 and hence no one from DGVCL had to be summoned. This is an evidence that three phase power supply was disconnected in November 2020 and continued to remain disconnected despite false claims of the officers of the Respondent Board. A compliance visit was undertaken by the officers of the Respondent Board on 07.11.2022. Copy of the said visit report dated 07.11.2022 is annexed hereto and marked as **ANNEXURE A-11**.

19. With respect to the contents of para 3(xiv), it is submitted that the same is denied in toto by the Appellant. The Appellant unit had filed the reply to the Respondent Board's Officers visit on 06.06.2023 vide their letter number "001" dated 07.06.2023. The Board's Acknowledgement of 09.06.2023 is annexed hereto and marked as **ANNEXURE A-12**. The contents of the reply are as under: -

(a) It was submitted that on October 11, 2022, the Main Power Supply switch, supplying 3-phase power supply and housed in a Main Switch Box, was duly sealed. The respective Man-Hole of each of our six reaction vessels were also sealed by Respondent Board's officers in presence of Ms. Krupaben Patel, Circle Office, Ankleshwar. The Appellant had stated on record that all the seals were intact and that no manufacturing activity has been or is being

carried out. Pictures of the said intact seals were enclosed for ready reference. The Appellant further stated that due to no commercial/manufacturing activity for a long time, the GST registration number was rendered inactive. The above can be easily verified from the GST Portal.

(b) On June 06, 2023, at about 18.45 hrs., **accidental leakage** was observed from near welding of the bottom nozzle of one of the 10000 litre HDPE tanks, holding the water collected from plot area of the unit due to pooling and ponding. The Appellant collects this water using single phase 0.5 HP pump. The Appellant has a total of 3 Nos. x 10000 litre HDPE tanks to hold the treated effluent. This treated effluent is conveyed to ETL by tankers for further treatment before final discharge. ETL refused to accept the effluent and informed to send the same only after the Appellant obtains Revocation of Closure Directions from the Respondent Board. All these tanks are kept on a RCC platform. Since these tanks are subjected to heat, rains and cold, the welded joints could have weakened. Initially it was felt that the leakage could be controlled using cold welding methods. However, at around 22.00 hours, the managing partner was informed about the increase in the rate of leakage. The managing partner instructed the worker to connect the bottom valve of the affected tank with a HDPE pipe and discharge the same in to the bathroom. At about 23.00 hours, the managing partner was informed about the arrival of the Respondent board's officer. The managing partner rushed to explain the sequence of events but the officer was not convinced. As per the instructions of the officer, the discharge was immediately stopped and the content of the tank was allowed to collect in the factory plot. To the misfortune of the Appellant, the second tank also leaked and the Appellant had no option but to let the water collect in the factory plot.

- (c) It is absolutely incorrect to say that during visit unit was found in operation and manufacturing process for the production of 3,4 Di Amino Benzophenone in one reactor. It is also mentioned by the Respondent Board's officer that one reactor, boiler, cooling tower and other required industrial ancillaries were operated using single phase power supply. **This is stated at page number "07" of "Annexure-R16"**. Nothing can be farther from truth as all the reactors, boiler, cooling tower, cooling pumps, compressor, etc. are fitted with three phase motors. Copy of the pictures of three phase motors, all intact seals are annexed hereto and marked as **ANNEXURE – A-13**.
- (d) In General Observation, on page number "02" of "Annexure R-16", it is not correct to state (i) ..that the unit is in production and (ii) ..that the unit is operating without valid CCA of the Board. The Appellant unit were holding valid CCA No. AWH-95266 valid upto 02.06.2023 and Application for Renewal of CCA was filed on 15.05.2023. This is contrary to what is mentioned at point number "10" on page number "01" of "Annexure-R16".
- (e) List of Raw Materials, semi-finished goods, Mother Liquor etc. was attached. The list shows no change. This is an additional evidence of no manufacturing activity.
- (f) Test Report on page "14" of "Annexure R-16" is of the sample drawn from collection tank of ETP shows "pH" of 8.66 which is very close to the acceptable limit. Other parameters too are very close to the acceptable limits. Similarly, Test Report on page "15" of "Annexure R-16" is of the sample drawn from w/w discharge pipeline provided in bathroom shows "pH" of 8.30 which is very close to the acceptable limit. Similarly, other parameters too are very close to the acceptable limits.

(g) From the explanations mentioned at sub-points “(a)” to “(e)” it can be concluded that (i) All the seals affixed in presence of Ms. Krupaben M. Patel, Circle Office, Ankleshwar, District Bharuch are intact (ii) It was a case of an accidental leakage of treated effluent from the welding of bottom nozzles of two 10000 litre HDPE ETP Holding Tanks (iii) All motors fitted to reactors, cooling tower, cooling pumps, Boiler, Compressor are “Three Phase” motors and can operate only on “three Phase” power supply. None of these motors can run on single phase power supply as alleged (iv) There is no change in the list of raw materials, semi-finished goods, mother liquor etc. which proves that there no evidence of any manufacturing activity and (v) waste water stored in the HDPE ETP Holding Tanks is all that is collected from the open plot of the unit, during heavy rains and overflowing storm water drain. This is also evident from the results of the two samples in Test Report on page “14” and page “15” of “Annexure R-16”.

20. With respect to the contents of para 3(xv), the same are denied and not admitted by the Appellant. Officers of Respondent Board were called by one Mr. Dharmesh Mistry to visit the Appellant Unit. In response to the observations made in the Notice Of Entry dated 10.06.2023, the Appellant filed its reply vide letter No. 003 dated 12.06.2023, copy of which is annexed hereto and marked as **ANNEXURE A-14**. The Appellant pointed out the following :-

(a) The Appellant stated that due to the accidental failure of the welding of the bottom nozzles of the 2 x 10000 litre ETP holding tanks on 06.06.2023, waste water contained in the said tanks leaked on to the open plot as stated at point “N(b)” above. This

leaked water was seeping from under the compound wall in to the storm water drain.

- (b) Employees of the Appellant unit were collecting the waste water from the ponding that had occurred on the open plot and storing in HDPE Drums. This was observed by the officer of the Respondent Board when he visited the Appellant unit on 10.06.2023.
- (c) On October 11, 2022, a total of six seals were affixed on the respective manhole of each of the six reactors and one seal was affixed on the Main Power Supply Control Panel by the officers of the Respondent board in presence of Ms. Krupaben Patel, Circle Office, Ankleshwar. The Appellant states on record that all the above seals are intact even today.
- (d) The Officer of the Respondent board observed that partial concretising of the open plot had started. About 150 to 200 drums were kept on the RCC concretised floor. The details of these drums are on record with the Respondent board ever since 2020 and hence the contents of the drums are “not unknown” as alleged. The Appellant unit continues to have the same stocks which goes to prove that there has been “no production activities”.
- (e) As desired by the officer of the Respondent board, Appellants enclosed Power Disconnection Certificate issued by DGVCL and Water Disconnection certificate issued by Dy.Exec.Eng.(W.S.).

21. With respect to the contents of para 3(xvi) the contents are denied in totality by the Appellant. In response to the Respondent Board's communication vide letter dated 17.07.2023 the DGVCL disconnected the single phase power supply on 23-08-2023. The Appellant has enclosed the single phase power supply disconnection

certificate dated 25.08.2023, which is annexed hereto and marked as **ANNEXURE A-15**.

22. With respect to the contents of para 3 (xvii) it is submitted that the same is a matter of record. The Respondent Board has filed Criminal Case No. CC/5570/2023 in the Hon. Civil Court, Ankleshwar against the Appellant Unit vide their communication dated 28.07.2023 for all the violations stated in their Affidavit In Reply. This is akin to penalising the Appellant unit twice for the same crimes which have not been committed and the same is double jeopardy.

23. With respect to the contents of 3(xviii) the same are denied by the Appellant herein. The Appellant submits that the officers of Respondent Board were called by an anonymous caller from Mobile No. "6354813935" to visit the Appellant Unit. In response to the observations made in the Notice of Entry dated 02.08.2023, the Appellant filed their reply with the Respondent, vide letter No. 007 dated 03.08.2023, which is marked and annexed hereto as **ANNEXURE A-16**. The Appellant pointed out the following :-

(a) The Appellant unit is having Factory plot number is A-2/4001. On the East side is plot number A-2/4002 and on the South side is plot number A-1/4012. Both the adjoining plots are about 2 (two) feet higher than our plot. This always lead to flooding of the plot as well as the shed in case of heavy rains. The Appellant has attached "ANNEXURE – 1" which shows flooding of the Plot. The flooring of the shed is lower than the plot and hence the shed also gets flooded. It is this flooding that leads to rain water flowing from under the compound walls. Seepage of the water continues even

for two to three days after stoppage of rains. **Till end July 2023, the Appellant increased the level of the entire plot and completed RCC work of half of the open factory plot area.** The officers have noticed the M.S. steel frame spread on the remaining open area of the plot for completing the RCC flooring. The Appellant has attached “ANNEXURE – 2” showing pictures of the same for ready reference. Once this RCC work is completed, the level of the entire plot will be at par with the neighbours’ plot and no more flooding will occur. This will automatically stop seepage of this water from the plot in to the Storm Water Drain. Please note that on 03.08.2023, the Appellant repaired the compound wall with concrete, on either side of the South West gate, to ensure that no water seeps out in to the storm water drain (SWD). The Appellant has attached “ANNEXURE – 3” showing the repaired compound wall.

- (b) All the seals were secured with cotton thread. **Seals on all the vessels are intact. The seal on the 3-Phase Power Supply Panel is also intact.** Sir, the 0.7 KL SS reactor is a High Vacuum (740 mm of Hg) High Temperature (230°C) distillation unit. **This vessel is very highly insulated as per IS 8183 Standards and hence it resists heat loss. It is for this reason, the vessel felt slightly warmer than the other vessel.** The vessel is fitted to a 3-H.P. Flame Proof 1440 RPM 3-Phase motor. **The Hot Oil Unit is very highly insulated as per IS 8183 Standards and hence it resists heat loss.** It is for this reason that the surface of the Hot Oil Unit felt slightly warmer. The Hot Oil Unit is electrically heated and requires 3-phase power supply. **Since our 3-phase power supply is disconnected, it is impossible to run the unit.** Officers had a doubt only because the 0.7 KL vessel and the Hot Oil Unit appeared a bit warm to touch than the other vessels / surfaces.
- (c) The Appellant had purchased three Nitrogen cylinders in the year 2019. One Nitrogen cylinder remains connected to the vessel ever since the unit was issued Closure order. Officers have not

mentioned that the vessel was empty. Two Nitrogen cylinders are still in the plant.

- (d) The Appellant explained to the officers that the Batch Sheet of MB-III bearing Lot No. MB-III/082 dated 01.08.2023 of Batch size 685 was of Lab./R&D. The Appellant has been holding substantial stocks of the intermediate MB-II i.e. 3-Nitro 4-Chloro Benzophenone. This is a product of Friedel-Craft's reaction, which has a tendency to degenerate on long storage. The Appellant conducts periodic performance test of MB-II in the laboratory in a 5-litre glass flask. The Appellant showed the laboratory Hot Oil heating mantle with digital display, Glass flask and glass separating funnel to Respondent Board's Officers to prove that the Log Sheet was of Laboratory Batch of **685 grams** and not a plant Batch. The Appellant showed to the Officers that they were holding substantial stocks of MB-II and not of MB-III. **This proves that no production activity on plant scale has ever been done during the CLOSURE ORDER.**
- (e) The Appellant has been holding the following stocks ever since Closure Order was issued to the unit as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	50
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
06	Benzyl Chloride	20
	<b>Total Number Of Drums</b>	<b>213</b>

07	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
08	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

The Appellant wishes to state that there is no change in the quantity of Raw Materials / intermediates. This can be verified and this is a further evidence that there has been no manufacturing activity in the factory. The Respondent Board's officers observed that there were about 213 Drums of raw materials, intermediates and mother liquor in the plant. It is not possible to store these drums entirely in the factory building. Since RCC flooring work of the remaining area of the plot was underway, Appellants were forced to store the drums on the RCC flooring area near the ETP, plant area as well as near the South West gate. As soon as the RCC flooring work of the remaining plot area is completed, the Appellant will shift the drums to a more secured place. As mentioned in "Point No. 1", the Appellant have repaired the compound wall with concrete and this will prevent any seepage of any effluent in to the storm water drain.

- (f) The Appellant has attached "ANNEXURE – 4" showing pictures of flood water collected underneath the Separator. The Appellant were transferring this flood water in to the collection cum neutralization tank. This, is the only correct way of emptying this flooded water. The Appellant believes, they were not doing anything wrong or unethical.
- (g) The Appellant wishes to state that they are strictly following the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. The power and water supply has been disconnected since November 25, 2020.

- (h) As directed by the Officers, the Appellant showed to them the latest DGVCL bill. Since the unit was not in production for a long time, the Appellant did not have any new Raw Materials bill, Production data, fuel consumption details, water consumption details etc.. Hence, the same was not submitted to the Officers.
- (i) Attention is drawn to the highlighted lines on page number “03” of “Annexure-R20” wherein it is stated that “DGVCL was instructed to disconnect the power supply of unit including single phase vide letter dated -19.07.2023, however during the inspection, single phase power connection is observed in the unit”. **This is a solid evidence, as late as on the date of the visit (02.08.2023), that the three phase power supply to the Appellant unit continued to remain disconnected.**

The Appellant unit submitted an application for Revocation of Closure Directions vide letter No.008 dated 06.09.2023 duly acknowledged by GPCB Gandhinagar and Regional Office, GPCB, Ankleshwar. Copy of the said acknowledgement is annexed hereto and marked as **ANNEXURE -A-17**. In response to this application, a compliance visit was conducted by the Respondent Board on 14.10.2023. Copy of the notice of entry dated 14.10.2023 is annexed hereto and marked as **ANNEXURE A-18**.

24. With respect to the contents of para 3 (xix) the same are not admitted by the Appellant. The Appellant unit filed the present Appeal before the Hon. Tribunal primarily against the unfair and unjust demand of Rs. 53.15 lacs as Interim Environmental Compensation on 27.04.2023 by the Respondent Board. As admitted by the Respondent Board, this was communicated to the Appellant unit, by SMS, on 28.02.2024. There was no other communication, in this regard, by the Respondent Board till the receipt of the Order bearing number: GPCB/ANK/CCA-

977(3)/ID-26937/811745 dated 20.05.2024 received by the Appellant unit on 28.05.2024. There was a delay of three months between the preliminary communication of the imposition of the Environment Damage Compensation and the issue of the abovementioned official order. Hon. Tribunal was pleased to condone the delay and admit the present Appeal. Armed with the order dated 28.05.2024 of this Tribunal, the Appellant unit approached the Respondent board with a request to revoke the Closure Directions. So far, the Appellant unit has suffered Closure Directions for more than 3 years and seven months. The Appellant unit appealed to the Respondent Board on humanitarian grounds.

25. The Appellant further submits as under:

- (a) Starting from 14.10.2020, the Appellant unit was visited fourteen times for inspection.
- (b) Out of these fourteen visits, on five occasions the Respondent Board's officials responded to complaints received from Narmada Clean Tech's (NCT's) team. Four visits were Compliance visits. On two occasions, the Respondent Board's officials responded to private citizens' complaints and only on two occasions the officers of the Respondent Board visited without being called by any complainant. One visit was to seal the Respondent unit in presence of the Officer, Circle Office, Ankleshwar, district Bharuch.
- (c) During the inspection visits with the NCT team, the emphasis was to prove that untreated waste water was being discharged directly in to

the Storm Water Drain by the Appellant Unit. On all the five occasions, detailed inspection of the unit was carried out by the officers of the Respondent Board as well as the NCT Team but nothing illegal was found. **On one occasion, men from the drainage department of the Notified Area were tasked to check the entire length of the storm water drain adjoining to the Appellant unit. No illegal / ghost connection was found. All Inspection Reports state that the “Unit was not found in operation.”**

- (d) The Managing Partner, 66 years old, was away from Ankleshwar from April 2021 till about June 2022 due to COVID and its RELAPSE. Surprisingly, after the inspection visit on 31.03.2021, the first reported inspection visit was on 15.04.2022. The Managing Partner was fit and mobile only after July 2022.
- (e) During the inspection visits after July 2022, the emphasis was to prove that the Appellant Unit was in Production, despite the Closure Directions. Water Supply and Three Phase Power supply to the Appellant Unit was disconnected since November, 2020 and continues to remain so. DGVCL had disconnected three phase power supply from the Main Transformer, located outside the factory premises and hence nothing could be tampered with. Subsequently, the Respondent Board's Officers started reporting that the Plant was being run illegally on Single Phase power supply. Since all the equipments of the Appellant unit are fitted with three phase motors, it

is impossible to run the plant on Single Phase power supply. Single Phase power supply was also disconnected on August 23, 2023.

