

1213

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 220 OF 2019**

IN THE MATTER OF:

ADIL ANSARI

....APPLICANT

VERSUS

M/s CL GUPTA EXPORTS PVT LTD & Ors

...RESPONDENTS

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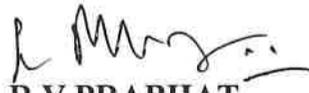
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10 Proof of Service

1233

RESPONDENT NO.1

THROUGH


R.V.PRABHATH
ADVOCATE

K-13, LGF,
KAILASH COLONY,
NEW DELHI – 110048

PH: 8001622962

NEW DELHI

DATE: 03.02.2021

EMAIL: RVPRABHATH9@GMAIL.COM

1214

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 220 OF 2019

ADIL ANSARI
S/O MOHD. NAUSHAD ANSARI,
MOB: 9614861414
ADD: 2 NEW SILAMPUR, GARHI MEDHU,
NEW DELHI – 110053

....APPLICANT

VERSUS

1. M/S CL GUPTA EXPORTS LTD.
18 KM. STONE, DELHI ROAD,
VILLAGE – JIVAI,
JYOTIBAPHULE NAGAR (AMROHA),
UTTAR PRADESH – 244 221
2. UTTAR PRADESH POLLUTION CONTROL BOARD
THROUGH ITS CHAIRMAN/SECRETARY
BUILDING NO. TC-12V, VIBHUTI KHAND,
GOMTI NAGAR, LUCKNOW
UTTAR PRADESH – 226 010
3. CENTRAL POLLUTION CONTROL BOARD,
THROUGH ITS CHAIRMAN/SECRETARY
“PARIVESH BHAVAN” EAST ARJUN NAGAR,
NEAR – KARKARDUMA COURT,
SHAHDARA, DELHI
4. CENTRAL GROUND WATER AUTHORITY (CGWA)
WEST BLOCK -2, WING -3,
RK PURAM, SECTOR – 1,
NEW DELHI – 110 066

..... RESPONDENTS



1215

**REPLY ON BEHALF OF THE RESPONDENT NO. 1/ M/S CL GUPTA
EXPORTS PVT LTD, TO THE COMPLIANCE REPORT IN THE MATTER
OF O.A. NO. 220/2019, TITLED AS ADIL ANSARI VS. M/S C.L. GUPTA
EXPORTS PVT. LTD. & ORS. IN COMPLIANCE TO THE HON'BLE NGT
ORDERS DATED 06.08.2020 AND 03.12.2020.**

I, Teevra Gupta s/o Anil Gupta, Age – 48 years r/o 2, Anand Lok, Andrews Ganj, South Delhi, New Delhi – 110049, do hereby solemnly affirm and state as under:

1. That I am a Director in Respondent No.1 company, authorised to represent the Respondent No.1 and conversant with the facts of the case.
2. That the present reply is being filed in response to the Compliance Status Report by the Central Pollution Control Board (CPCB)/Respondent No. 3 that was uploaded onto the website of the Hon'ble Tribunal on 30.01.2021, comprising the joint inspection conducted on 10.12.2020.
3. That said Joint Inspection Report dated 10.12.2020 demonstrates that the Respondent No. 1 is not in violation of any ZLD norms or any provision of the Hazardous Waste Management Rules, and that all recommendations in this connection noted in the earlier Joint Inspection Report of October 2019 and subsequent follow-up reports have been complied with.

4. That Respondent No. 1's comments on the final recommendations in the latest Joint Inspection Report dated 10.12.2020, are as below:

S.No.	Recommendation	Comments
1)	The unit shall obtain common consent to operate for all 06 manufacturing sections i.e., Metal Art ware, Glass Art ware, Wood Art ware, Thermocol blocks, Marble Art ware & Corrugated Paper & Carton under the Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from	Renewal applications have already been filed and is currently pending with the UPPCB. The UPPCB has indicated in its letter dated 09.12.2020 that the same will be processed in accordance with law, after the inspection. Said letter is annexed herewith as Annexure-A1 .

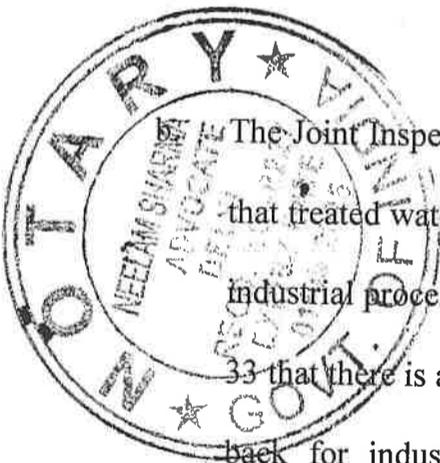


	UP Pollution Control Board.	
2)	Unit shall ensure no fresh water is used for industrial process and comply with the conditions laid down in NOC of CGWA.	The unit is complying with the same and will continue to comply with the same.
3)	The unit shall engage an expert institute to carry out detailed water audit of the unit for detailed study of total actual water consumption & recycling of treated wastewater	Unit has already engaged National Environmental Engineering Research Institute (NEERI) to conduct a complete water audit.
4)	For carrying out factual water audit, unit shall ensure metering at all and individual treated waste water consumption points at each manufacturing section to ascertain actual water consumption in each process as well as for domestic purpose and maintain logbook for the same	Unit has already undertaken this exercise and installation is ongoing.
5)	The unit shall install flow meters at inlet and outlet of both Pre-ETPs i.e., for treatment of effluent generating from electrophoretic, lacquering and paint booth processes and for treatment of floor washing effluent.	Unit has already installed the flow meters at inlet and outlet of both Pre-ETPs for treatment of effluent generating from electrophoretic, lacquering and paint booth processes and for treatment of floor washing effluent.
6)	For common-ETP, the unit shall install flow meters at outlet of secondary biological treatment system, permeate of RO, MEE condensate and ATFD condensate.	Unit has already installed the flow meter at outlet of secondary biological treatment system, Permeate of RO, MEE condensate and ATFD condensate. Copy of the photograph confirming the same is annexed herewith as Annexure-A2 (COLLY) .
7)	The unit shall dispose off the sludge from sludge drying bed of the previous ETP at wooden art ware manufacturing division, to TSDF site.	This has been undertaken. Copy of the photograph confirming the same is annexed herewith as Annexure-A3 . The sludge being mentioned here was kept for drying naturally on the date of the joint team inspection. The sludge drying bed has been cleaned and sludge has been sent to sludge storage room, thereafter.
8)	Presence of cyanide upto 5.0 mg/l in treated effluent from common-ETP is observed; hence, human contact shall be strictly avoided during the recycle/re-use of common ETP treated effluent.	It is a completely closed loop system and no human contact is allowed directly on the treated water. Even the persons working in the plating division are provided with PPE such as gloves & goggles.
	The unit shall check pH of treated sewage and maintain it in the range of 6.5-8.5 before pumping for horticulture use and FC concentration should be brought down below 1000 MPN/100 ml.	This is already being undertaken and the unit will continue monitoring the same. The unit has installed auto pH correction system to maintain pH in range 6.5 to 7.5 at outlet of STP. The unit has also installed chlorination system for controlling FC concentration below 1000MPN/100ml. Copy of the photograph confirming the same is annexed herewith as Annexure-A4 .



