

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,****WESTERN ZONE BENCH, PUNE****AT PUNE****ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)****RAKESH PATEL****.. APPLICANT****V/s****M/s LOXIM INDUSTRIES  
AND OTHERS****.. RESPONDENTS****REPLY ON BEHALF OF RESPONDENT NO.6  
(M/s TML INDUSTRIES LIMITED)****INDEX**

SR NO	ANN E XUR E	PARTICULARS	PAGE NOS.	
			From	To
			From	To
1.		Index	-	1154
2.		Reply	1155	1158
3.		Affidavit in Support	1159	1160
4.	R-1	Copy of the Consolidated Consent and Authorisation dated 20.10.2022	1161	1178
5.	R-2	Copy of the said Reply dated 26.09.2022 as	1179	1312
6.		Vakalatnama	131 3	1314
		<b>LAST PAGE NO.</b>		<b>1314</b>

PUNE

DATE : 30/09/2023



ADVOCATE FOR THE RESPONDENT NO.6

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,**

**WESTERN ZONE BENCH, PUNE**

**AT PUNE**

**ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)**

**RAKESH PATEL**

**.. APPLICANT**

**V/s**

**M/s LOXIM INDUSTRIES  
AND OTHERS**

**.. RESPONDENTS**

**REPLY ON BEHALF OF RESPONDENT NO.6  
(M/s TML INDUSTRIES LIMITED)**

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

1. At the outset, the Respondent No.6 in the present proceedings denies everything that is contrary what is stated therein and/or inconsistent therewith as if the same is set out in extenso and traversed. The Respondent No.6 submits that, nothing not expressly admitted herein ought to be taken as admitted by the Respondent No.6 or be deemed to have been admitted by the Respondent No.6 for want of specific traverse. The Respondent No.6 states that for the purpose of gravity, the Respondent No.6 is not denying each and every allegation, statement and contention of the Applicant which is ex-facia contrary to the contention of Respondent No.6 and its stand in

the present case except to the extent that such allegation, statement or contention necessitate, cogent, warrant or reply.

2. The Respondent No.6 submits that the Respondent No.6 is a Company, registered and incorporated under the provisions of Indian Companies Act, 1956 and is having its registered office at Vadodara, Gujarat. The Respondent No.6 is engaged in the business of manufacturing of chemicals comprising of industrial and specialty chemicals and intermediates and is having plants at Piludra (Dist. Bharuch) and Karakhadi (Dist. Vadodara). The Respondent No.6 has commenced its operations in the year 1993.
3. The Respondent No.6 is in receipt of the notice in compliance to the order dated 03.08.2023 passed in the present Original Application. The Hon'ble Tribunal was pleased to observe the name of the Respondent No.6 in the Joint Committee Report filed in compliance to order dated 21.07.2022. The Respondent No.6 submits that, the Respondent No.6 has the Consolidated Consent and Authorisation dated 03.11.2020 for Karakhadi plant (GPCB ID 22415), which is valid and subsisting till 31.12.2024 and Consolidated Consent and Authorisation dated 20.10.2022 for Piludra plant (GPCB ID 15812), which is valid and subsisting till 18.07.2027. Copy of the CCA is annexed hereto and marked as **ANNEXURE – R-1**. The Respondent

No.6 also has all necessary permission in place and has been duly complying with the terms and conditions of the same.

4. The Respondent No.6 submits that the officials of GPCB visited Respondent No.6 on 20.09.2022. During the said visit, the Officers of the GPCB made certain observations. The Respondent No.6 vide its detailed Reply dated 26.09.2022 has replied to each and every observation made by the officials of the GPCB and that pursuant to the submission of the said response, there has been no action whatsoever against the Respondent No.6. Copy of the said Reply dated 26.09.2022 as filed by the Respondent No.6 is annexed herewith and marked as **ANNEXURE - R-2**.
5. The Respondent No.6 submits that, the officials of GPCB visited the Unit of the Respondent No.6 located at Karakhadi on 19.09.2022. The officials of GPCB had made certain observations during their visit, which was responded by the present Respondent No.6 vide its detailed Reply dated 28.09.2022.
6. The Respondent No.6 submits that, the officials of the GPCB has visited the plants of the Respondent No.6 and have observed that, there were certain minor non-compliances, which have been duly complied with by the Respondent No.6 and thereafter, no action has been initiated on the part of the GPCB. It is thus, submitted there, is

no reason made out for impleading the present Respondent as a Party Respondent in the present proceedings and it be discharged forthwith.

7. In view of the facts stated herein above, this Hon'ble Tribunal be pleased to dispose the present Original Application so far as Respondent No.6 herein, as nothing survives in the present OA and the allegations made by the Applicant were without any merits and therefore, the present Applicant needs to be dismissed of pursuant to the Respondent No.6.

8. Affidavit in Support of this, is filed herewith

PUNE  
DATE 30/09/2023



ADVOCATE FOR RESPONDENT NO.6

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

WESTERN ZONE BENCH, PUNE

AT PUNE

ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)

RAKESH PATEL

.. APPLICANT

V/s

M/s LOXIM INDUSTRIES  
AND OTHERS

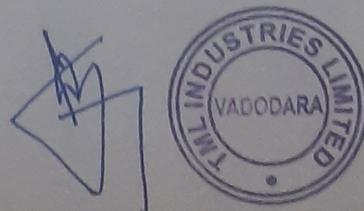
.. RESPONDENTS

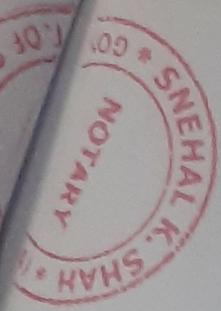
AFFIDAVIT TO THE REPLY ON BEHALF OF RESPONDENT  
NO.6

MAY IT PLEASE THE HON'BLE COURT:

I, Kismat Patel, Age 53 years, working with M/s TML INDUSTRIES LIMITED the Respondent No.6 herein above, do hereby state on solemn affirmation as under:-

01. That the Respondent No.6 is filing the reply to the present Original Application. The facts and circumstances are well set out in the main body of the Reply. The Respondent No.6 adopts, maintains, confirms, repeats and reiterate whatever has been stated in the main body of the reply and for the sake of brevity, convenience and in order to avoid repetition, craves leave of this Hon'ble Tribunal to treat the statements, averments and submissions in the main body of the Reply as part and parcel of this Affidavit as if the



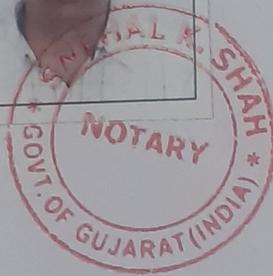


same are reproduced herein ad-seriatim, with a view to avoid repetition and for the sake of brevity.

