BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE

ORIGINAL APPLICATION NO. 1384 OF 2024 (PB) IN THE

MATTER OF:
News Item titled "four workers killed in storage tank explosion at Gujarat industrial unit " appearing in The Hindu dated 03.12.2024

REPLY ON BEHALF OF THE RESPONDENT No. 02: CENTRAL POLLUTION CONTROL BOARD (CPCB)

1. That, Hon'ble NGT (PB) vide order dated 23.12.2024 has sought the reply of respondents including CPCB (Respondent No. 02) in the instant matter. Thereby, the reply is made in succeeding paragraphs.
2. That, CPCB is constituted under Section 3 of The Water (Prevention and Control of Pollution) Act, 1974. It performs the functions under The Water (Prevention and Control of Pollution) Act, 1974, The Air (Prevention and Control of Pollution) Act, 1981 and The Environment (Protection) Act, 1986.

PRELIMINARY SUBMISSIONS

3. That the matter is registered in the Hon'ble NGT (PB) suo-motu on the basis of the news item titled "four workers killed in storage tank explosion at Gujarat industrial unit " appearing in The Hindu dated 03.12.2024. The matter is related to the death of four workers due to the explosion of a storage tank at an industrial unit in Ankleshwar GIDC area of Bharuch district in Gujarat. As per news item, blast occurred when laborers were working on top of a storage tank inside the premises of Detox India Pvt. Ltd, which is involved in industrial wastewater treatment. The said order also mentioned that "The news item does not disclose that any compensation has been paid to the family members of the victims.
4. That, para 2 and 3 of the order refers to various orders passed by the Hon'ble Tribunal in similar matters and compensation awarded in those matters.
5. That, para 4 of order mention "The news item raises substantial issues relating to compliance of provisions of Public Liability Insurance Act, 1991 and Environment (Protection) Act, 1986."

REPLY:

6. That, it is humbly submitted that Consolidated Consent and Authorization (CC&A) and health & safety related permissions are issued and dealt by the concerned state authorities
7. That GPCB has issued the consolidated consent and authorization (CCA) to M/s. Detox India Pvt. Ltd. (DIPL) located at Plot No.7921-22-23, GIDC Estate Ankleshwar, Distt. Bharuch, Gujarat. As per the CCA, the said facility is a common effluent treatment

NOTARY
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RECD. NO.12000/2017
Valid Up to :
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plant (having capacity of 2.1 MLD). The facility has provided 06 Stripping columns of total capacity 1800 KLD, 06 Multi Effect Evaporator (MEE) of total capacity 1800 KLD with Agitated Thin Film Dryer (ATFD) and two spray dryers having capacity of 250 KLD each. Salts generated from spray dryer/ATDF are hazardous waste and disposed at TSDF Sites and condensate is treated in ETP with Membrane Bio reactor (MBR) and Reverse Osmosis (RO). Permeate from RO is used in the facility for cooling tower, gardening and plantation, lime preparation etc. Reject from RO is treated in Mechanical Vapor Recompression (MVR) having capacity 300 KLD. Reject from MVR is taken back in inlet collection tanks. VOC laden effluent from stripping column is disposed as incinerable hazardous waste. The facility also have Integrated Common Boiler (120 TPH) facility.

8. Further, it is humbly submitted that CPCB obtained status of investigation and action taken in the said matter from the Gujarat Pollution Control Board (GPCB). The information related to M/s. Detox India Pvt. Ltd. provided by GPCB is summarized below.

i. The unit has obtained CCA from GPCB for the Common facility for Industrial wastewater treatment and the CCA is valid till 29.03.2026. GPCB has issued amendment in CCA vide order dated 18.10.2021 and 02.06.2023 wherein few of the conditions mentioned in original CCA have been amended, including specific conditions related to use of most advance safety equipment to transfer steam from the common boiler of DIPL to member units and separate management of high VOC and high organic containing effluent. Copy of original CCA and subsequent amendments are annexed as **Annexure-1.**

ii. M/s. Detox India Pvt. Ltd. was visited by team of GPCB officials on 03.12.2024 at 14.30 hrs in connection with the information received regarding the accident that took place in the unit at 12.45 hrs on 03.12.2024.

iii. As per the inspection report, four workers were engaged in welding work on top of Spray Dryer feed effluent storage tank No -1 (capacity - 75 KL, Material of Construction - Mild steel) and while doing the welding work (for railing installation), blast happened in the tank and the top structure of tank blown away, resulting in death of four workers working on top of the tank. During inspection, the said storage tank was observed half filled with effluent which was being fed to the Spray Dryer.

iv. The inspection report mention that, at the time of incident, both the spray dryers were in operation and the effluent was being collected in the Spray Dryer feed tank No -1 (where the incident took place) and was being fed from it to the Spray Dryer.

v. GPCB has collected one sample from the said storage tank for finger print analysis.

vi. The inspection report mention that the unit has not provided facilities like breather valve, condensers on Spray Dryer feed tank and separate stripping facility as per GPCB guidelines "Guideline for Concentrated Industrial Effluent Management through Spray Dryer".

vii. The inspection report mention that the unit has not furnished details of, last three months' effluent received (for MEE & SD), treated, reused, RO permeate reused /dispatched, effluent rejected, chemical consumption, hazardous waste stock & disposal etc.

viii. The inspection report mention that, near to the incident tank, unit has provided another Spray Dryer feed tank No -2 (capacity - 75 KL, MOC - MS above ground.) with 26 KL of effluent stored in it. It was observed that the top of the said storage tank No -2

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NOTARY
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Valid Up to :
29/04/2027
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was corroded and broken from top.

ix. Closure Direction was issued to the unit by GPCB on 05.12.2024 with an interim Environment Damage Compensation of Rs. One Crore. Through the Closure Direction, the unit was also directed to carry out assessment of Environment Damage Compensation through institute of national repute like NEERI / IIT to decide final EDC. Copy of Closure Direction is annexed as **Annexure-2.**

9. The above observations from the inspection report of GPCB shows that there were serious lacunas on part of the unit w.r.t. safety aspects as well as proper management of effluent, non- compliance of GPCB guidelines and requirement of submission of requisite information to GPCB.

10. That, as per the compliance report of safety audit of the Unit submitted by GPCB for compliance of Integrated Guidance Framework for Chemicals Safety in Respect of the Isolated Storages and Industries covered under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 prepared by CPCB and MoEF&CC in consultation with Directorate General Factory Advice Service & Labour institutes, National institute of Disaster Management, Petroleum and Explosives Safety Organization, National Safety Council and Indian Chemical Council in compliance to the Hon'ble National Green Tribunal order dated 11.06.2021 in Original Application No. 60/2021:

i. The Unit has implemented IMS (ISO 140001 & ISO 450001) and has submitted Safety Audit Report, HAZOP study, On-site & Off- site emergency plan. However, recommendations given in the reports is not implemented /complied by the Unit. The Gujarat SPCB has given necessary written instruction to the unit for the same.
ii. Unit has submitted information regarding notification of major accident in the schedule-6 of Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 regarding the accident and also, the Unit has submitted form-21 to DISH on date 04.12.2024.
iii. Unit has submitted report of periodic testing of fire-fighting equipment which was last done in Nov-2024.
iv. As per the compliance report, last Mock Drill conducted on 21/11/2024.
v. Unit shared emergency plan with mamlatdar and Executive Magistrate office, Ankleshwar with Ref. no. DIPL/CORR/SITE/2024/92 dated 16/12/24.
vi. Unit has carried out a hazardous area classification study for the site in May – 2023.

Copy of Report is annexed as **Annexure-3.**

11. That, it is humbly submitted that this answering Respondent shall abide by any order (s) or direction (s) of the Hon'ble Tribunal.

12. That, the answering respondent craves reply of the Hon'ble Tribunal to file additional reply, in future, if required.

13. That, in light of the above submission, it is respectfully submitted that this Answering respondent i.e. CPCB, shall abide by any order(s) or direction(s) passed by this Hon'ble tribunal in the instant OA.

P. Gargava

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

NOTARY
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RECD. NO. 3007/2017
Valid till :
29/04/2027
GOVT. OF INDIA

BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONE BENCH, PUNE

Regd. No. : 06
Date : 30/01/2025

ORIGINAL APPLICATION NO. 1384 OF 2024 (PB)

IN THE MATTER OF:

News Item titled "four workers killed in storage tank explosion at Gujarat industrial unit " appearing in The Hindu dated 03.12.2024.

AFFIDAVIT

I Prasoon Gargava, aged 52 years, having office at the Regional Directorate (Vadodara), Central Pollution Control Board (CPCB), **Nr. VMC Ward No. 10 Office, High Tension Road, Subhanpura, Vadodara, 390023)**, do hereby solemnly affirm, declare on oath and state as under:

1. That the deponent is authorized representative to represent the Respondent CPCB in the present case, and as such, I am well conversant with the facts and circumstances of the present case on the basis of the information derived from the official records, and hence, I am competent and authorized to verify, sign and swear this affidavit on behalf of the Respondent CPCB.
2. That the accompanying reply may be read part and parcel of the present affidavit as I am competent to swear this affidavit.
3. That the accompanying reply has been drafted and filed under my instructions and the contents thereof are true and correct on the basis of the record maintained during ordinary course of business of CPCB and available records and documents and the contents of the same are read over and explained to me and are not repeated herein for the sake of brevity.

P. Gargava
DEPONENT

VERIFICATION

Verified at Vadodara on this 30th day of January, 2025 that the contents of the above reply are correct and true on the basis of the record of the cases as mentioned in the day to day affairs of the CPCB. Nothing has been concealed therefrom or mis- stated.

Verified at Vadodara on this the 30th Day of January, 2025.

P. Gargava
DEPONENT
प्रसून गार्गव / PRASOON GARGAVA
क्षेत्रीय निदेशक / REGIONAL DIRECTOR
केन्द्रीय प्रदूषण नियंत्रण बोर्ड/Central Pollution Control Board
(पर्यावरण, वन एवं ज.प. मंत्रालय, 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... Prasoon Gargava
30/01/2025
MALINI AMARSINGH RAWAT
NOTARY, (Govt. of India)

My Commission Expires
on 29/01/2027
MALINI AMARSINGH RAWAT
NOTARY (Govt. of India)

NOTARY
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GUJARAT POLLUTION CONTROL B[redacted]

GPCB

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BY R.P.A.D.