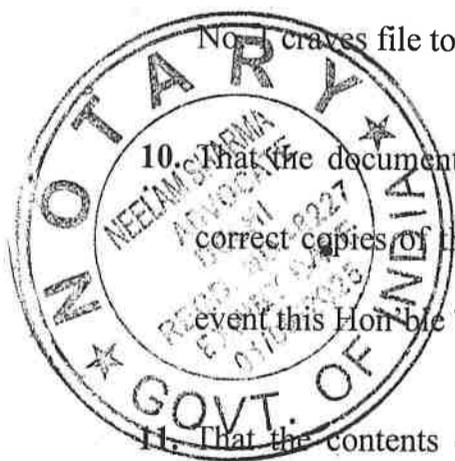
5. That the Respondent No. 1 is also herewith enclosing as **Annexure-A5**, a point-wise reply to the various conclusions in para 14 of the Joint Inspection Report dated 10.12.2020, for reference and records.
6. That there are a few factual discrepancies in the Joint Inspection Report dated 10.12.2020, which are also addressed in Annexure-A5. In particular, it is stated that:
- a. The Joint Inspection Report at internal pages 120, 43 has considered 10 l/person/day as the norm for employees/workers, whereas as per the published CGWA norms it is 30 l/person/day. Since 10 l/person/day for bathrooms/flushing purposes has been separately accounted for (from STP), one must consider 20 l/person/day in this case (i.e., 30-10). If this discrepancy is corrected, the total requirement as per CGWA norms would be 158.75 KLD. Whereas the unit is admittedly withdrawing only 114.08 KLD of groundwater (Report at internal page 49) and thus, there is no excess water being withdrawn. The unit is withdrawing significantly lesser water than the norm for domestic/drinking use; and

The Joint Inspection Report at internal pages 15, 18, 20 and 37 confirms that treated water from common-STP and common-STP is being used for industrial processes. However, the Report notes at internal pages 120, 32-33 that there is a mismatch in the quantum of treated water being pumped back for industrial use versus the quantum of input effluent. It is submitted that unfortunately, the Report has missed out another element of recycling unit, distinct from the common-ETP and common-STP, which separately provides an average of 28.5 KLD recycled water for use in industrial process. This additional element of recycled water is depicted and highlighted in **Annexure-A6** and **Annexure-A7**, respectively. This line is labelled as "metal process" and corresponds to



the water continuously circulated to adjust for evaporation losses. This is in addition to the output of the common-ETP and common-STP. Once this additional element of recycled water is accounted for, there is no mismatch in the quantum of treated water being pumped back for use versus the quantum of input effluent.

7. That as far the penalty is concerned, the Joint Inspection Report acknowledges in internal page 61 that part payment of Rs. 44,76,167 /- has already been made. The Compliance Report at internal page 1 has further acknowledged that the unit has requested a reduction in/waiver of the remaining penalty amount via various letters/representations, including a letter dated 05.11.2020, and that the same is currently pending with the UPPCB for finalisation. Appropriate action would be taken by the unit after hearing from the UPPCB.
8. That the Respondent No. 1 company has otherwise complied with all requirements in law as well as this Hon'ble Tribunal's orders and has always acted in compliance with the law.
9. That the present additional affidavit is being filed *bona fide* and to bring on record relevant and material facts and documents on record. The Respondent No. 1 craves file to file additional affidavits/replies, in the need arises.
10. That the documents being filed with this additional affidavit are the true and correct copies of the original and no prejudice would be caused to them in the event this Hon'ble Tribunal takes the same on record.
11. That the contents of this affidavit are true to the best of my knowledge and belief as per the records maintained by the Respondent No. 1 company.



VERIFICATION

I, Teevra Gupta, the deponent, do hereby verify that the contents of this Affidavit from Paragraph 1 to 11 are true to my personal knowledge and belief.

Signed and verified on this _____ day of February 2021 at Delhi.

03 FEB 2021



A. P. Prasad
I, the Deponent who has signed this affidavit, in my presence

ATTESTED

NOTARY (Govt. of India)
Neelam Sharma
Advocate
Ch. No. 165/A, Gate No. No. 11,
Patala House Courts,
New Delhi-110001
(M): 9899408301



03 FEB 2021

ANNEXURE-A1

1220

AK Johri

From: ceo7 <ceo7@uppcb.com>
Sent: Wednesday, December 09, 2020 12:16 PM
To: AK Johri
Cc: Amit Chandra; AEE
Subject: Renewal of Air and Water Consent.

In reference to your e-mail communication dated 09-12-2020 UPPCB has received your Consent to Operate applications under Water Act 1974 and Air Act 1981. The CTO applications is being examined.

Further the unit is to be inspected by Joint Committee comprising of officials of CPCB, CGWA, SPCB and Administration in compliance of direction of Hon'ble NGT.