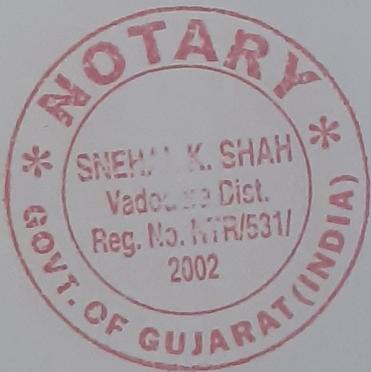
02. I say that whatever stated in the Reply and the present Affidavit is true and correct to the best of my knowledge, information and belief and the legal advice, which I believe to be true.

Solemnly affirmed at 29, on 29 day of September, 2023.

**NOTARY**



*[Signature]*  
Deponent



Solemnly Affirmed/Declared  
Sworn Before me

*[Signature]*  
**SNEHAL K. SHAH**  
NOTARY, VADODARA  
Govt. of Gujarat (INDIA)

29/09/2023



## GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : [www.gpcb.gov.in](http://www.gpcb.gov.in)

By **R.P.A.D.**

In exercise of the power conferred under section-25 of 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 And Other Waste (Management And Transboundary Movement) Rules-2016 framed under the Environment (Protection) Act-1986. This Board is empowered to grant CC&A.

And whereas Board has received consolidated consent application vide No. 180713 Dated: 18/09/2020 for the consolidated consent and authorization (CC & A-Renewal) of this Board under the provisions / rules of the aforesaid Acts. Consent & Authorization is hereby granted as under.

### CONSENT AND AUTHORISATION:

(Under the provisions / rules of the aforesaid environmental acts)

To,

**M/s. TML Industries Limited (Unit-II)**

**Plot No.1896-A, 1902, 1903,**

**ECPL Road, Vill: Karakhadi,**

**Tal: Padra, Dist: Vadodara-391450.**

1. Consent Order no.: AWH-110131. Date of issue: 03/11/2020.
2. The consent shall be valid up to 31/12/2024 for the use of outlet for the discharge of treated effluent & air emission and to operate industrial plant for manufacture of the following items / products:

Sr. No.	Product	Quantity (MT/Month)
1	Fexofenadine Derivatives:	13
1.1	4 (4-(4-(Hydroxydiphenylmethyl) - 1- piperidinyl)-1-oxobutyl)-alpha, alpha-dimethyl benzeneacetic acid methyl ester(Fex-10)	
1.2	Benzeneaceticacid , 4-[1-Hydroxy-4-[4-(Hydroxydiphenylmethyl)-1-piperidinyl] butyl] alpha, alpha-dimethyl (Fex-12)	
<b>2</b>	<b>Acid Chlorides</b>	396
2.1	Valeroyl Chloride	
2.2	Octanoyl Chloride	
2.3	Neodecanoyl Chloride	
2.4	Isononanoyl Chloride	
2.5	Iso Butyryl Chloride	
2.6	Pivaloyl Chloride	
2.7	Isophthaloyl Chloride	
2.8	Terephthaloyl Chloride	

<b>3</b>	<b>BY- Product</b>	
3.1	Sulfur Dioxide / Ethyl Chloride	238
	Total	647

3. SPECIFIC CONDITIONS:

- 3.1 Applicant shall not carry out any activity which attracts provisions of Environment Impact Assessment Notification 2006.
- 3.2 Applicant shall obtain prior permission of Ground Water Authority for withdrawal of ground water/use of bore wells. (if applicable)
- 3.3 Management of Solid Waste generated from industrial activities shall be as per Solid Waste Management Rules-2016 (solid waste as defined in Rule-3(46).
- 3.4 As per provision of Rule-18 of Solid Waste Management Rules-2016 all industrial units using fuel and located within 100 km from the refused derived fuel (RDF) plant shall made an arrangement to replace at least five percent of their fuel requirement by refused derived fuel so produced.

4. CONDITION UNDER THE WATER ACT 1974:

- 4.1 The quantity of the industrial effluent to be generated from the manufacturing process and other ancillary industrial operations shall be not exceed 38.9 KL/Day.
- 4.2 The quantity the domestic wastewater (sewage) shall not exceed 4.5 KL/Day.
- 4.3 The applicant shall provide adequate effluent treatment system in order to achieve the quality of the treated effluent as per norms mentioned in column No.3.

1	2	3
Sr. No.	Parameters	VECL Inlet Norms
1.	pH	6.5 to 8.5
2.	Temperature	40° C
3.	Colour (pt.co.scale) in units	100 units
4.	Suspended Solids	100 mg/l
5.	Oil and Grease	10 mg/l
6.	Phenolic Compounds	1 mg/l
7.	Cyanides	0.2 mg/l
8.	Fluorides	1.5 mg/l
9.	Sulphides	2 mg/l
10.	Ammonical Nitrogen	50 mg/l
11.	Arsenic	0.2 mg/l
12.	Total Chromium	2.0 mg/l
13.	Hexavelant Chromium	0.1 mg/l
14.	Copper	3 mg/l
15.	Lead	0.1 mg/l
16.	Mercury	0.01 mg/l



1	2	3
Sr. No.	Parameters	VECL Inlet Norms
17.	Nickle	3 mg/l
18.	Zinc	5 mg/l
19.	Cadmium	--
20.	BOD (5 days at 20°C)	100mg/l
21.	COD	250 mg/l
22.	Chlorides	600 mg/l
23.	Sulphates	1000 mg/l
24.	Total dissolved solids	5000 mg/l
25.	Free Ammonia	--
26.	Sodium absorption ratio	--
27.	Insecticides/Pesticides	Absent
28.	Bio-assay test	90 % Survival of fish after 96 hours in 100% effluent

- All efforts shall be made to remove color & unpleasant odor as far as practicable.
- 4.4. The final treated effluent conforming to the above standards shall be ultimately discharged to Effluent Conveyance Channel (ECP) managed by Vadodara Enviro Channel Ltd. (VECL) and shall ultimately be conveyed to estuary of river Mahi for final disposal.
- 4.5. Sewage shall be disposed of through septic tank/soak pit system.

#### 5 CONDITIONS UNDER AIR ACT 1981:

- 5.1 The following shall be used as fuel in Boiler/TFH/D. G. Set respectively.