NO: GPCB/ANK/CCA-1360(7)/ID-32798/ **DT. ___/09/2021**

CCA NO. AWH-113467

In exercise of the power conferred under section-25of the Water (Prevention and Control of Pollution) Act-1974, under section-21 of the Air (Prevention and Control of Pollution) Act-1981 and Authorization under rule 6(2) of the Hazardous & Other Waste (Management and Trans-Boundary Movement) Rule-2016, framed under the E(P)Act-1986.

And whereas Board has received consolidated application **dated 06/03/2021** with inward **no. 190252** for the consolidated consent and authorization (CC & A} of this Board underthe provisions/ rules of the aforesaid Acts Consent & Authorization is hereby granted as under.

CONSOLIDATED CONSENT AND AUTHORISATION:
(Under the provisions/ rules of the aforesaid environmental acts)

To,
M/s. DETOX INDIA PVT. LTD. (DIPL),
PLOT NO: 7921-22-23,
GIDC ESTATE ANKLESHWAR,
DIST BHARUCH.

1. **Consent Order No: AWH-113467, date of issue 28/06/2021.**
2. The consent under Water Act -1974, Air Act -1981 and Authorization under Environment Protection Act, 1986 **shall be valid up to 29/03/2026** to operate following facility.

No.	Name Of Equipment/ Facility	Total Quantity
1	Common effluent treatment plant (for MEE condensate & scrubbing solution for in-house treatment)	2.1 MLD
2	Ammonia/ VOC stripping	1800 KL/day
3	MEE/MVR with ATFD & Centrifuge	1800 KL/day
4	MVR	150 KL/day
5	Conventional ETP (2 stage Aeration with MBR & RO)	1620 KL/day
6	Spray Dryer (to achieve zero discharge)	2 nos. x 250 KL/day
7	Steam Boiler	18.5TPH x 1 Nos Boiler
8	Power Generation	1 no. X 4.8 MW = 4.8MW though back pressure turbine
9	Integrated Common Boiler Facility	120 TPH (60 TPH X 2 nos.)
10	Boiler water preparation unit	900 Kl/day
11	MVR only for treatment of Boiler Water preparation plant RO Reject	1 no. X 300 KL/day

SPECIFIC CONDITIONS :

2.1. Unit shall comply with all the conditions stipulated by MoEF in the order of Environment Clearance issued vide letter no. F.No.10-96/2010-IA.III dated 07/03/2018.

2.2. Unit shall maintain ZLD.

2.3. Unit shall provide PLC/SCADA system for excess air to give maximum thermal efficiency and reduce pollution load.

2.4. The unit shall submit list of registered member units of common boiler facility and intimate to the board.

2.5. Unit shall take utmost care with most advance safety equipments to transfer steam from AEEL to member units.

2.6. Unit shall obtain necessary permission from GIDC for steam pipeline network, if required.

2.7. Unit shall strictly adhere to notarized undertaking given dated 06/08/2019.

2.8. DIPL shall not allow any of their member unit to increase their book quantity as well as production capacity without taking prior permission of GPCB the respective industry.

2.9. DIPL shall not accept and allow industries to become member or increase their products and there should not be any increase in effluent quantity without having prior permission of GPCB by respective Industries.

2.10. DIPL shall regularly submit data with respect to the effluent discharge (Tanker Detail) and of their member units along with quality and quantity of data every month to GPCB.

2.11. DIPL shall explore the possibilities of fixing inlet norms

2.12. Complete logbook of the tankers rejected by DIPL is required to be maintained and to ensure that what has been done of rejected tankers by respective member industries.

2.13. DIPL shall develop software for management and handling of effluent of its individual member units to have detail data which can be later Online transmitted /linked to the XGN.

2.14. DIPL shall have fool proof system to ensure that tankers containing high Ammoniacal Nitrogen segregated and treated separately through proposed MAP or other equivalent treatment before tacking into CETP and shall have to achieve norms with respect to Ammoniacal Nitrogen at the outlet of CETP.

2.15. Only dedicated tankers having proper GPS enabled system shall be deployed and member industries tankers other than this fleet shall he informed to the GPCB. Dedicated tankers having GPS based monitoring system shall be placed.

2.16. DIPL shall accept waste water irrespective of the size of industries for a minimum lock in period of 5 years from first consent to operate.

2.17. The effluent from member units shall be transported through CETP tankers only duly maintaining proper GPS system. The Transportation of hazardous materials if any shall be as per the motor Vehicle Act, 1989.

2.18. The Units and the CETP will maintain daily log book of the quantity and quality of discharge from the units, quantity of inflow into th CETP, details of the treatment

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at each stage of the CETP including the raw materials used, quantity of the treated water proposed to be recycled reused.

2.19. Regular monitoring of functioning of CETP and treated effluent shall be carried out by the proponent.

2.20. Before accepting any effluent from member units, the same shall be as permitted by the GPCB in the consent order. No effluent from any unit shall be accepted without consent from GPCB under the water Act, 1974 as amended.

2.21. Suitable meters shall be provided to measure the quantity of effluent received, quantity of effluent recycled/reused and discharged.

2.22. DIPL shall give the names of member units along with committed quantity before accepting wastewater.

2.23. The quality of condensate water shall be of Industrial grade and it should not be discharged anywhere in Environment.

2.24. Unit shall sell out their hazardous waste to authorized endusers who is having authorization with valid CCA and rule 9 permission to receive this waste. Unit shall make MoU with such authorized endusers and submit MoU.

2.25. All the efforts shall be made to send hazardous waste to cement industry for Co-processing first & there after it shall be disposed through other option.

2.26. Unit shall follow spent solvent management guideline framed by board and shall make MoU with outside distillation units, if any. Also submit the prescribed forms as per guideline.

2.27. Unit shall strictly follow the Solid Fuel guideline framed by Board and shall install APCM as per guideline.

2.28. Unit shall follow coal handling guideline framed by Board and provide close ash handling facility.

2.29. Unit shall strictly follow the Fly Ash Notification for disposal of generated ash.

2.30. Unit shall install online Continuous Emission Monitoring Systems (CEMS) and link it with the server of GPCB for real time data transfer for boiler more than 8 TPH capacity or equivalent capacity of TFH

2.31. CCA is granted with a condition to comply guideline to be issued by Ministry of Environment, Forest and Climate Change in the matter of O.A.No.1038/2018 and Hon.NGT order dated: 10/07/2019 and 23/08/2019.

[A] Additional conditions under Air Act:

a) Unit shall adhere to stringent air pollutants standards i.e. 80 % of existing flue gas and process emission standards in the CPA.

Flue gas Emission Standards		
Parameters	**Existing**	**Revised norms (80% of Existing)**
PM	150 mg/Nm3	120 mg/Nm3
SO2	100 PPM	80 PPM
NOx	50 PPM	40 PPM

Process gas Emission Standards		
Parameters	**Existing**	**Revised norms (80% of Existing)**
Ammonia	175 mg/Nm3	140 mg/Nm3

b) Following air pollution control measures shall be provided for the flue gas emission sources like Boiler, Thermic Fluid Heaters etc. (As Applicable) (For solid fuel based utilities)

Stipulated APCM in Red category industrial units of CPA	
Steam generation capacity (in TPH)	**Type of APCM**
Less than 1	Multi Cyclone
1 to <3	Multi Cyclone + Water Scrubber
3 to <6	Bag filter + Water Scrubber
≥ 6	ESP+ Water Scrubber

c) Unit shall provide at least two stage scrubbing system of appropriate media for the control of the process gas emission.
d) Unit shall install and commission Continuous Emission Monitoring System- CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/ CPCB server (In case of large and medium red category industries)
e) All common facilities shall install CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/CPCB server to the Stacks provided with Common Multiple Effect Evaporator (CMEE), Common Spray Dryer, Common incinerator etc.
f) The unit shall adhere to Sector specific guidelines/ SOP published by GPCB / CPCB from time to time for effective fugitive emission control. (like guidelines for: Stone crushing units, Coal handling units, spent solvent handling and management, spent acid management, Decontamination of drums, containers etc.)
g) Unit shall take adequate measures to control odour nuisance from the industrial activities which may include measures like- use of masking agent with atomizer system (water curtain), closed / automatic material handling system, containment of the odour vulnerable areas etc.
h) Unit shall not use Pet-coke, furnace oil, LSHS as a fuel.
i) Unit shall adopt sectoral Best Available Technology-BAT (Like Use of Induction Furnace, Electric Arc Furnace instead of Cupola furnace in foundry industry, Caustic Recovery System in Cotton Textile units etc.)
j) Unit shall provide green belt of 40% of the plot area, using concept of the social forestry and development of green belt outside project premises in adjacent areas.
k) Unit shall provide Wall to Wall carpeting in vehicle movement areas within premises to avoid dusting.

[B] Additional conditions under the Water Act:

a) Unit shall only use treated effluent for preparation of lime and other slurry in ETP. No fresh water shall be utilized in ETP.
b) In the case, if the Industry is not a member of CETP and domestic waste water generation is more than 10 KLPD, industry shall install STP of adequate capacity and treated sewage shall be reused / recycled to the maximum extent.

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c) In case of Large and Medium Red Category industry, the unit shall install system for continuous monitoring of effluent quality / quantity as per CPCB guidelines for relevant parameters (like pH, Flow, Temperature, TOC/COD, NH3-N etc.) and shall be connected to GPCB server. In case, if the industry is a member of CETP, unit shall install flow meter.
d) If the water consumption of the unit is more than 50 KLPD, Unit shall submit detailed water harvesting plan (off site).
e) The unit shall explore Techno-Economic feasibility of Zero Liquid Discharge (ZLD) and if feasible, ZLD should be adopted.

[C] Additional conditions under the Hazardous Waste Management Rules:

a) Unit shall strictly carry out handling, storage and disposal of fly-ash, slag, red-mud, de-inking sludge etc. (High Volume- Low Effect Wastes) as per prevailing guidelines and its disposal at designated locations approved by the Board.
b) Industry shall dispose its hazardous wastes through co-processing, pre-processing to the extent possible prior its disposal to incineration/ landfill as per provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
c) Industry shall strictly comply with all the measures specified in guidelines for spent solvent management, spent acid management, and other guidelines/directions published from time to time by GPCB and/or CPCB, etc.
d) Unit shall carry out transportation of hazardous wastes through GPS mounted vehicles only.