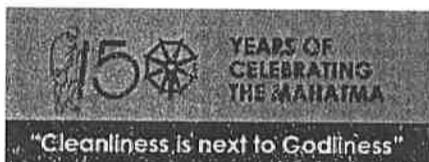
Your CTO applications shall be disposed on merit as per Law duly considering the report of Joint Committee.

Amit Chandra,

Chief Environment Officer (C-7)

U.P. Pollution Control Board,

Lucknow

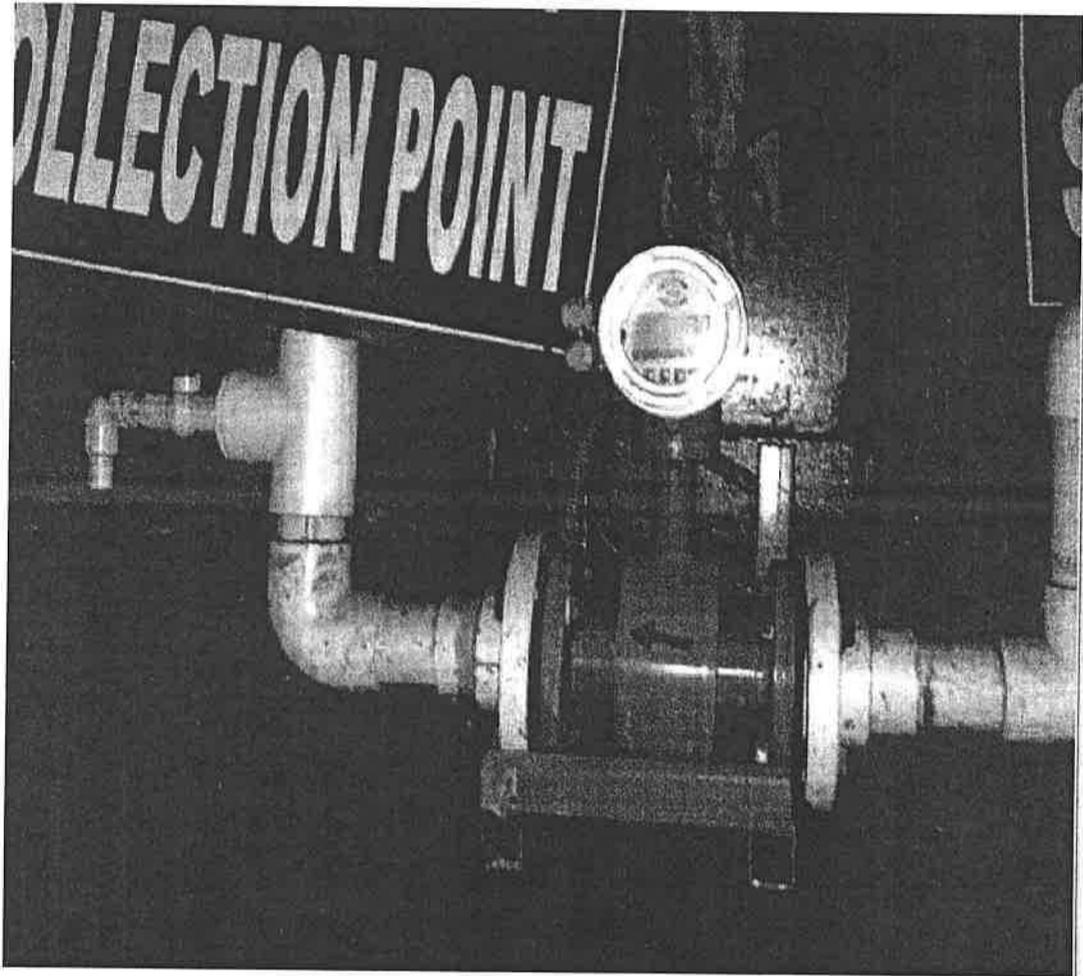


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ANNEXURE-A-2 (copy)

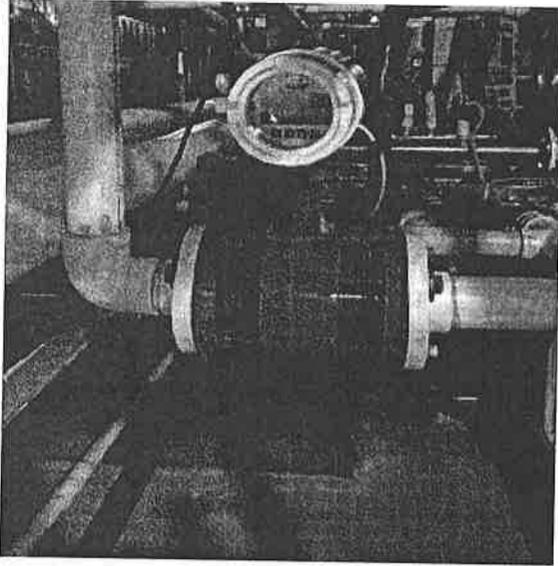
1221

Common ETP Outlet Flow Meter



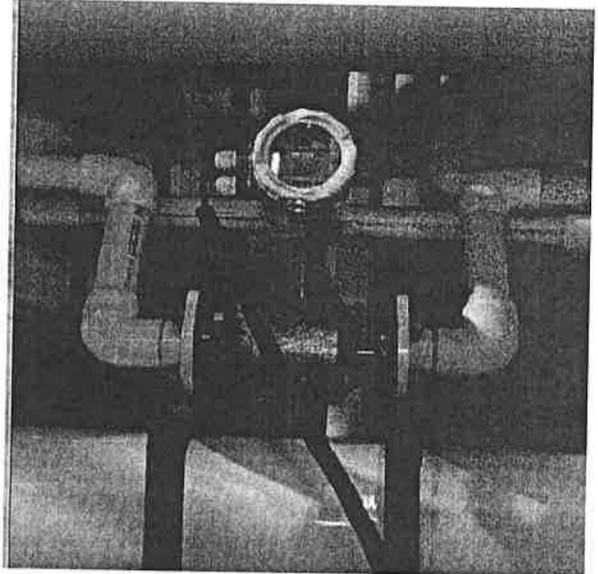
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RO-1 Inlet