- (f) The Appellant Unit has not filed GST Returns since December 2020. The GST Registration number stands cancelled. This is a major proof of there being no manufacturing / commercial activity.
- (g) The Appellant Unit has been submitting the list of Raw Materials, Semi Finished Goods and Mother Liquor along with the Replies filed with the Respondent Board. There are no changes in the list of Raw materials which again goes to prove no manufacturing activity.
- (h) The open Plot Area of the Appellant Unit was having loose mud and used to be about 2 to 2.5 feet below the Plot Area of the adjoining units on the East and the South directions. During the monsoons, excess rain water from the adjoining plots would flood the entire factory of the Appellant Unit. Excess water flowing in the storm water drain, along the West Side, would enter the open plot from the West side. After the rains, this water would seep from under the compound wall into the Storm Water Drain. Despite the obvious, the Officers of the Respondent Board would treat this as discharge in to the Storm Water Drain and penalise the Appellants.
- (i) There was an accidental leakage from welding of the Bottom Nozzle of 2 x 10000 litres Treated Effluent Holding Tanks on 06.06.2023. Entire contents flowed in to the open plot area. This water caused pooling and ponding. This led to seepage of this water from under the compound wall in to the Storm Water Drain. This was the reason for

the visits undertaken by the officials of the Respondent Board on 06.06.2023 and 10.06.2023.

- (j) April 2023 onwards, the Appellant unit started increasing the height of the open plot by land filling and subsequently concretising the entire open plot area. Even the space between the compound wall and the storm water drain was concretised. It took about six months and almost 100 lacs of rupees to complete the entire job. Proper secured internal drains along with “Contaminated run-off pits” have been provided. The run-off pits have been provided with valves to hold the contaminated water in case of accidental leakage.
- (k) After heavy rains on 31<sup>st</sup>. July and 1<sup>st</sup>. August 2023, a lot of water got collected on the South and the South West side of the open Plot. It was this water that was seeping out from our factory plot into the Storm Water Drain. A lot of water collected below the Separator (equipment). This led to the visit of the officials of the Respondent Board on 02.08.2023.
- (l) The Appellants do not have a D.G. Set in our factory. After the three-phase power supply was disconnected on 26-11-2020, at no instance has the three-phase connection been found tampered with. On 11-10-2022, the main 3-phase power switch and the power panel board was sealed. Also, each of the six reaction vessels was also sealed. All this sealing was done by the Board officials in presence of Ms. Krupaben M. Patel, Circle Office, Ankleshwar. The seals are intact till date. This is another solid evidence to prove that no illegal production activity

was being carried out. After the visit of the Respondent Board's official on 10-06-2023, the Unit Head, Gandhinagar, issued a letter to DGVCL asking them to disconnect even single phase power supply as well vide letter no. GPCB/ANK/CCA-977(3)/ID-26937/748285 dated 19-07-2023. DGVCL duly disconnected the single phase power supply on 23-08-2023. Letter, bearing no. DGVCLSDANK/0175/08/2023 dated 25-08-2023, issued by DGVCL, certifying the disconnection of the single phase power supply has been enclosed. Appellant unit is since suffering with no power connection, not even single phase power connection. Finally, a compliance visit was carried out on 14-10-2023. Thereafter, the Appellants have been following up for revocation of the Closure Directions.

26. The Appellant thus submits that the present Appeal is required to be allowed and the impugned order read with the order dated 20<sup>th</sup> May 2024 is required to be quashed and set aside.

Pune

Date: 05/07/2024



Advocate for Appellant

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

M/s SHCHEM CORPORATION ... Appeal No. 32 of 2024(WZ) APPELLANT  
Versus  
GUJARAT POLLUTION CONTROL BOARD ... RESPONDENT  
**A F F I D A V I T**

**MAY IT PLEASE THE HON'BLE TRIBUNAL:**

I, Mr.Vijay R Sheth, adult, Occu.: business, having office at 72, Shamaldas Gandhi Marg, Room No.33, 3<sup>rd</sup> Floor, Mumbai - 400002, do hereby state on solemn affirmation as under: -

I am the Partner of the Appellant above named and responsible for day to day administration of my business. As such, I have gone through the Rejoinder being filed today. I find that the contents therein are true and correct to the best of my knowledge and belief and which may be treated as part and parcel of the present affidavit.

WHATEVER STATED ABOVE is true and correct to the best of my knowledge and belief. In witness whereof I have signed hereunder at 5 JUL 2024 on \_\_\_\_\_ day of July 2024.



*(Signature of Deponent)*

I solemnly Affirm before DEPONENT  
by Shri Vijay. R. Sheth  
who is identified  
by Shri. *(Signature)*  
of documents is explained  
him/herself in his vernacular  
Dt. *(Signature)*

Reg. No. 3333/24  
Date 5 JUL 2024

I Knew the Deponent  
*(Signature)*

M. B. PATEL  
B.Com., LL.B.  
ADVOCATE & NOTARY  
(Govt. of Guj.)



*[Faint, illegible handwritten text]*



*[Faint, illegible handwritten text]*



# GUJARAT POLLUTION CONTROL BOARD <sup>387</sup>

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

## ANNEXURE-A-1

BY R.P.A.D.

**DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 [HEREINAFTER REFERRED TO AS THE WATER ACT] AS AMENDED FROM TIME TO TIME**

WHEREAS, you **M/s. SHCHEM CORPORATION** is having an industrial plant at **Plot No: 4001/A-2, GIDC ESTATE ANKLESHWAR, DIST.BHARUCH.**

AND WHEREAS, Gujarat Pollution Control Board had issued consent under the provisions of Water Act-1974 by its Consent Order No. AWH -95266, which was valid up to 02/06/2023 for operation of the industrial plant with various conditions mentioned therein and whereas, you have applied for the renewal of the same which is under consideration

AND WHEREAS, you have committed various non-compliances in the past, which is a matter of records and in particular, due to no compliances observed during inspection on 14/10/2020, this Board had issued closure direction with 15<sup>th</sup> day effect vide order no. GPCB/ANK-CCA-977/ID: 26937/572954 on date: 10/11/2020.

AND WHEREAS, as stated above, on various instances during inspection of your unit on 27/11/2020, 12/02/2021, 17/03/2021, 31/03/2021, 15/04/2022, 02/07/2022, 06/06/2023, 10/06/2023 and 02/08/2023, unit was found non-complying with closure direction and discharging contaminated effluent into Storm Water Drain of GIDC causing damage to the environment. Various telephonic complaints were also received against your unit regarding illegal effluent discharge in Storm Water Drain of GIDC Ankleshwar and for which, detailed scrutiny and inspection has been carried out by GPCB.

AND WHEREAS, you are found in operation in spite of Board's closure order dated 10/11/2020, which also on the face of it is a blatant violation committed by you. Under such circumstances, the Board had to issue Directions to District Collector, Bharuch to seal your unit vide letter dated 07/04/2021 and 22/08/2022 and accordingly, District Collector sealed your unit on 11/10/2022

AND WHEREAS, this Board has filed Criminal case on 20/12/2023 vide case no. CC/5570/2023 in civil court of Ankleshwar against your unit for violation as stated above.

AND WHEREAS, the non-compliance found during the inspection seems severe and also deliberate, as can be very clearly seen from your past records and has potential to cause damage to the Environment severely.

AND WHEREAS Hon. NGT has directed for levying Environment Damage Compensation (EDC) in the matter of O.A. no. 593 of 2017 and O.A. 95 of 2018 and in various other matters.

AND WHEREAS in line with Hon'ble NGT Orders in the matter of OA no. 593 of 2017 and others, Central Pollution Control Board (CPCB) has framed methodology for levying of Environment Compensation (EC). Your case is liable for levying EDC under the criteria **(a) of the said methodology i.e. Discharges in violation of consent conditions, mainly prescribed standards / consent limits.**

AND WHEREAS you have applied for Revocation to this Board to start operating your plant along with required documents i.e. Assurance in the form of Bank Guarantee of Rs. 1, 50,000/- which was valid upto 31/12/2023 and undertaking dated 31/10/2022 to comply with CC&A conditions and closure direction. This Board has considered your revocation application along with assessment of EDC as per standard procedure.

AND WHEREAS looking to non-compliance observed over period of 2020 to 2023 during various inspections on 27/11/2020, 12/02/2021, 17/03/2021, 31/03/2021, 15/04/2022, 02/07/2022, 06/06/2023, 10/06/2023 and 02/08/2023, this Board has assessed EDC based on number of days and unit is liable to pay total EDC amount of Rs. 53,15,000/-, which was communicated to you through SMS by the Board's official portal XGN by generating payment link on 28/02/2024, after payment of EDC only Trial Revocation for 03 months can be issued for restoring electricity supply and water supply by Board. In furtherance to the same, the captioned order is being issued.

UNDER THE CIRCUMSTANCES, as directed, I Arun G. Patel, Environment Engineer, Gujarat Pollution Control Board issue the direction under Section 33(A) of the Water Act - 1974 to pay Rs. 53,15,000/- as interim Environment Damage Compensation (EDC).

If you are aggrieved by the aforesaid direction, you may file appeal under section 33-B of the Water (Prevention and Control of Pollution) Act, 1974 before National Green Tribunal within thirty days from the date of this order.

This is issued with the approval of the competent authority.

For and on behalf of  
Gujarat Pollution Control Board

*Arun G. Patel*  
20.05.2024  
(Arun G. Patel)

ENVIRONMENT ENGINEER



# GUJARAT POLLUTION CONTROL BOARD

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

NO: GPCB/ANK/CCA-977(3)/ID-26937/81745

Dated: 20/05/2024

Issued to:

M/s. SHCHEM CORPORATION,  
PLOT NO: 4001/A-2,  
GIDC ESTATE ANKLESHWAR,  
DIST: BHARUCH, GUJARAT.

**COPY TO:**

**1. Regional Officer**

Gujarat pollution Control Board,  
Regional Office,  
Ankleshwar..... For your information.

For and on behalf of  
Gujarat Pollution Control Board

*Arun G. Patel*  
20.05.2024  
(Arun G. Patel)

ENVIRONMENT ENGINEER



# **SHCHEM CORPORATION**

390

## **FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 001

## **ANNEXURE-A-2**

October 17, 2020.

The Regional Officer  
The Gujarat Pollution Control Board  
1<sup>st</sup>. Floor, Plot No.1501  
GIDC Estate, Ankleshwar-393002.

ID : 26937.

Dear Sir,

Subject :- Your Notice Of Entry Dated October 14, 2020.

This has reference to the visit of your officers to our factory on October 14, 2020 vide notice of entry dated 14-10-2020. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. One of the samples drawn was of our primary treated effluent from our "Treated Effluent Tank". Our Primary Effluent Treatment plant is situated in the North East Corner of our Factory Plot. The second sample drawn was from GIDC's Storm Water Drain and the spot was in the South West Corner of our factory plot. The two spots are roughly 70 metres (230 feet) apart. Your officers carried out detailed inspection to see whether there were any means by which we could have discharged our effluent in the GIDC storm water drain. You will be pleased to know that they did not find any thing that could raise a doubt of illegal discharge of our effluent.
- b. The "pH" of both the samples was checked in our presence. The "pH" of the sample drawn from our "Treated Effluent Tank" was found to be about "8" whereas that of the sample drawn from the storm water drain was more than "10". The sample drawn from our "Treated Effluent Tank" was of light brown colour while that of the sample drawn from the storm water drain was dark brown in colour. No other characteristics of the samples were similar at all.
- c. We have cleaned the area around the ETP and have improved the house keeping immediately after it was pointed out by your officers.
- d. We are submitting the data, asked by your officers in the Notice Of Entry, separately.
- e. All earlier instructions have been complied with.

Contd...2

Contd..

Sir, we request you to consider our above responses, objectively, to the queries raised by your officers and earnestly request you to not penalise us merely on the basis of "Doubt". In the interest of natural justice, kindly grant us an opportunity to present our case, in person, and oblige.

Should you need any other clarifications, please let us know and we shall promptly answer the same to the best of our abilities. Assuring you of our best co-operation at all times, We Remain,  
Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Vijay Sheth  
Partner.

CC to : Gujarat Pollution Control Board  
Paryavaran Bhavan  
Sector 10-A,  
Gandhinagar-382010.



**SHCHEM CORPORATION****FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 003

**ANNEXURE-A-3**

November 21, 2020.

The Gujarat Pollution Control Board  
Paryavaran Bhavan  
Sector - 10 A  
Gandhinagar - 382010.

Dear Sir,

ID : 26937.

Subject :- Your Closure Direction Under Section 33-A Of The Water  
(Prevention And Control Of Pollution) Act 1974 bearing  
Number GPCB/ANK/CCA-977/ID-26937/572954 Dated  
10.11.2020 and Received On 17.11.2020.

We are in receipt of the above order and wish to bring to your kind notice our letter no. 001 dated 17.10.2020.

We wish to place on record, the following for your the following for your sympathetic consideration :-

- We state that the Brownish coloured waste water observed in GIDC open drain near the boundary wall of our unit is not our waste water. Our ETP plant is located in the North East corner of our factory plot and the sample of the brownish coloured waste water was taken from the GIDC open Drain in the South West corner of the factory plot. There is a distance of at least 230 feet between the two corners. Your officers had conducted a detailed inspection to see if there were any means by which we could have discharged our untreated effluent in to the GIDC. They did not find any evidence of the same. The attached photographs explain the brownish waste water found in the GIDC storm water drain that stretched for 80 - 90 feet. It is evident from the photographs that live chicken is cut and meat is cut and sold at the spot from where sample was taken from the GIDC open drain.
- Our ETP is for Primary Treatment of our waste water and is in working condition. The neutralized effluent is pumped from the collection cum neutralization tank in to the Sludge Drying Tank for filtration of the salts/sludge. The clear treated effluent is collected in the Treated Effluent Sump. We showed the collected sludge packed in HDPE bags to your officers. This proves that our Primary Effluent Treatment Plant was and is in working condition.

Contd...2

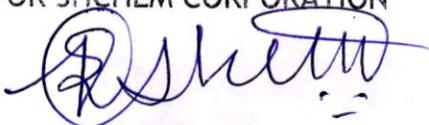
*V.N.P.*  
*21/12/2020*  
Gujarat Pollution Control Board  
Sector No. 10 A,  
Gandhinagar - 382 010

- c. It is your finding that the sample of the waste water taken from the Treated Effluent Sump showed "pH" of 8.68, C.O.D. of 4116 mg/ltr. And NH<sub>3</sub> - N of 101 mg/ltr. We are to achieve the above parameters after treating our waste water in our Primary Treatment Plant. The collected effluent is then conveyed to ETL for final treatment.
- d. There was some spillage of neutralized effluent while it was being pumped from our Collection Cum Neutralization Tank in to the Sludge Drying Bed. We now propose to have a concrete flooring near our ETP area.
- e. We have improved housekeeping in our entire premises as well as in the ETP area.
- f. We very strongly object to your conclusion that "...the unit discharges their waste water in to GIDC open storm water drain in odd hours instead of treatment and disposal as per CCA conditions." We place on record that we not discharged and shall never discharge our effluent in to GIDC open water drain.

Sir, we earnestly submit that the above action has been initiated against us based only on "Doubt". We are enclosing photographs which show the activities carried along the GIDC Storm Water drain, by anti-social elements, from where the sample was taken. The photographs clearly depict that illicit liquor is sold, Meat and Chicken is cut and sold in the open and Fish and Meat is cooked in the open and all the waste is let In the GIDC Storm Water Drain. This is the reason for the waste water being coloured and foul smelling.

In our letter number 001 dated 17.10.2020, we had requested you to grant us an opportunity for a personal hearing to present our case in person. We earnestly request you to not punish us on the basis of "Doubt" and for no fault of ours. We were unable to come earlier because of death of our family member, due to Corona.

Truly Yours,  
FOR SHCHEM CORPORATION



Vijay Sheth  
Partner.

Encls. : Photographs - 3 Nos.

cc to : 1. The Dy. Engineer (O&M)  
          DGVCL, GIDC Ankleshwar.

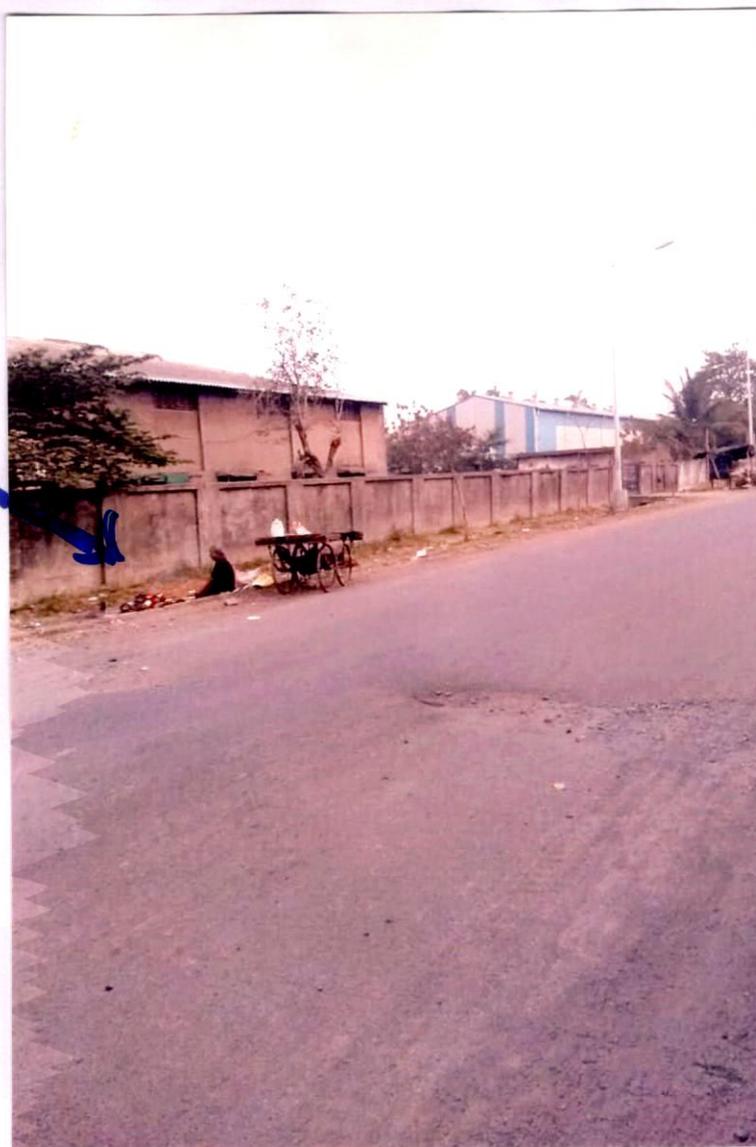
2. The Chief Officer  
          Ankleshwar Notified Area.