[D] Other General Conditions:

a) Unit shall submit report of compliance of the conditions of EC every year to the Board prepared by third party.
b) Unit shall enhance CER fund allocation to at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance

3. CONDITION UNDER THE WATER ACT:

3.1. The Condition for Water Consumption shall be read as under:

Sr. No.	Water Consumption	Water Consumption (KL/Day)
1	Domestic	10
2	Industrial	3300
3	Gardening	30
	Total	**3340**

3.2. The Condition for Waste Water generation shall now be read as under:

Sr. No.	Waste Water generation	Waste Water Generation (KL/Day)
1	Domestic	10
2	Industrial	115
	Total	**125**

3.3. Scrubbing waste water shall be disposed off through spray dryer &Cooling blow down, boiler blow down & floor washing shall be treated in ETP.

3.4. Sewage shall be discharged through septic tank and soak pit.

3.5. You will provide magnetic flow meter at the strategic point with provision of recording.

3.6. DIPL shall affix of water meters as per Section 4(1) of the water (Prevention and Control of Pollution) Cess Act-1977 for the purpose of measuring and recording the quantity of water consumed at such places as may be required, within 15 days and it shall be presumed that the quantity indicated by the meter has been consumed by the industry until the contrary is provided.

3.7. All the effluent treatment units shall be operated and maintain efficiently so that the treated effluent.

3.8. Leachate collection facilities for the sludge generated during treatment shall be provided and the leachate from the hazardous solid waste shall i.e. diverted to spray dryer for & ultimate disposal.

3.9. In order to enable the board to perform its functions of ascertaining the standards laid Down by it, the applicant shall have to submit every month, the analysis report of the sample of flue gas emission, process gas emission, mother liquor (ML) generated to be sent to common hazardous waste incineratation facility if a performance of in house ETP shall be analyzed by one of the laboratories recognized by the state board.

3.10. DIPL shall be responsible for collection of effluent from their member units and for the transportation of effluent by tankers to the CETP of DIPL.

3.11. Transportation of effluent should be through authorized tankers of DIPL. To distinguish the DIPL tankers from other tankers the DIPL tankers should be coated with special colour say red & marked with the words "DIPL" (About 6" size) in Blue colour.

3.12. Periodical maintenance of valves of the tanker shall be carried out to avoid any spillage or leakage during transportation. Rubber lined tankers having isolation valve made from PP is desirable.

3.13. DIPL shall keep records of their member unit in respect of quality of each product manufactured, quality of water consumption, quality of effluent supplied to CETP and consumption of electricity on day to day basis and required to submit the complied record for one month to GPCB on or before seventh day of the succeeding month.

3.14. DIPL is required to maintain records of PH sensor based and acid control system for neutralization system of DIPL.

3.15. DIPL shall also require to install PH sensor with alarm device at final out let to ensure that effluent being discharge is always neutral. (PH shall be between 6.5 to 8.5).

3.16. DIPL shall have to arrange for their tankers operating staff member's special uniform of dark green colour having logo of DIPL on the left side shoulder of the uniform and a name plate with the designation shall be clipped on the left shoulder of the uniform. The staff should always be provided with face shield gas mask, hand gloves, gum boots and helmet of green colour having logo of DIPL.

3.17. DIPL shall have to arrange for the sufficient numbers of tankers so that tankers shall always be available within no time to their member unit to avoid any direct discharge of effluent due to non-availability of tankers.

3.18. DIPL shall instruct and make sure that every member shall have to make storage facilities to store the effluent for at least 72 hours in an impervious acid proof brick lining tanks/HOPE tanks.

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3.19. All the activities like collection of effluent from the member unit, transportation to CETP of DIPL, unloading of effluent in to the CETP etc. shall be performed by the authorized persons of DIPL only. Due care shall be taken to avoid any leakage or spillage of effluent during loading. transportation and unloading.

3.20. Apart of the routine tankers some tanker shall be kept reserve for the emergency need of DIPL members in case of unforeseen circumstances.

3.21. In case of power failure stand by DG sets having power generation capacity equivalent to the requirement of power to run the shall be installed. So that DIPL shall always be operated round the clock even in case of power failure.

3.22. In case of either maintenance of the CETP or process disturbances. DIPL should provide impervious tanks/HOPE tanks/ impervious guard ponds to hold effluent for at least 72 hours but shall never discharge any treated effluent into the environment.

3.23. DIPL shall inform immediately to the GPCB, GIDC regarding the termination/suspension of the membership of the CETP of their member unit.

3.24. if the products/ process fall in Schedule-I or II of the Environment Audit Scheme, as specified in the order dated 13/3/97 of Hon'ble High Court in MCA No:326/97 in SCA No:770/95, M/S. DIPL shall also abide by the said scheme.

3.25. DIPL shall have to register the unit under the provisions of the factories Act-1948 and shall obtain the necessary factory license.

3.26. DIPL shall have to obtain P.L.I Policy as per P.L.I Act, 1991 and submit the copy of the same to the GPCB.

3.27. The concentration of noise in ambient air within the factory premises shall not exceed the following limit.

Between 6 AM to 9 PM: 75 dB(A)
Between 9 PM to 6 AM: 70 dB(A)

3.28. DIPL shall make all the requisite arrangements for the safe storage and handling of solid waste including impervious flooring and leachate collection facilities DIPL shall store and handle solid waste in accordance with the provisions of the relevant rules in this behalf, after obtaining authorization from GPCB.

3.29. DIPL shall & maintain

- Put up at the entrance and prominent places boards prominently displaying the name of their member unit details of effluent treatment process of DIPL and the name of the directors of the DIPL, the electricity consumer number and the mane of the electricity consumer as on the record of the DGVCL.
- Make adequate lighting arrangement all around the ETPs and also above the standards mentioned in the above clause.

3.30. DIPL shall submit the site plan of the unit indicating the location of the effluent treatment plants, and also a separate plan indicating the channel through which water/ effluent passes from different stages of effluent treatment process right up to the stage of its final outlet. Such plans shall also be displayed by the unit on a board of adequate size within its compound and near its effluent treatment plants.

3.31. DIPL shall supply to the GPCB the figures of the consumption of electricity for running the effluent treatment plants by having separate meter/sub-meter for such effluent treatment unit. The number of units consumed by operating the diesel generating sets, if any, shall also be supplied to the GPCB on monthly basis.

3.32. DIPL shall permit the officers/employees of the GPCB/Govemment, Members of the committee of the court, Members of the monitoring committee of the Associations of the Industries to enter the premises and to inspect and take

sample from the unit at any time without any prior permission. All the watchmen/security personnel or the unit shall be immediately apprised of the above.

3.33. It shall be open to the GPCB through general instruction of circulars and to the GPCB officers' inspecting the unit to give all the support instructions regarding location of the outlet and / or any other appropriate directions regarding effluent treatment plants their operation and processes and disposal channel and disposal system. DIPL shall comply with all such instructions, whether general or special.

3.34. All the chemicals and nutrients which are required to be added /dosed anywhere in the ETP should be so added by using "metering Pumps" only.

3.35. The pipeline connecting various equipment or sumps or tanks of ETP should be minimum in number. Lose connections of hose pipes or temporary connections will not be permitted.

3.36. In case of plants involving "biomass treatment, for each addition of biomass time and quantity, should be recorded. The uptake rate of oxygen of the biomass in the aeration basin and other parameters of biological system should be recorded every day.

3.37. The Printed log-books shall be maintained and get it certified for:

- Energy/Fuel Consumption/consumption of chemicals for treatment of effluent.
- Wastewater flow at inlet and outlet of ETP.
- Quantity of sludge generated.
- Laboratory analysis/ reports for each of the specified parameters of liquid effluents and soil sludge samples.

3.38. Adequate number of influent and effluent quality monitoring stations should be set up in consultation with the GPCB. Regular effluent quality monitoring should be carried out for relevant parameters and the monitored data along with the statistical analysis and interpretation should be submitted to the GPCB on monthly basis.

3.39. The ground water quality around the impervious guard ponds site should be monitored on a regular basis. The monitored data should be submitted to this board once in six months.

3.40. Handling. Manufacturing, storage, and transportation of hazardous chemicals should be in accordance with the Manufacture, Storage, and import of hazardous chemicals Rules 1989.

3.41. Transportation of effluent, Solid Waste or any other goods pertaining to treatment activities shall be carried out as per Central Motor Vehicle Rule-1989.

3.42. On-site and off-site Emergency plan as required under the Rules 13 and 14 of the Handling, Manufacturing Storage and import of' hazardous chemicals Rules 1989 should be prepared and approval from the board should be obtained.

3.43. A community Welfare Scheme for improving the socio- economic Environment should be worked out and report submitted to the Board and Government for review.

3.44. Periodical medical check-up of the workers should be done and records maintained as a measures to provide occupational health services to the workers.

3.45. DIPL should set up laboratory facilities for collection, analysis of samples under the supervision of competent technical personnel who will report to the Chief Executive.

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3.46. The Environment Management Unit/Cell shall set up to ensure implementation on and monitoring of environment safe guards and other condition stipulated by statutory authorities. The environ management Cell/Unit shall directly report to the Chief Executive of the organization and shall work as a focal point for interesting environment issues. These Cells/Units also co-ordinate the exercise if the environment audit and preparation of environmental statements.

3.47. The Environment audit shall be carried out yearly and the environmental statements pertaining to the previous year shall be submitting to this state board latest by 30th September every year.

3.48. The funds earmarked for the environmental protection measures should not be diverted or any other purpose and year wise expenditure should be reported to this board and to the Government

3.49. Storm Water shall not be mixed with the industrial effluent. Disposal system for storm water shall be provided separately.

3.50. Good housekeeping shall be maintained within the industrial premises. All pipes, Valves and drains shall be leak proof. Floor washing shall be admitted in to the effluent collection system for subsequent treatment and disposal.

3.51. DIPL shall intimate the occurrence of any accident, act or event resulting in discharge of poisonous, noxious or polluting matter or the likelihood of the same into a stream or well, to the regional office under the intimation to the Member Secretary in accordance with section 31 (1) of the Water Act.

3.52. GPCB reserves the right to review and/of above revoke the consent and/or make modification in the condition which it may deem fit in accordance with provisions of water Act -1974 as a mended from time to time.

3.53. In case of change of ownership/management the name and address of the new owners/partners/directors/proprietors should immediately be intimated to the board.