Sr. No.	Fuel	Quantity
1.	Agro waste (Boiler)	8 i 35 kg/day
2.	Agro waste (TFH)	1200 kg/day
3	F.O. (TFH)	600 kg/day
4	Diesel (D.G. set)	86.6 lit/hr

- 5.2 The applicant shall install & operate air pollution control system in order to achieve norms prescribed herewith.
- 5.3 The flue gas emission through stack attached to Boiler/TFH/D. G. Set shall conform to the following standards:

Sr. No.	Stack Attached To	Stack Height	APCM	Parameter	Permissible Limit
1	Boiler (ACL Plant)	30 meter	Cyclone separator	Particulate Matter SO <sub>2</sub> NO <sub>x</sub>	150 mg/NM <sup>3</sup> 100 ppm 50 ppm
2	Thermic Fluid Heater (ACL Plant)	12 meter	Cyclone separator		
3	D.G. Set-1010	As per	Acoustic		

	KVA	condition no.5.10(a)	Measures		
4	D.G. Set-380 KVA	As per condition no.5.10(a)	Acoustic Measures		

- 5.4 The process gas emission through stack/vent attached to various reactors, process vessel shall conform to the following standards:

Stack No.	Stack Attached To	Stack Height	APCM	Parameter	Permissible Limit
1	Acid Chloride/Fexo reactor plant	18 meter	Alkali scrubber	HCL SO <sub>2</sub> CL <sub>2</sub>	20mg/NM <sup>3</sup> 40mg/NM <sup>3</sup> 9mg/NM <sup>3</sup>
2	Emergency Hood for CL2 cylinder	15 meter	Acid absorber & alkali scrubber	CL <sub>2</sub>	9mg/NM <sup>3</sup>

- 5.5 Stack monitoring facilities like port hole, platform/ladder etc., shall be provided with stacks/vents Chimney in order to facilitate sampling of gases being emitted into the atmosphere.
- 5.6 The concentration of the following parameters in the ambient air within the premises of the industry and a distance of 10meters from the source) other than the stack/vent) shall not exceed the following levels. Applicant shall comply with the National Ambient Air Quality Standards notified by Central Pollution Control Board, New Delhi time to time under the provision of the Environment (Protection) Act-1986.

Parameter	Permissible Limit Annual	Permissible Limit 24 Hrs. Average
Particulate matter-10[PM10]	60Microgram /m <sup>3</sup>	100Microgram /m <sup>3</sup>
Particulate matter-2.5[PM2.5]	40Microgram /m <sup>3</sup>	60Microgram /m <sup>3</sup>
Sulphur Dioxide	50Microgram /m <sup>3</sup>	80Microgram /m <sup>3</sup>
Nitrogen Dioxide	40Microgram /m <sup>3</sup>	80Microgram /m <sup>3</sup>
HCL	-----	200Microgram /m <sup>3</sup>
Cl <sub>2</sub>	-----	100Microgram /m <sup>3</sup>

- 5.7 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.
- 5.8 There shall no any fugitive emission and/or odour pollution due to manufacturing activities and ancillary operations. Adequate measures shall be taken thereof.
- 5.9 The Industry 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 75 dB(A) during day time and 70

## GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : [www.gpcb.gov.in](http://www.gpcb.gov.in)

dB(A) during night time. Daytime is reckoned in between 6 a.m. and 10 p.m. and nighttime is reckoned between 10 p.m. and 6 a.m.

- 5.10. D. G. Set standards:- The flue gas emission through stack attached to D. G. Set shall conform to the following standards.
- The minimum height of stack to be provided with each of the generator set shall be  $H=h + 0.2 (KVA)^{1/2}$ , where H= Total stack height in meter, h= height of the building in meters where or by the side of which the generator set is installed.
  - Noise from DG set shall be controlled by providing an acoustic enclosure or by treating the room acoustically, at the users end.
  - The acoustic enclosure or acoustic treatment of the room shall be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on the higher side ( if the actual ambient noise is on the higher side, it may not be possible to check the performance of the acoustic enclosure/ acoustic treatment. Under such circumstances the performance may be checked for noise reduction up to actual ambient noise level, preferably, in the night time). The measurement for insertion loss may be done at different points at 0.5 m from the acoustic enclosure/room, and the averaged.
  - The D.G. Set shall be provided with proper exhaust muffler with insertion loss of minimum 25 dB (A).
  - All efforts shall be made to bring down the noise level due to the D.G.Set, outside the premises, within the ambient noise requirements by proper siting and control measures.
  - Installation of a D.G.Set must be strictly in compliance with the recommendations of the D.G.Set manufacturer.
  - A proper routine and preventive maintenance procedure for the D.G.Set should be set and followed in consultation with the DG Set manufacture which would help prevent noise levels of the DG Set from deteriorating with use.

6. GENERAL CONDITIONS: -

- Any change in personnel, equipment or working conditions as mentioned in the consents form/order should immediately be intimated to this Board.
- Applicant shall also comply with the general conditions given in annexure- I.
- If the products/process falls in SCHEDULE-I or II of the Environmental Audit Scheme, as specified in the order dated 13/3/97 of Hon. High Court in MCA NO.326/97 in SCA No.770/95, the applicant shall also abide by the said scheme.

7. AUTHORIZATION UNDER HAZARDOUS AND OTHER WASTE (MANAGEMENT AND TRANSBOUNDARY MOVEMENT) RULES-2016 FORM-2 (See rule 6(2)).

7.1 Number of authorization and date of issue: -110131, dated: 03/11/2020.

- 7.2 Reference of application No. 180713 Dated: 18/09/2020.
- 7.3 M/s. TML Industries Limited (Unit-II) is hereby granted an authorization based on the enclosed signed inspection report for generation, collection, treatment, storage, transport of hazardous wastes on the premises situated at-Plot No.1896-A, 1902, 1903, ECPL Road, Vill: Karakhadi, Tal: Padra, Dist: Vadodara-391450.