PICTURE SHOWING LOCATION  
OF VENDORS SELLING ILLICIT  
LIQUOR AS WELL AS CUT  
MEAT & CHICKEN



PICTURE SHOWING LOCATION  
OF VENDOR SELLING  
MEAT AND CHICKEN



PICTURE SHOWING LOCATION  
OF VENDOR COOKING  
FISH, MEAT & CHICKEN



# SHCHEM CORPORATION

397

**FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar - 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 004

**ANNEXURE-A-4**November 28, 2020.

The Regional Officer  
The Gujarat Pollution Control Board  
1<sup>st</sup>. Floor, Plot No.1501  
GIDC Estate, Ankleshwar-393002.

ID : 26937.

Dear Sir,

Subject :- Your Notice Of Entry Dated November 27, 2020.

This has reference to the visit of your officers to our factory on November 27, 2020 vide notice of entry dated 27-11-2020. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- One of the samples drawn was of our primary treated effluent from our "Treated Effluent Tank". The colour of the sample taken was of yellowish colour. Our Primary Effluent Treatment plant is situated in the North East Corner of our Factory Plot. The second sample drawn was from GIDC's Storm Water Drain and this sample was of greenish colour. The spot from where the second sample was taken is in the South West Corner of our factory plot. The two spots are roughly 70 metres (230 feet) apart. The difference in the colour of the two samples, prove that the effluent found in the GIDC Open Drain is not the same as that found in our treated effluent tank. Your officers carried out detailed inspection of our premises to see whether there were any means by which we could have discharged our effluent in the GIDC storm water drain. You will be pleased to know that they did not find anything that could raise a doubt of illegal discharge of our effluent. We place on record that no illegal discharge of waste water has happened from our unit. We also state that a particular officer of NCTL has been targeting us for quite some time and has been lodging complaints against us with GPCB. He had lodged a similar complaint against us on October 14, 2020 which led to issue of Closure Direction against our Unit. He lodges complaints against us purely based on his doubts and without evidence.
- Your officers found that our unit was not in production at the time of the visit. The DGVCL disconnected our power supply on November 25, 2020 as per the Board's Closure Direction under section 33-A of the Water (Prevention And Control Of Pollution) Act-1974 issued vide Order No.: GPCB/ANK/CCA-977/ID-26937/572954 dated 10/11/2020.

Contd..2



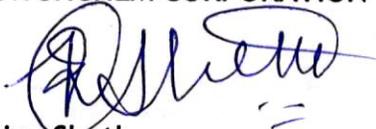
U.M.P  
02/12/2020  
Gujarat Pollution Control Board  
Sector No. 10 A,  
Gandhinagar - 382 016

- c. A Raw Material Stores is already under construction. This is a 1000 Sq. Ft. RCC structure coming up in the South West corner of our plot. The R.M. Stores will be a well illuminated area where the Raw Materials/Goods In Process/M.L. Drums will be properly labelled and stored. At present our Raw Materials/Goods In Process/M.L. Drums are lying in the open only till the time the R. M. Stores is constructed. Your officers have seen construction work as well as stocks of Sand, Kapchi etc..
- d. The Treated Effluent Holding Tank has since been welded and repaired. We have cleaned the area around the ETP tanks. We have taken up cleaning and house- keeping of our premises immediately and on priority basis.
- e. We have also decided to provide an enclosed PP Effluent Pipeline for conveying Effluent generated in the Production Area up to the underground Collection cum Neutralization Tank. This will ensure zero seepage.
- f. We have enclosed a photograph of a Tanker that was parked along the GIDC Storm Water Drain. There was no person found in the Tanker and the photograph was taken at 04:15 hours on November 30, 2020. We have enclosed this picture to inform you that there may be others who could be unloading effluent illegally. The registration number of the tanker is clearly seen in the photograph.

We again place on record that the colour of the sample taken from our Effluent Tank was of yellowish colour while the second sample drawn from GIDC's Storm Water Drain was of greenish colour. This itself proves that we have not discharged our effluent illegally in to the GIDC Open Drain. We have already suffered because of the DOUBTS of an individual officer of the NCTL and request you to not make us suffer more only because of his doubts.

Should you need any other clarifications, please let us know and we shall promptly answer the same to the best of our abilities. Assuring you of our best co-operation at all times, We Remain,  
Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Vijay Sheth  
Partner.

CC to : Gujarat Pollution Control Board  
Paryavaran Bhavan  
Sector 10-A,  
Gandhinagar-382010.



SUSPICIOUS TANKER  
PARKED OUTSIDE OUR  
PLOT AT 04:15 AM  
ON 30.11.2020



**SHCHEM CORPORATION****FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 016

**ANNEXURE-A-5**

February 15, 2021.

The Regional Officer  
The Gujarat Pollution Control Board  
1<sup>st</sup> Floor, Plot No.1501  
GIDC Estate, Ankleshwar-393002.

ID : 26937.

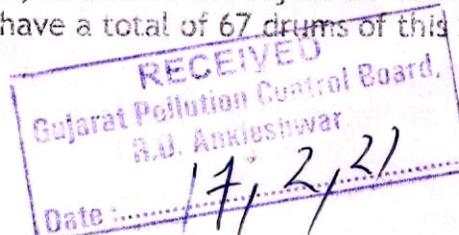
Dear Sir,

Subject :- Visit OF Your Officers Vide Notice Of Entry Dated 12.02.2021.

This has reference to the visit of your officers to our factory on February 12, 2021 vide notice of entry dated 12-02-2021. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. We hold a valid CC&A for manufacture of 2.0 MT each of Mebendazole and 3,4 Di Amino Benzophenone, valid up to June 2023. We had sold 20 drums(4600 kgs.) of Sodium Bromide Solution) to MEET CHEMO PHARMA, Ankleshwar through our trading firm, M/s Organix (at the same address) on 23<sup>rd</sup>. Dec. 2020 vide Invoice number 2020-21/F/20072. Copy of the invoice is attached for your ready reference. We were originally using DMF (Di Methyl Formamide) in catalytic quantity, in the Friedel Craft's reaction. However, after January 2018, we replaced DMF with N-Propyl Bromide, as a catalyst, in our Friedel Craft's reaction for higher conversion. There is no change in the other raw materials viz. Benzene, Thionyl Chloride, Aluminium Chloride, in the Friedel Crafts' reaction to convert 3-Nitro, 4-Chloro Benzophenone to 3-Nitro 4-Chloro Benzophenone. During this reaction, after coupling takes place, we have to quench the reaction mass in chilled water to isolate the material. Isolation of the organic compound is achieved by layer separation. The aqueous layer, after adjusting the "pH" with Caustic Soda lye, contains Sodium Bromide as well as Poly. Aluminium Chloride bearing nomenclature of "MB-III ML". We use NaSH, as reducing agent, for converting 3-Nitro 4-Amino Benzophenone to 3,4 Di Amino Benzophenone. We have replaced solvent Iso Propyl Alcohol (IPA) with N-Propyl Alcohol, after prices of I.P.A. sky rocketed due to its use in manufacture of Sanitizers. These are the only changes in the list of Raw Materials.
- b. We had sold 20 drums(4600 kgs.) of Sodium Bromide Solution) to MEET CHEMO PHARMA, Ankleshwar through our trading firm, M/s Organix (at the same address) on 23<sup>rd</sup>. Dec. 2020 vide Invoice number 2020-21/F/20072. The entire quantity of 20 drums (4600 kgs.) of Sodium Bromide Solution was rejected and returned back by Meet Chemo Pharma on January 9, 2021. Copy of the invoice, as well as the rejection memo, are attached for your ready reference. At present, we have a total of 67 drums of this Sodium Bromide Solution.

Contd....2



# **SHCHEM CORPORATION**

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-2-

- c. We hereby state that there was no production activity in our plant from April 2020 till 25<sup>th</sup> November 2020. We were issued closure directions under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020 and our power and water supply has been disconnected since November 25, 2020. Consequently, there was no production since April 2020.
- d. We have attached the GST Registration Certificate of our trading firm M/s ORGANIX, situated at the same address viz. A-2/4001, G.I.D.C. Ankleshwar - 393002, for your record and ready reference. WE STATE ON OATH AND UNDERTAKE THAT WE SHALL NOT BUY / SELL / DEAL / TRADE IN HAZARDOUS WASTE IN FUTURE. WE FURTHER UNDERTAKE TO STRICTLY COMPLY WITH THE HAZARDOUS WASTE MANAGEMENT RULES.

Should you need any other clarifications, please let us know and we shall promptly answer the same to the best of our abilities. Assuring you of our best co-operation at all times, We Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Vijay Sheth  
Partner.

Encls. : As above.

**ORGANIX**

MANUFACTURER EXPORTER  
BULK DRUGS AND FINE CHEMICALS

(SUBJECT TO ANKLESHWAR JURISDICTION)

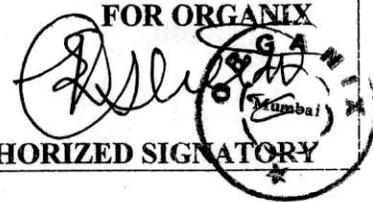
FACTORY: A-2/4001, G.I.D.C. ANKLESHWAR - 393002 Tel.: +91-02646 220653

E mail: [organix1@gmail.com](mailto:organix1@gmail.com), [organix1@rediffmail.com](mailto:organix1@rediffmail.com)

GSTIN : 24AHZPS5784K1Z6 STATE : GUJARAT

STATE CODE : 24

**TAX INVOICE**

BILLED TO MEET CHEMO PHARMA 202, SURYA COMPLEX, OPP. SPORTS COMPLEX, GIDC, ANKLESHWAR - 393002.			SERIAL NO. OF INVOICE : 2020-21/F/20072 DATE OF INVOICE : 23/12/2020 CHALLAN NO : F/231220072 DATE : 23/12/2020 ORDER NO. : DATE : TRANSPORTER : FREIGHT : PAID L.R. NO. : DATE : VEHICLE NO. : GJ24V3039 DATE : 23/12/2020 PAY. TERMS : DUE DATE: PLACE OF SUPPLY : GUJARAT EWAY BILL NO. :				
STATE : GUJARAT STATE CODE : 24 GSTIN/ UNIQUE ID : 24AEUPS4095K1ZN DRUG LIC. NO. :							
SHIP TO NAME : SAME AS ABOVE ADDRESS : SAME AS ABOVE STATE : GUJARAT STATE CODE : 24 GSTIN/ UNIQUE ID : 24AEUPS4095K1ZN DRUG LIC. NO. :							
SR. NO	DESCRIPTION OF GOODS	HSN CODE	QUANTITY	UNIT	RATE RS.	TAXABLE VALUE RS.	
1.	<u>SODIUM BROMIDE SOLUTION</u>	28275110	4600.0	KG	4.00	18,400.00	
					CGST	9%	1,656.00
					SGST	9%	1,656.00
					IGST	18%	
					R.Off	(+)	0.00
					<b>TOTAL VALUE</b>		<b>21,712.00</b>
AMOUNT OF TAX SUBJECT TO REVERSE CHARGES					GST		NIL
TOTAL INVOICE VALUE (in words)RUPEES TWENTY ONE THOUSAND SEVEN HUNDRED TWELVE ONLY.							
GSTIN : 24AHZPS5784K1Z6 STATE : GUJARAT STATE CODE : 24			COMPANY'S BANK DETAILS. BANK NAME : THE BHARAT CO-OPERATIVE BANK (MUMBAI) LTD A/C NO. : 000713100001018 BRANCH : ANDHERI (W) IFSC CODE : BCM0000008				
RECEIVERS'S SIGNATURE			Certified that the particulars given above are true & correct <b>FOR ORGANIX</b>  <b>AUTHORIZED SIGNATORY</b>				

# ORGANIX

MANUFACTURER EXPORTER  
BULK DRUGS AND FINE CHEMICALS  
(SUBJECT TO ANKLESHWAR JURISDICTION)

FACTORY: A-2/4001, G.I.D.C. ANKLESHWAR - 393002 Tel.: +91-02646 220653  
E mail: organix1@gmail.com, organix1@rediffmail.com

GSTIN : 24AHZPS5784K1Z6 STATE : GUJARAT

STATE CODE : 24

## TAX INVOICE

BILLED TO  
MEET CHEMO PHARMA  
202, SURYA COMPLEX, OPP. SPORTS COMPLEX,  
GIDC, ANKLESHWAR - 393002.

STATE : GUJARAT  
STATE CODE : 24  
GSTIN/ UNIQUE ID : 24AEUPS4095K1ZN  
DRUG LIC. NO. :

SHIP TO  
NAME : SAME AS ABOVE  
ADDRESS : SAME AS ABOVE  
STATE : GUJARAT  
STATE CODE : 24  
GSTIN/ UNIQUE ID : 24AEUPS4095K1ZN  
DRUG LIC. NO. :

SERIAL NO. OF INVOICE : 2020-21/F/20072  
DATE OF INVOICE : 23/12/2020

CHALLAN NO : F/231220072 DATE : 23/12/2020

ORDER NO. : DATE :

TRANSPORTER :

FREIGHT : PAID

L.R. NO. : DATE :

VEHICLE NO. : GJ24V3039 DATE : 23/12/2020

PAY. TERMS : DUE DATE:

PLACE OF SUPPLY : GUJARAT

EWAY BILL NO. :

SR. NO	DESCRIPTION OF GOODS	HSN CODE	QUANTITY	UNIT	RATE RS.	TAXABLE VALUE RS.	
1.	<u>SODIUM BROMIDE SOLUTION</u>	28275110	4600.0	KG	4.00	18,400.00	
						CGST 9%	1,656.00
						SGST 9%	1,656.00
						IGST 18%	
						R.Off (+)	0.00
						<b>TOTAL VALUE</b>	21,712.00
AMOUNT OF TAX SUBJECT TO REVERSE CHARGES						GST	NIL

TOTAL INVOICE VALUE (in words)RUPEES TWENTY ONE THOUSAND SEVEN HUNDRED TWELVE ONLY.

GSTIN : 24AHZPS5784K1Z6  
STATE : GUJARAT  
STATE CODE : 24

COMPANY'S BANK DETAILS.

BANK NAME : THE BHARAT CO-OPERATIVE BANK (MUMBAI) LTD  
A/C NO. : 000713100301018  
BRANCH : ANDHARI (W)  
IFSC CODE : BCBM0000008

RECEIVERS'S SIGNATURE

Certified that the particulars given above are true & correct  
**FOR ORGANIX**

AUTHORIZED SIGNATORY

*Rejected*  
*20/12/2020*  
*9/01/2021*

*Material Rejected & Received Back*

*9/01/2021*



Government of India  
Form GST REG-06  
[See Rule 10(1)]

Registration Certificate

Registration Number : 24AHZPS5784K1Z6

1.	Legal Name	JINESH RAMESHCHANDRA SHETH			
2.	Trade Name, if any	ORGANIX			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	PLOT NO A-2/4001, GIDC, ANKLESHWAR, ANKLESHWAR, Bharuch, Gujarat, 393002			
5.	Date of Liability				
6.	Period of Validity	From	14/02/2019	To	NA
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority	Gujarat			
Signature		Signature valid Digitally signed by S GOODS AND SERVICES TAX NETWORK(2) Date: 2019.02.14 14:15:46 IST			
Name		KUSUM SATISH RADIA			
Designation		Commercial Tax Officer			
Jurisdictional Office		Ghatak 56 (Ankleshwar)			
9. Date of issue of Certificate		14/02/2019			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the approval of application granted on 14/02/2019 by the jurisdictional authority.



ok

# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 018

**ANNEXURE-A-6**

Mach 18, 2021.

The Regional Officer  
The Gujarat Pollution Control Board  
1<sup>st</sup>. Floor, Plot No.1501  
GIDC Estate, Ankleshwar-393002.

ID : 26937.

Dear Sir,

Subject :- Visit OF Your Officers Vide Notice Of Entry Dated 17.03.2021.