3.54. The consent granted shall lapse at any time if any parameters or any conditions of this consent order are not complied with.

3.55. DIPL shall strictly observe and make sure that every member shall supply entire effluent quantity as per the booked quantity and ensure that quality of the effluent matches with data submitted before entering in agreement with you and your member unit accordingly.

3.56. DIPL shall have to comply with High Court directives and not allow any new member and/or enhance quantity of trade effluent of existing industrial units/members those who are having effluent discharge unless and until they have prior permission of the GPCB.

3.57. DIPL shall ensure that each and every member renews the agreement on/before expiry of said agreement pertaining to transportation and treatment of trade effluent and inform board about any unit renewing the agreement within stipulated period.

3.58. DIPL shall have to maintain complete data pertaining to the quantity of trade effluent, quantity of waste water generated, booked and supplied to DIPL, no. of tankers showing actual quantity of waste water supply stating COD and acidity etc. of each individual member, including list of non-complied members etc. and aforesaid details shall be submitted at RO Ankleshwar on weekly basis and cumulative details submitted at Head Office on quarterly basis without fail.

4. CONDITIONS UNDER AIR ACT:

4.1. The following shall be utilized as fuel.

Sr. No.	Fuel	Quantity
1.	Coal	435 MT/day
2.	Diesel	1000 Lit/day

4.2. SPECIFIC CONDITION UNDER AIR ACT:

4.2.1. DIPL shall strictly follow the fuel conversion guideline framed by Board.
4.2.2. DIPL shall follow Coal- handling guideline framed by board.
4.2.3. DIPL shall strictly follow the fly ash notification-2011.
4.2.4. DIPL shall provide on line monitoring facility at 18.5 TPH Boiler stack.
4.2.5. DIPL shall switch over to Natural Gas as a Fuel in steam Boiler/HAG and/or upgrade the APCM if not achieving the prescribed norms mention below.

4.3. The flue gas emission through stack shall confirm to the following standards:

Stack No.	Stack Attached to	Stack Height in Meter	Air Pollution Control Measures	Parameter	Permissible Limit
1	Steam Boiler 18.5 TPH × 1 No.	1 no. Stack height 50 m	ESP + alkali Scrubber	PM SO_2 NO_x	100 mg/NM3 100 ppm 50 ppm
2	HAG attached to Spray Dryer (7.5 Million Kcal/Hr. -2 Nos.)	1 no. (one Stack attached with two spray dryers) Stack Height 50 m	Multi cyclone + Bag filter + Venturi Scrubber + Rinsing Scrubber	PM SO_2 NO_x NH3 HCL	100 mg/NM3 100 ppm 50 ppm 175 mg/NM3 20 mg/NM3
3	DG Set (2 x 1000 KVA)	11 for each	--	PM SO_2 NO_x	150 mg/NM3 100 ppm 50 ppm
4	Boiler (400 kg./hr.)	12	--	PM SO_2 NO_x	150 mg/NM3 100 ppm 50 ppm
4	Boiler (2 Nos. × 60 TPH each)	1 no. Stack height 55 m	ESP + alkali Scrubber	PM SO_2 NO_x Hg	30 mg/NM3 100 mg/NM3 100 mg/NM3 0.03 mg/NM3

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4.4. The process emission through various stacks/ vent of reactors, process and vessel shall confirm to the following standards:

Stack No.	Stack attached to	Stack Height in Meter	Air Pollution Control Measure (APCM)	Parameter	Permissible Limit
1	VOC/Ammonia Stripper	14	Scrubber	NH3	175 mg/NM³
2	Unloading				
3	MEE Vent	14	Scrubber	NH3	175 mg/NM³
4	New MEE Vent (3 Nos.)	9.9m from ground level each	Scrubber	NH3	140 mg/NM³

4.5. The concentration of the following parameters in the ambient air within the premises of M/s. DIPL shall not exceed the limits specified here under:

PARAMETERS	PERMISSIBLE LIMIT (microgram /M3)	
	ANNUAL	24 Hours Average
Particulate Matter (PM10)	60	100
Particulate Matter (PM25)	40	60
Oxide of Sulphur (Sox)	50	80
Oxide of Nitrogen (NOx)	40	80

- **Annual arithmetic mean of minimum 104 measurements in a year at a particular site taken twice a week 24 for hourly at uniform intervals.**
- **24 Hourly or 08 hourly or 1 Hourly monitored values, as applicable, shall be complied with 98 % of the time in a year 2 % of the time they may exceed the limits but not on two consecutive days of monitoring.**

4.6. The applicant shall operate industrial plant / air pollution control equipment very efficiently and continuously so that the gaseous emission always conforms to the standards specified in condition no. 4 .3, 4.4 & 4.5 above.

4.7. The consent to operate the industrial plant shall lapse if at any time the parameters of the gaseous emission are nut within the tolerance limits specified in the condition no. 4.3, 4.4 & 4.5 above.

4.8. The applicant shall provide portholes, ladder, platform etc. at chimney(s) for monitoring the air emissions and the same shall be open for inspection to/and for use of Board's staff. The chimney(s) vents attached to various sources of emission shall be designed by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.

4.9. DIPL shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standards in respect of noise to less than 75dB(a) during day time and70 dB(A)during night time. Daytime is reckoned in between 6a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.

4.10. DIPL shall provide arrangement for acoustic enclosure to keep noise level within norms.

5. GENERAL CONDITIONS:-

5.1. In case of change of ownership/ management the name and address of the new ownership/ partners/ directors/ proprietor should immediately be intimate to the Board. Any change in personnel, equipment or working conditions as mentioned in the consents form/ order should immediately be intimated to this Board.

5.2. Adequate plantation shall be carried out all along the periphery of the industrial premises in such a way that the density of plantation is at least 1000 trees per acre of land and a green belt of 5 meters width is developed.

5.3. Unit shall put up at the entrance a board displaying the name of unit, particulars of the products/ process and the name of proprietor/partners /directors of the unit and the electricity consumer number as on the record of DGVCL.

6. AUTHORISATION FOR THE MANAGEMENT & HANDLING OF HAZARDOUS WASTE Form-2 (See rule 6(2)

6.1. Number of authorization: AWH-113467, Date of issue: 28/06/2021.

6.2. M/s. Detox India Pvt. Ltd. (DIPL) is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at **PLOT NO: 7921- 22-23, GIDC ANKLESHWAR, DIST: BHARUCH**.

Sr. No.	Name of waste	Category No.	Quantity	Mode of disposal
1	Spent/ waste oil	5.1	3.43 Litre/Day	Collection, Storage, Transportation, Reuse & Sale to registered re-processor
2	Spent carbon	36.2	0.138 MT/Day	Collection, Storage, Transportation, Disposed by Recycler/ Incinerator
3	ETP sludge	35.3	20 MT/Day	Collection, Storage, Transportation and Disposal at TSDF
	Pre-treatment Sludge	35.3	21 MT/Day	Collection, Storage, Transportation and Disposal at TSDF
4	Empty bags	33.1	9 Nos./Day	Collection, Storage, Reuse & Decontamination, Disposal by registered re-processor
	Discarded barrels	33.1	4 Nos./Day	
5	Ammonium sulphate waste	37.3	0.86 MT/Day	Collection, Storage, Transportation, Disposal by sale to actual users/ TSDF.

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6	Salts from forced evaporation system (SD)	35.3	65 MT/Day	Collection, Storage, Transportation, Disposal by TSDF/ recyclers.
	Salts from forced evaporation system (MEE + ATFD)	35.3	231 MT/Day	Collection, Storage, Transportation, Disposal by TSDF/ recyclers.
7	Solvent from VOC stripper	20.2	20 KL/Day	Collection, Storage, Transportation, Disposed by Incinerator/ Sale to approved recyclers.
8	Gypsum	--	23.72 MT/Day	Send to Cement industry/ TSDF site.
9	Fly ash from Boiler ESP	--	22.9 MT/Day	Sent to brick manufacturer/TSDF site

6.3. The authorization is granted to operate a facility as above.
6.4. The authorization shall be in force for a period **up to 29/03/2026**.
6.5. The authorization is subject to the conditions stated below and such other conditions as may be specified in the rules from time to time under the Environment (Protection) Act· 1986.

7. TERMS AND CONDITIONS OF AUTHORISATION:

7.1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
7.2. The authorisation or its renewal shall be produced for inspection at the request of an officer authorised by the Gujarat Pollution Control Board.
7.3. The persons authorized shall not rent, lend, sell, and transfer of otherwise transport the hazardous wastes without obtaining prior permission of the Gujarat Pollution Control Board.
7.4. Any unauthorized change in personnel, equipment or working conditions .as mentioned in the authorization order by the persons authorized shall constitute a breach of this authorization.
7.5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
7.6. The person authorised shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty"
7.7. The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
7.8. The importer or exporter shall bear the cost of import or export and mitigation of damages if, any.

7.9. It is the duty of the authorized person to take prior permission of the Gujarat Pollution Control Board to dose down the facility.

7.10. Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or Central Pollution Control Board from time to time.

7.11. An application for the renewal of an authorization shall be made as laid down under Hazardous & Other Wastes (Management and Transboundary Movement) Rules-2016.

7.12. DIPL shall have to display the relevant information with regard to hazardous waste as indicated in the Court's order in W.P. No. 657 of 1995 dated 14th October 2003.

7.13. DIPL shall have to display on-line data outside the main factory gate with regard to and nature of hazardous chemicals being handled in the plant, including waste water and air emission and solid hazardous waste generated within the factory premises.

7.14. DIPL shall have to manage waste oil, discarded containers etc., process waste as per Amended Rules - 2016 and shall apply Authorization for all applicable waste as per Amended Rules-2016.

7.15. DIPL shall submit Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

7.16. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.

7.17. The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilization of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorization.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(M.P.Solanki)
Dy. ENVIRONMENT ENGINEER

GPCB

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By R.P.A.D.

CONSOLIDATED CONSENT AND AUTHORIZATION (CC & A – Amendment)

NO: GPCB/ANK/CCA- 1360(7)/ID-32798/ _____ DT:__/10/2021

Correction in CCA order No: AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021.

To,
M/s. DETOX INDIA PVT. LTD. (DIPL),
PLOT NO: 7921-22-23,
GIDC ESTATE ANKLESHWAR,
DIST BHARUCH.

SUB: Correction in Consolidated Consent & Authorization (CC&A) under various Environmental Acts/ Rules.
REF: (1) CCA No. AWH - 113467 dated :15/09/2021.