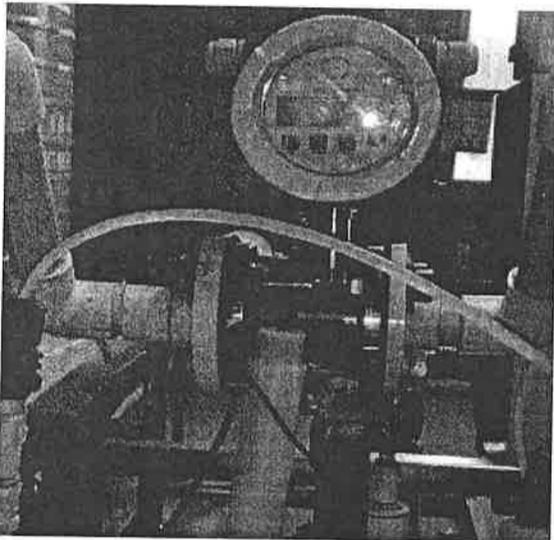


RO-1 Permeate

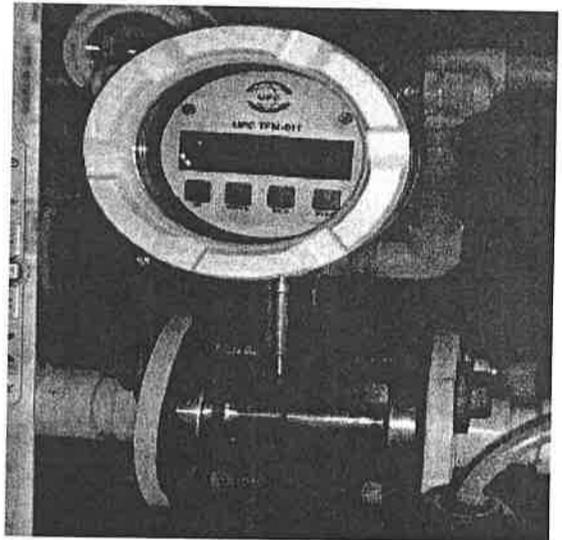
1222



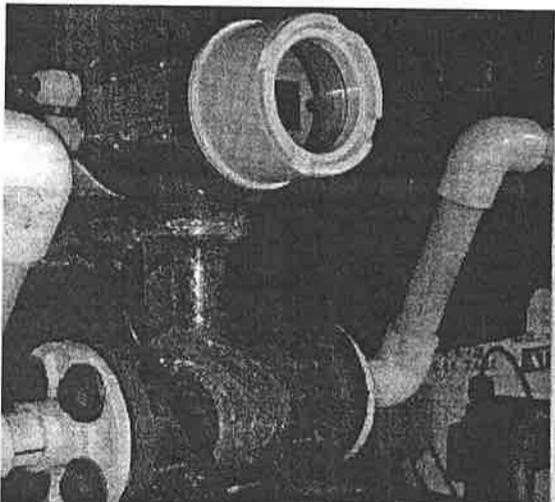
RO-2 Permeate



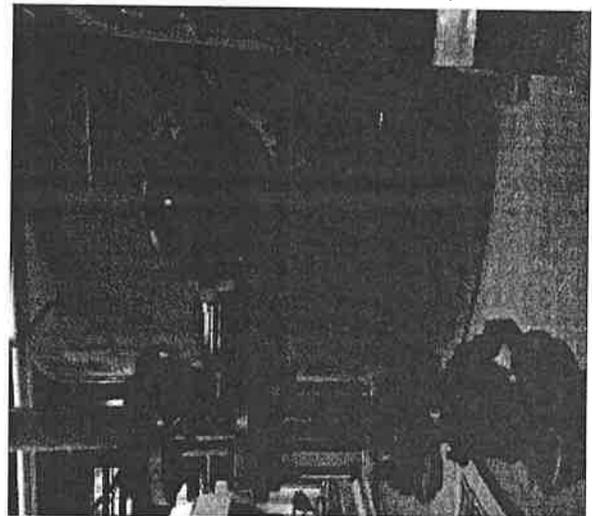
RO-3 Permeate



RO-3 Reject



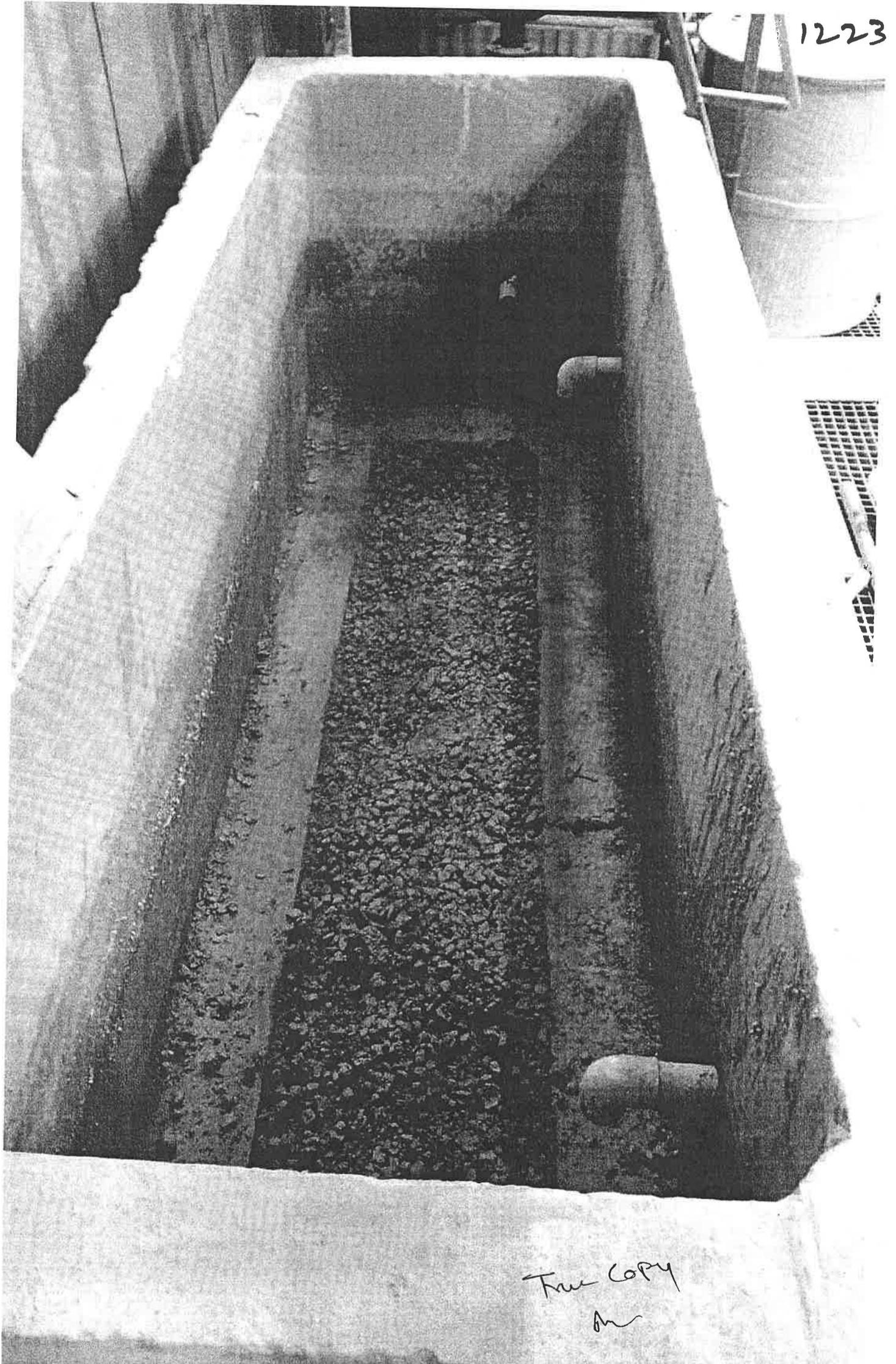
MEE/ATFD Condensate (Common)



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ANNEXURE-A3

1223



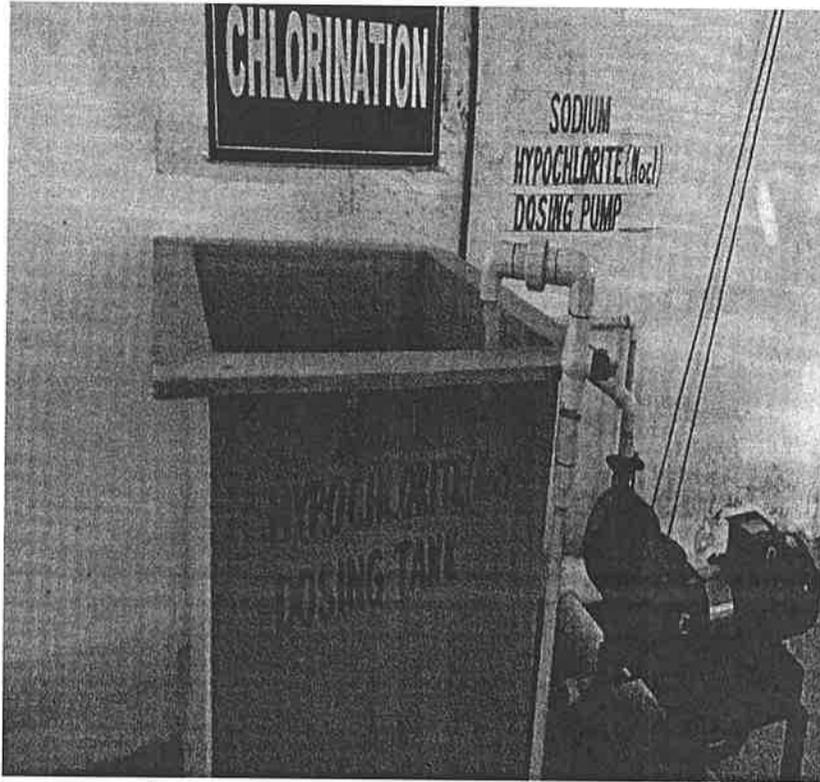
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ANNEXURE-A4

ANNEXURE-A4

1224

CHLORINATION AT STP



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S.No.	Recommendation	Our Comments
14.1 For CTO, ground water and all manufacturing sections		
1	<p>As per the previous CTO under the Water (Prevention & Control of Pollution) Act.1974 (Consent no. 939591) and the Air (Prevention & Control of Pollution) Act, 1981 (Consent No. 927007) issued by UPPCB. which has been expired on 31.12.2019, the unit has permission for production of 150 Ton/Month of wooden art wares, 250 Ton/Month of glass art wares and 200 Ton/Month of metal Art wares. The unit is yet to obtain valid common CTO for all 06 manufacturing sections i.e. Metal Art ware, Glass Art ware. Wood Art ware, Thermocol blocks, Marble Art ware & Corrugated Paper & Carton under the Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from UP Pollution Control Board.</p>	<p>Renewal applications have already been filed and is currently pending with the UPPCB. The UPPCB has indicated in its letter dated 09.12.2020 that the same will be processed in accordance with law, after the inspection.</p>
2	<p>As per the logbook record of borewells from Dec-2019 to Nov-2020, the unit has extracted 49,164 KL of ground water from 02 borewells (refer Table-3) against the permitted abstraction of 46,500 KL, which is violation of condition of NOC issued by CGWA.</p>	<p>The 46,500 KL per year limit is based on 155 KLD for 300 days only. However, the unit has a residential colony, where it is acknowledged that 350 persons are living all year, i.e. for 365 days and the CGWA itself states that for residential units, one must consider 135 l/person/day/. This translates to $(65 \times 135 \times 350) = 3071.25$ KL. Thus, inclusive of this 3071.25 KL, the total requirement going by CGWA norms is 49,571.25 KL. Thus, the extraction of 49,164 KL is within this calculation limit going by CGWA norms. The unit is proceeding to request the CGWA to clarify in terms of its approval granted to the unit dated 23.04.2020.</p>