This has reference to the visit of your officers to our factory on March 17, 2021 vide notice of entry dated 17-03-2021. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. Sir, our unit's Power and Water connections have been disconnected since November 25, 2020. Our unit has been visited by your officers on **four occasions** after November 25, 2020 and every time, no production activity has been observed. Our unit was issued closure order because of the complaint, made to you, by NCT on October 14, 2020. The complaint was regarding alkaline waste water found in the storm water drain, near our rear gate. A similar complaint about alkaline waste water, at the same spot, was made by NCT to you on November 27, 2020 and our unit was once again thoroughly inspected. On both the occasions, no direct evidence was found against us. Thereafter, in January 2021, NCT, along with Notified Area Authority officials, in presence of GPCB's official, carried out a detailed inspection of the storm water drain, near our rear gate, to find if there was any illegal or ghost connection from our factory premises. No such evidence was found. On March 17, 2021, NCT officials found acidic waste water at the same spot in the storm water drain and complained to GPCB. This time again our unit was thoroughly inspected and no evidence was found against us. Sir, we feel that the spot, near our rear gate, is used by someone to illegally drain waste water in the storm water drain. We have suffered and continue to suffer for no fault of ours. We again repeat, we have nothing to do with the acidic waste water found in the storm water drain near the rear gate of our factory.
- b. As stated above, our unit has been under closure since November 25, 2020. With a view to carry on some business, we undertook trading activity. The tanker No. GJ16X8412 found in our factory, at the time of the visit of your officials, had come to deliver fresh Hydrochloric Acid solution (30-32%). We have enclosed the copy of the invoice vide which the goods were delivered to us.

Contd.....2



# SHCHEM CORPORATION

## **FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-2-

The fresh Hydrochloric acid so received was being unloaded in HDPE drums for trading purpose. We hereby undertake to stop our trading activity with immediate effect and assure you that we shall not do it without the Board's prior approval.

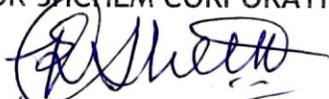
- c. We state that 39 MT of Stable Bleaching Powder and 21 MT of Caustic Soda Lye, both of GACL make, were procured for trading purpose. We were issued closure directions under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020 and our power and water supply has been disconnected since November 25, 2020. This has severely affected our financial condition and to make matters worse, we have been asked to deposit Rs.4.40 lacs towards E.D.C.. We have not been able to deposit the above amount for want of funds and hence our revocation order has not been issued. Sir, we shall sell the above stocks and raise money to pay the E.D.C..
- d. We have started construction of a tank farm for storage of our raw materials and intermediates. Till such time that the construction is over, we have stored our raw materials and intermediates in HDPE drums. The drums are stored on RCC floor and covered with tarpaulin. As soon as the tank farm is constructed, we shall empty the drums in the designated(proposed) HDPE tanks. The details of raw materials and intermediates stored in drums are as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	70
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
	<b>Total Number Of Drums</b>	<b>213</b>

- e. We agree that it is in our interest to install CCTV Cameras that cover and record the entire area of the storm water drain along our factory boundary. We assure you that we shall install and commission the same within the next eight days.

Should you need any other clarifications, please let us know and we shall promptly answer the same to the best of our abilities. Assuring you of our best co-operation at all times, We Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Partner.

Encls.: As above.

# FINIX PHARMA

Shop No.227, Golden Square, Nr.Omkar Complex, Valia Road, Ankleshwar - 393002.  
Mo.: 99797 24664 | E-Mail : finixpharma@gmail.com

**Debit Memo** **TAX INVOICE** **Duplicate**

**M/s. : SHCHEM CORPORATION**

**Invoice No. : 11**

**Date : 17/03/2021**

**ANKLESHWAR - 393002**

**Place of Supply : 24-Gujarat**

**GSTIN No. : 24AAHFS1987R1ZC**

SrNo	Product Name	HSN/SAC	Qty	UOM	Rate	GST %	Amount
1	HYDRO CHLORIC ACID 28061000	28061000	11990.000	KGS	1.65	18.00	19783.50

**GSTIN No.:** 24BETPP1257G2Z8 **PAN No.:** BETPP1257G

**Sub Total** **19783.50**

**Bank Name** : AXIS BANK LTD. (ANKLESHWAR)

**Bank A/c. No.** : 919020007721660

**RTGS/IFSC Code** : UTIB0000458

**Total GST** : *Three Thousand Five Hundred Sixty One And Four Paise Only*

**Bill Amount** : *Twenty Three Thousand Three Hundred Forty Five Only*

**Taxable Amount** **19783.50**

Central Tax 9.00% 1780.52

State/UT Tax 9.00% 1780.52

Round Off 0.46

**Grand Total** **23,345.00**

**Ratewise Summary :**

Slab	Taxable Value	Rate	Central Amount	Rate	State/UT Amount
18.00%	19783.50	9.00%	1780.52	9.00%	1780.52

**Note :**

**Transport** : LOCAL

**Vehicle No** : GJ16X8412

**Destination** : ANKLESHWAR

**Terms & Condition :**

1. Goods once sold will not be taken back.
2. Interest @18% p.a. will be charged if payment is not made within due date.
3. Our risk and responsibility ceases as soon as the goods leave our premises.
4. "Subject to 'ANKLESHWAR' Jurisdiction only, E.&O.E"

**For, FINIX PHARMA**

*G. Patel.*

(Authorised Signatory)

## TAX INVOICE

(ORIGINAL FOR RECIPIENT)

e-Invoice



IRN : addc21d668ad73b6fe3a534aee365b8e038049838770624-7c5a08fcb8a6690c7  
 Ack No. : 162110455960923  
 Ack Date : 17-Mar-21

 <b>Asha Minerals &amp; Chemical Industries</b> Plot No.4725-A, Near Ficom Chowkdi, Gidc Estate, Ankleshwar GSTIN/UIN: 24AGBPM9593R2ZG State Name : Gujarat, Code : 24 Contact : 02646-226079 E-Mail : yogindustries@yahoo.co.in	Invoice No.	Dated
	10485/20-21	16-Mar-21
Consignee (Ship to) <b>Finix Pharma</b> Shop No 227, Golden Square Nr. Omkar Complex Valia Chokdi Ankleshwar GSTIN/UIN : 24BETPP1257G2Z8 PAN/IT No : BETPP1257G State Name : Gujarat, Code : 24	Delivery Note	Mode/Terms of Payment
	10485/20-21	30 Days
Buyer (Bill to) <b>Finix Pharma</b> Shop No 227, Golden Square Nr. Omkar Complex Valia Chokdi Ankleshwar GSTIN/UIN : 24BETPP1257G2Z8 PAN/IT No : BETPP1257G State Name : Gujarat, Code : 24 Place of Supply : Gujarat	Reference No. & Date.	Other References
	10485/20-21 dt. 16-Mar-21	GRASIM
	Buyer's Order No.	Dated
	Dispatch Doc No.	Delivery Note Date
	10485/20-21	16-Mar-21
	Dispatched through	Destination
	GJ16X8412	ANKLESHWAR
	Terms of Delivery	

SI No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	Hydro Chloric Acid 28061000	28061000	11.990 M.T.	1,500.00	M.T.	17,985.00
	Less:				9 %	1,618.65
					9 %	1,618.65
						(-0.30)
	Total		11.990 M.T.			₹ 21,222.00

Amount Chargeable (in words)

Indian Rupees Twenty One Thousand Two Hundred Twenty Two Only

E. &amp; O.E

HSN/SAC	Taxable Value	Central Tax		State Tax		Total Tax Amount
		Rate	Amount	Rate	Amount	
28061000	17,985.00	9%	1,618.65	9%	1,618.65	3,237.30
Total	17,985.00		1,618.65		1,618.65	3,237.30

Tax Amount (in words) : Indian Rupees Three Thousand Two Hundred Thirty Seven and Thirty paise Only

Company's Bank Details

Bank Name : Axis Bank C.A.No.458010200005234

A/c No. : 458010200005234

Branch &amp; IFS Code : Gidc, Ankleshwar &amp; UTI0000458

for Asha Minerals &amp; Chemical Industries

Company's PAN : AGBPM9593R

Declaration

We declare that this invoice shows the actual price of the goods described and that all particulars are true and correct.

Authorized Signatory

SUBJECT TO ANKLESHWAR JURISDICTION

This is a Computer Generated Invoice

**DELIVERY CHALLAN**

Telefax : 02646 - 226079  
Mob. : 97142 99949  
93779 58885



**ASHA**  
**MINERALS & CHEMICAL**  
**INDUSTRIES**

Plot No. : 4725-A, Near Ficom Chowkdi, GIDC Estate,  
Ankleshwar - 393 002. Dist. Bharuch (Gujarat)

**GSTIN No. : 24AGBPM9593R2ZG**

M/s. Finix Pharma

And

Challan No. : 10485 Date : 16/3/21

Order No. : \_\_\_\_\_ Date : \_\_\_\_\_

Tanker No. : WJ 16 <sup>x</sup> Date : 8412

Sr. No.	Description of Goods	By Products of	Quantity	Remarks
	Hydrochloric Acid	Crossim	11.990	
				1500 Pmt

For, ASHA MINERALS & CHEMICAL INDUSTRIES

Receiver's Signatory

*[Signature]*  
Authorized Signatory



**TAX INVOICE**  
**GRASIM INDUSTRIES LIMITED**

DUPLICATE FOR TRANSPORTER

Grasim Industries Limited  
Chemical Division Vilayat

Plot No 4 GIDC Industrial Estate  
PO-Vilayat Taluka-Vagra, Bharuch India - 392012  
Phone: Fax  
Email: grasimchem.vilayat@adityabirla.com  
Regd. Office - PO Birlagram, Nagda Dist-Ujjain (MP) India - 456331

CIN : L17124MP1947PLC000410  
GSTIN : 24AAACG4464B2Z3  
PAN : AAACG4464B  
Website : www.grasim.com  
Eway Bill No : 000611278997563 Eway Bill Date: 16.03.2021  
IRN No : 66d1e23b4af016f4c749dc74287e833b6937806514d50d950cc340e9d0035688

Name & Address of Recipient (Billed To):  
ASHA MINERALS & CHEMICAL (1000009514)

4725/A FICOM CHOKDI  
OPP RD WEIGH

ANKLESHWAR - 393002  
State : Gujarat State Code : 24  
PO No : Email Date: 10.03.2021  
PAN No. : AGBPM9593R  
GSTIN : 24AGBPM9593R2ZG

Whether Tax is payable under reverse Charge Mechanism : No

Mode of Transport: Tanker  
Vehicle No.: GJ16X8412 LR No.:

Transporter Name : ASHA MINERALS & CHEMICAL  
Driver Name : METARBHAI LIC No.: GJ1820160000559

Description of Goods: Hydrochloric Acid (Comm)

HSN Code : 28061000  
No. & Description of Packages:  
Average Contents/Packages: Loose

Tax Invoice No.: 2401126516  
Delivery Order No.: 8305392982  
Date & Time of Inv. Prep : 16.03.2021 16:27:10  
Place of Supply/State/Code: ANKLESHWAR/Gujarat/24

Total Quantity in MT : 11.990		Ex Plant Price (INR / MT) : 600.00	In INR.
Gross wt	19.150 MT	Ex-Plant Value	7194.00
Tare wt	7.160 MT	Taxable Value	7194.00
Netwt	11.990 MT	SGST@9.00%	647.00
Conc	100%	CGST@9.00%	647.00
Seal :	188296	TCS@0.075 %	7.00
		Gross Amount	8495.00

Payment Term: 100% Advance Payment  
Tax: Against GST Registered

Amount in words:  
Total Tax Amount : Rs. One Thousand Three Hundred One Only  
Total Invoice Amount : Rs. Eight Thousand Four Hundred Ninety Five Only  
Inco Term : EXW Ex Works



Date of Removal: 16.03.2021



**Beneficiary Bank Details:**  
Beneficiary Name : Grasim Industries Limited Chemical Division Bank Name : HDFC BANK  
Account Number : GRCHEM1000009514HO Swift Code : HDFCINBB IFSC : HDFC0000240

**Declaration:** We hereby declare that the particulars given above are true and correct and the amount indicated represent the price actually charged and that there is no flow of additional consideration directly or indirectly from the buyer.  
IRN: 66d1e23b4af016f4c749dc74287e833b6937806514d50d950cc340e9d0035688

**TERMS & CONDITIONS:**  
1. Payment should be made within stipulated days as mentioned in the Invoice else interest @18% per annum will be charged beyond due date.  
2. We hereby certify that our GSTIN under GST Acts is in force on the date on which the sale of goods specified in this invoice is made by us.  
3. Transit risk of this consignment include in Ex Plant Value.  
4. Courts in PO-Vilayat, Taluka-Vagra, Bharuch shall have jurisdiction in case of any disputes.

Signature valid  
For GRASIM INDUSTRIES LIMITED  
Digitally Signed By:  
DS GRASIM INDUSTRIES LIMITED 1  
Tue 16-Mar-2021 16:47:10 GST  
Approved by Padmanabh Pathak  
Authorised Signatory

# SHCHEM CORPORATION

## FACTORY:

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## REGISTERED OFFICE:

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 019

## ANNEXURE-A-7

March 31, 2021.

The Regional Officer  
The Gujarat Pollution Control Board  
1<sup>st</sup>. Floor, Plot No.1501  
GIDC Estate, Ankleshwar-393002.

ID : 26937.

Dear Sir,

Subject :- Visit OF Your Officers Vide Notice Of Entry Dated 31.03.2021.

This has reference to the visit of your officers to our factory on March 31, 2021 vide notice of entry dated 31-03-2021. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. Sir, our unit's Power and Water connections have been disconnected since November 25, 2020. Our unit has been visited by your officers on five occasions after November 25, 2020 and every time, no production activity has been observed. Our unit was issued closure order because of the complaint, made to you, by NCT on October 14, 2020. The complaint was regarding alkaline waste water found in the storm water drain, near our rear gate. A similar complaint about alkaline waste water, at the same spot, was made by NCT to you on November 27, 2020 and our unit was once again thoroughly inspected. On both the occasions, no direct evidence was found against us. Thereafter, in January 2021, NCT, along with Notified Area Authority officials, in presence of GPCB's official, carried out a detailed inspection of the storm water drain, near our rear gate, to find if there was any illegal or ghost connection from our factory premises. No such evidence was found. On March 17, 2021, NCT officials found acidic waste water at the same spot in the storm water drain and complained to GPCB. This time again our unit was thoroughly inspected and no evidence was found against us. Again today, NCT officials found acidic waste water at the same spot in the storm water drain and complained to GPCB. Today, at the time of the visit of your officials i.e. at about 3.00 am, a tanker, showing label of Hydrochloric Acid, passed from the same spot from where acidic waste water was found in the storm water drain. The tanker did not stop, but Sir, no tanker movement is permitted in the G.I.D.C. Estate in the night. This was observed by one of your officials as well as by the NCT officials. Sir, it is for this reason, we feel, that the spot, near our rear gate, is used by someone to illegally drain waste water in the storm water drain. We have suffered and continue to suffer for no fault of ours. We again repeat, we have nothing to do with the acidic waste water found in the storm water drain near the rear gate of our factory.

Contd....2



# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-2-

- b. As stated above, our unit has been under closure since November 25, 2020. With a view to carry on some business, we undertook trading activity. We started trading in products that were our approved raw materials viz. Caustic Lye (48-49%), Fresh Hydrochloric Acid (30-32%), Propyl Alcohol etc.. We buy the first two raw materials in tanker lot, refill in drums and trade. To avoid contamination, we fill the above material in drums that are clean and rinsed with the same product. The acidic waste water, found in our HDPE reactor (R-1), the collection cum neutralization tank as well as in the treated waste water tank, is the water used for cleaning the drums and Fresh Hydrochloric Acid used for rinsing the drums. Sir, since our power and water supply has been disconnected since November 25, 2020, it is not possible to use the stirrer to neutralize the acidic waste water in our Collection cum Neutralization tank. We therefore use single phase mono block pump for mixing caustic lye for neutralizing, by recycling the contents. It is for this reason alone that your officials had found a mono block pump with flexible pipes near R-1, Collection cum Neutralization tank as well as near the final treated waste water tanks. We have since neutralized all the acidic waste water that was there in the Collection cum neutralization tank as well as in the Treated Effluent Tank.
- c. We state that there are 43 drums containing Fresh Hydrochloric Acid in our premises out of which some fourteen drums did not have properly fitting lids. We have fitted these 14 drums, with proper lids and now no fumes are coming out of these drums.
- d. We have started construction of a tank farm for storage of our raw materials and intermediates. Till such time that the construction is over, we have stored our raw materials and intermediates in HDPE drums. **The drums are stored on RCC floor and covered with tarpaulin. As soon as the tank farm is constructed, we shall empty the drums in the designated (proposed) HDPE tanks.** The details of raw materials and intermediates stored in drums are as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	70
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
	<b>Total Number Of Drums</b>	<b>213</b>

Contd...3

# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

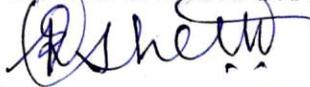
72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-3-

- e. We have already ordered for installation of CCTV Cameras that cover and record the entire area of the storm water drain along our factory boundary. These cameras will be installed and become functional by April 2, 2021.
- f. We strictly follow the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 25, 2020. This has severely affected our financial condition. We have decided not procure any material for trading anymore and we assure you that we shall not do any trading activity.

Should you need any other clarifications, please let us know and we shall promptly answer the same to the best of our abilities. Assuring you of our best co-operation at all times, We Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION

  
Partner.



# SHCHEM CORPORATION

414

## **FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 003

HAND DELIVERED

July 17, 2022.

## **ANNEXURE-A-8**

The Gujarat Pollution Control Board  
Paryavaran Bhavan  
Sector - 10 A  
Gandhinagar - 382010..

ID : 26937.

Dear Sir,

Subject : Visit OF Your Officers Vide Notice Of Entry Dated 02.07.2022.