Sir,

This has reference to the CCA order No: **AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021** under the provisions of the various Environmental Act/ Rules, which stands amended as under.

The Validity of this order will be up to 29/03/2026.

1. **SPECIFIC CONDITIONS:-**
   a. Specific condition (2.5) i.e. "Unit shall take utmost care with most advance safety equipments to transfer steam from AEEL to member units" is deleted. And now read as **"Unit shall take utmost care with most advance safety equipments to transfer steam from DIPL to member units"**.

2. All other conditions of CCA order No: **AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021** remain unchanged.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(M.P.Solanki)
Dy. ENVIRONMENT ENGINEER

GUJARAT POLLUTION CONTROL BOARD

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By R.P.A.D.

CONSOLIDATED CONSENT AND AUTHORIZATION (CC & A – Amendment)
CCA AMENDMENT NO: H - 126054

NO: GPCB/ANK/CCA-1360(9)/ID-32798/_____ **DT:____/06/2023**

To,
M/s. DETOX INDIA PVT. LTD.
PLOT NO: 7921-22-23,
GIDC ESTATE ANKLESHWAR,
DIST-BHARUCH.

SUB: Amendment in Consolidated Consent & Authorization (CC&A) under various Environmental Acts/ Rules.

REF: (1) Your application No. **264025** dated **15/11/2022.**
(2) CCA No. AWH - 113467 dated: 15/09/2021 and further amended dated: 18/10/2021. (CCA Renewal)
(3) CTE – Amendment No. CTE - 120389 dated: 03/08/2022.

Sir,

This has reference to the CCA order No: **AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021** under the provisions of the various Environmental Act/ Rules, which stands amended as under.

The Validity of this order will be up to 29/03/2026.

1. **There shall be no change in production quantity/capacity from proposed changes.**

2. **Specific conditions:**
   a) Unit shall submit details of High VOC and High Organic Containing effluent with bifurcation every month to the Board.
   b) Sender and receiver both shall comply with online manifest system and VLTS (Vehicle Location Tracking System).
   c) Unit shall comply with additional condition for CPA/SPA areas as per GPCB office order dated: 11/11/2019.

[A] Additional conditions under Air Act:

a) Unit shall adhere to stringent air pollutants standards i.e. 80 % of existing flue gas and process emission standards in the CPA.

Flue gas Emission Standards		
Parameters	**Existing**	**Revised norms (80% of Existing)**
PM	150 mg/Nm3	120 mg/Nm3
SO2	100 PPM	80 PPM
NOx	50 PPM	40 PPM

b) Following air pollution control measures shall be provided for the flue gas emission sources like Boiler, Thermic Fluid Heaters etc. (As Applicable) (For solid fuel based utilities)

Stipulated APCM in Red category industrial units of CPA	
Steam generation capacity (in TPH)	**Type of APCM**
Less than 1	Multi Cyclone
1 to <3	Multi Cyclone + Water Scrubber
3 to <6	Bag filter + Water Scrubber
≥ 6	ESP+ Water Scrubber

c) Unit shall provide at least two stage scrubbing system of appropriate media for the control of the process gas emission.

d) Unit shall install and commission Continuous Emission Monitoring System- CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/ CPCB server (In case of large and medium red category industries)

e) All common facilities shall install CEMS (as per CPCB guidelines for relevant parameters) which shall be connected with GPCB/CPCB server to the Stacks provided with Common Multiple Effect Evaporator (CMEE), Common Spray Dryer, Common incinerator etc.

f) The unit shall adhere to Sector specific guidelines/ SOP published by GPCB / CPCB from time to time for effective fugitive emission control. (like guidelines for: Stone crushing units, Coal handling units, spent solvent handling and management, spent acid management, Decontamination of drums, containers etc.)

g) Unit shall take adequate measures to control odour nuisance from the industrial activities which may include measures like- use of masking agent with atomizer system (water curtain), closed / automatic material handling system, containment of the odour vulnerable areas etc.

h) Unit shall not use Pet-coke, furnace oil, LSHS as a fuel.

i) Unit shall adopt sectoral Best Available Technology-BAT (Like Use of Induction Furnace, Electric Arc Furnace instead of Cupola furnace in foundry industry, Caustic Recovery System in Cotton Textile units etc.)

j) Unit shall provide green belt of 40% of the plot area, using concept of the social forestry and development of green belt outside project premises in adjacent areas.

k) Unit shall provide Wall to Wall carpeting in vehicle movement areas within premises to avoid dusting.

[B] Additional conditions under the Water Act:

a) Unit shall only use treated effluent for preparation of lime and other slurry in ETP. No fresh water shall be utilized in ETP.

b) In the case, if the Industry is not a member of CETP and domestic waste water generation is more than 10 KLPD, industry shall install STP of adequate capacity and treated sewage shall be reused / recycled to the maximum extent.

c) In case of Large and Medium Red Category industry, the unit shall install system for continuous monitoring of effluent quality / quantity as per CPCB guidelines for relevant parameters (like pH, Flow, Temperature, TOC/COD, NH3-N etc.) and shall be connected to GPCB server. In case, if the industry is a member of CETP, unit shall install flow meter.

d) If the water consumption of the unit is more than 50 KLPD, Unit shall submit detailed water harvesting plan (off site).

e) The unit shall explore Techno-Economic feasibility of Zero Liquid Discharge (ZLD) and if feasible, ZLD should be adopted.

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[C] Additional conditions under the Hazardous Waste Management Rules:

a) Unit shall strictly carry out handling, storage and disposal of fly-ash, slag, red-mud, de-inking sludge etc. (High Volume- Low Effect Wastes) as per prevailing guidelines and its disposal at designated locations approved by the Board.

b) Industry shall dispose its hazardous wastes through co-processing, pre-processing to the extent possible prior its disposal to incineration/ landfill as per provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

c) Industry shall strictly comply with all the measures specified in guidelines for spent solvent management, spent acid management, and other guidelines/directions published from time to time by GPCB and/or CPCB, etc.

d) Unit shall carry out transportation of hazardous wastes through GPS mounted vehicles only.

[D] Other General Conditions:

a) Unit shall submit report of compliance of the conditions of EC every year to the Board prepared by third party.

b) Unit shall enhance CER fund allocation to at least 1.5 times the slabs given in the OM dated 01.05.2018 for SPA and 2 times for CPA in case of Environmental Clearance.

3. CONDITION UNDER THE WATER ACT:

3.1 There shall be no change in water consumption, wastewater generation and their mode of disposal from proposed changes.

4. CONDITIONS UNDER THE AIR ACT:

4.1 There shall be no change in fuel consumption & flue gas emission from proposed changes.

4.2 There shall be no change in process gas emission from proposed changes.

5 CONDITIONS UNDER HAZARDOUS & OTHER WASTES (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES, 2016

5.1 Unit shall comply with provisions of Hazardous & Other Wastes (Management & Transboundary Movement) Rules-2016.

5.2 The condition No. 6.2 under authorization for Hazardous & other wastes of the CCA order No: **AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021** is amended and shall now be read as under.

Sr. No.	Name of Haz. Waste	Cate. Number	Quantity			Facility
			Exi.	Pro.	Total	
1	Spent/ waste oil	5.1	3.43 Lit/Day	--	3.43 Lit/Day	Collection, Storage, Transportation, Reuse & Sale to registered re-processor
2	Spent carbon	36.2	0.138 MT/Day	--	0.138 MT/Day	Collection, Storage, Transportation, Disposed by Recycler/ Incinerator.
3	ETP sludge	35.3	20 MT/Day	--	20 MT/Day	Collection, Storage, Transportation and Disposal at TSDF.

	Pre-treatment Sludge	35.3	21 MT/Day	--	21 MT/Day	Collection, Storage, Transportation and Disposal at TSDF.
4	Empty bags	33.1	9 Nos./Day	--	9 nos./Day	Collection, Storage, Reuse & Decontamination, Disposal by registered re-processor.
	Discarded barrels	33.1	4 Nos./Day	--	4 nos./Day	
5	Ammonium sulphate waste	37.3	0.86 MT/Day	--	0.86 MT/Day	Collection, Storage, Transportation, Disposal by sale to actual users/TSDF.
6	Salts from forced evaporation system (SD)	35.3	65 MT/Day	--	65 MT/Day	Collection, Storage, Transportation, Disposal by TSDF/recyclers.
	Salts from forced evaporation system (MEE + ATFD)	35.3	231 MT/Day	--	231 MT/Day	Collection, Storage, Transportation, Disposal by TSDF/recyclers.
7	Solvent from VOC stripper/ Separated organic material from raw effluent	20.2	20 KL/Day	480 KL/Day	500 KL/Day	Collection, Storage, Transportation and disposed by incinerator/ co-processing/ sale to Shree cement ltd and J.K. cement ltd. from who has authorization in valid CCA after making MoU.
8	Gypsum	--	23.72 MT/Day	--	23.72 MT/Day	Send to Cement industry/ TSDF site.
9	Fly ash from Boiler ESP	--	22.9 MT/Day	--	22.9 MT/Day	Sent to brick manufacturer/TSDF site.

6 All other conditions of the CCA order No: **AWH-113467, issued vide letter no. GPCB/ ANK/ CCA-1360(7)/ ID-32798/600654, dated 15/09/2021** will remain same.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

02/06/2023

(Arun G. Patel)
ENVIRONMENT ENGINEER

GUJARAT POLLUTION CONTROL BOARD

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

GPCB

BY R.P.A.D.

CLOSURE DIRECTION UNDER SECTION 31-A OF THE AIR (PREVENTION AND CONTROL OF POLLUTION) ACT-1981 [HEREINAFTER REFERRED TO AS THE AIR ACT] AS AMENDED FROM TIME TO TIME

WHEREAS you are having an industrial plant at **Plot No: 7921-22-23, GIDC ESTATE ANKLESHWAR, 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 –113467 dated: 15/09/2021 for operation of your common facility for treatment and disposal of waste water received through various industries (using spray dryer, MEE and ETPs) with various conditions mentioned therein, which was further amended on 02/06/2023. Your consent is valid up to 29/03/2026.