7.4 Details of Authorization.

Sr. No	Category of Hazardous waste as per the Schedules	Authorized Mode of disposal	Quantity
1	35.3 – Schedule-I (Chemical Sludge from wastewater treatment)	Disposal by sending to approved TSDF	161.33 MT/Month
2	36.4 – Schedule-I (Distillation Residue)	Disposal by sending for co-processing to cement industries or by sending to approved CHWIF.	15.84 MT/Month
3	33.1–Schedule-I (Discarded Containers/bags & liners)	Disposal by selling to authorized recyclers having Rule-9 permission.	1250 nos./Month
4	D-2– Schedule-II (HCL hydrochloric acid (28-30% pure) (by product (from:- ACL)	Disposal by selling to actual users having valid permission of GPCB & obtained Rule-9 permission.	1252.10 MT/Month
5	B-7– Schedule-II (Sodium Bisulphite)	Disposal by selling to actual users having valid permission of GPCB & obtained Rule-9 permission.	170 MT/Month
6	D-2– Schedule-II (Spent Sulphuric Acid)	Disposal by selling to actual users having valid permission of GPCB & obtained Rule-9 permission.	60 MT/Month

7.4.1 The Authorization shall be valid for a period of 31/12/2024.

7.4.2 The Authorization is subject to the following general and specific conditions:

7.5 GENERAL CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (M&TM) RULES-2016.

7.5.1 The Authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.



## GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar 382 010

Phone : (079) 23222425

(079) 23232152

Fax : (079) 23232156

Website : [www.gpcb.gov.in](http://www.gpcb.gov.in)

- 7.5.2 The Authorization or its renewal shall be produced for inspection at the request of an officer Authorized by the State Pollution Control Board.
- 7.5.3 The person Authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.
- 7.5.4 Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
- 7.5.5 The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization 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;
- 7.5.6 The person authorized 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"
- 7.5.7 It is the duty of the authorized person to take prior permission of the State Pollution Control Board to close down the facility.
- 7.5.8 The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
- 7.5.9 The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
- 7.5.10 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.
- 7.5.11 The importer or exporter shall bear the cost of import or export and mitigation of damages if any.
- 7.5.12 An application for the renewal of an authorization shall be made as laid down under these Rules.
- 7.5.13 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.
- 7.5.14 Annual return shall be filed by June 30<sup>th</sup> for the period ensuring 31<sup>st</sup> March of the year.
- 7.6 SPECIFIC CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (M&TM) RULES-2016.
- 7.6.1 The authorized actual user of hazardous and other wastes shall maintain records of hazardous and other wastes purchased in a passbook issued by the State Pollution Control Board along with the authorization.
- 7.6.2 Handing over of the hazardous and other wastes to the authorized actual user shall be only after making the entry into the passbook of the actual user.

- 7.6.3 In case of renewal of authorization, a self-certified compliance report in respect of effluent, emission standards and the conditions specified in the authorization for hazardous and other wastes shall be submitted to SPCB.
- 7.6.4 The occupier of the facility shall comply Standard operating procedure/ guidelines published by MoEF&CC or CPCB or GPCB from time to time.
- 7.6.5 Unit shall comply provisions of E-Waste Management Rules-2016.
- 7.6.6 The disposal of Hazardous Waste shall be carried out as per the waste Management hierarchy.

**For and on behalf of  
Gujarat Pollution Control Board**

*D.P. Shah*  
**(D.P. Shah)**

**Environmental Engineer**

NO. GPCB/CCA-VRD-183(9)/ID:22415/575951

*dtd. 30/12/2020*

Issued to:

**M/s. TML Industries Limited (Unit-II)  
Plot No.1896-A, 1902, 1903,  
ECPL Road, Vill: Karakhadi,  
Tal: Padra, Dist: Vadodara-391450.**



1169

**GUJARAT POLLUTION CONTROL BOARD**

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

By R.P.A.D.

**CONSOLIDATED CONSENT AND AUTHORIZATION****CCA NO: AWH -122228**

NO: GPCB/BRCH/CCA-189(17)/ID-15812/691349

DT: 26/12/2022

In exercise of the power conferred under Section-25 of 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 Wastes (Management and Transboundary Movement) Rules-2016, framed under the E(P)Act 1986,

And whereas Board has received consolidated application dated 22/06/2022 and inward no. 257197 for the consolidated consent and authorization (CC & A) of this Board under the provisions / rules of the aforesaid Acts, Consolidated Consent & Authorization is hereby granted as under.

**CONSOLIDATED CONSENT AND AUTHORIZATION:**

(Under the provisions / rules of the aforesaid Environmental Acts)

To,

M/s. TML Industries Ltd.,

Plot No: 33-P, 34-P, 35, 37, 39,

At &amp; Post: Piludra,

Tal: Vagra, Dist-Bharuch.

1. Consent Order No. : AWH-122228 date of Issue 20/10/2022.
2. The consent under Water Act-1974 for conveying the industrial effluent discharge up to the sea for final disposal at NIO designated point by own effluent discharge pipeline of 5000 KLD, The consent under Air Act-1981 & Authorization under Environment (Protection) Act, 1986 shall be **valid up to 18/07/2027** to operate industrial plant to manufacture following products:

Sr. No.	Products	Quantity (MT/Month)
1	Acid Chloride like	
1.1	Valeryl Chloride	
1.2	Octanoyl Chloride	
1.3	Neodecanoyl Chloride	
1.4	Isononanoyl Chloride	
1.5	Iso Butyryl Chloride	
1.6	Pivaloyl Chloride	
1.7	Isophthaloyl Chloride	
1.8	Terphthaloyl Chloride	
1.9	Propargyl chloride	1010
1.10	Methoxy acetayl chloride	
1.11	Pera nitrobenzoyl chloride	
1.12	4 Chloro butyryl chloride	
1.13	Meta Nitro Benzoyl Chloride	
1.14	N-Butyryl Chloride	
1.15	2-Propoxy ethyl Chloride	
1.16	4-Pentenoyl Chloride	
1.17	Louroyl Chloride	

2	Chloro Sulphonic Acid	1500
3	Glycidyl Chloride	1050
4	8-Hydroxy Quinoline	100
5	3-Chloro Pivaloyl Chloride	100
6	Safener	100
	<b>Total</b>	<b>3860</b>

**SPECIFIC CONDITIONS:-**

- Unit shall strictly follow all conditions of EC dated 18/07/2008.
- Unit shall not procure any hazardous waste without obtaining Rule-9 permission under HWR-2016 and CTE/CCA of the Board.
- Unit shall sell out their hazardous waste to authorized end user who is having authorization with valid CCA and rule 9 permission to receive this waste. Unit shall make MoU with such authorized end users and submit MoU.
- 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.
- 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.

**3 CONDITION UNDER THE WATER ACT:**

3.1 The quantity of total water consumption shall not exceed 612 KLD as per below break up.

- Industrial: 584 KLD
- Domestic: 18 KLD
- Gardening: 10 KLD

3.2 The quantity of total waste water generation shall not exceed 247 KLD as per below break up.

- Industrial: 232 KLD
- Domestic: 15 KLD

3.3 The quality of treated effluent (232 KLD) shall conform to the following standards and discharged into ECP canal operated by ECPL, Vadodara.

