

Regd. No. : 71
Date : 08/12/2021



**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE PUNE**

ORIGINAL APPLICATION NO. 60 OF 2021

IN THE MATTER OF:

ARYAVART FOUNDATION

APPLICANT

VERSUS

HEMANI INDUSTRIES LTD &ORS.

RESPONDENT(S)

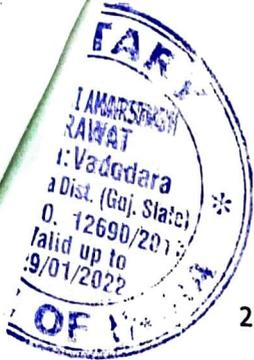
REPLY AFFIDAVIT ON BEHALF OF RESPONDENT NO. 3, CENTRAL POLLUTION CONTROL BOARD (CPCB)

I, Praseon Gargava, aged about 49 years and having office at the Regional Directorate Vadodara, Near VMC Ward office No. 10, Subhanpura, Vadodara, Gujarat – 390023, do hereby solemnly affirm and sincerely state as follows: -

1. I am presently working as Scientist 'E' & Regional Director, Central Pollution Control Board (CPCB), Vadodara. I am fully conversant with the facts of the case and hence, competent and authorized to depose and swear the present Reply Affidavit as under:



2. That averments made in the paras 1 to 3 is about the information of the Applicant and hence need no comments from this Answering Respondent.
3. That the averments made in para 4 is about the official information of Respondent no.4 Gujarat Industrial Development Corporation (GIDC) and hence no comments from this Answering Respondent.
4. That the averments made in para 5 is about the functional information of Respondent No. 6 Notified Area Committee, Gujarat and hence no comments from this Answering Respondent.
5. That the averments made in para 6 is about the allegation made by applicant against Respondent no. 1 i.e. M/s. Hemani Industries for violating the environmental parameters and discharging untreated effluents directly into GIDC pipeline, which can suitably answer by Respondent No. 2 i.e. Gujarat Pollution Control Board.
6. That the averments made in para 7 to 10 is about the allegation made by Applicant against Respondent No. 1 being a non-compliant for last 5 years and that as per analogy laid down in Paryavaran Suraksha Samiti case, the Respondent no. 1 unit ought to be closed for non-compliance. This Answering Respondent does not play any role in this, as respective State Pollution Control Board is required to take action and hence no comments from this Answering Respondent.
7. That the averments made in para 11 to 18 is about Respondent No. 1's consistent violations, to which Gujarat Pollution Control Board (GPCB) has carried out inspection of Respondent no.1 and issued various directions wherein, CPCB has no role to play and therefore no comments from this Answering Respondent no. 3.
8. That the averments made in para no. 19 to 21 regarding the observations about final discharge point of the effluent/wastewater, is included in the





Joint Committee Report filed before NGT, WZ in O.A No. 22/2020 titled as Aryavart Foundation Vs. Yashyashvi Rasayan Pvt. Ltd. & Anr. The said Joint Committee Report is a matter of court record and hence no comment from this Answering Respondent No. 3.

9. With respect to the averments made in para 22 about closure directions issued to Respondent No. 1, this does not invite comments from this Answering Respondent No. 3.
10. With respect to the averments made in para 23, Central Pollution Control Board, Delhi has pursued the public complaint with the Member Secretary, Gujarat PCB vide letter dated 28.01.2021 and CPCB, RD Vadodara followed up the matter with the Member Secretary, GPCB vide letter dated 17.02.2021. It is further submitted that Gujarat PCB has sent the action taken report through letter dated 05.04.2021 to Complainant under intimation to CPCB, Delhi. The copy of the letter dated 05.04.2021 is annexed herewith and marked as **Annexure R3-1**.
11. It is further submitted that in furtherance of Order dated 04.10.2021 passed by Hon'ble Tribunal, this Answering Respondent has carried out meeting with Gujarat Pollution Control Board on 20.10.2021 and has initiated inspection of Red Category of Industries in Dahej area.
12. That the averments made in para no. 24, needs no comment from this Answering Respondent.
13. That the averments made in paras 'A' to 'Q' under the heading 'Grounds' requires no comments from this Answering Respondent.
14. That the averments made in paras 'Limitations' and 'Prayers' needs no comment from this Answering Respondent.





In light of the aforesaid submissions, it is respectfully prayed that, this Answering Respondent No.3 i.e. CPCB, shall abide by all Orders or directions passed by this Hon'ble Tribunal

P. G. Gargava
DEPONENT

VERIFICATION

I, Shri. Praseon Gargava, working as Scientist 'E' & Regional Director, Central Pollution Control Board, the Respondent no. 3 herein, do hereby declare that, the contents of this Reply Affidavit which is based on official record and information available in the office are true to the best of my knowledge and belief.

Verified at Vadodara on this the 8th day of December, 2021.

COUNSEL FOR RESPONDENT No. 3



P. G. Gargava
DEPONENT

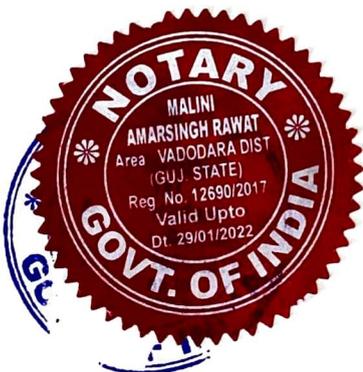
प्रसून गार्गव / PRASOON GARGAVA
क्षेत्रीय निदेशक / REGIONAL DIRECTOR
केन्द्रीय प्रदूषण नियंत्रण बोर्ड / Central Pollution Control Board
(पर्यावरण, वन एवं जल संरक्षण, भारत सरकार)
(Ministry of Environment, Forest & Climate Change, Govt. of India)
क्षेत्रीय निदेशालय (पश्चिम), वडोदरा-390023.
Regional Directorate (West), Vadodara-390023.

Solemnly Affirmed / Declared
Sworn Before me by...*Praseon Gargava*

Malini 08/12/2021
MALINI AMARSINGH RAWAT
NOTARY, (Govt. of India)

My Commission Expires
on 29/01/2022

MALINI AMARSINGH RAWAT
NOTARY (Govt. of India)





GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

Please examine
and approve.

→ SLD (AT) P.G.D.M.
29.04.2021
→ G.C.B.C.S.D.

GPCB/BARCH-B/CCA-1194(9)/ID-31038/ 587595 4/5/21DATE: 05/04/2021.

To,

Shri A R Mishra,
Aryavart Foundation,
J-50 Japan Market,
Opp. Liner Bus Stop,
Ring Road,
Surat-3 -395003

के.प्र.नि.बो./C.P.C.B.

आवक संख्या/Inward No.: 87दिनांक/ Date : 30.04.21

Subject: Complaint/Grievance against GIDC regarding violation of the Water Act, 1974, the Air Act, 1981 and the CRZ Notification.

Reference: Your letter vide dated 04/01/2021 and 18/02/2021.

Dear Sir,

In connection to above mentioned subject and references, this is to inform you that Gujarat Pollution Control Board has carried out various inspections and sampling of Dahej Vilayat Pipeline, its pumping stations and CETP of Dahej and Saykha.

In this regard, GPCB has already taken various actions against GIDC (Dahej Vilayat Pipeline Cell) and CETP time to time. A brief note on action taken by GPCB is attached herewith for your information.

This letter is issued after approval of the competent authority.

**FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD**

(P.B.PATEL)

DY. ENVIRONMENT ENGINEER

Encl.: As above.

Copy to:

- 1) The AD & Div. Head
Central Pollution Control Board
Parivesh Bhawan, East Arjun Nagar
Delhi-110032.... For your information please w.r.t your letter dated 28/01/2021.

(P.T.O.)

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2) The Regional Director,
Regional Directorate(West)
Central Pollution Control Board
Near ward office No. 10
Subhanpura, Vadodara 390023....

For your information please w.r.t your letter dated 17/02/2021.

Brief Note on action taken

- Regional office, Bharuch is frequently monitoring these projects and collects effluent samples. In last three years Dahej-Vilayat Pipeline project of GIDC was visited 110 times, Dahej CETP project of 40 MLD was visited 23 times, Saykha CETP project of 40 MLD was visited 06 times.
- Board has issued directions and notices under section 33A of the Water act 1974 to GIDC regarding the non-compliances observed in Inspection reports. In last three years, GPCB has issued 04 Nos. of Direction, 07 Nos. of notice of direction under section 33(A) of the Water act 1974.
- Board has issued closure directions & Notice of direction to defaulting industries.
- In last three year, GPCB has issued total 71 closure direction & directions, 81 notice of direction under section 33(A) of the Water act 1974 to defaulting industries.
- CETP of Dahej has started receiving effluent only from few industries.
- Also Board had issued letters / directions to GIDC to solve the issues. Summary of the same is as below.
 - Member Secretary GPCB has issued a letter dated: 10/04/2017 to the Chief Engineer, GIDC regarding strengthening of Environment Infrastructures in Dahej Industrial area. **(Attached as Annexure-I)**
 - Chairman, GPCB has issued a letter dated: 15/03/2018 highlighting facts of situation which is replied by VC&MD, GIDC is not complied so far and also no progress is reported. **(Attached as Annexure-II)**
 - Chairman, GIDC has submitted reply dated: 10/04/2018 of above said letter of Chairman, GPCB with action plan. **(Attached as Annexure-III)**
 - Member Secretary, GPCB has issued a letter dated: 02/02/2019 to the President- Dahej Industrial association and the Chief Engineer- GIDC regarding Action plan for Environmental Issues in Dahej PCPIR. **(Attached as Annexure-IV)**

- District collector, Bharuch has issued letter to Vice Chairman & Managing Director of GIDC for environmental issues in Dahej Industrial area. (**Attached as Annexure-V**)
- GPCB has issued direction under section 33(A) of the Water Act 1974 on 30/01/2019, 23/03/2020, 27/05/2020, 14/08/2020 (**Attached as Annexure-VI, VII, VIII & IX**) GPCB has also informed to Gujarat Coastal Management Authority.
- District level CRZ committee has visited this site and visit report of the same is annexed here as **Annexure-X**.
- Hon. ACS, F & ED has issued direction on 21/07/2020 under section (5) of the E(P) Act, 1986 for violation of CRZ Notification the same is annexed here as **Annexure-XI**.
- GIDC has submitted reply and informed that (**Attached as Annexure-XII**)
 - GIDC has commissioned 4.5 km CS pipeline of 1000 mm diameter in year 2006-07, due to scaling in the pipeline and diffusers were buried more than 3 mtr in sea bed. Also it is not possible to repair diffusers and removal of scaling in offshore pipeline. Hence, effluent could not be discharged into deep sea.
 - GIDC has laid two row of 600 mm dia MS pipeline upto 600 mtr. GIDC has planned to lay new offshore pipeline with diffusers for which consultant has been appointed and estimates are prepared but it will take atleast 2.5 years to complete the said work.
 - GIDC has attended leakages of pipeline.
- GPCB has issued notice of direction to CETP of Dahej under section 33(A) of the Water Act 1974 on 01/03/2021 (**Attached as Annexure-XIII**).
- Recently, GPCB has issued direction under section 33(A) of the Water Act 1974 on 24/03/2021 (**Attached as Annexure – XIV**).



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, Sector 10-A,
Gandhinagar 382 010, Gujarat. INDIA:
Phone : (O) +91-79 2323 2152, Fax : +91-79 2322 2784
E-mail : ms-gpcb@gujarat.gov.in
Website : www.gpcb.gov.in

No: GPCB/BRCH-B-CCA-1194 (5)/ ID-31038/ 409197 Date: /03/2017 10/04/2017

To,
Shri A.K.Patel
The Chief Engineer,
Gujarat Industrial Development Corporation,
Block no. 4, 2nd Floor,
Udhyog Bhavan,
Gandhinagar.

Sub: Strengthening of Environment Infrastructures in the Dahej Industrial area.

Ref: This Office letter No..GPCB/BRCH/B/C-38/404885 dated 21/02/2017.

Dear Sir,

With reference to the above-cited subject and reference, it is to inform you that, a time bound action plan is required to submit for the various activities to be carried out by GIDC for Strengthening of Environment Infrastructures at Dahej. Various issues in this regard were discussed during the meeting held on 23/01/2017 under the Chairmanship of Additional Chief Secretary, Forests & Environment Department & Chairman GPCB (Copy enclosed herewith for your ready reference please).

I would like to draw your kind attention on following points, which are required to be carried out on a priority basis.

- 1) Though it was decided to make an application for consent to establish for the CETP of Dahej within a week time to the GPCB, it is observed that the same has not been made yet. You are requested to direct concern office in this regard to make an application for consent to establish on a priority basis to the GPCB.
- 2) It was also decided to form SPV in coordination with Dahej Industries Association for the transportation and disposal of industrial effluent through tankers for the industries, which are located in the area devoid of underground drainage network system. It is learned that the SPV as discussed has not been formed yet. It is humbly requested to

o/c

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CPTO)

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look into the matter and to direct concerned office to coordinate with Dahej Industries Association in this regard for the formation of SPV at an earliest.

- 3) Various technical provisions for the up-gradation/strengthening of existing facilities as per the point no. 4 of the Minutes of Meeting are also required to put in action.
- 4) During the meeting, it was categorically asked by the Additional Chief Secretary, Forests & Environment Department and the Chairman GPCB to prevent robust penalty policy in line with the ECPL, Vadodara project in consultation with Dahej Industries Association. Kindly submit progress in this regard to the Board.
- 5) As per the Point no. 6 of Minutes of Meeting, it is also requested to provide time bound action plan for providing infrastructure to reuse treated effluent of the estate and treated sewage of Vadodara Municipal Corporation.

The above is for your further necessary action, please.

With regards,



(K.C. Mistry)
Member Secretary

Encl: As above.

O/C

D. M. Thakur
t/y



GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

No. GPCB/BRCH/B/C-38/

Dated /02/2017.

To,

- 1) Shri Dr. Bharat Jain,
Member Secretary,
Gujarat Cleaner Production Centre,
Block-12, 3rd Floor,
Udyog Bhavan, Sector-11,
Gandhinagar.
- 2) Shri A.K. Patel
Chief Engineer
Gujarat Industrial Development Corporation,
Udyog Bhavan, Sector-11,
Gandhinagar.
- 3) Shri M.A. Haniya, President,
Dahej Industries Association,
Plot no. 715/01,
Opp. Expanded Polymer,
Near III, GIDC Dahej,
Tal: Vagra,
Dist: Bharuch.
- 4) Shri G.J. Gamit
Suprintending Engineer
Gujarat Industrial Development Corporation,
1st & 2nd Floor, Panch Batti,
Bharuch.
- 5) Shri S. N. Patil, CEO
Dahej SEZ Ltd.
3rd Floor, Block No 14,
Udyog Bhavan, Sector-11,
Gandhinagar.

Subj: Minutes of the meeting held on 23/01/2017 for Environmental related issues of Dahej Industrial Area.

Ref: This office letter No. GPCB/BRCH/B/C-38/401530 dated 18/01/2017.

Respected Sir,

A meeting for Environmental related issues of Dahej Industrial Area was held on 23/01/2017 at 15:00 at GPCB - Gandhinagar.

Pl find enclosed here with minutes of the meeting. It is requested to submit time bound action plan for the activity pertaining to your organization as per minutes of the meeting within seven days.