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3	<p>Analysis result of sample collected from hand pump (near natural pond) showed Fe-1.79 mg/l against 0.3 mg/l and Mn-0.4 mg/l against 0.3 mg/l of the permissible limit of BIS IS 10500:2012 (permissible limit in absence of alternative source).</p>	<p>The hand pump being mentioned here is located outside the factory premises and it not used by us. This is a community hand pump. This public/community hand pump pipe casing is of galvanized / mild steel pipe due to which over a period of time iron (Fe) content may increase.</p> <p>There is no similar problem with the Borewell 3 & 4 located inside our premises since the pipe casing is of PVC. (As per the analysis report by CPCB). (Refer Table no. 7)</p>
4	<p>The unit has not provided flow meters at the consumption points of treated waste water from common STP & treated effluent common-ETP as well as effluent being pumped to Pre-ETP / common-ETP at any individual manufacturing sections. - Hence, the quantity of treated waste water from common-ETP and common-STP being utilized in individual sections and quantity of effluent generated from the individual sections could not be assessed due to unavailability of flow meters.</p>	<p>Unit has already undertaken this exercise and installation is ongoing.</p>
5	<p>Separate recycling plant located at glass division was found non-operational and waste water stored in the tanks was found stagnant.</p>	<p>The recycling plant was in breakdown condition on that day of inspection and is working as on date.</p>
6	<p>The quality of water samples collected from overhead storage tank at glass division and glass cutting section tap water does not match with the characteristics of effluent from common-ETP (refer table 10, 11 & 18 for analysis result of collected samples from glass division and common-ETP) indicating possibility of use of fresh water from borewell for industrial purposes.</p>	<p>This is not accurate because the following tables from the Joint Inspection Report at internal pages 17, 13-14, 34 confirm that the parameters of the water in the storage tank at glass division and glass cutting section is similar to the RO permeate (treated water) and not fresh water:</p> <p>Most of the parameters for the RO permeate (treated water) are in the Below Detection Limit (BDL) range. Further, for instance, fresh water does not have any Copper (Cu) but there is Cu content in the RO permeate, which is also see in the glass division tank. Similarly, fresh water does not have Nickel (Ni) or</p>

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		<p><u>Analysis Chart</u></p> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Glass Cutting Section</th> <th>RO Permeate</th> <th>Fresh Water</th> </tr> </thead> <tbody> <tr> <td>As</td> <td>BDL/0.01/0.02</td> <td>BDL</td> <td>0.04/BDL</td> </tr> <tr> <td>Cd</td> <td>BDL/BDL/BDL</td> <td>BDL</td> <td>BDL/BDL</td> </tr> <tr> <td>Cr</td> <td>BDL/BDL/BDL</td> <td>BDL</td> <td>BDL/BDL</td> </tr> <tr> <td>Cu</td> <td>0.03/0.04/0.32</td> <td>0.13</td> <td>BDL/BDL</td> </tr> <tr> <td>Fe</td> <td>0.4/0.44/0.53</td> <td>0.03</td> <td>0.03/0.1</td> </tr> <tr> <td>Mn</td> <td>0.09/0.09/0.78</td> <td>BDL</td> <td>0.12/0.21</td> </tr> <tr> <td>Ni</td> <td>0.02/0.04/0.55</td> <td>0.02</td> <td>BDL/BDL</td> </tr> <tr> <td>Pb</td> <td>1.2/1.52/0.02</td> <td>BDL</td> <td>BDL/BDL</td> </tr> <tr> <td>Sb</td> <td>BDL/BDL/BDL</td> <td>BDL</td> <td>BDL/BDL</td> </tr> <tr> <td>Se</td> <td>BDL/BDL/BDL</td> <td>BDL</td> <td>BDL/BDL</td> </tr> <tr> <td>V</td> <td>0.13/0.15/0.13</td> <td>0.12</td> <td>BDL/BDL</td> </tr> <tr> <td>Zn</td> <td>BDL/0.05/2.05</td> <td>BDL</td> <td>0.5/BDL</td> </tr> </tbody> </table> <p>Vanadium (V), but this is seen in the RO-permeate and thus, also seen in the glass division tank.</p>	Parameters	Glass Cutting Section	RO Permeate	Fresh Water	As	BDL/0.01/0.02	BDL	0.04/BDL	Cd	BDL/BDL/BDL	BDL	BDL/BDL	Cr	BDL/BDL/BDL	BDL	BDL/BDL	Cu	0.03/0.04/0.32	0.13	BDL/BDL	Fe	0.4/0.44/0.53	0.03	0.03/0.1	Mn	0.09/0.09/0.78	BDL	0.12/0.21	Ni	0.02/0.04/0.55	0.02	BDL/BDL	Pb	1.2/1.52/0.02	BDL	BDL/BDL	Sb	BDL/BDL/BDL	BDL	BDL/BDL	Se	BDL/BDL/BDL	BDL	BDL/BDL	V	0.13/0.15/0.13	0.12	BDL/BDL	Zn	BDL/0.05/2.05	BDL	0.5/BDL
Parameters	Glass Cutting Section	RO Permeate	Fresh Water																																																			
As	BDL/0.01/0.02	BDL	0.04/BDL																																																			
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Ni	0.02/0.04/0.55	0.02	BDL/BDL																																																			
Pb	1.2/1.52/0.02	BDL	BDL/BDL																																																			
Sb	BDL/BDL/BDL	BDL	BDL/BDL																																																			
Se	BDL/BDL/BDL	BDL	BDL/BDL																																																			
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Zn	BDL/0.05/2.05	BDL	0.5/BDL																																																			
7	<p>Characteristics of sample collected from the tank for storage of common-ETP treated effluent located at marble section match with the characteristics of sample collected from borewell no.3, indicates that the unit is using fresh water in the manufacturing process also, violating the conditions stipulated in the valid NOC, issued by CGWA.</p>	<p>For the same reasons as above, this is also not accurate because the following tables from the Joint Inspection Report at internal pages 17, 13-14, 23 confirm that the parameters of the water in the storage tank at the marble section is similar to the RO permeate (treated water) and not fresh water.</p>																																																				
8	<p>The sludge drying bed of the previous ETP at wooden art ware manufacturing division was found filled with sludge.</p>	<p>This ETP in wood section had already been closed as the unit had installed common treatment plants, and effluent from wood section is pumped to the common pre-treatment plant. The sludge was kept for drying naturally during the joint team inspection. The sludge drying bed has been cleaned and sludge has been sent to sludge storage room.</p>																																																				
<p>14.2 For Pre-ETPs, Common-ETP and Common-STP</p>																																																						
1	<p>As per NEERI report (December 2020) on Feasibility study for use of ETP/STP Treated water as process water at MIS C.L. Gupta Exports Pvt. Ltd., Amroha, U.P. - Overall analysis of samples indicates that the treated water from RO outlet of common-ETP and outlet</p>	<p>Joint Committee has confirmed that treated water is being used for industrial purpose. Unit will continue monitoring to ensure desired quality of treated water.</p>																																																				