Sr. No.	PARAMETERS	PERMISSIBLE LIMIT
1	pH	6.5 to 8.5
2	Temperature	40 °C
3	Colour (pt. co. scale)	100 Units
4	Total Suspended Solids	100 mg/l
5	Total dissolved Solids	5000 mg/l
6	BOD [3 day at 27°C]	100 mg/l
7	COD	250 mg/l
8	Oil and Grease	10 mg/l
9	Phenolic Compounds	1 mg/l
10	Sulphides	0.5 mg/l
11	Ammonical Nitrogen	50 mg/l
12	Chlorides	600 mg/l
13	Sulphates	1000 mg/l
14	Cyanides	0.2 mg/l



15	Fluorides	1.5 mg/l
16	Insecticides/Pesticides	Absent
17	Hexavalent Chromium	0.1 mg/l
18	Total Chromium	2.0 mg/l
19	Copper	2 mg/l
20	Nickel	3 mg/l
21	Zinc	5 mg/l
22	Mercury	0.01 mg/l
23	Lead	0.1 mg/l
24	Arsenic	2 mg/l
25	Cadmium	2 mg/l
26	Selenium	0.05 mg/l
27	Boron	2 mg/l
28	Bio assay test	90% survival of fish after 96 hours in 100% effluent

- 3.4 Domestic sewage shall be disposed of through septic tank/ soak pit system.
- 3.5 The treated industrial effluent conforming to the above standards shall be discharged in to ECP canal operated by ECPI, Vadodara.
- 3.6 Unit shall be required to make storage facilities to store the treated effluent for at least 48 hours by providing acid proof brick lined impervious tanks/HIDPI tanks.
- 3.7 Unit shall implement & follow communication plan so that respected work can be done in minimum response time in case of emergencies.
- 3.8 Unit shall provide online monitoring system for pH, TOC and other parameters with recorder & magnetic flow meters for flow measurement of treated wastewater, if applicable as per CPCB's norms/guidelines/directives.
- 3.9 Unit shall have only one authorized outlet over the ground with full access from outside the premises.
- 3.10 In case of shut-down of plant for more than three (3) days for any reason, member unit shall intimate to GIDC/ Pipeline Project authority & GPCB well in advance for the better operation & management of pipeline.
- 3.11 Unit shall make fixed arrangement for discharge of the effluent from their Final collection tanks to the ECP canal. Unit shall not keep any by-pass line or system or loose or flexible pipe line for discharge of the effluent into underground drainage network of Pipeline.
- 3.12 Magnetic flow meters shall be installed at the inlet & outlet of effluent collection tanks/ETP to measure the quantity of effluent discharged into ECP canal.
- 3.13 Unit shall affix of water meters 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 unit until the contrary is proved.
- 3.14 Unit shall provide adequate / safe effluent sampling facility for the effluent being stored in final collection / discharge tank of ETP or being discharged into ECP canal.
- 3.15 Unit shall either stop or curtail its production activities if the effluent is not conforming to the standards of ECP canal specified by GPCB.
- 3.16 The authorized representative of ECP canal shall have right of entry at any time for the purpose of inspection and monitoring the effluent collection facilities/ETP (if required) of Unit.

- 3.17 Unit shall have to keep accurate records of quality & quantity of effluent discharged to ECP canal on day-to-day basis. Separate logbook shall be maintained for recording the data & shall be made available for inspection as & when asked.
- 3.18 Unit shall keep accurate records of quantity of production of each product, quantity of water consumption, quantity of effluent generated and consumption of electricity on day to day basis and required to submit the complied record of each month to GPCB on or before fifth day of the succeeding month.
- 3.19 Disposal system for storm water shall be provided separately. In no circumstances storm water shall be mixed with the industrial effluent.
- 3.20 Leachate from the hazardous/solid waste, if any shall also be connected into a collection tank through leachate collection facilities and shall be treated along with industrial effluent and final treated effluent shall be discharged to the ECP canal.
- 3.21 The Environmental Management Unit/Cell shall be setup to ensure implementation on and monitoring of environment safeguards and other conditions stipulated by statutory authorities. The Environmental Management Cell / Unit shall directly report to the Chief Executive of the organization and shall work as a focal point for internalizing environmental issued. These Cells also coordinate the exercise of environmental audit and preparation of environmental statements
- 3.22 The Environmental audit shall be carryout yearly, if applicable. The environmental statements pertaining to the previous year shall be submitting to this State Board latest by 30<sup>th</sup> September every year.
- 3.23 The Board reserves the right to review and/or revoke the consent and / or make modifications in the conditions which it seems fit in accordance with provisions of Water Act-1974.

#### 4. CONDITIONS UNDER THE AIR ACT:

- 4.1 The following shall be used as fuel:

Sr. No.	Name of fuel	Quantity
1	Coal/ Lignite	20 MT/day
2	LDO	3000 Lt/day
3	Lignite/ Coal/ Agro waste (Bio fuel)	30 MT/day

- 4.2 The flue gas emission through stack shall conform to the following standards:

Stack No.	Stack attached to	Stack Height	APCM	Parameter	Permissible limit
1	FBC 1 Boiler (6 TPII)	40 m	Bag Filter & Cyclone Separator		
2	Oil Fired package type boiler (4TPII)	30 m	--		
3	Spray Dryer	24 m	Cyclone Separator & water/alkali scrubber	PM SO <sub>2</sub> NO <sub>x</sub>	150 mg/Nm <sup>3</sup> 100 ppm 50 ppm
4	DG Set-1 (380 kVA)	13 m	--		
5	DG Set-2 (1000 kVA)	15 m	--		



4.3 The Process emission through various stacks/ vent of reactors, process, vessel shall conform to the following standards:

Stack No.	Stack attached to	Stack Height	APCM	Parameter	Permissible limit
1	A. Reactor of TCAC plant (Replaced with Acid Chloride/ 8-Hydroxy Quinoline/ 3-Chloro Pivaloyl Chloride/ Safener)	22 m	Bubbler + Falling film absorber + caustic scrubber	HCl	20 mg/Nm <sup>3</sup>
	SO <sub>2</sub>			40 mg/Nm <sup>3</sup>	
	B. Chloro sulphonic Acid			NO <sub>x</sub>	25 mg/Nm <sup>3</sup>
2	Reactor of NaTCP Plant (Replaced with Glycidyl Chloride)	22 m	Falling film absorber	HCl Cl <sub>2</sub>	20 mg/Nm <sup>3</sup> 9 mg/Nm <sup>3</sup>

4.4 The concentration of the following parameters in the ambient air within the premises of the industry shall not exceed the limits specified hereunder:

Sr. No.	Parameters	Permissible Limit (microgram /M <sup>3</sup> )	
		Annual	24 Hours Average
1.	Particulate Matter (PM <sub>10</sub> )	60	100
2.	Particulate Matter (PM <sub>2.5</sub> )	40	60
3.	Oxides of Sulphur (SO <sub>x</sub> )	50	80
4.	Oxides of Nitrogen (NO <sub>x</sub> )	40	80

- Annual arithmetic mean of minimum 104 measurements in a year at a particular site taken twice a week 24 hourly at uniform intervals.
- 24 hourly or 08 hourly or 01 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.