Thanking you,

Yours Faithfully,

D. M. Thacker
(D.M. Thacker)

Environmental Engineer

Clean Gujarat Green Gujarat

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Minutes of the meeting held on 23-01-2017 at GPCB-Gandhinagar under Chairmanship of Shri Arvind Agrawal, IAS, Addition Chief Secretary, Forests & Environment Department & Chairman, GPCB to discuss various Environment related issues of Dahej Industrial Region.

A meeting was held under the Chairmanship of Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB to discuss various environment related issues of Dahej Industrial area. The list of the participants is attached herewith as Annexure A.

A brief power point presentation of the Dahej Industrial region was made by Regional Office, GPCB, Bharuch. Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB in its opening remarks, explained about necessity of having common environment infrastructures in place prior the industrial development comes up so as to avert the problems of pollution and strengthening of the existing infrastructures to cope up with the future development. Following points were discussed:

1. CETP at Dahej:

Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked about the status of CETP at Dahej. The Chief Engineer, GIDC informed that the construction work of the CETP at Dahej, of 40 MLD capacity is in an advanced stage and it is likely to be commissioned in March-2017. Initially, it will cater to the Chemical zone areas of the Dahej. CETPs for other areas of Dahej will be planned in future based on need assessment. Environment Engineer, GPCB informed that GIDC is yet to apply for the consent of the Board for the CETP. After detailed discussion, Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked GIDC to apply for the CTE of the Board within a week time.

(Action: GIDC)

2. The absence of the underground drainage network in some areas of Dahej: Environment Engineer, GPCB brought to the notice of the Chairman that in few areas of the Dahej, still there is no underground network in some in some pockets of Dahej. About Six industries are commissioned in such areas and face the

problem of industrial wastewater disposal. After detailed deliberation following was decided:

- a. The industry which is not made available underground drainage connection by GIDC and has the CTE of the Board to discharge in the underground drainage connection will be given temporary permission to discharge its industrial effluent in consented quantum through tankers at nearby pumping station of the underground drainage network.
- b. GIDC, Dahej Industries Association will form a Special Purpose Vehicle (SPV) for the transportation and disposal of the effluent from such units within one week.
- c. The SPV may take support for the vehicles and other logistics from the Common Environment Infrastructure of the Dahej area i.e. BEIL.
- d. There will be fleet of dedicated; GPS-enabled tanker for the transportation and discharge of the treated effluent from the industry.
- e. The manifest system shall be followed for the discharge of the transportation and discharge of the treated effluent.
- f. SPV will be responsible for the quality of the effluent, quantity of the effluent discharged by the industry and it will maintain the record thereof.
- g. The GPCB will give necessary permission to the industrial units to discharge their treated industrial effluent through above SPV.

(Action: GIDC, Dahej Industries Association)

3. CETP at Saykha and Deep Sea Pipeline for Saykha:

The Chief Engineer, GIDC informed that considering the scale and type of the industries to come up in the Saykha, CETP of 40 MLD has been already planned for the Saykha. The CETP-project has been sanctioned by the Government. The design, estimates, tender process are under way and construction of the CETP will start by December 2017. After detailed deliberation, Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked GIDC to complete the project in time bound manner considering high significance of the project. In addition to the above, it was decided that considering the limited capacity of the existing common deep sea effluent discharge pipeline at Dahej, and the nature of the development in the region, GIDC shall lay down separate dedicated deep sea pipeline for the Saykha estates. As the deep sea

pipeline project is complex in nature and requires time, it was decided that GIDC shall start working on this project.

(Action: GIDC)

4. Up-gradation / Strengthening of the existing facilities:

The regional office, GPCB, Bharuch in its presentation brought out following points for the strengthening of the existing infrastructure related to the conveyance of the treated industrial effluent:

- a. Provision of online pH meter, TOC meter, Flowmeter at all the pumping station and maintenance of the record thereof.
- b. Lifting of the contaminated water being accumulated in GIDC storm water channel in some areas of the estate
- c. Increase in the capacity of the storage of treated effluent at final pumping station to avoid any bypass of effluent during cleaning of the final pumping station
- d. Provision of the Security and CCTV at all the pumping stations and vulnerable locations to prevent any illegal disposal of the effluent through tankers
- e. Sealing of the manhole and surveillance / patrolling along the route of conveyance pipeline to prevent any illegal discharge of effluent through tankers
- f. Need of regular cleaning and sludge removal through mechanical means at all pumping stations
- g. Sampling facility for the Pumping station & effluent quality monitoring and industries directly discharging its effluent into the Final Pumping Station.

After detailed discussion, Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked GIDC to prepare short-term action plan in coordination with the Dahej Industries Association and complete all the works in time bound manner.

(Action: GIDC, Dahej Industries Association)

5. Penalty policy for the defaulting industrial units:

It was discussed that GIDC carries out the monitoring of the industrial units in Dahej area through third party agency and maintain the record thereof. At present, there is no penalty policy for the defaulting industrial units. Shri. Arvind Agrawal,

IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked GIDC to prepare a robust penalty policy in line with Effluent Channel Project (ECP-Vadodara) in consultation with Dahej Industries Association and implement it on priority basis so as to inculcate discipline in the member industrial units.

In addition, third party monitoring should be strengthened and its details shall be shared with the GPCB. It was also suggested by GPCB that the GIDC should share data of ambient air quality monitoring with member industries for the preparation of the EIA report so as to have uniformity of the data.

(Action: GIDC, Dahej Industries Association)

6. New Infrastructure for the Reuse of the treated effluent:

- a. During the presentation, it was mentioned by Regional Office, GPCB-Bharuch that many industries like Torrent Power Limited and others have a generation of industrial effluent with very low pollution potential (Only High TDS) which can be reused directly as industrial grade water in many other industries. There is a need to develop and separate conveyance network so that such wastewater can be reused appropriately and overall fresh water consumption can be reduced. It was also presented that GPCB earlier requested GIDC through a letter to plan a project in this regard. It was decided that the GIDC will prepare a blueprint for this project in coordination with Dahej Industries Association.
- b. It was also presented by the Dahej Industries Association that due to salinity ingress and continual decline in the surface water availability, there is a need to have an alternate source of fresh water for the industries at Dahej. This will also help to meet the future need of water in this region. After detailed discussion, it was decided that GIDC will explore the possibility to reuse the treated sewage of the Vadodara Municipal Corporation in line with the model of Surat Municipal Corporation where the 40 MLD of the treated sewage is used as industrial grade fresh water in the textile industries at Pandesara.

(Action: GIDC, Dahej Industries Association)

7. Development of the Green Belt in the Dahej Industrial Area:

It was discussed that though efforts are being made for the development of the green belt and plantation in the area, there is still ample scope for increase in the green cover of the area. After detailed discussion, it was decided that GIDC in coordination with the Dahej Industries Association will carry out thick plantation on roadsides, in the service corridors and at the common plots.

In concluding remarks, Shri. Arvind Agrawal, IAS, Additional Chief Secretary, Forests and Environment Department & the Chairman, GPCB asked GIDC to prepare a time-bound short term and long term action plan for the above activities and submit to the Board. He also asked industry association's representatives to have self-discipline in pollution control for the sustainable growth of the region.

The meeting ended with vote of thanks to the Chair.

Outward No. 4048C5-21-22/20

Gujarat Pollution Control Board
Gandhinagar

Annexure A

Meeting Regarding Environment Related Issues of Dahej Area in the chairmanship of Shri Arvind Agarwal, IAS, Additional Chief Secretary, Forests & Environment Department & Chairman GPCB, on 23/01/2017 at 15:00 hrs in the committee room of Gujarat Pollution Control Board at Head Office Gandhinagar.

List of Participants:

1. Mr. A.K. Patel, Chief Engineer, GIDC
2. Mr. J.G. Gamit, SECG GIDC
3. Mr. N.P. Vadalia, EE GIDC
4. Mr. Ashok G. Dhodi, DEE GIDC
5. Mr. Bharat Jain, GCPC
6. Mr. Hiren Bhendwal, Sr. Project Engineer, GCPC
7. Mr. S. N. Patil, CEO SEZ
8. Mr. Niraj Shah, Manager SEZ
9. Mr. D. M. Thaker, EE GPCB
10. Mr. Falgun Modi, DEE Representative RO GPCB Bharuch
11. Mr. L. M. Ahir, AEE RO GPCB Bharuch
12. Mr. D. P. Patel, DEE GPCB
13. Mr. Sunil Bhatt, JI. President DIA
14. Mr. Dinesh Patel, Secretary DIA
15. Mr. Shalin Shah AGM Environment
16. Mr. Vishal Shah Sr. Manager Environment

D. M. Thaker

Gujarat NO: 101035-21/02/2017

449-469

Annexure-II

No:-BRCH-B-CCA-1194(5)/ 447817

15 MAR 2018

Date:-15th March, 2018

Smt. D. Thara, IAS
Vice Chairman and Managing Director,
Gujarat Industrial Development Corporation,
Udhyog Bhavan,
Gandhinagar - 382017.

Sub: Discharge of effluent of Dahej PCPIR industries on landfall point instead of into the deep sea, by GIDC.

Madam,

The Gujarat PCPIR is a fast growing chemical and petrochemical hub of national and international status. As the PCPIR houses a large number of chemical units, the proper disposal of industrial effluents, in a scientific manner and meeting the permissible norms, is of utmost importance.

2) GPCB has given CC&A to GIDC to discharge the effluent into the deep sea at a point and in a manner suggested by NIO, through 52.5 kms. pipeline (39 kms on land + 9 kms. coastal + 4.50 kms. offshore) with diffuser system, without secondary treatment. It is understood that the work on CETP set up by GIDC is almost complete, and the project is ready to be commissioned soon. However, as it is not yet commissioned, the pipeline acts only as a carrier for the disposal of effluent.

3) As the effluent is to be discharged through diffuser system at a designated point into the deep sea, the individual industrial units have been permitted the discharge norms accordingly, i.e. they are permitted outlet COD of 250 mg/l and BOD of 100 mg/l as against the prescribed norms of 100 mg/l and 30 mg/l respectively for on land discharge.

4) GPCB had been receiving representations from different stakeholders regarding the excessive pollution in the Dahej industrial area, resulting into the non observance of the discharge parameters of the GIDC pipeline. The undersigned visited the Dahej PCPIR on 3.2.2018, accompanied by officers of GIDC and GPCB, to physically ascertain the prevalent situation. It was noticed

જી.આઇ.ડી.સી. ઈલેક્ટ્રોનિક્સ
રજીસ્ટ્રી શાખા
સેક્ટર-૧૧, ગાંધીનગર

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15-3-18
05.30 PM

that the effluent carrying pipeline, which is supposed to go 4.50 km offshore into the deep sea, with diffuser system, is damaged at the landfall point, and the diffuser at the final disposal point has also got damaged. The industrial effluent is being discharged at the landfall point itself through siphon. This situation has been prevalent since the last eight to nine months.

5) You will appreciate that this is a very serious environmental issue, and is also a serious violation of the CC&A given for operation of the effluent discharge pipeline maintained and operated by GIDC. It also amounts to violation of the CRZ Rules. It has caused and is continuing to cause extensive damage to coastal ecology, and has adversely affected marine life and fish in the region. It also causes extensive damage at the landfall point and to the entire seashore. That this has been prevalent since eight to nine months has further added seriousness to the subject, and also to the adverse affect on the environment. Needless to say, repairing the damaged pipeline and diffuser, and ensuring its proper functioning, would take another few months.

6) Heads of GPCB and GIDC had met on 7.2.2018 with their concerned officers to discuss the matter. Certain decisions were taken in the meeting. It is requested to take necessary action thereon. Minutes of the visit of the undersigned to the PCPIR on 3.2.2018, and minutes of the meeting held on 7.2.2018 between GIDC and GPCB, are attached herewith for ready reference.

7) Certain other important issues were noticed during the undersigned's visit to Dahej PCPIR on 3.2.2018, as below:

- a) A lot of sludge has collected at the GIDC pumping stations. The facility for timely removal/ disposal of the sludge was found inadequate.
- b) The individual industrial units are required to treat their effluent and bring it below the maximum permissible limit (COD 250 mg/l and BOD 100 mg/l) before discharging it into the GIDC pipeline. It was noticed that large number of industries are discharging untreated effluent, or are seriously violating the prescribed norms. While it is the main responsibility of GPCB to check the individual units on this respect, the permission (Condition no. 5 and 5.1 to 5.6 in particular of CC&A dated 4.4.2014) given to GIDC for operating the common pipeline clearly stipulates that the required inlet norms for the pipeline shall be ensured by GIDC, and regular inspections at the outlet point of individual industries are also to be looked into regularly by GIDC.

- c) Online monitoring and regular record keeping at GIDC pumping stations needs to be strengthened, to ensure that regular data is available on the effluent received into the carrier pipeline from member units.
- d) There is an accumulation of contaminated waste water in storm water drain due to overflow of manholes, caused due to choking of the pipelines in different sections.

8) The quality of effluent at the final pumping station on 1.3.2018 is as below :

Parameters	Actual	Prescribed	Remarks
pH	4.63	5.5 to 9	Acidic discharge
COD	1660	250	
BOD	256	100	
Phenolic Compound	24.33	5	

Note: All parameters except pH are in mg/l

Further, the average quality of effluent at the final pumping station during the last three months, i.e. December 2017 to February 2018 is as below :

pH - 5.57, COD - 1682 mg/l, BOD - 295 mg/l and phenolic compound - 14.39 mg/l.

9) Thus, it can be seen that the quality of the effluent at the final pumping station is very bad, and this is being discharged on land and not in the deep sea. The effluent has also turned acidic.

10) In the current scenario, the Board will have no option but to revise the prescribed norms for the industrial effluent at the final pumping station to that prescribed for disposal on land (i.e. 30mg/l BOD and 100mg/l COD) instead of that prescribed currently (100mg/l BOD and 250mg/l COD).

11) It is also necessary to draw your attention to the fact that GPCB has received an input from the Intelligence Bureau about the pollution at the land fall point in Dahej, and the resultant grievances of fisherman community. The specific input of IB is about the deterioration of the coastal water quality, resulting in decline of the quantity and quality of fish catch, which is being objected by the fishermen.

12) You are requested to kindly give your personal attention to the above issues and take remedial action at the earliest. I would appreciate if an Action Plan and the actual measures undertaken to remedy the situation be submitted by GIDC within 30 days.

Yours faithfully,

Arvind
(Arvind Agarwal)
ACS. F& ED and
Chairman, GPCB

g/c

Encl: As above

Copy to :

Principal Secretary,
Industries & Mines Department
... for information and necessary action.

Arvind
15/3/18



सत्यमेव जयते



Gujarat Industrial Development Corporation

(A Govt. of Gujarat Undertaking)
Block No. 3, 4 & 5, Udyog Bhavan
Sector 11, Gandhinagar - 382 011
Gujarat, India

D. THARA IAS
Vice Chairman & Managing Director

૨૩૬૬
૧૩-૨૦૧૮



L09009392120

Sender Name: XEN PH

Received: 10/04/2018

Date:

No GIDC/ENG/PH/935

1351
17/4/18
578
12/4/18

To,

Shri Arvind Agarwal
Additional Chief Secretary, F & E Dept and Chairman, GPCB
Gujarat Pollution Control Board,
Paryavaran Bhavan, Sector-10 A, Gandhinagar

Chairman

MS

OP
11/4

Sub: Discharge of effluent of Dahej PCPIR industries on landfall point instead of into the deep sea by GIDC

B-2CH unit

Ref: GPCB office letter no 447817 dated 15-03-2018

Sir,

In the year 2000, National Institute of Oceanography, Goa had prepared a Rapid Marine EIA to release the effluent in Coastal water off Dahej Coast from GIDC Industrial Estate.