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	of Ultra-filtration (UF) of common-STP can be used for different processes in the industry. Further, strict monitoring of treated waste water is required on regular basis to ensure continued desired quality of treated waste water.	
2	The unit has not installed flow meter at inlet and outlet of both Pre-ETPs i.e., for treatment of effluent generating from electrophoretic, lacquering & paint booth processes and for treatment of floor washing effluent	Unit has already installed the flow meters at inlet and outlet of both Pre-ETPs for treatment of effluent generating from electrophoretic, lacquering and paint booth processes and for treatment of floor washing effluent.
3	At common-ETP, the unit has not provided flowmeter at outlet of secondary biological treatment system, permeate of RO, MEE condensate and ATFD condensate hence, quantity of final treated effluent could not be assessed due to unavailability of flowmeters.	Unit has already installed the flow meter at outlet of secondary biological treatment system, Permeate of RO, MEE condensate and ATFD condensate.
4	As per the characteristics of sample collected from treated water tank (which receives treated effluent from RO-permeates, MEE condensate and ATFD condensate), it is contaminated with cyanide which ranges from 0.3 mg/l (RO- I-Permeate) to 5.0 mg/l (MEE condensate).	It is a completely closed loop system and no human contact is allowed directly on the treated water. Even the persons working in the plating division are provided with PPE such as gloves & goggles.
5	Concentration of cyanide in RO-I-Permeate and MEE condensate of common-ETP, indicates usage of cyanide salt in process whereas the unit representative denied for usage of same during joint inspection.	Unit does not use cyanide salt in the treatment.

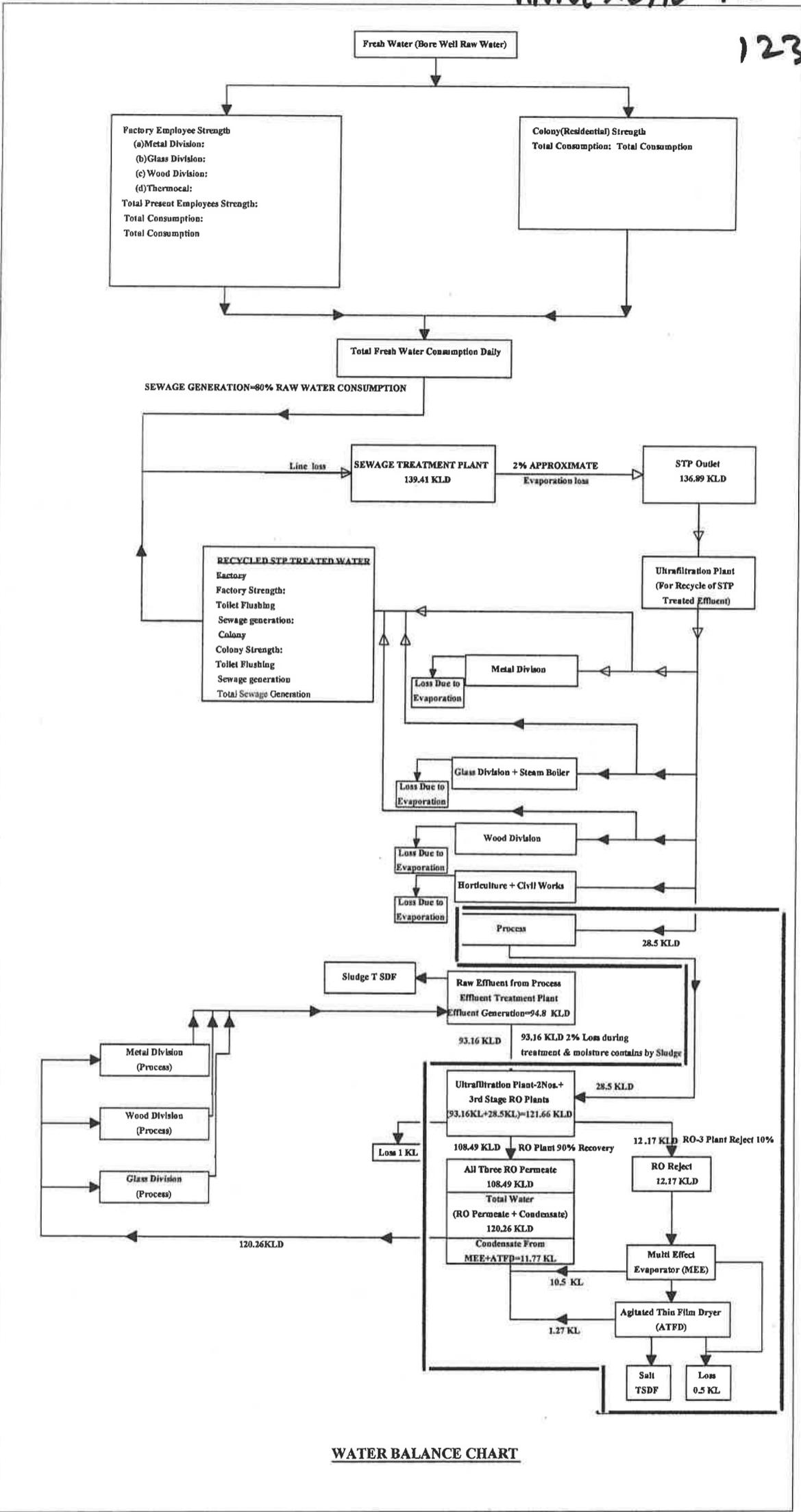
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6	As RO-3 reject is being fed to MEE, significant reduction in concentration of cyanide and nickel is observed in RO-3-reject from 8.8 mg/l to 4.4 mg/l and 66.13 mg/l to 43.07 mg/l in MEE feed respectively which could not be explained.	The Parameters vary depending upon the inlet pollution load. The RO-3 reject is collected in a 20 KL storage tank and fed into the Multi Effect Evaporator (MEE). The tank may contain water collected over period of time and therefore, parameters may always vary when compared to RO-3 reject water. However, this reject water is anyway further treated and fed back into the industrial process – in a closed loop system. This is not being discharged in anyway and the concentration are within permissible limits.
7	Almost negligible COD and BOD reduction is observed in common-ETP up to advanced tertiary system i.e. of ultrafiltration/before RO.	The Biological Oxygen Demand (BOD) & Chemical Oxygen Demand (COD) Concentration are further reduced to negligible level through RO / MEE treatment in the common-ETP from which treated effluent recycle into various process.
8	Increase in CN concentration from 6.3 mg/l in raw effluent) to 7.5 mg/l (in outlet of ultrafiltration system/before RO), indicates very less efficiency of primary and secondary treatment system.	There could be variation in the inlet and outlet concentration. However, UF treated effluent is passed through three stage RO /MEE plant through which concentration comes at negligible level.
9	As per the logbook data provided for effluent being treated in common ETP and treated effluent being recycled in wood, glass and metal divisions shows that the quantity of treated effluent recycled is more than the quantity of effluent fed/treated in ETP, which is contradictory and seems that about 11.09 KLD of fresh water being added in treated effluent storage tanks and the unit is in violation of conditions imposed in NOC issued by CGWA.	The Joint Inspection Report at internal pages 15, 18, 20 and 37 confirms that treated water from common-STP and common-STP is being used for industrial processes. However, the Report notes at internal pages 120, 32-33 that there is a mismatch in the quantum of treated water being pumped back for industrial use versus the quantum of input effluent. It is submitted that unfortunately, the Report has missed out another element of recycling unit, distinct from the common-ETP and common-STP, which separately provides an average of 28.5 KLD recycled water for use in industrial process. This additional element of recycled water is depicted and highlighted in Annexure-A6 and Annexure-A7 , respectively. This line is labelled as “metal process” and corresponds to the water continuously circulated to adjust for evaporation losses. This is in addition to the output of the common-ETP and common-STP. Once this additional element of recycled water is accounted for, there is no mismatch in the quantum of treated water being pumped back for use versus the quantum of input effluent.