4.5 Unit 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. 4.2, 4.3 & 4.4 above.

4.6 The consent to operate the industrial plant shall lapse if at any time the parameters of the gaseous emission are not within the tolerance limits specified as above.

4.7 Unit 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.

4.8 Unit 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 75 dB(a) during day time and 70 dB (A) during night time. Daytime is reckoned in between 6a.m. and 10 p.m. and nighttime is reckoned between 10 p.m. and 6 a.m.

4.9 All efforts shall be made to control VOC emissions and odor problem, if any.

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. Also any change in 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. **CONDITIONS UNDER HAZARDOUS & OTHER WASTES (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES, 2016**

6.1 Number of authorization: **AWH-122228 date of Issue 16/04/2022.**

6.2 **M/s. TML Industries Ltd**, is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at **Plot No: 33-P, 34-P, 35, 37, 39, At & Post: Piludra, Tal: Vagra, Dist-Bharuch.**

Sr. No.	Name of Waste	Category Number	Quantity	Facility
1	ETP Sludge	35.3	260.19 MT/M	Collection, Storage, Transportation and Disposal at common TSDF.
2	Discarded Containers/ Bags & Liners	33.1	3500 Nos/Y	Collection, storage, Decontamination/ Detoxification, Reuse & Disposal to decontamination facility.
3	Used Oil	5.1	1 Kl./Y	Collection, storage, Transportation & Disposal to registered recycler/re-processor.
4	Distillation Residue	35.3	130.91 MT/M	Collection, Storage, Transportation and Disposal at approved CHWIF or pre-processing or co-processing at Cement plant.
5	Dil. Hydrochloric Acid	Sch-II/B15	2300.5 MT/M	Collection, Storage, Transportation and send to authorized actual end-user having Rule-9 permission & valid CCA after making MOU.
6	Sodium Bisulphite	--	212.9 MT/M	Collection, Storage, Transportation and send to authorized actual end-user having Rule-9 permission & valid CCA after making MOU.
7	Sulfur Dioxide	--	565.6 MT/M	Collection, Storage, Transportation and send to authorized actual end-user having Rule-9 permission & valid CCA after making MOU/ captive use.
8	Sulphuric Acid	Sch-II/B15	100 MT/M	Collection, Storage, Transportation and send to authorized actual end-user having Rule-9 permission & valid CCA after making MOU.



9	Calcium Chloride	Sch-II/B-10	1300 MT/M	Collection, Storage, Transportation and Disposal by sending to authorized actual end-users having rule-9 permission & valid CCA after making MOU.
---	------------------	-------------	-----------	---

- 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 **18/07/2027**.
- 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 AUTHORIZATION:**
- 7.1 The authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
- 7.2 The authorization or its renewal shall be produced for inspection at the request of an officer authorized by the Gujarat Pollution Control Board.
- 7.3 The person authorized shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.
- 7.4 Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
- 7.5 The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization 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 authorized 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 It is the duty of the authorized person to take prior permission of the Gujarat Pollution Control Board to close down the facility.
- 7.8 The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
- 7.9 The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
- 7.10 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.
- 7.11 The importer or exporter shall bear the cost of import or export and mitigation of damages if, any.
- 7.12 An application for the renewal of an authorization shall be made as laid down under Hazardous & Other Wastes (Management and Transboundary Movement) Rules-2016.
- 7.13 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.
- 7.14 Annual return shall be filed by June 30<sup>th</sup> for the period ensuring 31<sup>st</sup> March of the year.
- 7.15 Unit 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 14<sup>th</sup> October 2003.
- 7.16 Unit 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.

- 7.17 Unit shall have to manage used or spent oil; empty or discarded barrels / containers / liners contaminated with hazardous chemicals / wastes, process waste as per Hazardous & Other Wastes (Management and Transboundary Movement) Rules-2016, framed under the E(P)Act-1986 and shall apply Authorization for all applicable waste.

FOR AND ON BEHALF OF  
GUJARAT POLLUTION CONTROL BOARD

*P. J. G.*  
(IRFAN KAGZI)  
ENVIRONMENT ENGINEER



## Provisional Consent Order (CCA)

Consent No. W-128006 Valid upto: 18/07/2027

Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector-10/A,  
Gandhinagar - 382010  
Tele : 23222756

Application : CtO:CCA-Ammendment, No. 268746 Dt. 12/01/2023, Granted On: 28/07/2023

PCB Id:15812

Besides streamlining and simplifying of regulatory regime, Gujarat Pollution Control Board has taken initiative in from of introduction of Consolidated Consent and Authorization (CC&A) which provides for a one shot application and clearance of the consents under Water Act, Air Act and Authorization under Hazardous Wastes Rules for a period of 5 years. Board issues consolidated consent and Authorization to an industrial unit for operation of plant/carrying out industrial activity specifying following conditions.

### Consolidated Consent and Authorisation

In exercise of the power conferred under section-25 of 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 3(c) & 5(5) of the Hazardous Waste (Management, Handling and Transboundary Movement) Rules'2008 framed under the E(P) Act-1986.

And whereas Board has received consolidated Application No. (CtO:CCA-Ammendment) 268746 and Dated 12/01/2023 for the consolidated consent and authorization (CC&A) of this Board under the provisions / rules of the aforesaid Acts Consent & Authorization is hereby granted as under.