The collected treated effluent of Industrial Estate has to be disposed-off through marine pipeline of about 4.5 kms length and a diffuser system at LAT 210 39' 26"N & LONG 720 29' 50"E in coastal water of Luwara, in the bay of Khambhat.

The proposal for the final disposal was prepared to dispose 180 MLD of effluent out of which 90 MLD disposal pipeline was laid in 1st Phase and was completed in July 2005. The rest of the capacity is to be carried out in 2nd Phase.

At present 90 MLD pipeline is used for effluent disposal, for which GIDC has obtained NOC of GPCB vide Letter no. 32367 dated 22 October, 2002.

Presently, the said pipeline has been found damaged / leaking and presently the effluent is disposed at the land fall point itself. The diffuser in the sea is

નવચીજ સ્ટેશન પુનઃ સ્થાપના

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STP

13/4

buried due to silting of about 2m deep on diffuser. Subsequently, a study was carried out for up gradation of existing 90 MLD through M/s. Hydro Air Tectonics (SPD) Pvt Ltd.

Actions to be initiated by GIDC:

1. GIDC will approach NIO, Goa for confirmation of location for diffuser.
2. Float Tender for new line in place of existing 90 MLD which is damaged – Tenders for the same were approved by the competent authority recently and the work is expected to be completed before monsoon. This will help the point of damage at landfall point towards the sea for about 800 mt.

Also, GIDC has planned to float the tenders for another effluent disposal line to accommodate the industries of Saykha, Dahej III and Dahej II through existing Final Pumping Station located near Village Ambheta. GIDC will approach NIO, Goa for deciding location of diffuser.

The action plan for the observations on dtd 03-02-2018, as desired, is attached herewith as annexure A.

Thanking You,

Yours,


D Thara
VC & MD

Encl. : Annexure 'A'

ANNEXURE "A"

Sr No	Issue observed during Visit by ACS, F & E	Compliance by GIDC
1	<p>A lot of sludge has collected at the GIDC pumping stations. The facility for timely removal/disposal of the sludge was found inadequate.</p>	<p>GIDC has registered with M/s BEAIL, Dahej for disposal of sludge obtained at pumping stations. Hence, safe disposal of sludge is being carried out. The sludge removed from Pumping Stations is allowed to get dried and then it is being disposed.</p> <p>GIDC is exploring the feasibility for developing the mechanism for settling the effluent for removal of sludge before pumping at such pumping stations.</p>
2	<p>The individual industrial units are required to treat their effluent and bring it below the maximum permissible limit (COD 250 mg/l and BOD 100 mg/l) before discharging it into the GIDC pipeline. It was noticed that large number of industries are discharging untreated effluent, or are seriously violating the prescribed norms. While it is the main responsibility of GPCB to check the individual units on this respect, the permission (Condition no. 5 and 5.1 to 5.6 in particular of CC & A dated 4.4.2014) given to GIDC for operating the common pipeline clearly stipulates that the required inlet norms for the pipeline shall be insured by</p>	<p>GIDC receives the treated effluent from the Individual units through u/g drainage network and terminates it at pumping stations which ultimately discharged at Final Pumping Station in the collection well which ultimately discharges into sea.</p> <p>GIDC monitors Air & Liquid waste through agency M/s. Unistar Environment Research Labs Pvt Ltd. The liquid monitoring by taking samples from industries is with frequency of 6 samples a month whereas for pumping stations, it is twice a week. The monthly reports are being shared with RO, GPCB, Bharuch.</p> <p>At present 90 MLD pipeline is used for effluent disposal, for which GIDC has obtained NOC of GPCB vide Letter no. 32367 dated 22 October, 2002 renewed from time to time. Presently, the said pipeline has been damaged and presently the effluent is discharged at the land fall point. The diffuser in the sea is buried due to silting of about</p>

ANNEXURE "A"

	GIDC, and regular inspections at the outlet point of individual industries are also to be looked into regularly by GIDC.	2m on diffuser. GIDC has awarded the work of laying of part offshore pipeline for effluent discharge into deep sea as a temporary solution. However, GIDC is planning to upgrade the disposal line at land fall point and off shore line as well, for which GIDC will approach NIO for another disposal point available. On receipt of the same new tender for effluent disposal into deep sea shall be floated.
3	Online monitoring and regular record keeping at GIDC pumping stations needs to be strengthened, to ensure that regular data is available on the effluent received into the carrier pipeline from member units.	GIDC monitors Air & Liquid waste through agency M/s. Unistar Environment Research Labs Pvt L ^{td} . The liquid monitoring by taking samples from industries is with frequency of 6 samples a month whereas for pumping stations, it is twice a week. The monthly reports are being shared with RO, GPCB, Bharuch and half-yearly reports are being sent to GPCB and Bhopal regularly. GPCB and GIDC jointly may have surprise inspection once in a month. Now onwards, GIDC will also submit the regular record of effluent received at pumping station online to GPCB's Server, once the space allotted.
4	There is an accumulation of contaminated waste water in storm water drain due to overflow of manholes, caused due to choking of the pipelines in different sections.	Waste water accumulated in storm water drains was either surface water or there might be possibility of foul activity of any industrial unit. In such circumstances GIDC will explore to strengthen the vigilance by providing CCTV and by increasing security staff for the particular points within estate.



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector 10-A, Gandhinagar 382 010

Phone : (079) 23226295

Fax : (079) 23232155

Website : www.gpcb.gov.in

By R.P.A.C

No: GPCB/BKCH-B/CCA-1194(6)/ID-31038L

- To,
1. The President
Dahej Industries Association,
C/o. Disaster Management
Centre,
Plot no. 715/01, Nr. Goal ITI,
Chemical Zone,
DAhej-392130, Tal: Vagra
Dist: Bharuch
 2. The Chief Engineer,
Gujarat Industrial
Development
corporation
Block no. 4,
2nd Floor,
Udhyog Bhavan,
Gandhinagar.
 3. The Regional Officer
Gujarat Pollution Control
Board
Bharuch.

SUB: - Regarding Action Plan for Environmental Issues in Dahej PCPIR.

REF: - Special Drive-Field Visit at PCPIR, Dahej during December-2018 & January 2019

Sir,

In connection with above mentioned subject and reference, as you are aware that, GPCB recently conducted study on environment situation prevail at PCPIR, Dahej in the month of December 2018 - January 2019 and prepared a report with action plan in consultation of stack holders, which is accepted by the Board.

You are requested to go through Action Plan and send your Time limit for concerned items of action plan.

Thanking you,


K.C. Mishra,
Member Secretary

Encl: Action plan

Clean Gujarat Green Gujarat

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Action Plan for Environmental Issues in Dahej PCPIR

Sr.No.	Action Point	Detailed Tasks	Time limit	Agency
(I) ISSUES RELATED TO GENERAL INFRASTRUCTURE				
1	Scaling (Siltng) in the final deep sea discharge line near FPS	<ul style="list-style-type: none"> i) Identification of non-compatible streams responsible for scaling (<i>Calcium bearing effluent from units like GFL& Sulphate containing effluent from units like Indofil Ind. Ltd, Grasim Cellulosic etc. is suspected to result into scaling</i>) ii) Segregation and isolation of the identified non-compatible streams iii) Staggering in discharge of non-compatible effluents iv) Explore possibility of waste exchange for utilization by different industrial units 		GIDC/GPCB/DIA (with help of expert agencies)
2	Maintenance of Final Pumping Station	<ul style="list-style-type: none"> i) Huge accumulation of sludge at FPS to be removed immediately ii) Permanent sludge removal system like filter press/ belt press etc. should be installed for regular maintenance iii) Ensure continuous pumping to prevent sludge deposition in FPS and final discharge pipeline 		GIDC
3	Restoration of the final off-shore sea discharge pipeline	<ul style="list-style-type: none"> i) Provide off-shore 4.5 km long final Discharge pipeline with diffuser 		GIDC
4	Commissioning of the CETP- Dahej (40 MLD)	<ul style="list-style-type: none"> i) CETP to be made operational immediately ii) Listing the members of CETP with respective permitted quantities, sharing the same with concerned agencies (GPCB, DIA etc.) iii) Start taking effluent from units discharging through tankers into CETP with quality check as per inlet norms, instead of FPS, till the pipeline network is provided iv) At present effluent from PS-A is diverted into CETP, possibility of diverting effluent from the PS-C & D may also be explored v) Formation of SPV for CETP and related infrastructure vi) As per the EC condition, all pipeline network connected to the CETP to be provided above the ground vii) CETP authority to apply and obtain CTO immediately 		GIDC/DIA

Action Plan for Environmental Issues in Dahej PCPIR

Sr.No.	Action Point	Detailed Tasks	Time limit	Agency
5	Assessment of current Hydraulic load of the internal pipeline network as against the designed load (Evaluate the existing effluent discharge quantity vis-à-vis design criteria)	<ul style="list-style-type: none"> i) Identify pipeline network sections/manhole subject to frequent overflowing ii) Fix-up causes of the overflow including assessment of effluent discharge of relevant units and carrying capacity of the overflowing sections iv) Installation of SCADA system v) Compare the discharge of effluent in the overflowing pipeline sections with the GIDC water supply and CCA quantity vi) Remedial action plan to be prepared 		GIDC/GPCB
6	Regular maintenance of infrastructure & prevent overflowing of manholes	<ul style="list-style-type: none"> i) Regular cleaning of internal PS and pipeline network ii) Provide flow meter and TOC meter at all pumping stations and connect the same with GPCB server iii) Identified areas like (i) Near Road 4 & 4 C in SEZ-1, (ii) Opposite Mrs Meghmani Organics Ltd (GIDC) near Mrs Universal Chemicals in GIDC Dahej and (ii) beside the Dahej-Amod Road to be take up immediately for maintenance iv) Divert all accumulated contaminated water to the nearest PS 		GIDC
7	Checking of discharge connections with manhole and identify route of the live and dead pipelines/manhole Dahej	<ul style="list-style-type: none"> i) Manholes to be nomenclated for identification ii) List of units connected with respective manholes for discharge to be prepared iii) Check each manhole for ghost connections, itsand removal, if any and sealing 		GIDC/GPCB/GP
(II) ISSUES RELATED TO FINAL EFFLUENT DISCHARGE QUALITY				
8	For units generating high COD and high TDS effluent	<ul style="list-style-type: none"> i) Identification of the industries ii) Individual pipelines with free fall in the respective PS/FPS having sampling arrangements (Express line) by such units 		GIDC/GPCB/GP
9	Industries having MEE/captive incinerator to have restriction of limit on storage quantity	<ul style="list-style-type: none"> i) Identification of the industries ii) Locations of the MEE feed tanks to be adjacent to the MEE plant and Storage capacity to be restricted (for buffer of 3 day) iii) Separate pipeline network for MEE feed and condensate 		GPCB, Concerned Industries

Action Plan for Environmental Issues in Dahej PCPIR				
Sr.No.	Action Point	Detailed Tasks	Time limit	Agency
10	Industrial monitoring	i) Strict & frequent monitoring of potential polluting industries and strict actions against the defaulters ii) In addition to GPCB, the GIDC may develop disciplinary policy like disconnection of drainage facility, for violation of conditions related to quality of effluent as mentioned in plot allotment permissions		GPCB/GIDC
(III) WITHIN INDUSTRY				
11	ETP and Effluent pipeline network	i) All pipeline networks of effluent to be made colour-coded with flow directions and nomenclatures ii) All ETP units to be nomenclated with capacity iii) Abandoned ETP units/ pipelines to be removed		Concerned Industries/ DIA
12	Records keeping by the industries and Providing of EMS operating indicators	i) Industries to provide separate flow meters and energy meters for ETP, MEE, incinerator		Concerned Industries/ DIA
(IV) POLICY MATTER				
13	Specific Issues	i) No polluting industries to be allotted plots in plastic/engineering zone ii) Units having potential of high COD & TDS and having MEE, may be given additional option of sending the concentrated effluent to common facility in case of maintenance of MEE and exigencies for very limited period only		GIDC/GPCB GPCB

Annexure - V

Dr. M.D. Modiya

IAS

Collector & District Magistrate
BHARUCH

Office of the collector & District Magistrate

B-13, Siva Sadan, P. O. No. 1, 22

Bh. Rd. No. 1, 22

Ph. No. 02612 240011

Fax: 02612 240061

E-mail: collector.bha@gujarat.gov.in

MSC/WS/867

Date: 10/02/2020

To,
Vice Chairman & Managing Director,
Gujarat Industrial Development Corporation,
Gandhinagar.

Sub: Environmental Infrastructural issues in Dahej Industrial area

Respected Sir,

You may be aware that District Environment Planning committee is constituted in every district of the State in compliance with the Hon'ble NGT Order dated 15.07.2019 in matter of O.A. No. 710/2017 to monitor environmental issues of the District and review District Environment Plan regularly. Furthermore review report is to be sent to Hon'ble Chief Secretary. In District Environment Planning committee review meeting, it has been brought to my notice that there is long pending environmental issue due to choking of 4.5 KM offshore PCPIR, Dahej effluent disposal pipeline laid down by GIDC. Due to choking of this disposal pipeline, a 600 meter pipeline from sea coast is laid down by GIDC as alternative arrangement for effluent disposal. Due to choking & non-operational 4.5 KM offshore effluent disposal pipeline, presently effluent of Dahej PCPIR is disposed into near to sea coast, but into deep sea resulting marine environmental problem at sea coastal area. Furthermore leakages & manholes overflow in various sections of GIDC drainage line in Dahej Industrial area resulting in heavy water logging of wastewater in storm water drains & low laying area in Dahej GIDC have also been brought to our notice in past. The effluent from the GIDC manholes & effluent coming out from the pipe & the effluent leakages reaches to sea coast through storm water drains.

It may be also noted that Dahej PCPIR is the key developing industrial region which is attracting investors globally. therefore, it is requested to short out environmental issues of this PCPIR on top priority at your level.

(Dr. M.D. Modiya)

Collector and District Magistrate
Bharuch

Copy to: Member Secretary, Gujarat Pollution Control board, Paryavaran Bhavan, Sector-10A, Gandhinagar for information



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : www.gpcb.gov.in

BY RPAD

Direction under Section 33(A) of The Water (Prevention and Control of Pollution) Act

1974 to the unit.