AND WHEREAS during the inspection of your industrial plant on **03/12/2024** under section-24 of the Air Act by the authorized officer of the Board it has been noticed that:

1. This unit is inspected with reference to blast incident occurred in the unit on 03/12/2024 @ 12:45 Hrs. As per spot information, this blast has caused death of four workers. As per information workers were doing welding work on top of Spray dryer feed effluent storage tank No -1 (capacity - 75 KL, MOC – MS) located above ground. While doing welding work for railing installation work, blast occurred in the tank and top structure of tank is blast off and fell on floor nearby and due to this the workers doing welding work on tank have died.
2. The glass of windows in nearby spray dryer control room are also observed broken due to the blast in the tank.
3. As information received, at the time of incident, both the spray dryers were in operation and the effluent reception in to the Spray dryer feed effluent storage tank No -1 and discharge of effluent from the same tank into Spray dryer was ongoing.
4. During the inspection, the above mentioned storage tank is observed half filled (around 37.5 KL stock) with effluent for spray dryer feed.
5. During the inspection, it is observed that, unit has provided another Spray dryer feed effluent storage tank No -2 (capacity - 75 KL, MOC - MS above ground) just near to the tank of incident. 26 KL of effluent is observed stored in to this tank. The top of the Spray dryer feed effluent storage tank No -2 is also observed corroded and broken from the top.
6. It is observed that unit has not provided facilities like breather valve & condensers on Spray dryer feed tank as per GPCB guidelines for "Guideline for Concentrated

Industrial Effluent management through spray dryer". Unit also not provided separate stripping facility for spray dryer feed effluent as pre the guidelines.

AND WHEREAS the inspecting officers had issued written remarks for the observed violation for the immediate compliances and also as a part of chance of hearing on the ground of natural justice before taking stringent actions. You had been agreed upon observations of the officers. You have not submitted any compliance.

AND WHEREAS the non-compliance found during the visit seems severe and may damage environment adversely.

AND WHEAREAS, due to the blast incident there might have been severe damages to the environment and human health in nearby surrounding area. It seems that you have failed to take preventive measures to control pollution due to your industrial activity by not complying with conditions of Consent to Operate.

AND WHEREAS, DISH has issued prohibitory order for your industrial plant vide its letter dated: 04/12/2024.

AND WHEREAS in line of Hon'ble NGT matter of O.A. No. 593/2017 (WP(civil) no. 375/2012), Central Pollution Control Board, New Delhi has framed guideline to levy of Environment Damage compensation (EDC). Therefore, it is decided by Board to levy interim Environment Damage Compensation as per present prevailing policy of Board considering Clause (4) related to industrial accident. Considering this accident having causality in your case, it is considered as severe/emergency and as your industry is of large scale, Interim Environment Damage Compensation (EDC) is assessed here of Rs. 1,00,00,000/- (Rs. One Crore).

UNDER THE CIRCUMSTANCES, as directed, I Arun G. Patel, Environment Engineer, Gujarat Pollution Control board issue the direction under Section 31(A) of the Air Act – 1981 as under:

1. To prohibit you from operation of Common Facility for effluent treatment **immediately** at Plot No: 7921-22-23, GIDC ESTATE ANKLESHWAR, DIST.BHARUCH.
2. To stop operation of D.G. set and CPP(if any) with immediate effect.
3. To close the operation of your industrial plant on the above mentioned site with immediate effect.
4. To direct the concerned authority to stop supply of electricity and water with immediate effect.
5. This order will be effective with **immediate effect**.
6. To take all necessary measures by removing all remaining in-process material/intermediate materials considering requisite process safety aspect.
7. To take all necessary measures to ensure safety of all P&M to prevent further miss-happening and environment damage.

GPCB

GUJARAT POLLUTION CONTROL BOARD

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

8. To carry out safety audit/ HAZOP study and root cause analysis for accident that shall include environment aspects at the earliest and submit the same to the board.
9. To ensure safely collection of residues of chemicals / hazardous & other wastes generated from the accident and dispose the same as per provisions environmental acts under intimation to the Board.
10. To submit compliance report of the instructions / direction issued by DISH w.r.t. above accident and submit status of Plant machinery.
11. To submit valid PLI policy, site notification (site plan approved by DISH), onsite and offsite emergency plan.
12. To take all necessary safety measures before operating industrial plant.
13. Unit shall not operate industrial plant or related activity without prior permission of Board.
14. Unit shall carry out assessment of Environment Damage compensation through institute of national repute like NEERI/IIT to decide final EDC. The EDC amount calculated based on scientific assessment may be considered final.
15. To Submit Bank Guarantee of Rs. 10,00,000/- of scheduled bank claimable within Gujarat State for compliance assurance at the time of revocation.
16. Pay Interim Environment Damage Compensation (EDC) of Rs. 1,00,00,000/- (Rs. One Crore) immediately through XGN portal only and inform to Board.

Non-compliance or violation of the aforementioned direction/order will constrain this Board to initiate action as per provision of Section- 37 of the Air (Prevention and Control of Pollution) Act-1981 and amendment thereof.

IF any person aggrieved by the aforesaid direction, you may file an appeal under Section 31 of the Air (Prevention and Control of Pollution) Act, 1981 before Appellate Authority (Forests & Environment Department, Government of Gujarat) within thirty days from the date of this order.

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

For and on behalf of
Gujarat Pollution Control Board

05.12.2024

(Arun G. Patel)
ENVIRONMENT ENGINEER

Note: If it is necessary to complete the safety related work or to close down industrial activity safely in order to avoid any further pollution or safety hazard (accident), unit shall have to take proper preventive measures by bringing work in process material to stable condition and then stop plant within maximum 48 hours. Officers of DGVCL are requested to allow time for shut down process accordingly.

NO: GPCB/ANK/CCA-1360(13)/ID-32798/ Dated: /12/2024

Issued to:
M/s. DETOX INDIA PRIVATE LIMITED
PLOT NO: 7921-22-23,
GIDC ESTATE ANKLESHWAR,
DIST: BHARUCH, GUJARAT.

COPY TO:

1. **The Dy. Engineer (O&M)**
   Dakshin Gujarat Vij Company Ltd (DGVCL),
   GIDC Sub-Division, DGVCL,
   Plot No.U/4/2, opp: GIDC Police Station,
   GIDC Ankleshwar, Dist. Bharuch.....
   I am directed to request you to disconnect supply of **ELECTRICITY** (except single phase) with **Immediate effect** from the date of issue of this order to the industrial plant of **M/s. DETOX INDIA PRIVATE LIMITED,** PLOT NO: 7921-22-23, GIDC ESTATE ANKLESHWAR, DIST.BHARUCH & intimate to us accordingly.

2. **The Chief Officer**
   Ankleshwar Notified Area
   Plot No.618/619,
   GIDC Ankleshwar,
   Dist: Bharuch .....
   I am directed to request you to disconnect supply of **WATER** with **Immediate effect** from the date of issue of this order to the industrial plant of **M/s. DETOX INDIA PRIVATE LIMITED,** PLOT NO: 7921-22-23, GIDC ESTATE ANKLESHWAR, DIST.BHARUCH & intimate to us accordingly.

3. **Regional Officer**
   Gujarat pollution Control Board,
   Regional Office,
   Ankleshwar..... to follow up for compliance of this direction & send IR/AR.

For and on behalf of
Gujarat Pollution Control Board

05.12.2024

(Arun G. Patel)
ENVIRONMENT ENGINEER

Compliance report of MSIHC Rules-1989

Compliance Report of	**:**	**DETOX INDIA PRIVATE LIMITED**
Address Of the Company	**:**	**7921-22-23, GIDC Ankleshwar ,Bharuch**
CC&A No:	**:**	**Valid upto 29.03.2026**
PCB ID	**:**	**32798**
Date of Inspection & Time	**:**	**22.01.2025**
Visited by	**:**	**N.A.Patel(D.E.E.) & A.H.Vasava (A.E.E.)**