**CONSENT AND AUTHORISATION :** (under the provisions / rules of the aforesaid environmental acts)

To,

**M/s. TML Industries Ltd.,**

33-P, 34-P, 35, 37, 39, AT. & POST. PILUDRA,,

TAL. JAMBUSAR,, City : Piludra,

Dist : Bharuch, Tal : Jambusar, SIDC : Not In Gide

Phone : 9898508387

1. Consent Order No: **W-128006** Valid Upto: **18/07/2027**

2. All Conditions under the WATER ACT-1974 shall be Applicable to you as mentioned in the detailed Consent Order \*\*\*

Consented CETP: **Not Linked to any CETP**

Consented TSDF: **Bharuch Enviro Infrastructure Ltd is -Dahej[40137]**

### 3. GENERAL CONDITIONS :-

- This order is provisional order and detailed order is considered as final.
- All the conditions & provisions under the Water Act 1974, the Air Act 1981 and the Environment (Protection) Act - 1986 and the rules made there under shall be complied with \*.
- All the conditions & provisions under the Hazardous Waste (Management, Handling and Trans boundary Movement) Rules 2008 as amended shall be complied
- 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.
- The industry 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 and 70dB(A) during night time. Daytime is reckoned in between 6 a.m. and 10 p.m. and nighttime is reckoned between 10 p.m. and 6 a.m.
- In case of change of ownership/management the name and address of the new owners/ partners/ directors/ proprietor or equipment or working conditions as mentioned in the consents form / order should immediately be intimated to the Board.
- Industry shall have to display data outside the main factory gate with regard to quantity and nature of hazardous chemicals being handled in the plant, including waste water and air emissions and solid hazardous wastes generated within the factory premises.
- The CCA shall be produced for inspection at the request of an officer authorized by the Gujarat Pollution Control Board.
- Any unauthorized change in personnel, equipment or working conditions as mentioned in the CCA order by CCA holder shall constitute a breach of this CCA.
- Adequate plantation shall be carried out all along the periphery of the industrial premises in such a way that the density of plantation is atleast 1000 trees per acre of land and a green belt of 5 meters width is developed.
- The applicant shall have to submit the returns in prescribed form regarding water consumption and shall have to make payment of water cess to the Board under the Water Cess Act- 1977.

\*\*\* Note : ACT-Specific, Industry-specific, Area-specific Conditions alongwith Product, Waste water effluent details shall be precisely mentioned in the DETAILED Consent Order.

\*\*\* Note : This is only provisional communication. The final Consent/Authorization in hard copy with duly signed by competent authority shall the final and valid Consent/Authorization.

For and on behalf of  
Gujarat Pollution Control Board

D. M. Thaker,

( Member Secretary )



1178

**Provisional Consent Order (CTE)**

Gujarat Pollution Control Bo  
Paryavaran Bhavan, Sector-10  
Gandhinagar - 382  
Tele : 23222

Consent No. CTE-130368 Valid upto: 18/05/2030

Application : CtE:CTE-Change Product.Mix, No. 277084 Dt. 21/04/2023, Granted On: 08/11/2023

PCB Id:158

To,  
M/s. TML Industries Ltd.,  
33-P,34-P, 35,37,39, AT. & POST.PILUDRA,,  
TAL. JAMBUSAR,,City : Piludra,  
Dist : Bharuch, Tal : Jambusar, SIDC : Not In Glde  
Phone : 9898508387

SUB: Consent to Establish (NOC) under Section 25 of  
REF: Your Application No.(CtE:CTE-Change Product.Mix) 277084 and Dated 21/04/2023

Without prejudice to the powers of this Board under the Water (Prevention and Control of Pollution) Act-1974, the Air Act-1981 and Environment (Protection) Act-1986 and without reducing your responsibilities under the said Acts in any way, this is to inform you that this Board grants Consent to Establish for setting up of an industrial plant/activities at AT. & POST.PILUDRA, TAL. JAMBUSAR,, Piludra, Jambusar , Bharuch , Phone No. 9898508387 for the manufacturing of the items/products as mentioned in the detailed order \*\*\*.

The Validity period of the order will be Five Years from the date of issue of CTE (NOC) order.

1. CTE Order No: CTE-130368 Valid Upto: 18/05/2030

2. All Conditions under the shall be Applicable to you as mentioned in the detailed Consent Order \*\*\*

Approved CETP: Not Linked to any CETP  
Approved TSDF: Bharuch Enviro Infrastructure Ltd is -Dahej[40137]

**3. GENERAL CONDITIONS :-**

- This order is provisional order and detailed order is considered as final.
- All the conditions and provisions under the Water Act 1974, the Air Act 1981 and the Environment (Protection) Act - 1986 and the rules made there under shall be complied with\*.
- All the conditions and provisions under the Hazardous Waste (Management, Handling and Trans boundary Movement) Rules 2008 as amended shall be complied with\*.
- The concentration of Noise in ambient air within the premises of industrial unit shall not exceed following levels:  
Between 6 A.M. and 10 P.M.: 75 dB (A)  
Between 10 P.M. and 6 A.M.: 70 dB (A)
- In case of change of ownership/management the name and address of the new owners / partners/ directors/ proprietor or equipment or working conditions as mentioned in the consents form/ order should immediately be intimated to the Board.
- Industry shall have to display data outside the main factory gate with regard to quantity and nature of hazardous chemicals being handled in the plant, including waste water and air emissions and solid hazardous wastes generated within the factory premises.
- Adequate plantation shall be carried out all along the periphery of the industrial premises in such a way that the density of plantation is atleast 1000 trees per acre and a green belt of 5 meters width is developed.
- The applicant shall have to submit the returns in prescribed form regarding water consumption and shall have to make payment of water cess to the Board under Water Cess Act- 1977.
- The applicant shall obtain membership of common infrastructure for disposal of effluent / Hazardous waste.
- The applicant shall however, not without the prior consent of the Board bring into use any new or altered outlet for the discharge of effluent or gaseous emission sewage waste from the proposed industrial plant. The applicant is required to make applications to this Board for this purpose in the prescribed forms under the provisions of the Water Act-1974, the Air Act-1981 and the Environment (Protection) Act-1986.
- If it is established by any competent authority that the damage is caused due to their industrial activities to any person or his property, in that case they are obliged to pay the compensation as determined by the competent authority.

\*\*\* Note : ACT-Specific, Industry-specific, Area-specific Conditions alongwith Product, Waste water effluent details shall be precisely mentioned in the DETAILED Consent Order

\*\*\* Note : This is only provisional communication. The final Consent/Authorization in hard copy with duly signed by competent authority shall be the final and valid Consent/Authorization.