WHEREAS, PCPIR located at Dahej, District: Bharuch is an investment region developed by GIDC with an environmental infrastructure for collection, transportation and disposal of effluent in the area, which have been discharging effluent at sea shore by siphoning from GIDC discharge pipeline instead of discharging into deep sea due to ill maintenance of pipeline and damaged diffuser at final discharge point; and

WHEREAS, The Gujarat Pollution Control Board (GPCB) has prescribed norms for effluent disposal in the consent to operate to the individual industries located in PCPIR; and

WHEREAS, effluent discharged by some of individual industries from their outlet in to collection, transportation and disposal system operated by GIDC is exceeding norms of treated effluent discharge prescribed by GPCB to them; and

WHEREAS, disposal of effluent exceeding norms of treated effluent discharge prescribed by GPCB resulting in to (1) foaming and sludge generation at GIDC pumping stations, (2) choking of pipelines, Scaling of conveyance lines resulting in to reduction of its carrying capacity and (3) accumulations of contaminated waste water in storm water drain due to overflow of manholes due to choking of pipelines; and

Outward No: 493028/2017/01

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WHEREAS, GPCB has issued directions and notices to the GIDC and errant industries in this regards for violation of condition prescribed under the Consent to operate granted to them from time to time; and

WHEREAS, GPCB felt it necessary to have detailed study of issues address in aforesaid paragraphs so that conditions for effluent discharge and norms prescribed by GPCB are complied; and

WHEREAS, GPCB have studied the existing situation prevail at PCPIR, Dahej in the month of December 2018 - January 2019, based on observation, action plan and recommendation of report corrective actions are required by non compliant industries to mitigate issues of concern in time bound manner; and

WHEREAS, GIDC (Dahej-PCPIR) is engaged in Collection, conveyance treatment and disposal of effluent as per CCA no. AWH-60292 dated 04/04/2014.

WHEREAS, GIDC Environmental Infrastructure was inspected by team of GPCB official on date: 07/12/2018, 09/12/2018, 11/12/2018, 12/12/2018, 13/12/2018, 14/12/2018, 15/12/2018, 16/12/2018, 20/12/2018, 21/12/2018, 22/12/2018, 23/12/2018, 24/12/2018, 26/12/2018, 28/12/2018, 29/12/2018, 31/12/2018 to have detailed study for addressing issues mentioned in aforesaid paragraphs so that conditions for effluent discharge and norms prescribed by GPCB are complied with; and

Outward No: 493028, 30/01/2019



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

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WHEREAS, during inspection following observations / non compliances were made:

- (1) As an immediate short term measure, treated effluent from Indofil Industries Ltd and Gujarat Fluorochemicals Limited needs to be diverted to prevent formation of calcium sulphate and its discharge to the pumping station-C may be stopped.
- (2) To make CETP Dahej operational depending upon motive of establishing CETP and its design criteria effluent from pumping station-A & C may be diverted entirely to the CETP, considering available capacity.
- (3) There is a need of separate collection sumps for (i) treated effluent coming from the CETP and (ii) effluents coming from chlor alkali manufacturing unit.
- (4) To stop discharge of treated waste water from individual industries through tankers, pending work of internal pipeline network in D-II & D-III needs to be expedited.
- (5) Presently effluent discharge is onshore instead of deep sea discharge. The offshore pipeline along with diffuser should be immediately be made operational.
- (6) Discharge effluent on shore through alternative arrangements like Syphoning needs to be stopped.
- (7) Installation & operation of flow meter & TOC meter at all pumping stations with connectivity to GPCB server.
- (8) GIDC needs to take necessary actions against non-compliant units in violation of the condition prescribed by them for collection, conveyance treatment and disposal of effluent.
- (9) Analysis reports of sample collected from Pumping Station A, Pumping Station C, Pumping Station D, Pumping Station at Vilayat & Final Pumping Station Ambheta during period of aforesaid monitoring indicate that concentrations are higher than the permissible limit specified by the Board.

Outward No: 49302/2008-09/2008

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AND WHEREAS, it is necessary implement aforesaid observations /non compliances in time bound manner with detailed Action Plan.

NOW therefore, in exercise of the power delegated under Section 33(A) of The Water (Prevention and Control of Pollution) Act 1974 I, Mr. A. V. Shah, Senior Environment Engineer, Gujarat Pollution Control Board issuing following direction with approval from competent Authority.

(1) To submit detailed time bound action plan for corrective actions required within 21 days.

Failing to submit action plan within stipulated time, responsible officers are liable to be prosecuted under Section 41(2) of The Water (Prevention and Control of Pollution) Act 1974.

For and on behalf of
Gujarat Pollution Control Board



(A.V. Shah)

Sr. Environment Engineer

NO: - GPCB/BRCH-B-CCA-1194(6)/ID-31038/

ISSUED TO:-

✓ THE CHIEF ENGINEER,

GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION

BLOCK NO. 4, 2ND FLOOR, UDHYOG BHAVAN,

GANDHINAGAR.

COPY TO:

The Regional Officer, G.P.C. Board, Bharuch. For information and submission of monitoring reports.

Outward No: 493028, 30/01/2019



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : www.gpcb.gov.in

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 are Gujarat Industrial Development Corporation (Dahej-Vilayat Pipeline Development Cell) are having effluent conveyance pipeline and use for discharge of treated effluent into said marine outfall system at Plot No. 13/A, Dahej pumping station GIDC Estate, Dahei, Dist: Bharuch.

AND WHEREAS Gujarat Pollution Control Board has granted you consent under the provisions of water Act-1974 by its Consent Order No.AWH -60292, valid up to 12/11/2018 (Expired) for operation of the Common effluent conveyance pipeline project with various conditions mentioned therein, and you have applied for CCA-Renewal for the same.

AND WHEREAS during the inspection of GIDC on various dates under section-23 of the Water Act by the authorized officer of the Board it has been noticed that:

1. GIDC is discharging effluent 500 to 600 mtr away from sea, so proper dilution as per condition no. 5.4 may not be available at discharge point. GIDC has breached condition no.5.2 & 5.4 of CCA.
2. 4.5 KM offshore pipeline is presently choked and not in operation. Due to choking of the 4.5 KM offshore pipeline, treated waste water of Dahej & Vilayat industrial area is disposed near the sea shore by providing 600-meter offshore pipeline as alternative arrangement and presently not being disposed into deep sea disposal point suggested by NIO.
3. There are leakages in GIDC drainage lines and overflow from GIDC drainage manholes in various sections of GIDC drainage system in Dahej & Vilayat resulting accumulation of wastewater in storm water drain and in low laying areas adjacent to storm water drain.
4. The overflowed wastewater reaches to estuary / sea through the natural drain/ storm water drain. GIDC fails to tackle this issue.

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5. Sludge deposition is observed at the GIDC Final Pumping Station (FPS) resulting frequently choking of Effluent disposal pipeline and decreasing capacity of the FPS & disposal pipeline.
6. Pipeline from Pumping Station-C to the final pumping station Ambetha for the carrying of treated industrial wastewater were broken inside SEZ-1. Due to a breakdown in the above said pipeline wastewater were mixes into the estuary zone of the Narmada River via a natural canal. As per AR of sample collected from pipeline leakage within within SEZ-1, COD: 615 mg/l, NH3-N: 149.3 mg/l which is higher than norms. As per AR of sample collected from natural drain leading to estuary zone of the Narmada River, COD: 868 mg/l, NH3-N: 137.76 mg/l which is higher than norms.
7. In SEZ corridor, storm water was mixing with industrial effluent due to overflowing of manhole of pipeline carrying GIDC industrial effluent near SEZ main road and road no.4. As per AR of sample collected from open drain behind SEZ - 1, COD: 400 mg/l, NH3-N: 150.92 mg/l.
8. Water from storm water drain & natural drain was discharging into estuary of river narmada.
9. Opposite torrent power 33 KV sub-station Industrial effluent was discharged into storm water drain by pump installing at manhole of the GIDC drain. As per AR of sample collected from storm water drain, COD: 1588 mg/l, NH3-N: 65.1 mg/l.
10. Ponding of waste water is observed in low laying area due to overflow in the GIDC manhole beside boundary of M/s Grasim Industries Ltd. As per AR of sample collected from ponding of wastewater, COD: 543 mg/l, NH3-N: 143.53 mg/l.
11. As per Sample collected from final pumping station dated 06/01/20, COD: 1469 mg/l, NH3-N: 60.76 mg/l which is higher than norms.
12. As per Sample collected from final pumping station dated 18/01/20, COD: 847 mg/l, NH3-N: 195.16 mg/l which is higher than norms.
13. GIDC has not provided adequate storage facility to prevent discharge of effluent in estuary zone during emergency situation like failure of pumps, leakage in pipeline etc.
14. GIDC has not relocated manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains / surrounding area.
15. GIDC has not re-collected accumulated wastewater from surrounding area
16. GIDC has not strengthen pipeline infrastructure to convey effluent upto deep sea.
17. GIDC has not provided permanent solution of storm water management
18. GIDC has not taken necessary steps to keep storm water drain dry during lean period

AND WHEREAS the non-compliance as narrated above, observed in GIDC is contributing to the pollution problem in Dahej area.



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : www.gpcb.gov.in

UNDER THE CIRCUMSTANCES, as directed, I P. B. Patel, Dy. Environment Engineer, Gujarat Pollution Control board issue the direction under Section 33(A) of the Water Act - 1974 as under:

1. To stop discharge of effluent from pipeline laid at 600-meter on offshore as alternative arrangement
2. To discharge effluent 4.5 km mtr away from sea, so proper dilution as per condition no. 5.4 of CCA may be available at discharge point.
3. To carry out maintenance of 4.5 KM offshore pipeline and solve problem of choking of pipeline
4. To rectify and repair leakages in GIDC drainage lines
5. To stop overflow from GIDC drainage manholes in various sections of GIDC drainage system in Dahej & Vilayat.
6. To take necessary steps to control overflowed wastewater reaches to estuary / sea through the natural drain/ storm water drain.
7. To remove sludge deposition observed at the GIDC Final Pumping Station (FPS).
8. To provide adequate storage facility to prevent discharge of effluent in estuary zone during emergency situation like failure of pumps, leakage in pipeline etc.
9. To relocate manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains / surrounding area.
10. To re-collect accumulated wastewater from surrounding area
11. To strengthen pipeline infrastructure to convey effluent upto deep sea.
12. To provide permanent solution of storm water management
13. To take necessary steps to keep storm water drain dry during lean period
14. To submit action plan within 15 days for above non-compliances.

IF the above direction is not complied, you are liable for prosecution under Section 41(2) of the Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This letter is issued with the approval of the competent authority.

For and on behalf of
Gujarat Pollution Control Board

(P. B. PATEL)

Dy. ENVIRONMENT ENGINEER

Clean Gujarat Green Gujarat

ISO-9001-2008 & ISO-14001 - 2004 Certified Organisation

NO: GPCB/BRCH-B/CCA-1194(8)/ID-31038/

Dated: /03/2020

Issued to:

GIDC Dahej-Vilayat Pipeline Development Cell

Plot No: 13/A, Dahej Pumping Station,

Dahej-392130,

Tal: Vagra Dist: Bharuch.

COPY TO:

1. Vice Chairman & Managing Director,
GIDC, Block No.-4, 2nd floor,
Udhyog Bhavan, Gandhinagar.....for your information and necessary action.
2. Gujarat Coastal Zone Management Authority
Block No: 14/8th Floor, New Sachivalaya,
Sector - 10A, Gandhinagar.....I am directed to request you to take appropriate action against GIDC regarding discharge of effluent into estuary of Narmada.
3. Regional Officer
Gujarat pollution Control Board,
Regional Office,
Bharuch.....To follow up for compliance of this direction & send IR/AR.

Outward NO: 550467, 23/03/2020



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

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 are Gujarat Industrial Development Corporation (Dahej-Vilayat Pipeline Development Cell) are having effluent conveyance pipeline and use for discharge of treated effluent into said marine outfall system at Plot No. 13/A, Dahej pumping station GIDC Estate, Dahej, Dist: Bharuch.

AND WHEREAS Gujarat Pollution Control Board has granted you consent under the provisions of water Act-1974 by its Consent Order No.AWH -60292, valid up to 12/11/2018 (Expired) for operation of the Common effluent conveyance pipeline project with various conditions mentioned therein, and you have applied for CCA-Renewal for the same.

AND WHEREAS during the inspection of GIDC on various dates under section-23 of the Water Act by the authorized officer of the Board it has been noticed that:

- (1) GIDC has not submitted reply of the Direction given dated 23/03/2020 till date and not started any work related to remediation of choked effluent disposal pipeline.
- (2) 4.5 KM offshore discharge line is still choked and not working and treated wastewater is being disposed in tidal zone (near the sea coast) with the help of 600-meter offshore pipeline instead of NIO suggested deep disposal point.
- (3) Heavy sludge deposition is observed in Final Pumping station of GIDC.
- (4) Looking to the site condition, it seems that the overflowing of manholes is taking place choking and leakages problem.

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- (5) It is observed that this accumulation of wastewater is due to leakage & seepage from GIDC drainage line and overflow from drainage manholes of this area.
- (6) The site condition indicates that there is frequent overflowing of wastewater from these manholes leading to storm water drains of this area.
- (7) During inspection, tinge greenish colored water/ wastewater is observed accumulated on-land near the area of GIDC manhole between M/s. Jubilant infrastructure and M/s. Grasim industries limited, vilayat, due to wastewater is being overflow from the manhole provided on the said location and accumulation in nearby area.
- (8) During visit, it is observed that brownish colored waste water leading into estuarine zone of River Narmada.
- (9) AR of Sample collected from Natural drain behind boundary wall of M/s OPAL is higher than permissible limit, i.e. COD: 690 mg/l (Permissible limit: 250 mg/l), NH₃-N: 168.90 mg/l. (Permissible limit: 50mg/l)
- (10) Due to leakage in water supply line of GIDC fresh water got mixed with effluent which was in ponding due to previous leakages in effluent discharge line of GIDC. After mixing with effluent it started flowing into estuarine zone of River Narmada.
- (11) It is observed that there is accumulation/ ponding of brown coloured wastewater in low laying area in Dahej SEZ-1 corridor outside OPAL peripheral boundary in North, East & West side. Also, part of this accumulated wastewater is leading to River Narmada Estuary through natural drain and ultimately meeting to sea.
- (12) Light brownish colour flow is observed in this storm water drain. On investigation, it is found that the overflow of wastewater from the GIDC drainage manholes in various sections of GIDC & SEZ (particularly beside Road 4 & Road 4 C in SEZ-1 and opposite M/s Meghmani Organics Ltd (GIDC) near M/s Universal Chemicals in GIDC Dahej) is enters in this storm water drain resulting its contamination.
- (13) The storm water drains beside Road 4 & Road 4 C in SEZ-1 near M/s Meghmani Organic Ltd (SEZ) and M/s Meghmani Unichem are observed filled with industrial wastewater.



GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

- (14) Due to drainage manholes overflow in this area, the storm water drains of this area is filled with Industrial w/w and it also reaching to aforesaid GIDC storm water drain leading to estuary of River Narmada/sea. The overflow of these manholes entering to the storm water drain of this area and resulting ponding of wastewater in the surrounding storm water drain.
- (15) It is observed that there is mostly domestic wastewater flow along with contamination of industrial wastewater in this natural drain which is ultimately accumulated on low laying open land near M/s Khaitan Fertilizers and Salt farms and making ponding of wastewater.
- (16) As per IR dated 20/04/2020, AR of Sample collected from Final pumping station Ambetha, Pumping Station A & C is higher than permissible limit i.e. COD: 524 mg/l, 1521 mg/l & 1482 mg/l (Permissible limit: 250 mg/l) and NH₃-N: 99.51 mg/l & 81.98 mg/l. (Permissible limit: 50 mg/l) .
- (17) As per IR dated 24/04/2020, AR of Sample collected from Final pumping station Ambetha, Pumping Station A & C is higher than permissible limit i.e. COD: 865 mg/l & 896 mg/l (Permissible limit: 250 mg/l) and NH₃-N: 62.72 mg/l & 65.24 mg/l. (Permissible limit: 50 mg/l)
- (18) As per IR dated 28/04/2020, AR of Sample collected from Final pumping station Ambetha, Pumping Station A & C is higher than permissible limit i.e. COD: 763 mg/l, 2330 mg/l & 2024 mg/l (Permissible limit: 250 mg/l) and NH₃-N: 89.94 mg/l & 52.36 mg/l. (Permissible limit: 50 mg/l)
- (19) As per IR dated 05/05/2020, AR of Sample collected from Final pumping station Ambetha is higher than permissible limit i.e. COD: 347 mg/l (Permissible limit: 250 mg/l).