Sr no.	The guidelines are as follows	Compliance
1	An occupier (of an industry or isolated storage) shall identify the major accident hazards and shall take adequate steps to prevent such major accidents and to limit their consequences to persons and the environment and shall provide the persons working on the site with the information, training and equipment including antidotes necessary to ensure their safety.	Unit has maintained Training Records , PPE is found available at site, OHC with 24*7 one Nurse is Provided with primary facility.
2	Where a major accident occurs on a site or in a pipe line, the occupier shall within 48 hours notify the concerned authority as identified in Schedule 5 (of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 as amended) of that accident, and furnish thereafter to the concerned authority a report relating to the accidents in Schedule 6 (of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (as amended)). However, the concerned authorities, local crisis group, District emergency authorities etc. have to be informed by the occupier as early as possible.	Unit has submitted the schedule-6 of Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 regarding the major accident. Unit has submitted form-21 to DISH on date. 04.12.2024.
3	The occupier shall not undertake any industrial activity or isolated storage unless he has been granted an approval for undertaking such an activity by the concerned authorities and has submitted a written report to the concerned authority containing the particulars specified in Schedule 7 of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 as amended. In case of an activity in which subsequently there is or is liable to be a threshold quantity or more of an additional hazardous chemical shall be deemed to be a different activity and the occupier has to take a separate approval for undertaking such activity.	Unit has submitted copy of DISH revocation and copy of Schedule-7 under MSHIC Rules-1989. Unit has barricaded the incident area. No any activities observed during inspection.
4	The occupier shall furnish a further report to the concerned authorities, in case the changes to the	Not applicable.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	threshold quantity of hazardous chemicals are made.	
5	An occupier shall not undertake any industrial activity or isolated storage to which the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (as amended) applies, unless he has prepared a safety report on that industrial activity containing the information specified in Schedule 8 of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (as amended) and has sent a copy of that report to the concerned authority at at least ninety days before commencing that activity.	Unit has submitted Safety audit report which is prepared by Solamax Fire solutions LLP . Recommendation given in safety audit report is not implement /complied by unit yet. Necessary written instruction given to the unit for the same.
6	The occupier of both the new and the existing industrial activities or isolated storage shall carry out an independent safety audit of the respective industrial activities with the help of an expert, not associated with such industrial activities. The occupier shall forward a copy of the auditor's report along with his comments to the concerned authorities within 30 days after the completion of such audit.	
7	The occupier shall update the safety audit report once a year by conducting a fresh safety audit and forward a copy of it with his comments to the concerned authorities	
8	The occupier, within 30 days of the completion of the safety audit, shall send a report to the Chief Inspector of Factories with respect to the implementation of the audit recommendations.	
9	The occupier shall not make any modification to the industrial activity or isolated storage to which that safety report relates which could materially affect the particulars in that report, unless he has made a further report to take account of those modifications and has sent a copy of that report to the concerned authorities at least 90 days before making those modifications.	No any modification activity observed during inspection.
10	Where an occupier has made a safety report and that industrial activity or isolated storage is continuing, the occupier shall within three years of the date of the last such report, make a further report which shall have regard in particular to new technical knowledge which has affected the particulars in the previous	Unit has submitted Safety audit report which is prepared by Solamax Fire solutions LLP . Recommendation given in safety audit report is not implement /complied by unit yet. Necessary written instruction given to the unit for the same.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	report relating to safety and hazard assessment and shall within 30 days send a copy of the report to the concerned authority.	
11	For the purpose of enabling the concerned authority to prepare the off-site emergency plan, the occupier shall provide the concerned authority with such information relating to the industrial activity or isolated storage under his control as the concerned authority may require, including the nature, extent and likely effects off-site of possible major accidents.	Unit has submitted On-site emergency plan.
12	The occupier of an industry or isolated storage shall take appropriate steps to inform persons outside the site either directly or through District Emergency Authority who are likely to be in an area which may be affected by a major accident about the nature of the major accident hazard and the safety measures and the "Do's' and 'Don'ts'' which should be adopted in the event of a major accident. The occupier of a new industry or isolated storage shall take these steps, before that activity is commenced.	Unit has record of Mock drill conducted and SOP is there to connect with different District Emergency Authority.
13	The industries / isolated storages shall update the comprehensive safety audit, on-site emergency plans and risk analysis reports annually and ensure that the reports are furnished to the concerned authorities.	Unit has submitted Safety Audit Report , HAZOP study and On site emergency plan. Recommendation given in reports is not implemented by unit. Necessary written instruction given to the unit for the same.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
14	The industry or isolated storage shall conduct comprehensive hazard identification and risk assessment (HIRA) to identify the non-compliances and take corrective actions for the non-compliances identified. Emergency plans shall be established to deal with leakages /accidents. The safety & hazard audit should identify the control measures necessary to be taken during an emergency.	Unit has implemented IMS (ISO 14001 & ISO 45001) and submitted On Site & Off Site emergency plan. Unit has submitted Safety audit report but recommendation implementation is not done.
15	A detailed study on the risk assessment and disaster management shall be carried out by the industry / isolated storage. Hazard identification and evaluation in a local community, preparation of standard operating procedures for accident prevention, preparedness and response, onsite emergency plans etc. have to be reviewed at least once in a year.	
16	In the industries / isolated storages where gas leakages are suspected, an emergency plan to vent out / neutralize the gases safely should be prepared.	Above ground tanks connected with scrubber systems but u/g storage tanks are found disconnected from scrubber. Necessary written instruction given to the unit for the same.
17	All industries and isolated storages should have mitigation plans for spillages / leakages of hazardous chemicals, fires, explosions or any other accident.	Unit has provided proper mitigation plan.
18	Standard Operating Procedure (SOP) for the steps to be taken during emergency situations / accidents shall be prepared by all industrial activities / isolated storages that are handling hazardous chemicals.	Unit has prepared SOP having steps to be taken during emergency situation/accidents. On-Site emergency plan is prepared by unit.

Compliance report of MSIHC Rules-1989

TESTING

Sr no.	The guidelines are as follows	Compliance
19	The pressure test and leak test must be ensured after replacement of valves, pipes, joints etc. as per the original equipment manufacturer (OEM) manual or as per standard established procedure.	Unit is doing pressure vessel testing through a competent person submitted in form-11 as per standard after the incident.
20	Check valves, relief valves should be installed at appropriate locations. Flow meters, sensors, measuring devices have to be regularly calibrated. Vents from relief valves shall be directed to a safe place.	Unit has maintained record of caliberation of equipments.
21	Seals, glands and gaskets shall be regularly inspected, without dismantling. Leak detectors should be provided for all piping, valves, seals, flanges, and other pertinent equipment.	Unit has maintained regular maintenance record.
22	All hazardous chemicals carrying piping should be periodically inspected for failed insulation/ vapour barrier, rust and corrosion. Damaged and deteriorated piping / equipment should be replaced.	
23	Operation and process control systems like Supervisory Control and Data Acquisition (SCADA) and Leak Detection and Repair (LDAR) systems should be adopted by the major accident hazard installations	Unit has installed an operation and process control system like Supervisory control and data acquisition (SCADA) system.
24	The safety measures including valve regulated systems shall be regularly checked and the concerned workers involved in the activity shall be properly trained.	Training given to the workers and record is maintained by unit.
25	Periodic inspection of equipment and machineries w.r.t. safety aspects should be done.	Unit has computerised an Asset Management system for periodic maintenance of machineries.
26	Portable gas masks should be kept at critical locations for use in any emergency.	Unit has total 8 nos. of Portable Gas detectors available at site different locations.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
27	Material Safety Data Sheets of raw materials & products should be made available to all the concerned personnel.	Unit has displayed MSDS of used chemicals at different locations.
28	The design of storage tanks, pressure vessels etc. should be as per applicable standards. The material of the storage tanks, pressure vessels etc. should be of adequate strength and chemically inert for the chemicals to be stored. The inspection of storage tanks, pressure vessels etc. should be as per standard protocols.	As per informed and record verified Pressure vessel testing is done by a competent person submitted in form-11 as per standard after the incident.
29	All the vessels should be examined periodically by a competent person under the Factory Act / applicable extant laws.	
30	Blanketing of tanks for fire protection of volatile / flammable chemicals should be considered.	
31	Free Fall of any flammable material in the vessel has to be avoided. All solvents and flammable material storage tanks should be at a safe distance from the Process plant and the required quantity of material should be charged in the reactor through appropriate safe mode.	Not Applicable.
32	Earth connection should be provided to all solvent handling equipment, pipelines, reactors, vessels etc. for protection from electric current/ static electricity.	
33	Separate safety manual should be prepared for each equipment along with the emergency management plan.	Safety manual is prepared by unit.
34	Periodic testing of firefighting equipment should be conducted.	Unit has submitted report of periodic testing of fire-fighting equipment which was last done in Nov-2024.

Compliance report of MSIHC Rules-1989

DUTIES

Sr no.	The guidelines are as follows	Compliance
35	Mock drills must be conducted regularly at every six months by the industries / isolated storages in controlled environments on actions to be taken during accidents, gas leakage, failure of critical process parameters etc.	As per record verified Last Mock Drill conducted on dated: 21/11/2024.
36	It shall be ensured that the chemical storage tanks should be appropriately located so that adequate space to take action during emergency situation is available.	Adequate space provided.
37	A clear documented emergency procedure should be laid down which details the precise duties of all staff and arrangements for evacuation, rescue, first aid etc. during an emergency.	On site emergency plan is prepared by unit.
38	All pipework containing hazardous chemicals shall be identified by colour coding or labelling (as per standards notified by Bureau of Indian Standards) and shall be protected to prevent corrosion / damage. The practice to identify the parts of the system that contain gas or liquid and the direction of flow should be followed.	Colour coded pipelines are found rusted and no labelling is readable. Necessary written instruction given to the unit for the same.
39	The industry or isolated storage shall install sensors with an **alarm system for detecting leakage of hazardous chemicals. Emergency ventilation, electricity tripping system to stop the process, sprinkling system to contain the leaked hazardous chemicals / gases etc. may be interlinked with the sensors for** taking a prompt action in case of leakage / emergency.	Not Applicable.
40	Suitable gas sensors and alarm system should be installed in the industrial unit / isolated storages at appropriate locations where **emission of gas is suspected so that any leaked gas is detected** and the employees are immediately alerted. In	Not applicable