This has reference to the visit of your officers to our factory vide notice of entry dated 02-07-2022. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. Sir, our unit's Power and Water connections have been disconnected since November 25, 2020. Our unit has been visited by your officers on **six occasions** after November 25, 2020 and every time, no production activity has been observed. Our unit was issued closure order because of the complaint, made to you, by NCT on October 14, 2020. The complaint was regarding alkaline waste water found in the storm water drain, near our rear gate. A similar complaint about alkaline waste water, at the same spot, was made by NCT to you on November 27, 2020 and our unit was once again thoroughly inspected. On both the occasions, no direct evidence was found against us. Thereafter, in January 2021, NCT, along with Notified Area Authority officials, in presence of GPCB's official, carried out a detailed inspection of the storm water drain, near our rear gate, to find if there was any illegal or ghost connection from our factory premises. No such evidence was found. On March 17, 2021, NCT officials found acidic waste water at the same spot in the storm water drain and complained to GPCB. This time again our unit was thoroughly inspected and no evidence was found against us. NCT officials found acidic waste water at the same spot in the storm water drain and complained to GPCB. **Again, no production activity was observed on March 31, 2021 during the visit of your officials at about 3.00 am. However, at 3.00 am, a tanker, showing label of Hydrochloric Acid, passed from the same spot from where acidic waste water was found in the storm water drain. The tanker did not stop, but Sir, no tanker movement is permitted in the G.I.D.C. Estate in the night. This was observed by one of your officials as well as by the NCT officials. Sir, it is for this reason, we feel, that the spot, near our rear gate, is used by someone to illegally drain waste water in the storm water drain. We have suffered and continue to suffer for no fault of ours. We again repeat, we have nothing to do with the acidic waste water found in the storm water drain near the rear gate of our factory.**

Contd.....2

  
18/07/22  
Gujarat Pollution Control Board  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

# SHCHEM CORPORATION

## **FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-2-

- b. Sir, we wish to state that at the time of the visit of our plant by the officials of the Board on July 2, 2022, cleaning activity of the S.S. Reactor (R-6) and Glass Lined Reactor (R-8) was going on. We were rinsing and cleaning the vessels with water using single phase 0.5 H.P. tullu pump. No other equipments or machineries were operational. **There has been no production or business activity undertaken ever since our power and water supply was disconnected since November 25, 2020 on account of Closure Directions issued to us under Section 33-A of The Water (Prevention and Control Of Pollution) Act -1974 vide letter No.GPCB/ANK/CCA-977/ID-26937/57294 dated 10.11.2020.** We can produce evidence of no business activity, ever since December 2020, by way of Nil GST Returns. The Board can verify the same from G.S.T. Authorities. We can produce Notified Area's Water Bills showing nil consumption and DGVCL's minimum Lighting Bills which will further substantiate our claim of no manufacturing or business activity.
- c. We have started construction of a tank farm for storage of our raw materials and intermediates. Till such time that the construction is over, we have stored our raw materials and intermediates in HDPE drums. **The drums are stored on RCC floor and covered with tarpaulin. As soon as the tank farm is constructed, we shall empty the drums in the designated(proposed) HDPE tanks.** The details of raw materials and intermediates stored in drums as well as other Raw Materials (powder Form) are as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	50
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
06	Benzyl Chloride	20
	<b>Total Number Of Drums</b>	<b>213</b>
07	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
08	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

Contd...3

# **SHCHEM CORPORATION**

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-3-

- d. We have stored solid waste (neutralisation sludge) in HDPE bags and kept in a dedicated waste storage area. However, BEIL has refused to accept this Hazardous waste, despite it being tested and approved by their laboratory. They have agreed to accept the same for storage in secured land fill in August 2022. We have a stock of almost 17 tons to 18 tons of the same. The hazardous waste has been packed in HDPE bags and stored in the open as there is not enough place to store in dedicated waste storage area. A few bags got torn and hence some quantity was spread on "under construction site" and not on open ground as mentioned in the Notice Of Entry. The torn bags have since been re-packed and no material is in the open.
- e. Our plot is surrounded by Plot No. A-2/4002 on the East side and Plot No. A-1/4012 on the South side. Both these plots are on a higher level of about one foot. During the rains, our plot gets inundated with all this water. During heavy rains, water from the Storms water drain enters our plot and the entire plot area is flooded with water from the storm water drain. We explained this to your officers but they were not convinced. We shall enclose pictures of our plot getting flooded with water from our neighbouring plots as well as by water from the storm water drain. It was this water that showed alkaline pH.
- f. Sir, there is no production activity ever since November 25, 2020 and hence there is no generation of any waste water. As stated in point "b" above, we can offer documentary evidences of no business activity since November 25, 2020. We have not made any hole in the compound wall for disposal of any waste water, as alleged in the Notice of Entry. It is this flood water that flows out from damaged compound wall. We have already got the compound wall repaired.
- g. We again repeat that our Water supply and Power supply has been disconnected since November 25, 2020. We can produce water supply bills that show the status of our connection as "Disconnected" and our DGVCL invoices showing only Single Phase supply. It is not possible to carry out any manufacturing activity with single phase supply. We also repeat that we have not filed any GST return since December 2020 which is the biggest evidence that there is no manufacturing activity.

Contd..4

# **SHCHEM CORPORATION**

**FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

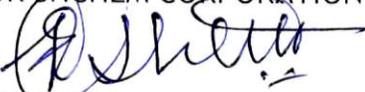
-4-

- h. We assure you that we will improve House Keeping.  
i. We strictly follow the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 25, 2020.

Sir, I am the only surviving partner of this Firm and I was affected by COVID on two occasions. I was hospitalised for more than four weeks on both the occasions. The year 2021 was lost due to my illness and hospitalisation. I am 64 years old and I have been attending to my work only from May 2022.

I request you for your sympathetic consideration. I assure you of my best co-operation at all times, I Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Partner.

C.C. : The Regional Officer, GPCB Ankleshwar.



# SHCHEM CORPORATION

418

## **FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 004

HAND DELIVERED

July 29, 2022.

## **ANNEXURE-A-9**

The Gujarat Pollution Control Board  
Paryavaran Bhavan  
Sector - 10 A  
Gandhinagar - 382010..

ID : 26937.

Dear Sir,

Subject : Additional Evidence in continuation with Our Letter Bearing  
Ref. No.003 Dated July 17, 2022.

This has reference to our earlier letter bearing Reference number "003" dated July 17, 2022 in regards to the visit of your officers to our factory vide notice of entry dated 02-07-2022. Clarifications and explanations with regards to the queries raised by your officers are as under:-

- We are herewith submitting the Statement showing Electricity Consumption for the period November 2020 up to July 2022. The Statement bears testimony that only Single Phase Power Supply has been provided by DGVCL ever since November 25, 2020. We further state that we do not have any D.G. Set and hence we have not had access to Three Phase Power Supply since November 25, 2020. Therefore, there has been no production activity ever since November 25, 2020.
- Our Water supply was also disconnected since November 25, 2020 and that the Water Meter Reading is the same. This is verified by the Water Supply department every month.
- We have stopped filing GST Returns as there has been no commercial activity. This is a very strong proof of no business / production activities.
- We have attached photographs which show that during heavy rains, our entire plot gets flooded due to the water from Storm Water Drain as well as from the Factory on our East and South Side. The photographs are of all the four sides of our Plot. Our Unit was visited by your officers on July 2, 2022 and there was heavy rain on June 30, 2022. It was this water that showed alkaline "pH". There is pooling of water, in our plot, even after water recedes. This was pointed out to your officers but unfortunately, they were not convinced.

Contd.....2

  
1108/22  
Gujarat Pollution Control Board  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

# SHCHEM CORPORATION

419

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

-2-

- e. Sir, we wish to state that at the time of the visit of our plant by the officials of the Board on July 2, 2022, cleaning activity of the S.S. Reactor (R-6) and Glass Lined Reactor (R-8) was going on. We were rinsing and cleaning the vessels with water using single phase 0.5 H.P. tullu pump. No other equipments or machineries were operational. **There has been no production or business activity undertaken ever since our power and water supply was disconnected since November 25, 2020 on account of Closure Directions issued to us under Section 33-A of The Water (Prevention and Control Of Pollution) Act -1974 vide letter No.GPCB/ANK/CCA-977/ID-26937/57294 dated 10.11.2020.** We can produce evidence of no business activity, ever since December 2020, by way of Nil GST Returns. The Board can verify the same from G.S.T. Authorities. We can produce Notified Area's Water Bills showing nil consumption and DGVCL's minimum Lighting Bills which will further substantiate our claim of no manufacturing or business activity.
- f. We have started construction of a tank farm for storage of our raw materials and intermediates. Till such time that the construction is over, we have stored our raw materials and intermediates in HDPE drums. **The drums are stored on RCC floor and covered with tarpaulin. As soon as the tank farm is constructed, we shall empty the drums in the designated(proposed) HDPE tanks.** The details of raw materials and intermediates stored in drums as well as other Raw Materials (powder Form) are as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	50
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
06	Benzyl Chloride	20
	<b>Total Number Of Drums</b>	<b>213</b>
07	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
08	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

Contd...3

# SHCHEM CORPORATION

420

## **FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
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-3-

- g. We have stored solid waste (neutralisation sludge) in HDPE bags and kept in a dedicated waste storage area. However, BEIL has refused to accept this Hazardous waste, despite it being tested and approved by their laboratory. They have agreed to accept the same for storage in secured land fill in August 2022. We have a stock of almost 17 tons to 18 tons of the same. The hazardous waste has been packed in HDPE bags and is now stored in dedicated waste storage area.
- h. Sir, there is no production activity ever since November 25, 2020 and hence there is no generation of any waste water. On July 2, 2022, Water was pumped, using single phase pump of 0.5 HP from the Cooling Tower Tank in to a 200 litre drum. The water from the drum was pumped in a 20 litre flask for cleaning the GLR (R-8) as well as the SSR (R-6).
- i. Digital temperature indicators are connected to the single phase power supply. The display of these indicators are always on. The indicators show incorrect temperatures due to voltage fluctuations.
- j. The Boiler was not in operation as the Boiler Feed Pump Motor and Blower Motor are 3-Phase Motors and are non-functional. Our 3-Phase power supply is disconnected since November 2020.
- k. We assure you that we will improve House Keeping.
- l. We strictly follow the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020.

I request you for your sympathetic consideration. I assure you of my best co-operation at all times, I Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Partner.

Encls.: As above.

C.C. : The Regional Officer, GPCB Ankleshwar.

**SHCHEM CORPORATION****FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
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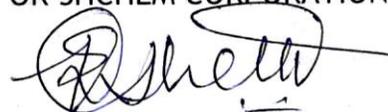
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Phone : (022) 22032841  
Fax : (022) 22032940.

**STATEMENT SHOWING ELECTRICITY CONSUMPTION DURING NOVEMBER 2020 UP TO  
JULY 2022**

SR. NO.	MONTH - YEAR	CONSUMPTION - UNITS	AMOUNT IN RS.	REMARKS
01	November 2020	11822	72789	Last Bill Before Disconnection
02	December 2020	916	9757	Regular Lighting
03	January 2021	3474	27530	Roof Welding
04	February 2021	3851	29804	Structure Welding
05	March 2021	4026	31712	Structure Welding
06	April 2021	5677	43431	Structure Welding
07	May 2021	3107	24529	Regular Lighting
08	June 2021	3551	27702	Regular Lighting
09	July 2021	493	6094	Reading Error
10	September 2021	7374	55350	3 Months' Bill
11	October 2021	2985	26272	Regular Lighting
12	November 2021	1439	11026	Regular Lighting
13	December 2021	1221	9391.16	Regular Lighting
14	January 2022	1681	12872.43	Regular Lighting
15	February 2022	1824	14282.94	Regular Lighting
16	March 2022	1706	13484.09	Regular Lighting
17	May 2022	1326	10813.58	Regular Lighting
18	June 2022	1498	12116.65	Regular Lighting
19	July 2022	1780	10877.38	Regular Lighting

FOR SHCHEM CORPORATION



PARTNER.



ANNEXURE-A-10**SHCHEM CORPORATION****FACTORY:**

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## ANNEXURE-A-11

### તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

નંબર : 26937

તારીખ : 07/11/2022

પાણી અધિનિયમ 1974ની કલમ-23, હવા અધિનિયમ 1981ની કલમ-24 અને પર્યાવરણ (સુરક્ષા) અધિનિયમ - 1986ની કલમ-10 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.

- (1) અમોને સોંપેલા રાજ્ય બોર્ડ/કેન્દ્ર સરકારનાં કાર્ય બજાવવાના હેતુ માટે,
- (2) 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 ખોગવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે,
- (3) 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 કોઈ મહત્વની વસ્તુ કબજે લેવા માટે અમે નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ/સ્થાપનામાં દાખલ થવાનો સમય : સવારના/સાંજના 17:00 તા. 07 / 11 / 2022

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે.

1. N. m. Tholiya (APE)

2.

3.

પ્રતિ,

M/s. Shchem Corporation,

Plot No. 4001/A-2,

GIDC Ankleshwar,

Dist. Bharuch

For SHCHEM CORPORATION

નકલ મળેલ છે.

આ સૂચના (નોટીસ) મેળવનારની સહી :-

Mr. Vijay Sheth

(Partner)

સહી :-

અધિકારીનું નામ :-

હોદ્દો :-

A. A. Vasava

A. A. Vasava

AEE

I undertake to file English Translation if required by Hon'ble Tribunal

સ્થળ તપાસ દરમ્યાન આપવામાં આવેલ લેખિત સૂચના

આપના એકમની આજ રોજ મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓ સંદર્ભે ધ્યાને આવેલ વિસંગતતાઓ/ત્રુટિઓ તેમજ સ્થળ ઉપર માંગવામાં આવેલ વિગતો પૂરી પાડવા અંગેની નીચે મુજબની સૂચના આપને આપવામાં આવે છે. જે અંગેનો ખુલાસો/રજુઆત/પૂર્તતા દિન-૩ માં અત્રેની કચેરીએ તેમજ ગાંધીનગર ખાતેની વડી કચેરીએ જાણ કરવા જણાવવામાં આવે છે. સદર વિગતો બોર્ડના ઓનલાઇન XGN પોર્ટલ ઉપર પણ અપલોડ કરવું.

- (1) મુલાકાત સમયે, એકમની મુખ્ય ઇલેક્ટ્રીક જ્વલ તથા Reaction Vessels (૬ nos.) સીલ કરાયેલ ધ્યાને આવેલ, સદર સીલ ની જાળવણી કરવી.
- (2) આપના એકમને પાડવામાં આવેલ clauses direction Dated 10/11/2020 ની તમામ શરતોનું સુસ્તપણે પાલન કરવું.

I undertake to file English Translation if required by Hon'ble Tribunal



For SHCHEM CORPORATION

*(Signature)*

Mr. Vijay Sheth  
(નોટીસ મેળવનાર)  
(Partner)

*(Signature)*  
N.M. Tholiya  
(APE)

*(Signature)*  
A.A. Vasava  
ગુ.પ્ર.નિ. બોર્ડના નામે અને વતી,  
A.A. Vasava  
AEE  
(નોટીસ આપનાર)

# SHCHEM CORPORATION

425

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 001

HAND DELIVERED

June 07, 2023.

ANNEXURE-A-12

The Regional Officer  
Gujarat Pollution Control Board  
Ankleshwar - 393002.

ID : 26937.

Dear Sir,

Subject : Visit Of Your Officer Vide Notice Of Entry Dated 06.06.2023.

This has reference to the visit of your officer to our factory vide notice of entry dated 06-06-2023. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officer, as under:-

- a. **BRIEF HISTORY:** Sir, we have attached a copy of the letter No. 003 dated July 17, 2022 for your ready reference and records. The said letter was hand-delivered to your office on July 17, 2022. The said letter bears testimony to all that has happened since October 2020.
- b. Sir, on October 11, 2022, the Main Power Supply switch, supplying 3-phase power supply and housed in a Main Switch Box, was also duly sealed. The respective Man-Hole of our six vessels were also sealed by your Officers in the presence of Ms. Krupaben Patel, Circle Office, Ankleshwar. **WE WISH TO STATE ON RECORD THAT THE SAID SEALS ARE INTACT AND THAT NO MANUFACTURING ACTIVITY HAS BEEN OR IS BEING CARRIED OUT.** We have attached the pictures of the same for your ready reference. We further wish to point out that due to No Commercial/manufacturing Activity for a long time, our GST Number stands cancelled / rendered inactive. There can be no greater proof of no commercial/manufacturing activity than the termination of our GST number. Our GST Number is 24AAHFS1987R1ZC and our contention may be easily verified.
- c. On June 6, 2023, at about 18.45 hours, accidental leakage was observed from near welding of the bottom nozzle of one of the 10000 litre HDPE tanks, holding our effluent. We had installed 3 x 10000 litre HDPE tank to hold our Treated Effluent before conveying the same to ETL for further treatment before final discharge. ETL refused to accept our effluent and informed us to send only after Revocation of Closure Directions was obtained from the Board. This effluent is our old effluent treated in our Primary Effluent Plant. Since all the tanks are kept in the open on a RCC platform, it seems the heat, cold and monsoons, appears to have weakened the welding.