AND WHEREAS the non-compliance as narrated above, observed in GIDC is contributing to the pollution problem in Dahej area.

UNDER THE CIRCUMSTANCES, as directed, I P. B. Patel, Dy. Environment Engineer, Gujarat Pollution Control board issue the direction under Section 33(A) of the Water Act - 1974 as under:

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1. To submit compliance report of the Direction given dated 23/03/2020 and time bound action plan for remediation of choked effluent disposal pipeline.
2. To stop discharge of effluent in tidal zone (near the sea coast).
3. To provide sludge removal mechanism and remove heavy sludge deposition observed in Final Pumping station of GIDC.
4. To stop overflowing of manholes which is taking place due to choking and leakages problem.
5. To collect and dispose accumulated wastewater which is due to leakage & seepage from GIDC drainage line and overflow from drainage manholes of this area.

IF the above direction is not complied, you are liable for prosecution under Section 41(2) of the Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This letter is issued with the approval of the competent authority.

For and on behalf of
Gujarat Pollution Control Board



(P. B. PATEL)

• • Dy. ENVIRONMENT ENGINEER

NO: GPCB/BRCH-B/CCA-1194(8)/ID-31038/

Dated: /03/2020

Issued to:

Executive Engineer

GIDC Dahej-Vilayat Pipeline Development Cell

Plot No: 13/A, Dahej Pumping Station,

Dahej-392130,

Tal: Vagra Dist: Bharuch.

Outward No: 5551/105/2020



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

COPY TO:

1. **Vice Chairman & Managing Director,**
Gujarat Industrial Development Corporation,
Block No.-4, 2nd floor,
Udhyog Bhavan, Gandhinagar.....for your information and necessary action.
2. **Superintending Engineer**
Gujarat Industrial Development Corporation,
Narmada Commercial Complex,
2nd floor, Panchbatti, Bharuch.....for your information
3. **Gujarat Coastal Zone Management Authority**
Block No: 14/8th Floor, New Sachivalaya,
Sector - 10A, Gandhinagar.....I am directed to **request you to take appropriate action against GIDC** regarding discharge of effluent into estuary of Narmada.
4. **Regional Officer**
Gujarat pollution Control Board,
Regional Office,
Bharuch.....To follow up for compliance of this direction & send IR/AR.

For and on behalf of
Gujarat Pollution Control Board

(P. B. PATEL)

Dy. ENVIRONMENT ENGINEER

Clean Gujarat Green Gujarat

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GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

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 are **Gujarat Industrial Development Corporation (Dahej-Vilayat Pipeline Development Cell)** are having effluent conveyance pipeline and use for discharge of treated effluent into said marine outfall system at **Plot No. 13/A, Dahej pumping station GIDC Estate, Dahei, Dist: Bharuch.**

AND WHEREAS Gujarat Pollution Control Board has granted you consent under the provisions of water Act-1974 by its Consent Order No.AWH -60292, valid up to 12/11/2018 (Expired) for operation of the Common effluent conveyance pipeline project with various conditions mentioned therein, and you have applied for CCA-Renewal for the same.

AND WHEREAS during the inspection of GIDC on various dates under section-23 of the Water Act by the authorized officer of the Board, non-compliance are observed which contributing to the pollution problem in Dahej area.

AND WHEREAS GIDC has submitted compliance report of direction issued under the Water act 1974 vide letter dated 23/03/2020 & 27/05/2020 and mentioned that it will take at least 2.5 years to complete the project.

UNDER THE CIRCUMSTANCES, as directed, I P. B. Patel, Dy. Environment Engineer, Gujarat Pollution Control board issue the direction under Section 33(A) of the Water Act - 1974 as under:

- (1) To stop discharge of effluent from pipeline laid at 600-meter on offshore as alternative arrangement.
- (2) To discharge effluent 4.5 km mtr away from sea, so proper dilution as per condition no. 5.4 of CCA may be available at discharge point.
- (3) To carry out maintenance of 4.5 KM offshore pipeline and solve problem of choking of pipeline.
- (4) To remove sludge deposition observed at the GIDC Final Pumping Station (FPS).
- (5) To provide adequate storage facility to prevent discharge of effluent in estuary zone during emergency situation like failure of pumps, leakage in pipeline etc.

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- (6) To relocate manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains / surrounding area.
- (7) To provide permanent solution of storm water management.
- (8) To take necessary steps to keep storm water drain dry during lean period.

IF the above direction is not complied, you are liable for prosecution under Section 41(2) of the Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This letter is issued with the approval of the competent authority.

For and on behalf of
Gujarat Pollution Control Board



(P. B. PATEL)

Dy. ENVIRONMENT ENGINEER

NO: GPCB/BRCH-B/CCA-1194(8)/ID-31038/

Dated: /08/2020

Issued to:

✓ GIDC Dahej-Vilayat Pipeline Development Cell
Plot No: 13/A, Dahej Pumping Station,
Dahej-392130,
Tal: Vagra Dist: Bharuch.

COPY TO:

1. Vice Chairman & Managing Director,
GIDC, Block No.-4, 2nd floor,
Udhyog Bhavan, Gandhinagar.....for your information and necessary action.
2. Gujarat Coastal Zone Management Authority
Block No: 14/8th Floor, New Sachivalaya,
Sector - 10A, Gandhinagar.....I am directed to request you to take appropriate action against GIDC regarding discharge of effluent into estuary of Narmada.
3. Regional Officer
Gujarat pollution Control Board,
Regional Office,
Bharuch.....To follow up for compliance of this direction & send IR/AR.

Outward No. 392130/2020



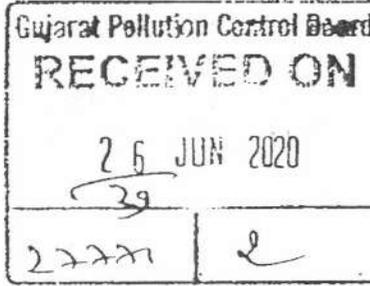
Annexure - X

Gujarat Pollution Control Board

72924

C-1/119/3, GIDC, Phase-II, Narmadanagar, BHARUCH-392 015. Phone : (02642) 246333
Email : ro-gpcb-bhar@gujarat.gov.in Web site : www.gpcb.gujarat.gov.in

No. : GPCB/RO-BRCH/T-268(B)/ 3475/2020



18/06/2020

To,
Shri Ashok Chauhan
(JTO & US, Technical Cell)
Forest and Environment Department
Block No. : 14/8, Sachivalay
Gandhinagar-382010

Subject: Visit report of the site visit of GIDC Dahej-Vilayat Effluent Disposal Pipeline at Disposal Point, Dahej Carried out by the District Level CRZ Committee, Bharuch

Respected Sir,

In Connection to the above subject, site visit of GIDC Dahej-Vilayat Effluent Disposal Pipeline at Disposal Point Dahej is Carried out by the District level CRZ Committee, Bharuch on 27/05/2020 with reference to your email dated: 20/05/2020. The Site visit report is enclosed here with for your further necessary action please.

Thanking you,

Yours Faithfully,

(F.M. Modi)

Member Secretary, District level CRZ
Committee and Regional Officer, GPCB-Bharuch

Enclosure: As Above

- Copy to: 1) Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector 10-A, Gandhinagar..... For your Information
- 2) Chairman, District CRZ Committee and Collector, Collector office, Bharuch..... For your Information
- 3) Shri Ashok Dhodi, Executive Engineer (Water Supply and Drainage), Gujarat Industrial Development Corporation, 1st Floor, Narmada Commercial complex, Panchbatti, Bharuch..... For your Information
- 4) Shri M.H. Kathwadiya, RFO, Bharuch..... For your Information
- 5) Smt. Minaxiben Mehta, I/C Supritendant, Fisheries Department, Multi Storage Building, Ground Floor, Behind Collector Office, Bharuch..... For your Information
- 6) Shri Pravinbhai Machhi, Representative of Machhimar community, Village : Bhadbhut, Dahej Road, Dist : Bharuch..... For your Information
- 7) Shri Dhansukhbhai Carpenter, Ram Nagar Society, Hansot, Dist : Bharuch..... For your Information
- 8) Shri M.A. Hania, President Dahej Industrial Association, Plot No.715/01, Nr. Goal ITI, opp. Expanded Polymer Chemical Zone, Dahej, Bharuch - Dahej Road Gujarat 392130..... For your Information
- 9) Dr. Mahesh Vashi, President Vilayat Industrial Association, Colourtex Industries Ltd., Plot No. : 3/A, GIDC Vilayat, Ta. : Vagra, Bharuch..... For your Information

Visit report of the site visit of GIDC Dahej –Vilayat Effluent disposal Pipeline at Disposal Point, Dahej carried out the District level CRZ Committee, Bharuch

An email dated 20.05.2020 received from the Forests & Environment Department, Government of Gujarat regarding violation of the provisions of the CRZ Notification in the matter of representation/ complaint of Shri MSH Sheikh, BWRC, Olpad, Dist- Surat.

Shri MSH Sheikh has raised various environmental issues pertaining to Dahej- Vilayat Effluent Disposal Pipeline including violation of the provisions of CRZ Notification. The Matter was discussed with the Collector & District Magistrate, Bharuch & the Chairman of the District level CRZ Committee and it was decided to carry out site inspection by the members of the District level CRZ committee in the matter and accordingly site visit is carried out on 27.05.2020

by the following Committee members and other officials & stake holders:

1. Shri F. M. Modi, Regional Officer, GPCB, Bharuch.
2. Shri Ashok Dhodi, Executive Engineer (Water Supply & Drainage), GIDC, Bharuch.
3. Shri M.H. Kathwadiya, RFO, Bharuch
4. Smt Minaxiben Mehta, I/C Superintendent, Fisheries Department, Bharuch
5. Shri Pravinbhai Machhi, Representative of Machhimar Community
6. Shri Dhansukhbhai Carpenter, Representative of Machhimar Community
7. Shri M.A. Hania, President, Dahej Industries Association
8. Dr. Mahesh Vashi, President, Vilayat Industries Association
9. Shri Sunil Bhatt, Secretary, Dahej Industries Association
10. Shri R.D. Bhagora, EE (electrical & Mechanical) GIDC, Bharuch
11. Shri B D Prasad, DEE, GPCB, Bharuch
12. Shri Jignesh Prajapati, DE (Drainage), GIDC, Bharuch
13. Shri V K Patel, AEE, GPCB, Bharuch

The observations of the site visit are as follows:

- The 4.5 KM offshore effluent disposal pipeline laid down by GIDC as suggested by NIO for deep sea discharge of treated wastewater industrial units of Dahej- Vilayat area is choked and presently not in operation.
- Due to choking of 4.5 KM offshore discharge pipeline, GIDC has laid down an offshore discharge pipeline up to 600 meter from the sea coast as alternative arrangement and treated wastewater of the industries is presently discharged at 600 meter from the sea coast through this alternate pipeline. GIDC has also installed another 600 meter

offshore discharge pipeline as standby of the first 600 meter offshore discharge pipeline.

- The disposal point of the above mentioned 600 meter offshore discharge pipeline is located in CRZ -1b i.e. located between HTL and LTL.
- During inspection, there is low tide and there is no sea water at the disposal point.
- During inspection, there is no discharge of wastewater through the disposal pipeline since presently GIDC final pumping station is not being operated continuously due to lesser no. of industries operation & operation of industries operated at lower capacities due to Covid-19 lock down & labour problem.
- It is informed by the representative of Machhimar Community that there Hilsa fish breeding ground is very near to the GIDC effluent disposal point. In this regard, the Fisheries Officer present during inspection informed that there is fish like hilsa, tor tor, M. rojanbargi and jinga species breeding ground is located in up stream of river Narmada estuary at about 1 km from the presently GIDC effluent disposal point (i.e. 600 meter offshore effluent pipeline disposal point). It is informed by the Fisheries Officer that there is possibility of affecting the above mention fish breeding ground due to discharge of effluent from GIDC 600 meter off shore pipeline. The fisheries officer also informed that such fish species should be protected as per clause 6(8) (f) mentioned in the Notification dated 15/08/2003 of Port & Fisheries Department, Gandhinagar.
- There is no mangrove observed in nearby of the GIDC 600 meter offshore effluent disposal pipeline. The nearest mangrove location is at Dahej old bandar area located at distance of about 7 KM from the GIDC 600 meter off shore effluent disposal point as informed by the RFO. No any eco-sensitive area is in nearby of this disposal point.
- The action taken and proposed action by the GIDC in the matter submitted by the GIDC representative is attached herewith.

Conclusion:

1. The 4.5 KM offshore effluent disposal pipeline laid down by GIDC as suggested by NIO for deep sea discharge of treated wastewater industrial units of Dahej- Vilayat area is choked and not in operation since long. Presently effluent discharged through 600 meter off shore pipeline as alternate arrangement made by the GIDC, which disposal point is in between HTL & LTL i.e. located in CRZ 1b area and hence, there is violation of CRZ Notification 2011.
2. There is no Hilsa fish breeding ground near the disposal point of the GIDC 600 meter offshore effluent disposal pipeline. However, there is fish like hilsa, tor tor, M.