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10	The quality of treated sewage is non-complying w.r.t. on land discharge norms w.r.t. pH-5.9 against 6.5 to 8.5. The pH needs to be brought within permissible limit of 6.5 to 8.5; for use in horticulture.	This is already being undertaken and the unit will continue monitoring the same. The unit has installed auto pH correction system to maintain pH in range 6.5 to 7.5 at outlet of STP. The unit has also installed chlorination system for controlling FC concentration below 1000MPN/100ml. Copy of the photograph confirming the same is annexed herewith as Annexure-A4.
14.3 For Water Audit		
1	The unit is withdrawing about 8.08 KL to 30.06 KL per day of fresh water more than the fresh water requirement and the point of utilization of this excess quantity could not be identified due to unavailability of flow meters at individual utilization points. - However, the excess quantity of effluent/sewage being recycled in process section than the quantity of effluent/sewage being treated indicates that dilution of fresh water is being made in treated water tank, which is recycled for industrial purposes.	The Joint Inspection Report at internal pages 120, 43 has considered 10 l/person/day as the norm for employees/workers, whereas as per the published CGWA norms it is 30 l/person/day. Since 10 l/person/day for bathrooms/flushing purposes has been separately accounted for (from STP), one must consider 20 l/person/day in this case (i.e., 30-10). If this discrepancy is corrected, the total requirement as per CGWA norms would be 158.75 KLD. Whereas the unit is admittedly withdrawing only 114.08 KLD of groundwater (Report at internal page 49) and thus, there is no excess water being withdrawn. The unit is withdrawing significantly lesser water than the norm for domestic/drinking use. No groundwater is used for industrial purpose.
2	Exact quantity of treated effluent from common-ETP and waste water from common STP being utilized in process as well as toilet flushing could not be identified due to unavailability of flow meters at individual utilization points.	Unit has already undertaken this exercise and installation is ongoing.

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WATER BALANCE CHART

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R V Prabhat <rvprabhat9@gmail.com>

In the matter of OA No. 220/2019 between Adil Ansari vs. CL Gupta Exports Ltd. & Ors.

R V Prabhat <rvprabhat9@gmail.com>
To: envisect@nic.in, cgwa@nic.in, ceoadmin@uppcb.com, clo@uppcb.com
Bcc: Adarsh Ramanujan <adarsh@akrlaw.in>

Wed, Feb 3, 2021 at 10:52 AM

Dear Sir/Ma'am,

In the above captioned matter, we the Respondent No. 1 have filed a Reply to Compliance Report and are serving you the Respondent No. 2, 3 and 4 with an advance copy. The copy of Reply alongwith all annexures is attached herewith.

Best Regards,
RV Prabhat
Counsel for Respondent No. 1

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(Faint, illegible text, possibly a signature or address block)

 **ADIL ANSARI VS CL GUPTA EXPORTS.pdf**
1512K

R V Prabhat <rvprabhat9@gmail.com>
To: adilansariseva@gmail.com

Wed, Feb 3, 2021 at 10:53 AM

Dear Sir,

In the above captioned matter, we the Respondent No. 1 have filed a Reply to Compliance Report and are serving you the Applicant with an advance copy. The copy of Reply alongwith all annexures is attached herewith.