Contd..2



Initially, we felt that we had been able to control the leakage by using cold welding methods. The undersigned left for home thereafter. At around 22.00 hours, our employee called me and informed me that the leakage had all of a sudden increased. I instructed him to connect the Bottom valve of the affected tank with a HDPE pipe and discharge the same in to our bathroom. At about 23.00 hours, our employee called me to inform me that GPCB officer had come and were asking as to why was material (contained in the tank) being discharged illegally ? I immediately rushed to the factory to explain the circumstances. The undersigned explained the circumstances and pleaded with your officer but it seems he was not convinced. On your officer's instructions, we immediately stopped the discharge. We have attached photographs, as evidence, of our contention for your understanding and records. We wish to add that thereafter, one more tank also leaked and we have let it collect on the ground. Pictures have been attached for your records. In the meantime, we completed construction of the tank Platform for holding Liquid effluent, our raw materials and intermediates. Till such time that the construction is over, we have stored our raw materials and intermediates in HDPE drums. **The drums are stored on RCC floor and covered with tarpaulin. As soon as our 3-Phase power is restored, we shall empty the drums in the designated (proposed) HDPE tanks.**

- d. The details of raw materials and intermediates stored in drums as well as other Raw Materials (powder Form) are as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	50
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
06	Benzyl Chloride	20
	<b>Total Number Of Drums</b>	<b>213</b>
07	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
08	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

We wish to state that there is no change in the quantity of Raw Materials / intermediates. This can be verified and this is a further evidence that there has been no manufacturing activity in our factory.

- e. We again repeat that our Water supply and Power supply has been disconnected since November 25, 2020. We can produce water supply bills that show the status of our connection as "Disconnected" and our DGVCL invoices showing only Single Phase supply. It is not possible to carry out any manufacturing activity with single phase supply. We also repeat that we have not filed any GST return since December 2020 which is the biggest evidence that there is no manufacturing activity.

Contd..3

f. We strictly follow the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 25, 2020.

Sir, I am the only surviving partner of this Firm and I was affected by COVID on two occasions. I was hospitalised for more than four weeks on both the occasions. The year 2021 was lost due to my illness and hospitalisation. I am 64 years old and I have been attending to my work only from May 2022.

I request you for your sympathetic consideration. I assure you of my best co-operation at all times, I Remain, Dear Sir,

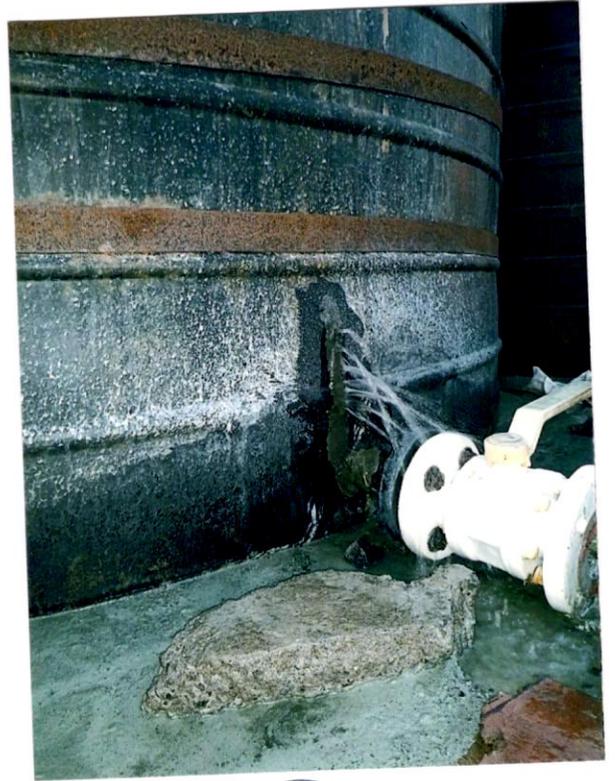
Truly Yours,  
FOR SHCHEM CORPORATION

  
Partner.

C.C. : The Unit Head, Ankleshwar. (By Courier)



①



②



③



④



5



6



7



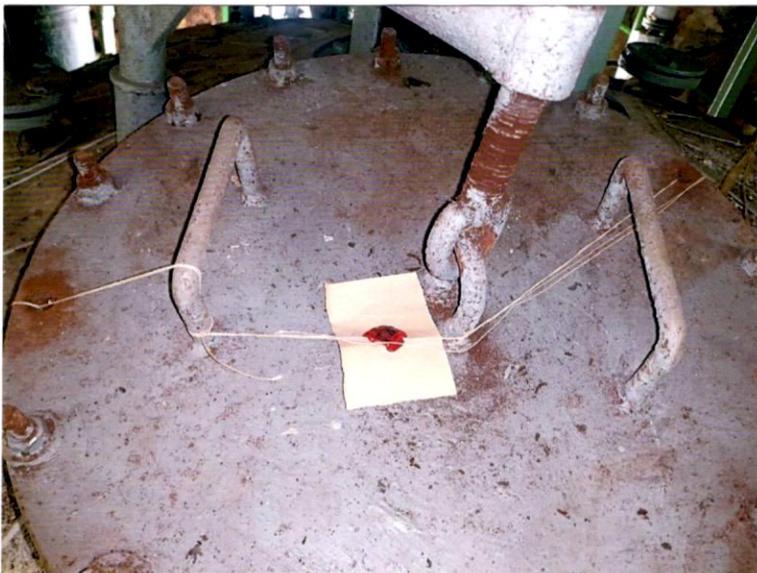
8



9



10



11

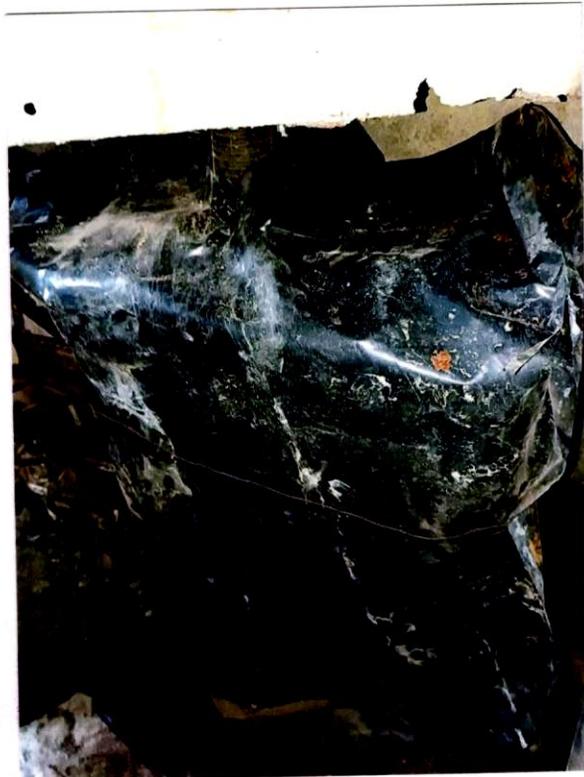
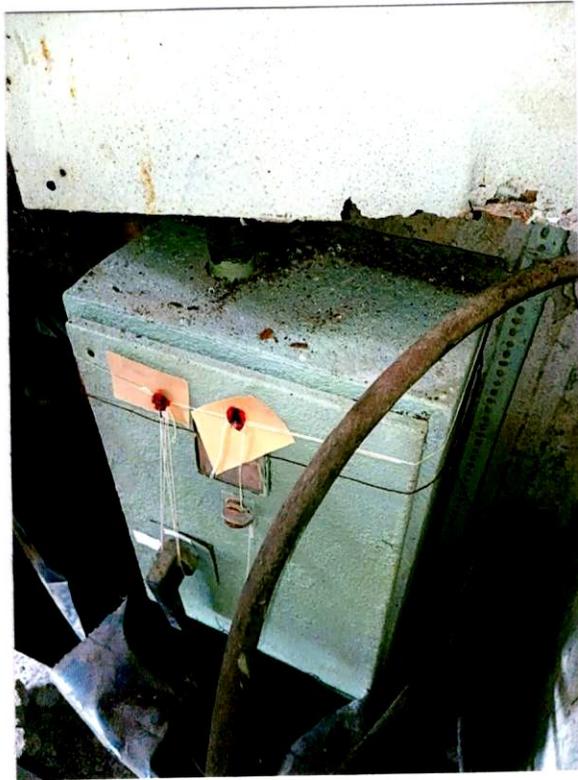


12



MAIN POWER SUPPLY CONTROL PANEL (3-PH)

ANNEXURE-A-13





S.S.R. (H.V.D.)



M.S.R. (AUTOCLAVE)



S.S.R.



S.S.R.



G.L.R.



SSR



ofc

# SHCHEM CORPORATION

438

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
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Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 003

HAND DELIVERED

June 12, 2023.

**ANNEXURE-A-14**

The Regional Officer  
Gujarat Pollution Control Board  
Ankleshwar - 393002.

ID : 26937.

Dear Sir,

Subject : Visit Of Your Officer Vide Notice Of Entry Dated 10.06.2023.

This has reference to the visit of your officer to our factory vide notice of entry dated 10-06-2023. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officer, as under:-

- a. Sir, in presence of your officer, our men started collecting the waste water that had leaked from our damaged Treated Effluent Storage tanks. After collecting as much water as possible, mud was spread to absorb the waste water and control & contain the seepage. Your officer will agree that it was a case of accidental leakage and that we had no other option but to wait for the tanks to empty. We wish to state that the tanks are almost empty and that no treated waste water is seeping in to the Storm Water Drain.
- b. Sir, our men collected the leaked treated waste water from the "ponding" that had occurred and stored in HDPE drums.
- c. On October 11, 2022, a total of six seals were affixed on the respective manhole of each of the six reactors and one seal was affixed on the Main Power Supply Control Panel, by your officers in presence of Ms. Krupaben Patel, Circle Office, Ankleshwar. The seal on the Main Power Supply Panel Box was intact as it was in the Electric Panel room. During the inspection, your officer had observed various civil construction activities going on as well as scrapping & painting of all M.S. members of the Truss and Reactor was in progress. The seals were secured by Cotton thread which cannot withstand the aforementioned conditions. Please note that the most important fact is that 3-Phase Power Supply and Water supply has been disconnected since November 2020 and the intact seal on the Main Power Supply Control Panel further reinforces the fact that there is no 3-Phase Power Supply since November 2020. No production activities can be undertaken without 3-Phase Power Supply.

Contd..2



- d. Your Officer observed approx. 150 drums kept on the RCC flooring. We have undertaken increase of the ground level of the entire Plot Area of our factory. We are spreading Quarry Spoil / Mud to increase the Ground Level and then finishing it with R.C.C.. We had about 150 drums ever since 2020 and the same has been mentioned in the records. We continue to have the same stocks which is a further evidence of "no production activities." Please note that the contents of the drums are "not unknown". The drums contain Mother Liquor of our Stage MB-II, MB-III and MB-IV. We recycle the Mother Liquor as it is a part of our process. We are therefore not going to dispose the contents of the drum, which please note.
- e. As desired by your officer, attached please find the Disconnection Certificate issued by DGVCL for your ready reference.
- f. We strictly follow the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 25, 2020.

Sir, I am the only surviving partner of this Firm and I was affected by COVID on two occasions. I was hospitalised for more than four weeks on both the occasions. The year 2021 was lost due to my illness and hospitalisation. I am 64 years old and I have been attending to my work only from May 2022.

I request you for your sympathetic consideration. I assure you of my best co-operation at all times, I Remain, Dear Sir,

Truly Yours,  
FOR SHCHEM CORPORATION



Partner.

C.C. : The Unit Head, Ankleshwar. (By Courier)

## DAKSHIN GUJARAT VIJ COMPANY LIMITED

Regd. Office : "Urja Sadan", Corporate Office, Kapodra Char Rasta, Nana Varachha Road,  
Surat - 395 006 (Gujarat)

## GIDC SUB-DIVISION

SHED NO: - U/4/2 NEAR GIDC POLICE STATION

ANKLESHWAR - 392 012

PH.NO.02646-220551, 220451

DE/ANKGIDC/TECH/ 5674 DATE:- 27 NOV 2020

પ્રતિ

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ (સ્થાનિક કચેરી)

પ્લોટ નં.૧૫૦૧

જી.આઈ.ડી.સી., અંકલેશ્વર.

વિષય : પ્રદૂષણ નિયંત્રણના કાયદા હેઠળ વીજ જોડાણ કાપવા બાબત.

ઉપરોક્ત વિષયના સંદર્ભમાં આપને જણાવવાનું કે આપના તરફથી મળેલ વીજ જોડાણ કાપવાની સૂચનાનું અમલીકરણ થઈ ગયેલ છે. જેની વિગત નીચે મુજબ છે.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડના જાવક ક્રમાંક જીપીસીબી /એન્કે /સીસીએ -977/આઈડી-26937/572954 તારીખ:10.10.2020 ના હુકમના અનુસંધાને જણાવવાનું કે M/S : SHCHEM CORPORATION PL NO :4001/A-2 G.I.D.C ANKLESHWAR DIST: BHARUCHCH નામ સરનામાં વાળા ઔદ્યોગિક એકમનું વીજ જોડાણ જેનો ગ્રાહક નંબર: 08910001399 છે તે તા:26.11.2020 ના રોજ 17:53 વાગે કપાત કરવામાં આવેલ છે તે અંગેની જાણ આ પત્ર દ્વારા આપને કરવામાં આવે છે.

વીજ જોડાણ કાપ્યું ત્યારે મીટર રીડીંગ 120053-KWH,25561-KVARH,MD-18.0 KW હતું.

નાયબ ઈન્જીનર

જી.આઈ.ડી.સી., સબડીવીઝન,

દ.ગુ.વિ.કં.લી.

અંકલેશ્વર.

નકલ રવાના:

૧) કાર્યપાલક ઈન્જીનર, ઔદ્યોગિક વિભાગીય કચેરી, દ.ગુ.વિ.કં.લી. અંકલેશ્વર.

૨) M/S : SHCHEM CORPORATION PL NO :4001/A-2 G.I.D.C ANKLESHWAR

**I undertake to file English Translation  
if required by Hon'ble Tribunal**



નાયબ કાર્યપાલક ઈજનેરશ્રી-(પા.પૂ.)  
નિર્દિષ્ટ વિસ્તાર કચેરી  
પ્લોટ નં. ૬૧૮/૬૧૯, જી.આઈ.ડી.સી.,  
અંકલેશ્વર.  
જાવક ક્રમાંક /નાકાઈ/પા.પૂ./1576  
તારીખ : 02/12/2020

પ્રતિ,  
મેસર્સ સી.પી.સી. ડી.પોર્ટલેન્ડ  
પ્લોટ નં. A2-4001

જી.આઈ.ડી.સી., અંકલેશ્વર.

વિષય :- પાણીનું જોડાણ કાપવા બાબત

પ્લોટ /શેડ/ક્વાર્ટર/ પ્લોટ નં.....A2-4001.....

માનનીય,

સવિનય ઉપકોરત વિષય અન્વયે જણાવવાનું કે આપશ્રીનું પાણીનું જોડાણ તારીખ 02-12-2020 ના રોજ નીચે જણાવેલ કારણોસર કાપવામાં આવેલ છે. જેની નોંધ લેવા વિનંતી છે.

- (૧) પાણીના બીલના નાણાં બાકી હોવાથી.
- (૨) પાણીનું મીટર બગડેલ હોવાથી.
- (૩) પાણીની આંતરિક લાઈન લીકેજ હોવાથી.
- (૪) પાણીના મીટર વગર પાણી વાપરતા હોવાથી.
- (૫) ગેરકાયદેસર પાણીનો બોર કરેલ હોવાથી.
- (૬) ગેરકાયદેસર પાણીનો વપરાશ કરતા હોવાથી.
- (૭) ફાળવવામાં આવેલ પ્લોટ સિવાયના કામ માટે પાણી વાપરતા હોવાથી.
- (૮) પાણીના મીટર સાથે ચેડા કરેલ/કરતા હોવાથી.
- (૯) ગુજરાત પ્રદુષણ બોર્ડના આદેશ મુજબ પત્ર નંબર 572954.....તારીખ 10/11/2020.....મુજબ ✓
- (૧૦) છેલ્લા પાંચ મહિનાથી ચેમ્બર/દરવાજો બંધ હોવાથી.
- (૧૧) બી.ઈ.એ.આઈ.એલ.નાં પત્ર નંબર.....તારીખ.....મુજબ
- (૧૨)
- (૧૩)

ઉપરોક્ત કારણોસર પાણીનું કનેક્શન અત્રેથી કાપવામાં આવે છે. જે નિયમો અનુસાર રીવાઈઝડ ડીપોઝીટ, બાકીના નાણાં, દંડકીય રકમ, બાંહેધરી પત્ર વિગેરે આપવાથી પુનઃ જોડાણ કરવામાં આવશે, જેની નોંધ લેવા વિનંતી છે.

સહકારની અપેક્ષા સહ,



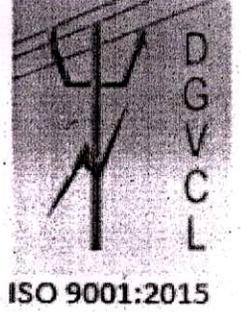
સી.પી.સી. ડી.પોર્ટલેન્ડ  
નાયબ કાર્યપાલક ઈજનેરશ્રી-(પા.પૂ.)  
નિર્દિષ્ટ વિસ્તાર કચેરી,  
જી.આઈ.ડી.સી., અંકલેશ્વર.