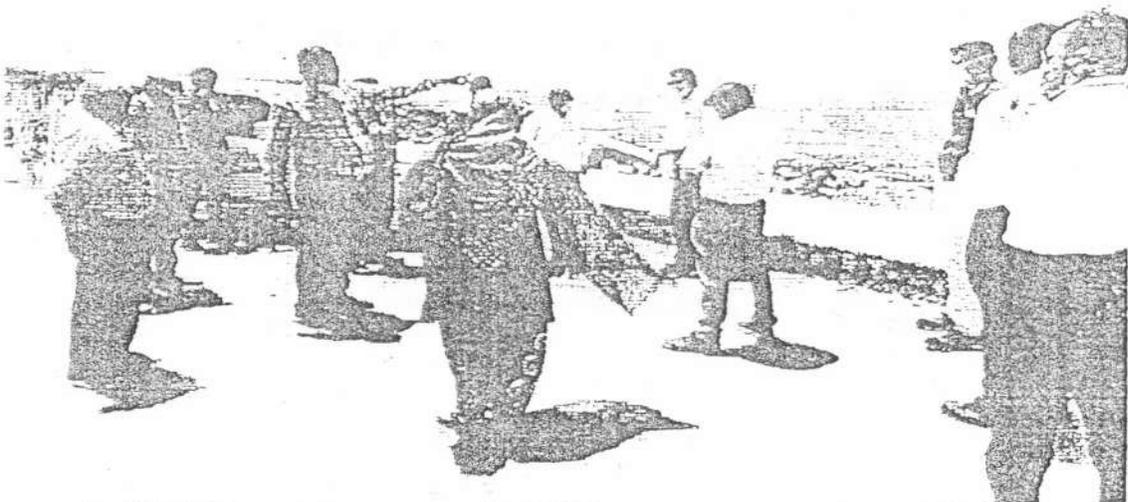
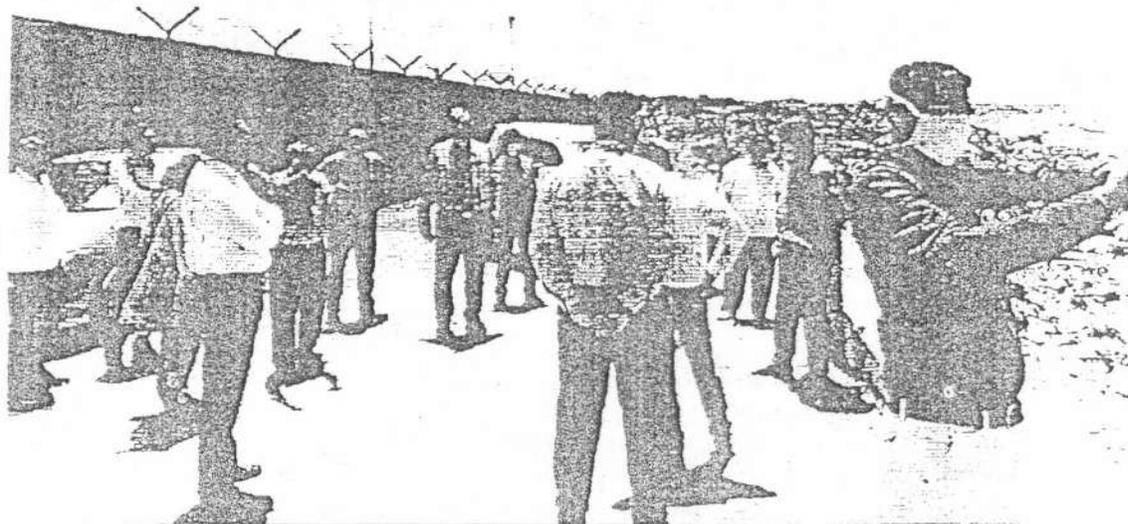
7/3/10

rojanbargi and jinga species breeding ground is located in up stream of river Narmada estuary 1 KM away from the presently GIDC effluent disposal point and there is possibility of impact on hilsa fish breeding due to disposal of effluent through 600 meter off shore pipe line. Such fish species should be protected as per clause 6(8) (f) mentioned in the Notification dated 15/08/2003 of Port & Fisheries Department, Gandhinagar.

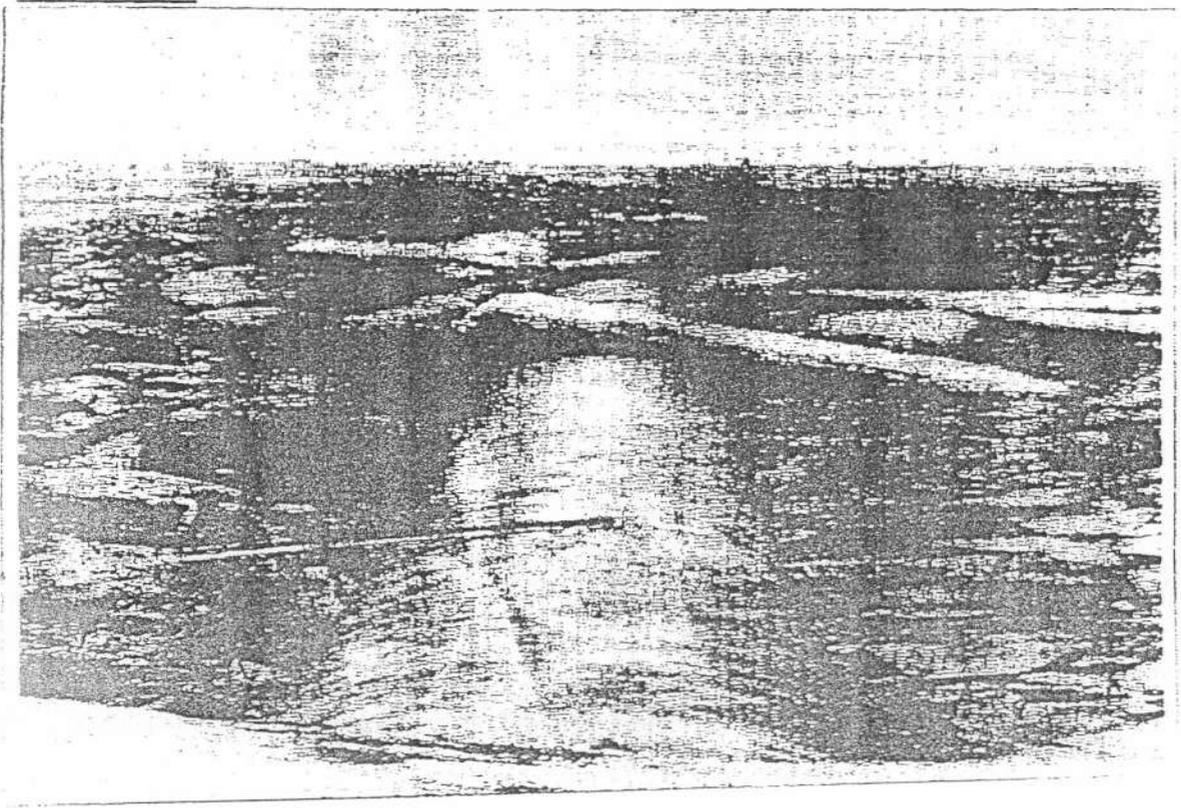
3. There are no mangroves or ecologically sensitive area is observed in nearby of the disposal point.

Sr. No	Name of the inspecting member / official	Signature
1.	Shri F. M. Modi, Regional Officer, GPCB, Bharuch	
2.	Shri Ashok Dhodi, Executive Engineer (Water Supply & Drainage), GIDC, Bharuch.	
3.	Shri M.H. Kathwadiya, RFO, Dahej	
4.	Smt Minaxiben Mehta, I/C Supritendent, Fisheries Department, Bharuch	
5.	Shri Pravinbhai Machhi, Representative of Machhimar Community	
6.	Shri Dhansukhbhai Carpenter, Representative of Machhimar Community	
7.	Shri M.A. Hania, President, Dahej Industries Association	
8.	Dr. Mahesh Vashi, President, Vilayat Industries Association	
9.	Shri Sunil Bhatt, Secretary, Dahej Industries Association	
10.	Shri R.D. Bhagora, EE (electrical & Mechanical) GIDC, Bharuch	
11.	Shri B D Prasad, DEE, GPCB, Bharuch	
12.	Shri Jignesh Prajapati, DE (Drainage), GIDC, Bharuch	
13.	Shri V K Patel, AEE, GPCB, Bharuch	

Photographs of Site Visit of GIDC Dahej by District Level CRZ Committee



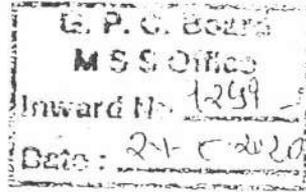
Photographs of Site Visit of GIDC Dahej by District Level CRZ
Committee





सत्यमेव जयते

Dr. Rajiv Kumar Gupta IAS
Additional Chief Secretary



No. No: ENV-10-2020-91-T

Government of Gujarat

Forest and Environment Department

Block No. 14, 8th, Floor, Sardar Bhavan,

Sachivalaya, Gandhinagar - 382 010

Tel.: +91-79-23251051, 23251053

Fax : +91-79-23252156

E-mail : secfed@gujarat.gov.in

Date: July, 21st, 2020

Directions under section 5 of the Environment (Protection) Act, 1986.

Whereas the Ministry of Environment and Forests, Government of India has issued Coastal Regulation Zone (CRZ) Notification, 2011 under the provisions of the Environment (Protection) Act, 1986

AND Whereas the provisions of the CRZ Notification, 2011 are also applicable in the State of Gujarat.

AND Whereas as per the provisions of the CRZ Notification 2011, MOEF & CC Govt. of India has issued Environment Clearance vide letter dt. 29/04/2005 for laying of the effluent disposal pipeline for disposal of treated effluent from GIDC industrial estate of Vilayat and Dahej, Dist. Bharuch with subject to conditions.

AND Whereas complaints received from Shri MSH Shaikh, Brakish Water Research Centre, Olpad, Dist. Surat regarding violation of CRZ notification, through Ministry of Environment, Forest and Climate Change, Government of India vide letter dt. 11/05/2020 and from PMO vide letter dt. 17/03/2020.

AND Whereas your project area was visited by District Level CRZ committee of District Bharuch on 27/05/2020. As per committee report 4.5 km offshore effluent disposal pipeline laid down by GIDC as suggested by NIO for deep sea discharge of treated waste water industrial units of Dahej-Vilayat area is choked and not in operation since long and presently effluent discharge through 600 meter off shore pipeline as alternative arrangement made by GIDC, which disposal point is in between HTL & LTL, i.e. located in CRZ-1B area and hence there is violation of CRZ Notification-2011.

AND Whereas GIDC has not obtained CRZ clearance under CRZ Notification-2011 for laid down alternative pipeline.

AND Whereas, there is fish like hiisa, tor tor, M. rojanbargi and jinga species breeding ground is located in up stream of river Narmada estuary 1.0 km away from the presently GIDC effluent disposal point and there is possibility of impact on hiisa fish breeding due to disposal of effluent through 600 meter off shore pipeline. Such species should be protected as per clause 6(8) (f) mentioned in the Notification dated 15/03/2003 of port & Fisheries Department, Gandhinagar.

NOW, in view of the above and the fact as reported by the Forests Department, you are hereby directed to:

- Stop effluent discharge through 600 meter off shore pipelines which disposal point is in between HTL & LTL, i.e. located in CRZ-1B.
- Start operation of old 4.5 km offshore effluent disposal pipeline and dispose treated water in to deep sea as suggested by NIO.
- To submit detail time bound action plan for corrective actions required within 15 days.

Ritesh
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Failing to comply with the directions issued hereinabove will attract the provisions of the Environment (Protection) Act, 1986, and compel this Department to direct the concerned authorities to disconnect supply of electricity and water supply to industrial units which are member of this pipeline project and discharging their industrial effluent through this pipeline. Further to this an action taken report for compliance of above directions is required to be submitted to this Department immediately.

- SA -
[Dr. Rajiv Kumar Gupta IAS]
Additional Chief Secretary

To,
Vice Chairman & Managing Director,
Gujarat Industrial Development Corporation,
Block No. 4, 2nd floor, Udhog Bhavan,
Gandhinagar.

Copy To:

1. Dr. M.D. Modiya, IAS
Collector,
Collector Office.
Bharuch _ With a request to take immediate necessary action and ensure that no CRZ violations are taken in the matter.
2. Member Secretary ,
Gujarat Pollution Control Board,
Paryavaran Bhavan, Sector-10A
Gandhinagar.
- To take necessary immediate action and ensure that there should not be any violations of CRZ Notification 2011.
3. Shri Falgun Modi,
Regional Officer & MS DLC Committee
Gujarat Pollution Control Board,
C-1/119/3, GIDC, Phase-II, Narmada nagar,
Bharuch-392015.
- To take necessary immediate action and ensure that there should not be any violations of CRZ Notification 2011.
4. Shri Anant Kumar, Section officer,
Prime Minister's Office,
New Delhi.....For information w.r.to your letter No. PMOPG/D/2020/0079357.
5. Dr. Saranya P, Joint Director (CRZ),
Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhavan, Jor Gagh Road, New Delhi-110003....for information w.r.to your letter No. F.No. 19-11/2019-IA.III dated. 11th May, 2020.

di
[S.M. Saiyad, IFS]
Director (Environment) &
Additional Chief Secretary

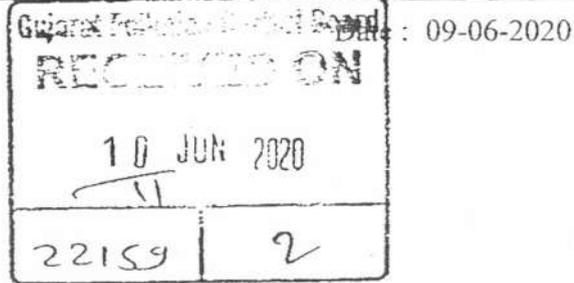
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GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION



(A Govt. of Gujarat Undertaking)
Office of the Executive Engineer (W/D)
 1st & 2nd Floor, Narmada Commercial Complex,
 Station Road, Panchbatti, Bharuch - 392 001
 PH : 242432/244184 FAX:(02642)241902
 Email: xen-brc@gidcgujarat.org

No. GIDC/BRH/EE/WD/492



To,

✓
Dy Environment Engineer,
 Gujarat Pollution Control Board,
 Paryavaran Bhavan,
 Sector 10-A,
 Gandhinagar.

Sub : Compliance of GPCB notice dated 23-03-2020 regarding Prevention of chemical pollution in coast of Dahej and protect the Gulf of Cambay, Narmada Estuary and fisheries.

Ref : your notice no. 558467 dated 23/03/2020

Dear Sir,

With reference to the above, this office has received notice related to various points. The compliance of the notice is as below.

Sr No	Points / Remarks	Compliance
1	To stop discharge of effluent from pipeline laid at 600-meter on offshore as alternative arrangement.	GIDC had commissioned 4.5 km of 1000 mm dia CS offshore pipeline in the year 2006-07. Due to huge scaling in the pipeline and diffusers were buried more than 3 meter in sea bed. Thus, the effluent could not discharge in deep sea. In this situation, GIDC had laid two row of 600 mm dia MS pipeline up to 600 meter. GIDC has planned to lay new offshore pipeline with diffusers for which consultant has been appointed and estimates are prepares but it will take at least 2.5 years to complete the said work.
2	To discharge effluent 4.5 km mtr away from sea, so proper dilution as per condition no. 5.4 of CCA may be available at discharge point.	
3	To carry out maintenance of 4.5 km offshore pipeline and solve problem of choking of pipeline.	As per compliance of point no 1; and it is not possible to repair diffusers and removal of scaling in offshore pipeline. Hence, it is required to lay new offshore pipeline and it will take at least 2.5 years to complete the said work.
4	To rectify and repair leakages in GIDC drainage lines.	Leakages were attended and at present there is no leakage found in effluent collection and conveyance pipeline.