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	sensitive areas of the unit where gas leakages are suspected, the unit shall work out an emergency prepared plan to neutralize / vent out the gases safely.	
41	The industries / isolated storages should install **automatic alarming systems to alert its personnel as well as surrounding localities** simultaneously in case of emergency situation and likelihood of emergency situation if any process parameter goes out of control.	Unit has manual alarm system with siren system.
42	There should be an auto alarm system to alert the employees in case of any deviations noticed in process parameters that may cause an emergency.	Unit has SCADA operation with in-built logic for Alaram and stop of equipment in case deviation of process parameters.
43	Only fully trained and qualified operators shall be permitted to operate the industrial processes involving hazardous chemicals. Training to all employees on Standard Operating Procedures, production process, safety aspects etc. should be provided. Refresher training should be conducted at least every year regarding safety `and emergency preparedness aspects associated with the industrial process / isolated storage. The employees shall be given hands-on experience with the product process under the supervision of senior employees. The industries / isolated storages only after ensuring that adequate training is imparted to its employees should engage the employees for independent works.	Unit has trained & Qualified operator as per Policy.
44	The industries and isolated storages should impart regular training to the staff to make them aware about process details, process functionalities. The employees should be trained to deal with emergencies arising out of leakage, abnormal temperature & pressure, increased emissions, pump failures, failure of air pollution control devices or effluent treatment plant, shock loads or any other accidents likely to occur. Overall the industries and isolated storages	Unit has maintained record of training. Periodic training is conducted by unit.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	should be prepared for emergency response readiness & effectiveness in terms of major & minor accidents.	
45	Any non-operational industry / isolated storage shall carry out proper risk study and safety audit before resuming the operations.	Unit has done Safety audit & HAZOP which is carried out by M/s. Solomax fire solution LLP after the incident.
46	Hazard and operability study must be carried out strictly and regularly by the industries and isolated storages. The concerned personnel should be made aware of the hazard and safety aspects associated with the process and material handled by them.	
47	The industry / isolated storage should procure chemicals from authorized dealers only. The spent solvents shall be procured from only those industries / solvent recyclers that are authorized by respective State Pollution Control Boards (SPCBs)/ Pollution Control Committees (PCCs).	This is ZLD-CETP unit, They do not procure spent solvent for any utilization.
48	The industry / isolated storage shall provide essential Personnel Protective Equipment (PPE) to all the concerned employees and make it mandatory that the employees have to wear PPE during working hours.	PPEs are available at site.
49	Occupational Health surveillance i.e., periodical health check-up of the employees should be conducted by the industries / isolated storage.	Full body medical check ups are conducted for the employees after every 6 months. Form-32 and Form-33 are submitted by unit.
50	The industries / isolated storages have to ensure self-compliance regarding recruiting competent staff, imparting Industrial, Environmental and Safety training to the staff, conducting safety audit, onsite emergency plans with record maintenance and information to SPCBs/ PCCs/ concerned Authorities.	Safety audit done by unit after incident. On site emergency plan is prepared by unit.
51	The distancing criteria for storage of hazardous chemicals have to be followed as per extant safety guidelines / rules. The	All the hazardous chemicals have their designated area with compatibility study.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	chemicals should be stored as per compatibility and separate area for flammable, corrosive, explosive and toxic chemicals should be earmarked.	
52	The labelling of hazardous chemical storing containers shall be as per extant rules. The concerned employees should be made aware of the risks associated with the stored hazardous chemicals and appropriate precautions that need to be taken.	All the hazardous chemicals are labelled and equipped with SDS (Safety Data Sheet)
53	To contain any spillage or leakage of hazardous chemicals or any uncontrolled reaction that may cause any emergency or accident, the industries / isolated storages should have sufficient stock of neutralizing chemicals, absorbents, reaction quenchers with proper equipment and trained manpower.	The site is equipped with secondary containment at various locations to collect such chemicals in case of spillage or leakage.
54	Emergency ambulance services should be arranged in the industrial zones along with experienced doctors and paramedic staff.	An emergency ambulance and OHC staff are available 24X7.
55	Safety in operation greatly depends on proper commissioning of an industry / isolated storage and hence utmost care should be taken to monitor every aspect during erection and maintenance schedules or other areas which require proper planning.	Not applicable presently.
56	The industries / isolated storages shall ensure that their premises should be constructed in accordance with the local government regulations.	Unit has submit compliance in this regard.
57	A control room to deal with the emergencies should be commissioned by the industries / isolated storages. A quick response team of responsible officers should be constituted having duly assigned duties to be executed during emergencies.	Unit has prepared Emergency response team with members .
58	The industry / isolated storage should conduct public awareness programmes in	Unit has mentioned they will do awareness programmes.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	the surrounding localities about do's & don'ts during emergency situations on an annual basis.	
59	Mutual Aid Scheme' among industries to meet required response measures during chemical emergencies should be adopted	No any mutual aid scheme observed.
60	Emergency contact numbers should be readily available at the isolated storages or industrial installations similar to 'Crisis Alert System' or Red Book.	Emergency contact numbers have been posted at various locations inside out in site premises.
61	Placing / indicating hazard signs at appropriate places in the isolated storage or industry or outside the shop floor (within the premises) should be done.	Unit has indicated hazard sign at appropriate places.
62	Increased automation that avoids physical handling of dangerous chemicals and substances should be brought into practice.	Automatic acid dosing system is provided .
63	The industry / isolated storage should have proper firefighting arrangements in accordance with The Factories Act, 1948 / applicable extant laws.	Unit has firefighting arrangements in accordance with the factory Act, 1948. Unit has submitted details of the same.
64	All emergency valves and switches and emergency handling facilities should be easily accessible.	Unit has submitted compliance in this regard.
65	Safety audit reports shall be made online for the public.	Unit has done safety audit report which they will upload online for public after implementation.
66	To ensure safety during operation/ handling / storage of hazardous chemicals, the industries/ isolated storages wherever and as applicable, shall obtain requisite clearances from The Chief Inspector, Factories and Boilers / Department of explosives / Fire Department etc. without fail.	Unit has submitted copy of factory licence & Boiler certificate.
67	The industries / isolated storages shall ensure that the effluent generated during any accident because of firefighting / decontamination activities etc. should be disposed of in a scientific manner after	No effluent was observed in plant. As per informed by unit no any w/w generated due to accident.

Sr no.	The guidelines are as follows	Compliance
	proper treatment. The hazardous wastes generated after any accident must be disposed of in accordance with the extant rules.	
68	Occupiers of storage installations like warehouses / tank farms are required to prepare an On-Site Emergency Plan and make available information regarding any possible off-site consequences to the District Collector to enable him to include the same in the Off Site Emergency Plan for the district or the particular area.	Unit informed that they Shared emergency plan with mamlatdar and Executive Magistrate office, Ankleshwar with Ref. no. DIPL/CORR/SITE/2024/92 dated. 16/12/24,
69	In order to avoid accidents, the following measures may be taken while establishing a warehouse/tank-farm. These should also be carried out in existing installations to enhance safety : i. Hazardous chemical storages should be located away from densely populated areas from drinking water sources, water bodies or from areas liable to flooding. ii. The location should have easy access for transport and emergency services. iii. Adequate emergency requirements like water for firefighting, drainage to prevent ground water contamination, standby source of electricity etc. should be provided. iv. The layout of warehouses should be designed in accordance with the nature of materials to be stored. The construction material should be non-flammable. v. Floors should be impermeable to liquids and should be designed for easy cleaning. vi. Drains should not be connected directly to water ways or public sewers. The drains should be connected to an interceptor pit. vii. Proper embankments to contain any accidental spillage should be provided for all hazardous materials storages. viii. Loading and unloading operations are to be done with utmost care. ix. Procedure for receipt, despatch and transport should be clearly laid down. x. Details of hazardous chemicals, access and escape routes, available emergency	(i) Hazardous chemical storage tanks are away from the admin building and canteen (populated area). No nearby water sources or water bodies present. ii. Have wide roads for easy access for transport and emergency service vehicles if any. Iii. Easy access for fire extinguisher, fire hydrant for firefighting. Have secondary containment in case of spillage or overflow. Have a connection with DG in case of power failure. iv. The storage area has been made up of RCC. v. Floors are easy to clean and are not damaged or leaked. vi. The drains are connected with the secondary containment only, and are not connected with any water ways or public sewers. vii. Proper embarkments are at place. viii. Utmost safety has been taken while loading and unloading operations. ix. SOP's for operation have been clearly posted in operation areas. x. Safety data sheet of hazardous chemicals and on-site emergency plan have been

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
	& firefighting equipment should be available. xi. In addition to a storage plan, a safe operation of a storage facility should have planning for safety training, personal protective clothing and equipment, spillages and leaking containers, waste disposal, first aid, fire detection and protection equipment, environment protection, proper on site emergency plan etc.	available. xi. Safety training module, PPE's matrix along with fire fighting procedure and waste disposal plan are effectively in place.
70	Wherever applicable, the industries or the isolated storages shall invariably comply with the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (as amended), The Major Accident Hazard Control Rules, 1997, The Factories Act, any other applicable rules or guidelines issued by the respective Government of State / Union Territory, The Ministry of Labour & Employment, Petroleum and Explosive Safety Organization, Oil Industry Safety Directorate etc.	Unit is instructed to comply the Rules conditions.

Compliance report of MSIHC Rules-1989

Sr no.	The guidelines are as follows	Compliance
71	The occupier of an industrial activity / isolated storage shall prepare and keep up-to-date an on-site emergency plan containing details specified in Schedule 11 of the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 (as amended) detailing how major accidents will be dealt with on the site on which the industrial activity is carried on and that plan shall include the name of the person who is responsible for safety on the site and the names of those who are authorized to take action in accordance with the plan in case of an emergency.	Unit has prepared On site emergency plan.
72	The occupier shall ensure that the emergency plan prepared takes into account any modification made in the industrial activity / isolated storage and that every person on the site who is affected by the plan is informed of its relevant provisions.	
73	The occupier shall prepare the emergency plan in the case of a new industrial activity or isolated storage, before that activity is commenced.	
74	The occupier shall conduct a mock drill of the on-site emergency plan every six months and a detailed report of the mock drill conducted shall be made immediately available to the concerned authorities as and when demanded.	As per their SOP unit is conducting mock drill at an interval of every six month. Last mock drill conducted on dated: 21.11.2024.
75	With every change or modification made in a factory, operation or process, the on-site emergency plan may have to be modified and updated to keep it meaningful and effective. An on-site emergency plan should contain the following key elements: i. basis of the plan and hazard analysis; ii.accident prevention procedure/measures; iii.accident/emergency response procedure/measures; and iv. recovery procedure.	Unit has submitted compliance in this regard.
76	Proper planning by industries / isolated	

Sr no.	The guidelines are as follows	Compliance
	storages helps in reducing the chances of accidents. For proper planning, the following needs to be considered: i. risk associated with the process technology; ii. safety measures; iii. siting and layout of industry / isolated storage ; iv. emergency preparedness; and v. compliance with the regulatory requirements.	
77	Assessing the hazard potential of an installation is the first step in planning for emergencies. Preliminary Hazard Analysis which comprises hazard identification and vulnerability analysis should always be carried out at the conceptual stage for all installations including small and medium installation. However, Major Accident Hazard (MAH) installations, both existing and proposed ones, should carry out a risk analysis.	Unit has submitted On site emergency plan.

Hazard Analysis:

Sr no.	the guidelines are as follows	Compliance
78	Hazard analysis is a critical component in planning for emergencies. To analyse the safety of a major installation as well as its potential hazards, a hazard analysis should be carried out covering the following areas: i.The toxic, reactive, explosive or flammable substance in the installation that constitutes a major hazard. ii.The failures or errors that may cause abnormal conditions leading to a major accident. iii.The consequences of a major accident for the workers, people living or working outside the installation and the environment. iv.Preventive measures for accidents. v.Mitigation of the consequences of an	HAZOP study is carried out by unit. Report of the same is submitted by unit.

Sr no.	the guidelines are as follows	Compliance
	accident.	

Vulnerability Analysis:

Sr no.	the guidelines are as follows	Compliance
79	Considering the maximum loss scenario e.g. catastrophic vessel rupture, the occupier may estimate the vulnerable zone or the zones which will be affected by the release of hazardous chemicals. It should be borne in mind that every effort should be made to confine the vulnerable zone within the factory premises. In order to achieve this, the following could be adopted: i.Reduce the quantity of hazardous substances stored. ii.Split the hazardous storages into a number of smaller ones. iii. Isolate the storages that might lead to cascading effect. iv.Substitute extremely hazardous substances with less hazardous substances.	Unit has carried out a hazardous area classification study for our site in May - 2023.

Risk Analysis:

Sr no.	the guidelines are as follows	Compliance
80	Risk analysis can provide a relative measure of the likelihood and severity of various possible hazardous events and enable the emergency plan to focus on the greatest potential risks. Risk analysis involves an estimate of the probability or likelihood that an event will occur.	On site emergency plan is prepared by unit. .

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