**I undertake to file English Translation  
if required by Hon'ble Tribunal**

**Dakshin Gujarat Vij Company Limited**

सत्यमेव जयते

Government of Gujarat

(A Government of Gujarat Undertaking)  
(CIN U40102GJ2003SGC042909)**Ankleshwar GIDC Sub Division Office**Plot No:U/4/2 Opp GIDC Police Station  
Ankleshwar, Dist-Bharuch. Pin- 393002.  
Phone No:02646 220251,220451**ANNEXURE-A-15**

To,

**Gujarat pollution control board,****Plot no:5009/4****Gidc Ankleshwar 393002****Sub:**Disconnection of Electricity connection i.e MS.S.H.CHEM CORPORATION**Ref:**1) Your letter no GPCB/ANK/cca-977(3)/id-26937/748285 17.07.2023**Dear Sir,**

On the above subject and reference details of disconnection of Electricity connection of M/S S.CH.CHEM CORPORATION P NO:4001/A-2, GIDC Ankleshwar is as under.

Sr no	Name of consumer	Con no	Contacted load	Dt of disconnection	Reading of main meter in KWH	Disconnected by
1	MS.S.H.CHEM CORPORATION	08910001399	31KW	23.08.2023	396789 kwh, 76281 Kvarh , 51.6 kw md	Shri B s Vasava Je

**Note:** Power supply of plant of M/S S.CH.CHEM CORPORATION P NO:4001/A-2 GIDC Ankleshwar is disconnected by disconnecting panel switch and seal 1)2168979 2)2168980 AKASH is provide on panel switch(MCC switch) as shown by consumer without disconnecting power supply of main meter.

This is for your kind information and necessary action please



Deputy Engineer

Ankleshwar GIDC SDN

**Signature valid**Signed by: Jigneshkumar  
Jayntibhai Patel  
Deputy Engineer  
Date: 2023.08.25 18:30:20  
+05:30File No: DGVCLSDANK/TECH/e-file/4474/2023/0578/Technical  
Approved By: Jigneshkumar Jayntibhai Patel(Deputy Engineer,Technic  
*Open the document in Adobe Acrobat DC to verify the E-sign*

# SHCHEM CORPORATION

443

## **FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

## **REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

Ref.No.: 007

HAND DELIVERED

August 03, 2023.

## **ANNEXURE-A-16**

The Regional Officer  
Gujarat Pollution Control Board  
Ankleshwar - 393002.

ID : 26937.

Dear Sir,

Subject : Visit Of Your Officers Vide Notice Of Entry Dated 02.08.2023.

This has reference to the visit of your officers to our factory vide notice of entry dated 02-08-2023. We are herewith submitting the clarifications and explanations as regards the queries, raised by your officers, as under:-

- a. **POINT No. 1:** Our factory plot number is A-2/4001. On the East side is plot number A-2/4002 and on the South side is plot number A-1/4012. Both the adjoining plots are about 2 (two) feet higher than our plot. This always leads to flooding of our plot as well as the shed in case of heavy rains. We have attached “**ANNEXURE - I**” which shows flooding of our Plot during the monsoons. The flooring of the shed is lower than the plot and hence the shed also gets heavily flooded. It is this flooding that leads to rain water flowing from under the compound walls. Seepage of the water continues for days, after stoppage of rains. **We have attached “ANNEXURE - II” which shows the main reason for which your officers visited our unit on August 2, 2023. The water was seeping out of the damaged compound wall of Shed No. A-1/4012. Your officers assumed that it was from our compound. The picture justifies our contention.** Please note that today i.e. on 03.08.2023, we have repaired the compound wall with concrete, on either side of the South West gate, to ensure that no water enters in to the storm water drain (SWD). We have attached “**ANNEXURE - III**” showing the status, after repairs. Sir, in the last two months, we have increased the level of our entire factory plot and completed RCC work of half of the open factory plot area. We will be completing, the RCC work of the remaining area, before August 12, 2023. Your officers have noticed the M.S. steel frame spread on the remaining open area of the plot for completing the RCC flooring. We have attached “**ANNEXURE - IV**” showing pictures of the same for your ready reference. Once this RCC work is complete, the level of the entire plot will be at par with the neighbours' plots and no more flooding will occur. This will automatically stop water flowing from our plot in to the Storm Water Drain.

Contd...2

- b. **POINT No. 2:** (i) As mentioned in our letter dated June 12, 2023, all the seals were secured with cotton thread. Seals on two out of the six vessels were damaged during the painting activity. **Seals on the remaining four vessels are intact. The seal on the 3-Phase Power Supply Panel is also intact.** Sir, the 0.7 KL SS reactor is a High Vacuum (740 mm of Hg) High Temperature (450°C) distillation unit. **This vessel is insulated with very high quality insulating material, as per IS 8183 Standards and hence it resists heat loss. It is for this reason, your officers felt the vessel felt slightly warmer than the other vessels. The vessel is fitted to a 3-H.P. Flame Proof 1440 RPM 3-Phase motor. The Hot Oil Unit is insulated with very high quality insulating material, as per IS 8183 Standards and hence it resists heat loss.** It is for this reason that the surface of the Hot Oil Unit felt slightly warmer. The Hot Oil Unit is electrically heated and requires 3-phase power supply. Since our 3-phase power supply is disconnected, it is impossible to run the unit. Your officers had a doubt only because the 0.7 KL vessel and the Hot Oil Unit appeared a bit warm than the other vessels / surfaces.
- (ii) We had purchased three Nitrogen cylinders in the year 2019. One Nitrogen cylinder remains connected to the vessel ever since our unit was issued Closure order. Your officers had seen that the vessel was empty. Two Nitrogen cylinders are still available in our plant.
- (iii) We explained to your officers that the Batch Sheet of MB-III bearing Lot No. MB-III/082 dated 01.08.2023 of Batch size 685 was of Lab./R&D. We have been holding substantial stocks of our intermediate MB-II i.e. 3-Nitro 4-Chloro Benzophenone. This is a product of Friedel-Craft's reaction, which has a tendency to degenerate on long storage. We conduct periodic performance test of MB-II in the laboratory in a 5-litre glass flask. No temperature indicators were working anywhere else in the plant. We showed the laboratory Hot Oil heating mantle with digital display, Glass flask and glass separating funnel to your Officers to prove that the Log Sheet was of Laboratory Batch of **685 grams** and not a plant Batch. We showed to your Officers that we are holding substantial stocks of MB-II and not of MB-III. **This proves that no production activity on plant scale has ever been done during the CLOSURE ORDER.**
- c. **POINT No. 3:** We have been holding the following stocks ever since Closure Order was issued to our unit as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	Caustic Soda Lye	70
02	Sodium Hydrogen Sulphide	50
03	Hydrochloric Acid (30-32%)	44
04	3,4 DABP (Intermediate Stage)	06
05	Methyl Chloro Formate	23
06	Benzyl Chloride	20
	<b>Total Number Of Drums</b>	<b>213</b>
07	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
08	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

Contd..3

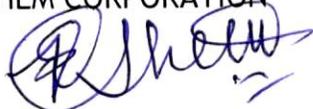
We wish to state that there is no change in the quantity of Raw Materials / intermediates. This can be verified and this is a further evidence that there has been no manufacturing activity in our factory. You will observe that there are about 213 Drums of raw materials, intermediates and mother liquor in our plant. It is not possible to store these drums entirely in our factory building. Since RCC flooring work of the remaining area of the plot is underway, we have been forced to store these drums on the RCC flooring area near the ETP, plant area as well as near the South West gate. As soon as the RCC flooring work of the remaining plot area is completed, we shall shift the drums in a more secure place. As mentioned in "Point No. 1", we have repaired the compound wall with concrete and this will prevent any seepage in to the storm water drain.

- d. **POINT No. 4:** We have attached "ANNEXURE - V" showing pictures of flood water collected underneath the Separator. We were transferring this flood water in to the collection cum neutralization tank. This, we believe, is the only correct way of emptying this flooded water. **We therefore say that we were not doing anything wrong or unethical.**
- e. **POINT No. 5:** We wish to state that we are strictly following the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 25, 2020. **We have attached photographs in "Annexure - I" which shows flooding of our Plot during the monsoons and not because we are discharging effluent in our own premises.**
- f. **POINT No. 6:** As directed by your Officers, we showed to them the latest DGVCL bill. Since we are not in production for a long time, we had no new Raw Materials bill, Production data, fuel consumption details, water consumption details etc.. Hence, we did not submit the same to your Officers.

We request you for your sympathetic consideration. We assure you of our best co-operation at all times, We Remain, Dear Sir,

Truly Yours,

R SHCHEM CORPORATION



Partner.

Encls.: Annexure - I to Annexure - V.

CC : Gujarat Pollution Control Board

Paryavaran Bhavan

Sector 10 - A

Gandhinagar - 382 010.

# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.



# SHCHEM CORPORATION

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A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
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72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.



Damaged Compound  
wall of Shed No.  
A-1/4012  
(AKHILESH ENTERPRISES)

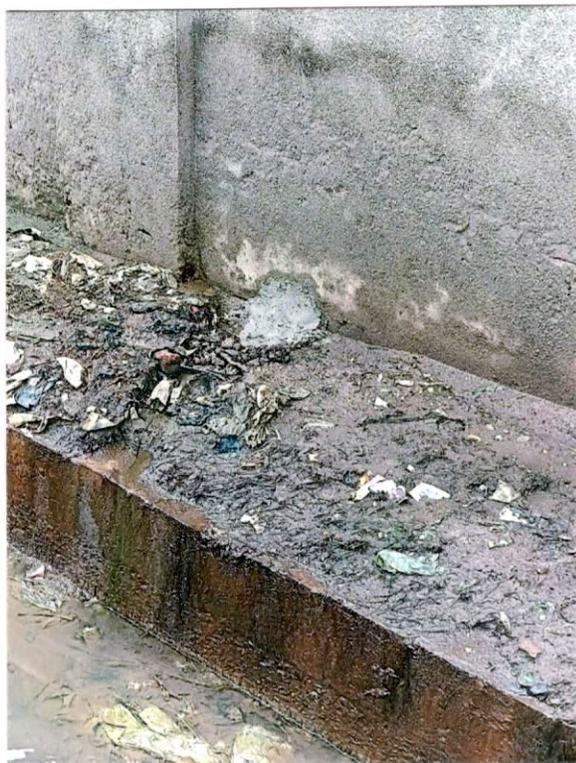
# **SHCHEM CORPORATION**

**FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar - 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
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# SHCHEM CORPORATION

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# SHCHEM CORPORATION

**FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District:Bharuch,Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.



**ANNEXURE-A-17 SHCHEM CORPORATION****FACTORY:**

A-2/4001,G.I.D.C.Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

Ref.No.: 008

**REGISTERED OFFICE:**

72,Shamaldas Gandhi Marg,  
Room No. 33,3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.

REGD. POST / HAND DELIVERED

September 06, 2023.

The Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector 10-A  
Gandhinagar - 382010.

ID : 26937.

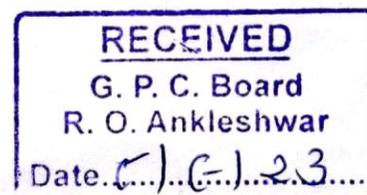
Dear Sir,

**Subject: Revocation of the Closure Direction Under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide Order No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020.**

This has reference to your letter No. GPCB/ANK/CCA-977(3)/ID-26937/748285 dated 19-07-2023. We wish to inform you that our single phase power was also disconnected on August 23, 2023. Since the undersigned had to undergo a surgery on the same day, we could not submit this application earlier. We are submitting the following as under:-

- Our 3-phase power supply was disconnected on 26.11.2020 and we had submitted DGVCL's letter number DE/ANKGIDC/TECH/5674 dated 27.11.2020 evidencing the same. Copy attached at Annexure-VIII. DGVCL disconnected our single phase power supply on August 23, 2023. Enclosed please find their letter No. DGVCLSDANK/0175/08/2023 dated 25-08-2023 evidencing the same. Copy attached at Annexure-IX.
- Please note that we have not received Notice Of Entry dated 15.04.2022. We had submitted detailed reply to the Notice Of Entry dated 02.07.2022 along with photographic evidences. We have duly acknowledged receipts of our submissions. Please note that these submissions were subsequently uploaded on the XGN as well. In response to the Board's letter dated 22.08.2022 and as per the Board's directions, on October 11, 2022, a total of six seals were affixed on the respective manhole of each of the six reaction vessels and one seal was affixed on the Main Power Supply control panel (3-phase), by your officers, in presence of Ms. Krupaben Patel, Circle Office, Ankleshwar. Only single phase supply was permitted as it is an essential necessity for safety and security against thefts. During monsoons, snakes have also been spotted in our plot and hence, single phase supply provides safety to the security personnel. Please note that we do not have a D.G. set in our factory and the seal on the Main Power Supply control panel (3-phase) has always been found intact, during various visits by your officers. We have attached the picture of the sealed Main Power Supply control panel (3-phase) as ANNEXURE-I. This is a necessary and adequate evidence which confirms that no production activity has ever been undertaken in our factory since November 26, 2020.

Contd...2



-2-

- c. We have enclosed pictures showing sealed manhole of each of the six reaction vessels as well as pictures showing 3-phase motor fitted to each of the six reaction vessels vide **ANNEXURE-II to ANNEXURE-VII**. This further proves that no production is possible in our factory using single phase power.
- d. We have submitted detailed reply to the Notice Of Entry dated 06.06.2023 along with photographic evidences on 09.06.2023. We have duly acknowledged receipt of the said submission. We have admitted that the incident of 06.06.2023 was an accident caused due to accidental leakage from the Treated Effluent Storage Tank.
- e. We have been holding the following stocks ever since Closure Order was issued to our unit as under :

Sr. No.	Name Of Raw Material/Intermediate	Nos. Of Drums
01	MB-III M.L.	50
02	MB-II M.L.	74
03	Hydrochloric Acid (30-32%)	10
04	3,4 DABP (Intermediate Stage)	12
05	Methyl Chloro Formate	27
06	Benzyl Chloride	16
07	Caustic Soda Lye	12
08	N Propyl Alcohol (Recovered)	24
	<b>Total Drums</b>	<b>225</b>
09	Thio Urea (220 bags x 25 kgs.)	5500 kgs.
10	Soda Ash (180 bags x 50 kgs.)	9000 kgs.

You will observe that there are about 225 Drums of raw materials, intermediates and mother liquor in our plant We wish to state that there is no change in the quantity of Raw Materials / intermediates. This can be verified from the figures submitted by us way back in 2021. This is a further evidence that there has been no manufacturing activity in our factory.

- f. As regards Notice of Entry dated 10.06.2023, we have submitted a detailed reply along with photographic evidences on 13-06-2023. We also have duly acknowledged receipt of our submission. As mentioned in point "e", we have a total of 225 drums in our factory. It is not possible to store these drums entirely within our factory building. The main problem faced by us was that our entire factory plot was at least 3 feet below the ground level of our adjoining factories. This led to flooding of our entire factory plot as evidenced by photographs attached at ANNEXURE-X. Further, the area between our compound wall and the Storm water drain was filled with mud and led to seepage of water in the Storm water drain as evidenced by photographs attached at ANNEXURE-XI. You will be pleased to know that we have completed the RCC flooring of the entire plot area of our factory. We have attached photographs evidencing the same at ANNEXURE-XII. We have completed RCC flooring of the area between the compound wall and the storm water drain. We have attached photographs evidencing the same at ANNEXURE-XIII. Completion of the RCC flooring will ensure that there is no seepage of any material in to the Storm Water Drain.

Contd..3

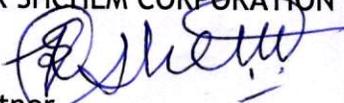
- g. We wish to state that we are strictly following the closure directions issued to us under Section 33-A of The Water (Prevention And Control Of Pollution) Act-1974 vide letter No. GPCB/ANK/CCA-977/ID-26937/572954 dated 10.11.2020. Our power and water supply has been disconnected since November 26, 2020. The biggest evidence which proves that there has been no production activity since December 2020 is that we have not filed GST Return ever since December 2020. This can be verified by you and our GST Registration number is 24AAHFS1987R1ZC.

Sir, we have already suffered a lot. We are a SSI unit and we cannot afford to remain out of production for such a long time. We are not blaming anyone for the delay except that it is our misfortune. The undersigned is 65 years old and had suffered for more than 18 months during Covid and had to undergo a surgery in August 2023.