Sr No	Points / Remarks	Compliance
5	To stop overflow from GIDC drainage manholes in various sections of GIDC drainage system in Dahej & Vilayat.	This is continuous process for maintenance of underground drainage line and manhole. GIDC has awarded the M&R of underground drainage work to the agency. At present there is no overflow found from drainage manholes.
6	To take necessary steps to control overflowed wastewater reaches to estuary/ sea through the natural drain / storm water drain.	Whenever any leakage / breakdown took place, the discharge of member industries were stopped and immediate actions are taken for repairing. The accumulated effluent pumped in to nearby manhole chamber to avoid drain in estuary / sea.
7	To remove sludge deposition observed at the GIDC final pumping station (FPS).	GIDC has invited the tender for the work of Construction of Sludge Drying bed at FPS which is under approval stage. After receiving the approval, work will be completed within six months.
8	To provide adequate storage facility to prevent overflow of wastewater entering into surface water drains/ storm water drains/ surrounding area.	GIDC has planned to shift FPS at Plot no-Z/93, SEZ-II. The master consultant is appointed for designing of guard pond, pump house and effluent conveyance system.
9	To relocate manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains/ surrounding area.	GIDC has invited the tender for the work of Construction of ESR, sump and pump house with conveyance main in SEZ area which is under approval stage. After receiving the approval, work will be completed within eleven months. The work of construction of two numbers of sump with pump house is under progress which will be completed within six months. After completion of the above works, all drainage connection will be released above the ground level so that overflowing of manholes can be avoided.
10	To re-collect accumulated wastewater from surrounding area.	Whenever any leakage / breakdown took place, the discharge of member industries were stopped and immediate actions are taken for repairing. The accumulated effluent pumped in to nearby manhole chamber to avoid drain in estuary / sea.
11	To strengthen pipeline infrastructure to convey effluent upto deep sea.	GIDC had laid 1000 mm dia HDPE pipeline from FPS to LFP in the month of June-2019. Hence, there is no any leakage found in conveyance line.
12	To provide permanent solution of storm water management.	GIDC has invited the tender for the work of Construction of ESR, sump and pump house with conveyance main in SEZ area which is under approval stage. After receiving the approval, work will be completed within eleven
13	To take necessary steps to keep storm water drain dry during lean period.	

Sr No	Points / Remarks	Compliance
		<p>months. The work of construction of two numbers of sump with pump house is under progress which will be completed within six months.</p> <p>After completion of the above works, all drainage connection will be released above the ground level so that overflowing of manholes can be avoided.</p>
14	To submit action plan within 15 days for above non-compliances.	Please consider compliance of point no 1 to 13.

Tanking you,

Yours truly,

Executive Engineer (W/D),
GIDC, Bharuch.

Copy swr to :

1. The Chief Engineer, GIDC, Gandhinagar for information please.
2. The SE (CG); GIDC, Bharuch for information please.
3. The EE (PH), GIDC, Gandhinagar for information and with reference to his email dated 09-06-2020.
4. The EE (M&E), GIDC, Bharuch for information and necessary action please.
5. The RO, GPCB, Bharuch for information please.

Copy to : DEE (Drg), GIDC, Bharuch for information.

GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION

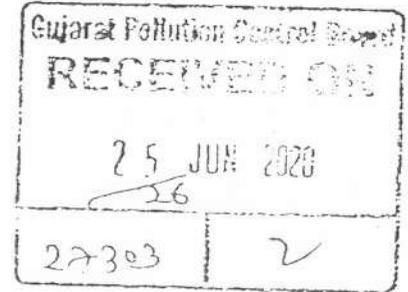


(A Govt. of Gujarat Undertaking)
Office of the Executive Engineer (W/D)
 1st & 2nd Floor, Narmada Commercial Complex,
 Station Road, Panchbatti, Bharuch - 392 001
 PH : 242432/244184 FAX:(02642)241902
 Email: xen-brc@gidcgujarat.org

No. GIDC/BRH/EE/WD/557

Date : 24-06-2020

To,
 ✓ **Dy Environment Engineer,**
 Gujarat Pollution Control Board,
 Paryavaran Bhavan,
 Sector 10-A,
 Gandhinagar.



Sub: Compliance of GPCB notice dated 27-05-2020.

Ref: your notice no. 560574 dated 27/05/2020

Dear Sir,

With reference to the above, this office has received notice related to various points. The compliance of the notice is as below.

Sr No	Points / Remarks	Compliance
1	To submit compliance report of the Direction given dated 23/03/2020 and time bound action plan for remediation of choked effluent disposal pipeline.	The compliance report was submitted vide this office letter no GIDC/BRH/EE/WD/492 dated 09-06-2020 and uploaded on xgn portal.
2	To stop discharge of effluent in tidal zone (near the sea coast).	
3	To provide sludge removal mechanism and remove heavy sludge deposition observed in Final Pumping Station of GIDC.	GIDC has invited the tender for the work of Construction of Sludge Drying bed at FPS which is under approval stage. After receiving the approval, work will be completed within six months.
4	To stop overflowing of manholes which is taking place due to choking and leakages problem.	This is continuous process for maintenance of underground drainage line and manhole. GIDC has awarded the M&R of underground drainage work to the agency. At present there is no

		overflow found from drainage manholes.
5	To collect and dispose accumulated wastewater which is due to leakage & seepage from GIDC drainage line and overflow from drainage manholes of this area.	Whenever any leakage / breakdown took place, the discharge of member industries were stopped and immediate actions are taken for repairing. The accumulated effluent pumped in to nearby manhole chamber to avoid drain in estuary / sea.

Moreover, the work of monitoring of liquid in Dahej PCPIR area has been awarded to M/s Unistar Environment and Research Labs Pvt Ltd. As per the directive received from RO office, GPCB, Bharuch that whenever sample of effluent seems abnormal, then monitoring agency shall call GPCB officials immediately. Accordingly instructions are followed. It is to also state that the monthly liquid monitoring reports are submitting to Regional Officer, GPCB, Bharuch. Hence, it is requested to take actions against defaulter units.

Tanking you,

Yours truly,

Executive Engineer (W/D),
GIDC, Bharuch.

Copy swr to :

1. The Chief Engineer, GIDC, Gandhinagar for information please.
2. The SE (CG), GIDC, Bharuch for information please.
3. The EE (PH), GIDC, Gandhinagar for information please.
4. The EE (M&E), GIDC, Bharuch for information.
5. The RO, GPCB, Bharuch for information and necessary action please.

Copy to : DEE (Drg), GIDC, Bharuch for information and necessary action.

GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION



(A Govt. of Gujarat Undertaking)
Office of the Executive Engineer (W/D)
 1st& 2ndFloor, Narmada Commercial Complex,
 Station Road, Panchbatti, Bharuch - 392 001
 PH : 242432/244184 FAX:(02642)241902
 Email: xen-brc@gidcgujarat.org

No. GIDC/BRH/EE/WD/872

Date: 26-08-2020

To,
Dy Environment Engineer,
 Gujarat Pollution Control Board,
 Paryavaran Bhavan,
 Sector 10-A,
 Gandhinagar.

Sub: Compliance of GPCB notice dated 14-08-2020.

Ref: your notice no. 565862 dated 14-08-2020

Dear Sir,

With reference to the above, this office has received notice related to various points. The compliance of the notice is as below.

Sr No	Points / Remarks	Compliance
1	To stop discharge of effluent from pipeline laid at 600-meter on offshore as alternative arrangement.	It is to submit that GIDC has released 79 nos of drainage connections as per NOC/CTE/CCA of GPCB. You are well aware that Gujarat Govt. has developed PCPIR in Dahej. If we stop the discharge of effluent from pipeline laid at 600 meter on offshore, the above stated 79 nos of industries and its allied industries will be shutdown. GIDC has already complied to lay new pipeline with diffusers vide this office letter no 492 dated 09-06-2020. It is requested to accept compliance submitted by this office and not to take any harsh action to stop the discharge of effluent.
2	To discharge effluent 4.5 km mtr away from sea, so proper dilution as per condition no. 5.4 of CCA may be available at discharge point.	GIDC has planned to lay new offshore pipeline with diffusers for which consultant has been appointed and estimates are prepared. The project is under approval.
3	To carry out maintenance of 4.5 km offshore pipeline and solve problem of choking of pipeline.	It is to submit that the maintenance is not possible as pipeline is fully choked. Hence, GIDC has planned to

		for which consultant has been appointed and estimates are prepared. The project is under approval.
4	To remove sludge deposition observed at the GIDC Final Pumping Station (FPS).	GIDC has invited the tender for the work of Construction of Sludge Drying bed at FPS which was rejected due to single bidder. Now, the tender has been re-invited. After finalization of agency, work will be completed within six months.
5	To provide adequate storage facility to prevent discharge of effluent in estuary zone during emergency situation like failure of pumps, leakage in pipeline etc.	GIDC has planned to shift FPS at Plot no-Z/93, SEZ-II. The master consultant is appointed for designing of guard pond, pump house and effluent conveyance system. The project is under approval.
6	To relocate manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains/ surrounding area.	GIDC has awarded the work of Construction of ESR, sump and pump house with conveyance main in SEZ area. The work will be completed by end of June-2021. The work of construction of two numbers of sump with pump house at chemical zone is under progress which will be completed by end of March-2021. After completion of the above works, all drainage connection will be released above the ground level so that overflowing of manholes can be avoided.
7	To provide permanent solution of storm water management.	After completion of works mentioned in point no. 6, all connections will release above the ground level and existing manholes will filled up with soil/concrete. Hence, effluent will not be drained in SWD.
8	To take necessary steps to keep storm water drain dry during lean period.	

Tanking you,

Yours truly

Executive Engineer (W/D),
GIDC, Bharuch.

Copy swr to :

1. The Chief Engineer, GIDC, Gandhinagar for information please.
2. The SE (CG), GIDC, Bharuch for information please.
3. The EE (PH), GIDC, Gandhinagar for information please.
4. The EE (M&E), GIDC, Bharuch for information.
5. The RO, GPCB, Bharuch for information and necessary action please.

Copy to : DEE (Drg), GIDC, Bharuch for information and necessary action.



GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

R.P.A.D.

NOTICE OF DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 (HERE IN AFTER REFERRED TO AS THE "WATER ACT") AS AMENDED FROM TIME TO TIME.

WHEREAS you M/s. CETP OF DAHEJ INDUSTRIAL ESTATE are having an CETP at Plot No: D-2/14/A, GIDC Dahej, Ta:- Vagra, Dist:- BHARUCH.

AND WHEREAS you are having CCA No. AWH- 107883 valid up to 14/01/2025 to operate Common Effluent Treatment Plant (CETP).

AND WHEREAS during the inspection of your industrial plant on 12/01/2021 under Section -23 of the Water Act by the authorized officer of the Board it has been noticed and required to attend following issues:

- 1) The units of the CETP are found filled with wastewater. Flow from one unit to another unit of the CETP is not observed.
- 2) All the units of CETP are found not in operation and no aeration is going on in oxidation ditch units.
- 3) There is no biomass observed in oxidation ditch (secondary treatment unit).
- 4) No chemical dosing is observed going on during the visit.
- 5) SPV (Special Purpose Vehicle) has not been formed for the operation and maintenance of CETP.
- 6) The CETP is yet under stabilization stage and the full-fledged operation of the CETP is yet to be started however unit is receiving effluent from member units through pipeline and tanker.
- 7) Analysis report of sample collected from final disposal tank of CETP is not meeting norms. I.e. COD:579 mg/l, Ammonical Nitrogen: 149.52 mg/l.

NOW THEREFORE Board proposes to issue directions under Section 33-A of the Water Act-1974 as under:

1. To prohibit you from the operation of your CETP.
2. To close the operation of your CETP on the above mentioned site till complying consented conditions.
3. To direct the concerned authority to stop supply of electricity and water till that time.

(P.T.O.)

Clean Gujarat Green Gujarat

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

You are hereby directed to reply & Submit compliance of above points within 15 days from the date of serving of this notice failing which, it shall be presumed that you have nothing to say in this matter and appropriate action will be initiated against you for the conduct of the business of your industry, under the Water Act-1974 for above non-compliance.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD



(P. B. Patel)
Dy. ENVIRONMENT ENGINEER

NO: GPCB/BRCII/CCA-421/ID50837/

Date: __/03/2021

Issued to:
M/S. CETP OF DAHEJ INDUSTRIAL ESTATE
Plot No. D-2/14/A, GIDC DAHEJ,
TA:- VAGRA, DIST:- BHARUCH

Copy To:

- Regional Officer,
Gujarat Pollution Control Board,
Regional Office,
Bharuch..... for monitoring & verification.

Outward No. 504845, 02/03/2021



GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

R.P.A.D.

DIRECTION UNDER SECTION 33-A OF THE WATER (PREVENTION AND CONTROL OF POLLUTION) ACT-1974 (HERE IN AFTER REFERRED TO AS THE "WATER ACT") AS AMENDED FROM TIME TO TIME.

WHEREAS you M/s. Gujarat industrial Development Corporation (Dahej-Vilayat Pipeline Development Cell) are having effluent conveyance pipeline and use for discharge of treated effluent into said marine outfall system at Plot No: 13/A, Dahej pumping station GIDC Estate Dahej, Dist:- BHARUCH.

AND WHEREAS you are having CCA No.AWH-110550 valid up to 04/03/2025 for operation of the Common Effluent Conveyance Pipeline Project with various conditions mentioned therein.

AND WHEREAS during the inspection of your Common Effluent Conveyance Pipeline Project on 05/09/2020, 10/10/2020, 04/11/2020, 05/12/2020, 21/12/2020, 05/01/2021 and 12/01/2021 under Section -23 of the Water Act by the authorized officer of the Board following non-compliances are observed:

1. 4.5 km offshore deep sea pipeline is choked since long and waste water is being discharged through 600m offshore disposal pipeline. Analysis report of same shows, COD- 1983 mg/l, Ammonical Nitrogen - 175.28 mg/l and Phenol- 7.85 mg/l.
2. Leakages are observed at various points in the 600m pipeline through which some quantity of the waste water is discharged on shore and rest in CRZ 1B area.
3. Ponding/Accumulation is still observed in the low lying areas and storm water drain in some locations of SEZ-1. Also, overflow of manhole (temporary pumping station - E) and leakages has resulted into contamination of the storm water drain. As per analysis report of sample collected From storm water drainage of SEZ-1 near pumping station E on 12/01/2021, COD- 639 mg/l and Ammonical Nitrogen - 434 mg/l which is very higher.
4. In other parts of the GIDC drainage network, Overflow/leakages from GIDC drainage line which resulting into accumulation of waste water into natural / storm water drains at various location is observed and at D-2 area near Universal Chemicals limited (GIDC) and Meghmani Organics Limited (GIDC).
5. No guard pond is provided at the final pumping station for any emergency/breakage in pipeline.
6. In Pumping station A which is receiving treated effluent of Chemical Zone at Dahej, Sample results shows very high concentration of COD: 3808 mg/l (Limit: 250 mg/l), BOD: 772 mg/l (Limit: 100 mg/l), Phenolic compound: 30.90 mg/l (Limit: 5 mg/l).

(P.T.O.)

Clean Gujarat Green Gujarat

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

Outward No: 5867

7. In Pumping station C which is receiving treated effluent of SEZ-I, Sample results shows very high concentration of COD: 1831 mg/l (Limit: 250 mg/l), BOD: 390 mg/l (Limit: 100 mg/l), NH-N: 834.4 mg/l (Limit: 50 mg/l).
8. In Final pumping station Ambheta, Dahej which is receiving treated effluent of Pumping station A & C, Sample results shows very high concentration of COD: 1983 mg/l (Limit: 250 mg/l), BOD: 323 mg/l (Limit: 100 mg/l), NH-N: 274.4 mg/l (Limit: 50 mg/l), Phenolic compound: 14.12 mg/l (Limit: 5 mg/l).

AND WHEREAS the non-compliance as narrated above, observed in your Common Effluent Conveyance Pipeline Project is contributing to the pollution problem in Dahej area.

UNDER THE CIRCUMSTANCES, as directed, I P. B. Patel, Dy. Environment Engineer, Gujarat Pollution Control board issue the direction under Section 33(A) of the Water Act - 1974 as under:

1. To stop discharge of effluent from pipeline laid at 600-meter on offshore as alternative arrangement.
2. To discharge effluent 4.5 km mtr away from sea, so proper dilution as per condition no. 5.4 of CCA may be available at discharge point.
3. To carry out maintenance of 4.5 KM offshore pipeline and solve problem of choking of pipeline.
4. To rectify and repair leakages in GIDC drainage lines.
5. To stop overflow from GIDC drainage manholes in various sections of GIDC drainage system in Dahej & Vilayat.
6. To take necessary steps to control overflowed wastewater reaches to estuary / sea through the natural drain/ storm water drain.
7. To remove sludge deposition observed at the GIDC Final Pumping Station (FPS).
8. To provide adequate storage facility to prevent discharge of effluent in estuary zone during emergency situation like failure of pumps, leakage in pipeline etc.
9. To relocate manholes to prevent overflow of wastewater entering into surface water drains/ storm water drains / surrounding area.
10. To re-collect accumulated wastewater from surrounding area.
11. To strengthen pipeline infrastructure to convey effluent up to deep sea.
12. To provide permanent solution of storm water management.
13. To take necessary steps to keep storm water drain dry during lean period.
14. To submit action plan within 15 days for above non-compliances.



GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

If the above direction is not complied, you are liable for prosecution under Section 41(2) of the Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This direction is issued with the approval of the competent authority.

FOR AND ON BEHALF OF
GUJARAT POLLUTION CONTROL BOARD

(P.B.PATEL)
DY. ENVIRONMENT ENGINEER

NO: GPCB/BRCH-B/CCA-1194/ID:31038/

Date: ___/03/2021

Issued to:

✓ M/S. GUJARAT INDUSTRIAL DEVELOPMENT CORPORATION
(DAHEJ- VILAYAT PIPELINE DEVELOPMENT CELL),
PLOT NO: 13/A, DAHEJ PUMPING STATION,
GIDC ESTATE DAHEJ,
TA: VAGRA, DIST:- BHARUCH

Copy To:

- 1) Vice Chairman & Managing Director,
GIDC, Block No -4, 2nd Floor,
Udhyog Bhavan, Gandhinagar..... for your information and necessary action please.
- 2) Regional Officer,
Gujarat Pollution Control Board,
Regional Office,
Bharuch..... to investigate non-complying industry discharging effluent in the area and to carry out extensive monitoring, for monitoring & verification of this direction.

Outward No: 586744, 24/03/2021

Clean Gujarat Green Gujarat

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

ZOW/Tech-305/PC/Gen/2020-21/348-349

दि. 17.02.2021

सेवा में
सदस्य सचिव,
गुजरात प्रदूषण नियंत्रण बोर्ड
पर्यावरण भवन, सैक्टर 10 -ए
गांधी नगर - 382010 ,गुजरात

विषय : मै. आर्यवर्त फाउन्डेशन से GIDC, Dahej विस्तार मे इन्डस्ट्री द्वारा पर्यावरण नियमों के उल्लंघन के विरुद्ध शिकायत के संदर्भ में।

संदर्भ : के.प्र.नि.बो. दिल्ली से प्राप्त पत्र सं CPCB/IPC-VII/CETPs/2021/5197 दिनांक
28.01.2021

महोदय ,

के.प्र.नि.बो., वडोदरा कार्यालय को केन्द्रीय प्रदूषण नियंत्रण बोर्ड, दिल्ली से पत्र प्राप्त हुआ है। यह पत्र मै. आर्यवर्त फाउन्डेशन से GIDC, Dahej विस्तार मे इन्डस्ट्री द्वारा पर्यावरण नियमों के उल्लंघन के विरुद्ध शिकायत के संबंध में है जिसकी स्ववर्णित प्रति संलग्न है।

इस संदर्भ में आपके कार्यालय द्वारा शीघ्रता से उचित कार्यवाही प्रार्थनीय है। आपके कार्यालय द्वारा की गयी कार्यवाही के.प्र.नि.बो. दिल्ली को अवगत कराएं एवं साथ में इस कार्यालय को एक प्रतिलिपि सूचनार्थ भेजने की व्यवस्था करें।

धन्यवाद,

भवदीय

P. Garg
(प्रसून गार्गव)
क्षेत्रीय निदेशक

प्रति,

श्री अजय अग्रवाल
AD IPC-VII Div, CPCB, Delhi

P. Garg
(प्रसून गार्गव)

o/c



→ SCD(AT) P.G. 02.02.2021
K. G. 01/2/21
→ S.C.B./SES 11/2/21

केन्द्रीय प्रदूषण नियंत्रण बोर्ड 945

CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

CPCB/IPC-VII/CETPs/2021 5197

Date: 28/01/2021

To

The Member Secretary
Gujarat Pollution Control Board
Sector 10- A Gandhi Nagar-382043
Gujarat

के.प्र.नि.नो./CPCB. 1562
आवक संख्या/Inward No.:
दिनांक/ Date : 02.02.21

Sub: Public Grievances regarding violation of water (Prevention and Control of pollution) Act, 1974, Air (Prevention and Control of pollution) Act, 1981 and CRZ notification dated 09/01/2011 reg.

Sir,

This has reference to the representation dated 04/01/2021 received from Aryavart Foundation, Gujarat regarding violations by industries located in Dahej Industrial Estate.

It is requested to look into the matter and take appropriate action. The action taken report may be provided to the applicant under intimation to this office, within 15 days.

Yours faithfully

(Ajay Aggarwal)

AD & Div. Head, IPC-VII

Email: ipc7.cpcb@gov.in

Each: as above

Copy to:

- ✓ 1. **Regional Director (West)** : for follow-up, please
Central Pollution Control Board
Opposite VMC ward No.10, Subhanpura,
Vadodara- 390023
2. **Aryavart Foundation** : for information, please
J-50, Japan Market,
Opp. Linear bus stop,
Ring road, Surat-3
Gujarat



ARYAVART FOUNDATION ISO

visit us : www.aryavartfoundation.org

9001 : 2015

Ref. No.: AF/GUJ/10A/JAN/2021

171619
5/1/21

171619/M
06/01

Date: 04/04/2021

To,

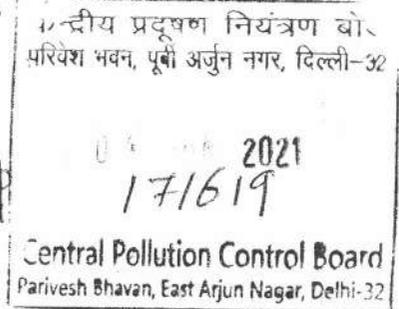
The Chairman

Gujarat Pollution Control Board

Sector- 10A,

Gandhinagar, Gujarat-382010.

MS
6/1/21
IPC-1
05/01/2021



Sub: Violation of the Water (Prevention and Control of Pollution) Act, 1974, Violation of the Air (Prevention and Control of Pollution) Act, 1981 and Violation of Sec. 3 (ii) of CRZ notification dated 06/01/2011

Respected Sir,

1. The complainant is President of "Aryavart Foundation" which is an NGO registered under the Central Societies Act 1860. The NGO is inter-alia engaged in spreading awareness about environmental issues and taking steps to prevent the environment from pollution.
2. It is respectfully submitted that I along with my team comprising of Members of Aryavart Foundation NGO visited general area of Dahej Industrial Estate on 26/12/2020, 27/12/2020 & 28/12/2020 and interacted with the locals. The Complainant also met The Regional Officer of Bharuch, GPCB on 28/12/2020. The following was observed / learnt during the visit and interaction:

"That although as per the CPCB and GPCB norms, all the industries are obliged to discharge their treated trade effluents through closed GIDC drains which take the effluents to CETP, further to final pumping station and finally into the deep sea at a distance of 4.5 km from the shore but untreated / semi-treated trade effluents were observed in the open drains in the general

: OFFICE :

D(KR)
Aryavart
13/1/21

ATR from GPCB
may be sought.

K.P.T.
14/1/21

C.B. (YKV)

DA-IPC-VII
13/1/21

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E-mail : aryavartfoundation2016@outlook.com ♦ aryavartfoundation2016@gmail.com



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area of GIDC Dahej. The locals have intimated that the industries situated in GIDC, Dahej have scant regard for the environmental norms. The untreated / semi treated trade effluents emit pungent smell causing Air pollution. It is also pertinent to mention that the untreated trade effluents are hazardous chemicals which are injurious to flora and fauna”.

3. That apart from the above, in a case filed by Aryavart Foundation being original Application no. 85 of 2020, titled as “Aryavart Foundation versus M/s Yashyashvi Rasayan Pvt. Ltd. And Anr.”, an expert committee was constituted. The Expert committee so constituted has submitted a detailed report before the Hon’ble National Green Tribunal about the violations of Environmental obligations by the industries located in GIDC, Dahej. The relevant part of the report is reproduced below:

“6.5 OTHER ALLIED ISSUES FOUND RELEVANT:- Effluent Management in Dahej Industrial Area Most of the industries in Dahej- Vilayat area are discharging treated wastewater in to internal drainage network (39 km) provided by GIDC having pumping stations (4 nos.) and earlier finally used to pump to deep Sea through underground pipeline (90 MLD capacity, present flow @ 39 MLD) from Final Pumping Station (FPS). The length of this disposal pipe line is 13.5 km out of which 9 km on- shore and 4.5 km off-shore. The final disposal point was identified by the National Institute of Oceanography (NIO). However, presently, the wastewater is being reportedly discharged only at 600 m inside (with 600 m off-shore separate pipeline) the Sea, instead of 4.5 km due to damage/choking of

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4.5 km off-shore pipeline/diffuser system. The 600 m off-shore pipe in use is reportedly having leakages at a number of locations discharging effluent in between High Tide Level (HTL) & Low Tide Level (LTL). The effluent discharged from Final Pumping Station is not meeting prescribed norms as per CPCB & GPCB monitoring results. It is inferred that the individual industries are not treating the effluent as per standards prescribed by GPCB and letting wastewater without proper treatment into the GIDC drainage system. There are industrial clusters like GIDC Dahej, (D1,D2,D3, Dahej SEZ Part I and Part II and Vilayat GIDC and SAYKKA GIDC) in Vagra Taluka. There is one CETP (For Dahej D2 and D3, Capacity 40 MLD) under stabilisation, while another one is for Saykha GIDC 40MLD already constructed but not commissioned. Others have no facilities of CETP. As such there is no functional CETP and all discharging the trade effluent either treating or otherwise in drains of GIDC. In view of the reports it can be said that some industries are not treating the trade effluent. GPCB has till now issued three directions to GIDC under Section-33 A of the Water (P & CP) Act, 1974 dated 30.01.2019, 23.03.2020 and 27.05.2020 for violation and non-compliances viz. discharge of effluent in intertidal zone through 600 m separate off-shore pipeline instead of 4.5 km off-shore pipeline due to choking of pipeline violating CCA condition/CRZ Notification, non-compliance of discharge standards at Final Pumping Station (FPS), heavy sludge deposition at FPS, overflowing of manholes due to choking/leakage problems of GIDC drainage lines, frequent overflowing of effluent from manholes leading to storm

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water drains/natural drains which ultimately carry effluent to estuary of River Narmada & to the Sea, accumulation of effluent in some areas etc. As per latest direction issued by GPCB dated 27.05.2020, GIDC has been directed to:

- Submit compliance report of the direction issued on 23.03.2020 and time bound action plan for remediation of choked effluent disposal pipeline,
- Stop discharge of effluent in tidal zone (near the Sea coast)
- Provide sludge removal mechanism and remove heavy sludge deposition in FPS
- Stop overflowing of manholes which is taking place due to choking and leakage problem
- Collect & dispose wastewater accumulated due to leakage & seepage from GIDC drainage line and overflow from drainage manholes

The copy of directions dated 23.03.2020 & 27.05.2020 have been marked to Gujarat Coastal Zone Management Authority (GCZMA) for taking appropriate actions for violation of CRZ Notification by GIDC regarding discharge of effluent into the estuary of Narmada. GIDC has submitted reply to the GPCB and informed that-

- GIDC commissioned 4.5 km CS pipeline of 1000 mm diameter in 2016- 17, due to scaling in the pipeline and diffusers were buried more than 3 meters in the sea bed. Also, it is not possible to repair diffusers and removal of scaling in offshore pipelines. Hence, effluent could not be discharged into the deep sea.
- GIDC has laid two rows of 600 mm diameter MS pipeline up to 600 meters. GIDC has planned to lay a new offshore pipeline with diffusers for which a consultant has been appointed and estimates are prepared but it will take at least 2.5 years to complete the said work.
- GIDC has attended leakages of pipelines. From what is stated above it is clear that since 2016 –

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2017 the effluent is being discharged just a distance of 600 meters. It is required to be borne in mind that the effluent is of the industries engaged in manufacturing hazardous chemicals or using hazardous chemicals. The industries through GIDC cannot be permitted to discharge the effluent not meeting with the norms just at a distance of about 600 m in the sea instead of 4.50 Kilo Meters as per permission granted.”

4. That from the facts stated above it is crystal clear that the industries located in Dahej Industrial Estate are violating the provisions of Water Act and Air Act by committing the following Act.

- a) Discharging untreated / semi treated hazardous chemicals in open GIDC drains.
- b) Discharging semi-treated hazardous chemicals between high tide line and low tide line i.e. at a distance of 600 mtr of the seashore in gross violation of provisions of Section 3 (II) of CRZ notification dated 06/05/2011.
- c) That the pipeline which discharges the Trade effluents into the sea is also broken at various places even before going into the Sea.
- d) That it can be very safely inferred that the industries are discharging untreated / semi treated hazardous chemicals into the GIDC drains and the CETP / ETPs are also not fully functional because the sample taken from outlet of final pumping station are not meeting the CPCB / GPCB environmental norms.
- e) It is also evident that the GPCB officials have not performed their duties as required under the law because no effective action has been taken against the GIDC, (Dahez – Vilayat pipeline development cell) for operating without consolidated Consent and Authorization

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since 13/11/2018. The GPCB has also not taken any effective steps for violation of the environmental parameters by GIDC (Dahez – Vilayat pipeline development cell) for violating the Environmental parameter as mentioned in notice of Direction U/S 33 A of the Water Act vide order no. GPCB/BRCH-B/CCA-4(8)/ID-31038, Outward no. 531938 dated 31/12/2019. No effective steps have been taken against the industries which are discharging untreated/semi treated trade effluents into the GIDC drains.

- f) That as per the law laid down by the Hon'ble Supreme Court in Paryavaran Suraksha Samiti case W.P. 375 of 2012 in Paryavaran Suraksha Samiti & Anr vs Union Of India & Ors judgment dated 22 February, 2017 all the industries located in Dahej industrial estate must be closed down immediately. Allowing the industries to operate without a fully functional CETP / ETPs is actually contempt of the Hon'ble Supreme Court.

5. That in view of the above you are requested to constitute a committee of officers and experts of impeccable integrity to conduct detailed inspection of all the industries located in GIDC, Dahej and ensure compliance of the environmental obligations by all the industries and also take punitive measures against the industries for violating the environmental parameters in the past.

Yours Truly,

A.R.Mishra

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CC: To

1. The Secretary, Ministry of Environment & Forest (MoEF), New Delhi.
- ✓ 2. The Chairman, Central Pollution Control Board, New Delhi.
3. The Member Secretary, Gujarat Pollution Control Board, Gandhi Nagar.
4. The Collector, Bharuch.

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