We therefore request you for your sympathetic consideration and assure you of our best co-operation at all times, We Remain, Dear Sir,

Truly Yours,

FOR SHCHEM CORPORATION

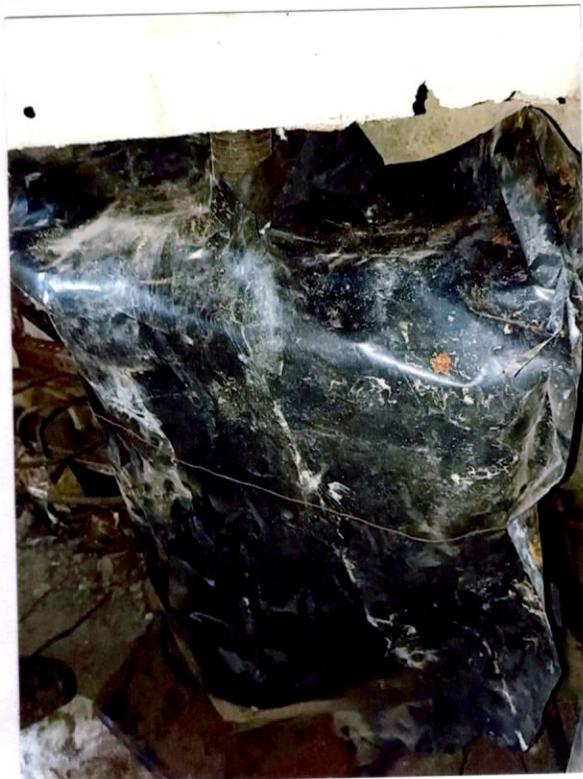
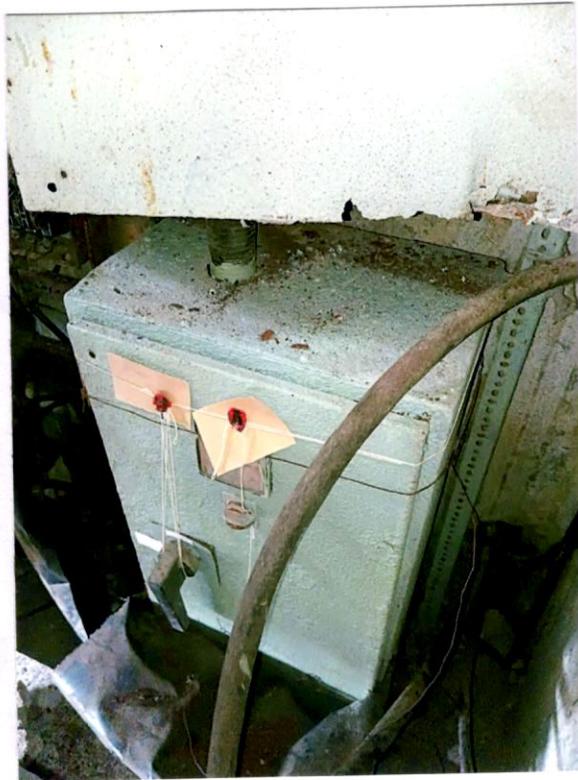


Partner.

Encls.: Annexure-I to Annexure-XIII.

CC to : The Regional Officer, GPCB Ankleshwar.

MAIN POWER SUPPLY CONTROL PANEL (3-PHA





S.S.R. (H.V.D.)



M.S.R. (AUTOCLAVE)



S.S.R.



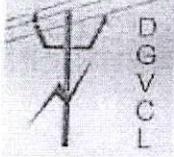
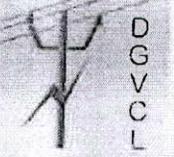
S.S.R.



G.L.R.



SSR

<b>DAKSHIN GUJARAT VIJ COMPANY LIMITED</b>	
Regd. Office : "Urja Sadan", Corporate Office, Kapodra Char Rasta, Nana Varachha Road, Surat.- 395 006 (Gujarat)	
	<b>GIDC SUB-DIVISION</b>
	<b>SHED NO:- U/4/2 NEAR GIDC POLICE STATION</b>
	<b>ANKLESHWAR - 392 012</b>
	<b>PH.NO.02646-220551, 220451</b>
	<b>DE/ANKGIDC/TECH/ 5674</b> DATE:- 27 NOV 2020
	

પ્રતિ

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ (સ્થાનિક કચેરી)

પ્લોટ નં.૧૫૦૧

જી.આઈ.ડી.સી., અંકલેશ્વર.

વિષય : પ્રદૂષણ નિયંત્રણના કાયદા હેઠળ વીજ જોડાણ કાપવા બાબત.

ઉપરોક્ત વિષયના સંદર્ભમાં આપને જણાવવાનું કે આપના તરફથી મળેલ વીજ જોડાણ કાપવાની સૂચના નું અમલીકરણ થઈ ગયેલ છે. જેની વિગત નીચે મુજબ છે.

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડના જાવક ક્રમાંક જીપીસીબી /એન્કે /સીસીએ -977/આઈડી-26937/572954 તારીખ:10.10.2020 ના હુકમના અનુસંધાને જણાવવાનું કે M/S : SHCHEM CORPORATION PL NO :4001/A-2 G.I.D.C ANKLESHWAR DIST: BHARUCHCH નામ સરનામાં વાળા ઔદ્યોગિક એકમનું વીજ જોડાણ જેનો ગ્રાહક નંબર: 08910001399 છે તે તા:26.11.2020 ના રોજ 17:53 વાગે કપાત કરવામાં આવેલ છે તે અંગેની જાણ આ પત્ર દ્વારા આપને કરવામાં આવે છે.

વીજ જોડાણ કાપ્યું ત્યારે મીટર રીડીંગ 120053-KWH,25561-KVARH,MD-18.0 KW હતું.

નાયબ ઈન્જનેર

જી.આઈ.ડી.સી., સબડીવીઝન,

દ.ગુ.વિ.ક.લી.

અંકલેશ્વર.

નકલ રવાના:

૧) કાર્યપાલક ઈન્જનેર, ઔદ્યોગિક વિભાગીય કચેરી, દ.ગુ.વિ.ક.લી. અંકલેશ્વર.

૨) M/S : SHCHEM CORPORATION PL NO :4001/A-2 G.I.D.C ANKLESHWAR

**I undertake to file English Translation**  
**if required by Hon'ble Tribunal**

**Dakshin Gujarat Vij Company Limited**

सत्यमेव जयते

Government of Gujarat

(A Government of Gujarat Undertaking)

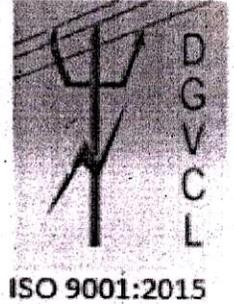
(CIN U40102GJ2003SGC042909)

**Ankleshwar GIDC Sub Division Office**

Plot No:U/4/2 Opp GIDC Police Station

Ankleshwar, Dist-Bharuch. Pin- 393002.

Phone No:02646 220251,220451

**To,****Gujarat pollution control board,****Plot no:5009/4****Gidc Ankleshwar 393002****Sub:**Disconnection of Electricity connection i.e MS.S.H.CHEM CORPORATION**Ref:**1) Your letter no GPCB/ANK/cca-977(3)/id-26937/748285 17.07.2023**Dear Sir,**

On the above subject and reference details of disconnection of Electricity connection of M/S S.CH.CHEM CORPORATION P NO:4001/A-2, GIDC Ankleshwar is as under.

Sr no	Name of consumer	Con no	Contacted load	Dt of disconnection	Reading of main meter in KWH	Disconnected by
1	MS.S.H.CHEM CORPORATION	08910001399	31KW	23.08.2023	396789 kwh, 76281 Kvarh , 51.6 kw md	Shri B s Vasava Je

**Note:** Power supply of plant of M/S S.CH.CHEM CORPORATION P NO:4001/A-2 GIDC Ankleshwar is disconnected by disconnecting panel switch and seal 1)2168979 2)2168980 AKASH is provide on panel switch(MCC switch) as shown by consumer without disconnecting power supply of main meter.

This is for your kind information and necessary action please

Deputy Engineer

Ankleshwar GIDC SDN

**Signature valid**

Signed by: Jigneshkumar  
Jayntibhai Patel  
Deputy Engineer  
Date: 2023.08.25 18:30:20  
+05:30

File No: DGVCLSDANK/TECH/e-file/4474/2023/0578/Technical

Approved By: Jigneshkumar Jayntibhai Patel (Deputy Engineer, Technic

Open the document in Adobe Acrobat DC to verify the E-sign



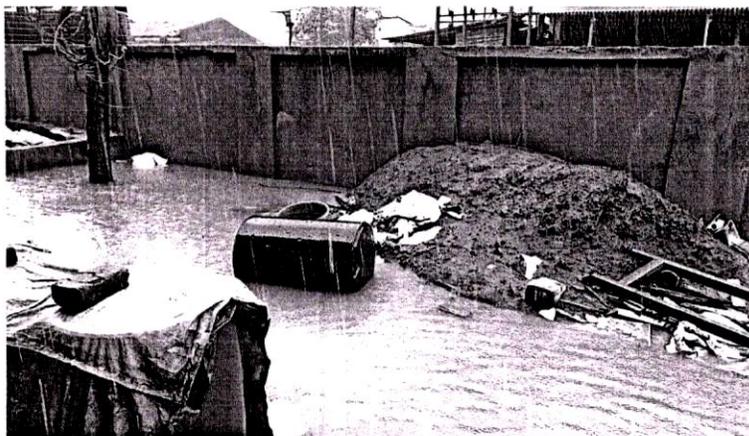
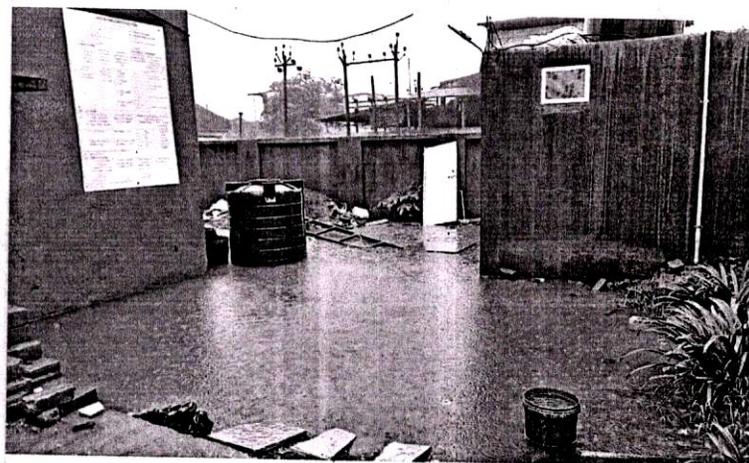
# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar – 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai – 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.



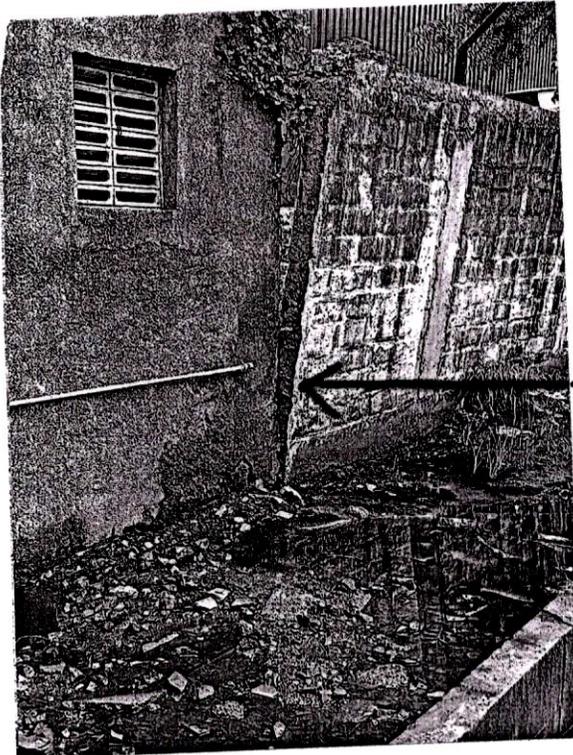
# SHCHEM CORPORATION

**FACTORY:**

A-2/4001, G.I.D.C. Estate,  
Ankleshwar - 393 002.  
District: Bharuch, Gujarat.  
Phone : (02646) 220653  
Email : shchem@yahoo.com

**REGISTERED OFFICE:**

72, Shamaldas Gandhi Marg,  
Room No. 33, 3<sup>rd</sup> Floor,  
Mumbai - 400 002.  
Phone : (022) 22032841  
Fax : (022) 22032940.



Damaged Compound  
wall of Shed  
No. A-1/4012  
(AKHILESH ENTERPRISE)







## ANNEXURE-A-18

### તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

નંબર : ૨૬૧૩૭

તારીખ : 14/10/2023

પાણી અધિનિયમ 1974ની કલમ-23, હવા અધિનિયમ 1981ની કલમ-24 અને પર્યાવરણ (સુરક્ષા) અધિનિયમ - 1986ની કલમ-10 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.

- (1) અમોને સોંપેલા રાજ્ય બોર્ડ/કેન્દ્ર સરકારનાં કાર્ય બજાવવાના હેતુ માટે,
- (2) 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 ખોટાવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે,
- (3) 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 કોઈ મહત્વની વસ્તુ કબજે લેવા માટે અમે નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ/કારખાનામાં દાખલ થવાનો સમય : સપ્તરત્ન/સાંજના

10:40 Hrs

તા. 14/10/2023

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે.

1. R.B. Makwana (SSA)
- 2.
- 3.

પ્રતિ,

M/s. Shchem Corporation

Plot no. 4001/A-2

GIDC Ankleshwar.

Bhavnesh, SHCHEM CORPORATION

નકલ મળેલ છે.

આ સૂચના (નોટીસ) મેળવનારની સહી :-

Mr. Vijay R. Sheth (Partner)

સહી :-

અધિકારીનું નામ :-

હોદ્દો :-

B. A. Blumer  
(ABB)

## ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર

### સ્થળ તપાસ દરમ્યાન આપવામાં આવેલ લેખિત સૂચના

આપના એકમની આજ રોજ મુલાકાત દરમ્યાન પર્યાવરણીય કાયદાઓ સંદર્ભે ધ્યાને આવેલ વિસંગતતાઓ/ત્રુટિઓ તેમજ સ્થળ ઉપર માંગવામાં આવેલ વિગતો પૂરી પાડવા અંગેની નીચે મુજબની સૂચના આપને આપવામાં આવે છે. જે અંગેનો ખુલાસો/રજુઆત/પૂર્તતા દિન-૩ માં અત્રેની કચેરીએ તેમજ ગાંધીનગર ખાતેની વડી કચેરીએ જાણ કરવા જણાવવામાં આવે છે. સદર વિગતો બોર્ડના ઓનલાઇન XGN પોર્ટલ ઉપર પણ અપલોડ કર્યું.

ગુ.પ્ર.નિ. બોર્ડના તામે અને વતી,



સ્થળ તપાસની નિરિક્ષણ નોંધ

આઈ.ડી.નં: ૨૬૯૩૭, કેટેગરી/સ્કેલ: R/S, Latitude/ Longitude: /

શ્રીમાન,

આપશ્રીને જણાવવાનું કે. આજ તા. 14/10/2023 ના રોજ આપશ્રી ના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઈન્સ્પેક્શન કરેલ છે જે દરમ્યાન હવા/પાણી/જોખમી કચરા/.....ના...../...../.....નમુના પૃથક્કરણ 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 જ્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખિતમાં સ્થળસ્થિતિ/મુદાઓ/સુચનાઓ આપવામાં આવે છે.

આ પરત્વે આપશ્રી નીચે લેખિતમાં સ્પષ્ટતા કરી શકો છો અથવા લેખિત ખુલાસો/સ્પષ્ટતા/પુર્તતા અહેવાલ કામકાજના દિન-૦૩ માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખિત માં અથવા XGN પર અથવા Email થી સ્પષ્ટ કરવા નોટીસ આપવામાં આવે છે.

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

- ① અંગ્રેજીમાં સ્પષ્ટ કરેલા માહિતીના લાગુ પડતા પેપર/પ્લાન ની વચ્ચે કાચી storm water draining બનાવેલ છે જેને પણ બનાવેલ અને storm water draining outlet point પાસે contaminated runoff pit તથા recollection system with fix pipeline નો pump સાથેની વ્યવસ્થા છે. ETP સ્ટ્રીકાઈના લાગુમાં પણ SMD સાથેની વ્યવસ્થા પણ ઉપરના બાબતો મુજબ SMD pit with recollection system ની વ્યવસ્થા છે.
- ② અંગ્રેજીમાં સ્પષ્ટ કરેલ HDPE/MS drums માં જે મરીલીયુન (chemical) ભરેલું છે તેની માહિતી અને તેનો શેડમાં ઉપયોગ કર્યો તેની માહિતી લાંબેને રજૂ કરવી.
- ③ અંગ્રેજીમાં સ્પષ્ટ કરેલ ETP sludgeનું TSDP માં નિકાલ કરી લાંબેને રજૂ કરવી.
- ④ અંગ્રેજીમાં સ્થાપિત electric hotair unit ની સુધી પહોંચવાની જગ્યા મર્યાદા.
- ⑤ ETP upgradation ની સમગ્રી દસ્તાવેજી દાખલા સાથે સાથે તે પૂર્ણ થયે અને scrubber upgradation પૂર્ણ થયે લાંબેને રજૂ કરવી.
- ⑥ લાંબેને તા. 10/11/2020 ના સંકેતરૂં મુસ્તાપાની પાયા રજૂ.



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ગુ.પ્ર.નિ.બોર્ડના નામે અને વતી,  
(અધિકારીઓના નામ, હોદ્દો, સહી):

*R.B. Makwana*  
C&A)

*B.M. Blum*  
(Att)

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

મુલાકાત દરમ્યાન અધિકારીશ્રીઓએ.....નું.....મુદાઓ માટે સ્થળસ્થિતિ/સુચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે જેમા,

For SHCHEM CORPORATION

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

31 *(Signature)*  
MAX B. SETH  
PARTNER

(૨) જેમા દર્શાવેલ સ્થળસ્થિતિ/સુચનાઓમાંથી મુદા નં.....સાથે હું નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજુઆત છે.

I undertake to file English Translation if required by Hon'ble Tribunal



For SHCHEM CORPORATION

*(Signature)*  
MAX B. SETH  
PARTNER

એકમના પ્રતિનિધી/આ નોંધ મેળવનાર નું નામ, હોદ્દો અને સહી:

Mr. Nitul R. Seth