For and on behalf of  
Gujarat Pollution Control Board

D. M. Thaker

( Member Secretary )



INDEX		
<u>Sr No</u>	<u>Perticular</u>	<u>Ref</u>
1	Joint inspection report filed as JWC as Annexure 32(TML Piludra) as part of JWC report dated 20th Sept 2022	Annexure 3P
2	Notice of entry of Joint inspections & Observations (CPCB/CGWA/GPCB) dated 19th & 20th Sept 2022	Annexure 4P
3	Compliance dated on Joint inspection reports	Annexure 5P
4	Showcause notice dated 03/11/2022 - TML Piludra	Annexure 6
5	Compliance dated on Notice dated 15/11/2022 - TML Piludra	Annexure 7
6	Summary of GPCB Notice of entry, compliance date, Orders & legal orders- Pre joint inspection & Post Joint inspection	Annexure 8
7	VECL samples records of last 2 years	Annexure 9
8	GPCB Water & Air samples report of last 2 years	Annexure 10
9	CGWA Joint inspection reports ( <i>Photo copies of report 1st &amp; 2nd pages only</i> ) TML Piludra dated - 2022 & 2023	Annexure 11
10	GPR survey done dated 2021 & information to Member Secretary GPCB for TML TML Piludra. ( <i>Photo copies of report 1st &amp; 2nd pages only</i> )	Annexure 12

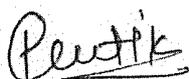
**Annexure A 32**  
**Inspection Report**

1	<b>Name &amp; Address of unit</b>	M/s. TML industries Ltd Plot no. 33-P, 34-P, 35, 37, 39, At & Po: Piludra, Tal: Jambusar, Dist: Bharuch.
2	<b>Date &amp; Time of Inspection</b>	20/09/2022, 11:35 Hrs.
3	<b>Name, designation &amp; contact number of industry representative</b>	Mr. Dixit Patel, Sr. Manager– Mo. 9898508393
4	<b>Operational status of unit at the time of inspection</b>	In operation.
5	<b>Validity of CCA</b>	AWH-88278 and subsequent amendments valid up to 18/07/2022. Unit has applied for CCA-Renewal, which is under process.
6	<b>Products/Sector</b>	Organic Chemicals manufacturing (TCAC, Sodium salt of trichloro pyridinol, Chloropyriphos, Triclopyr, Triclopyr Ethyl Ester, Triclopyr Methyl Ester, Vinyl Laurate, ChloroSulphonic Acid)
7	<b>a. Source of Water Supply b. Status of CGWA permission, if GW is being used</b>	Borewell (1 nos.) provided in the premises Unit has valid CGWA permission (up to 06/12/2023) for abstraction of ground water (582 KLD).
8	<b>ETP system provided</b>	<b>The unit has provided ETP consisting of following treatment units.</b> <b>Neutralization Tank (lime dosing) → Filter Press (01 Nos.) → Primary Settling tank → Equalization tank → Filter press (01 Nos.) → Aeration Tank (01 Nos.) → Bio filter plant collection tank → Bio filter plant → Sand-Gravel &amp; Carbon bed → Collection tank → Aeration Tank (01 Nos.) → Collection tank → Treated Effluent Tank (02 nos.) → Discharged into VECL</b>
9	<b>ETP operational status</b>	<ul style="list-style-type: none"> <li>● During inspection, unit was in operation. The operational condition of ETP was unsatisfactory in view of following observations:</li> <li>● The raw effluent neutralization tank (underground tank) was almost empty and there was no fixed provision for removal of the sludge from the tank.</li> <li>● The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.</li> <li>● The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.</li> <li>● There are many PVC/HDPE pipelines observed lying in the ETP</li> </ul>

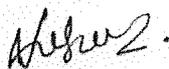
		<p>area without proper identification and clear intended purpose.</p> <ul style="list-style-type: none"> <li>• It is observed that different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.</li> <li>• The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@ 4-5 on pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP is not proper or some acidic stream of the effluent is entering the bio Filter unit of ETP directly.</li> <li>• There was no continuous flow from secondary treatment units to bio filter plant and tertiary treatment system i.e. Sand &amp; Carbon Filter. 02 nos. of final treated waste water holding cum disposal tank of ETP were found empty. And therefore sample of treated w/w could not be collected.</li> <li>• Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank. There was no provision for treatment of the same.</li> <li>• Proper nomenclature and flow diagram not observed on different units and effluent conveying pipelines in ETP area.</li> <li>• Photographs taken during inspection are attached herewith.</li> </ul>
10	Is treated effluent discharge line provided above ground?	No
11	Is treated effluent discharge observed into VECL at the time of inspection, if yes then analysis results of the sample collected	No
12	Operational status of OCEMS	OCEMS installed but connectivity to VECL is pending
13	Results showing in OCEMS, including discharge flow rate	--
14	Any bypass line / unauthorized discharge / accumulation of wastewater in premises	<ul style="list-style-type: none"> <li>• Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank. There was no provision for treatment of the same.</li> </ul>

	observed?							
15	Is proper logbook maintained regarding operation of ETP?	No						
16	Quantity of effluent discharged into VECL in last 3 months (to be verified from flow meter record)	<table border="1"> <thead> <tr> <th>June'22</th> <th>July'22</th> <th>August'22</th> </tr> </thead> <tbody> <tr> <td>2863.52 m3</td> <td>3702.13 m3</td> <td>2957.07 m3</td> </tr> </tbody> </table> <p>Source: Received from VECL via Email on 07/10/2022</p>	June'22	July'22	August'22	2863.52 m3	3702.13 m3	2957.07 m3
June'22	July'22	August'22						
2863.52 m3	3702.13 m3	2957.07 m3						
16	Is hazardous waste found stored & disposed as per Rules?	<ul style="list-style-type: none"> <li>Storage of hazardous waste was not satisfactory. Approximately 30-35 MT Solid and semi solid sludge (Hazardous waste) was found stored under a shed in haphazard manner and some sludge also found stored in open area behind the shed.</li> <li>As per XGN manifest records, unit has disposed 716.44 MT Chemical sludge to common facility i.e. TSDF during last one year (01-09-2021 to 31-08-2022).</li> </ul>						

## Inspection by:



P. S. Chaudhary  
AEE, GPCB RO Vadodara



A. H. Vasava  
AEE, GPCB RO Bharuch

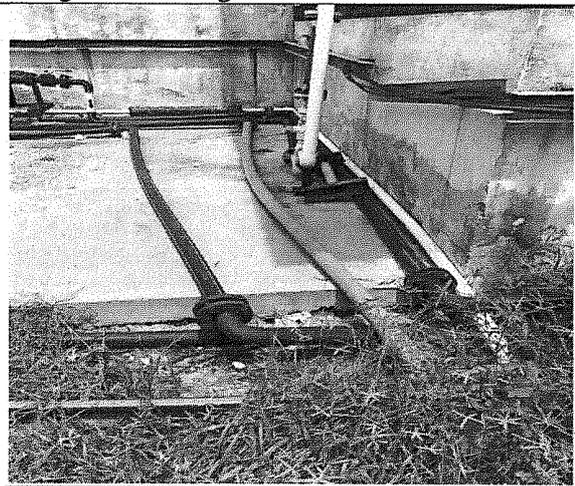


Dr. N. Semwal  
Scientist-C, CPCB RD Vadodara

Photographs taken during Inspection



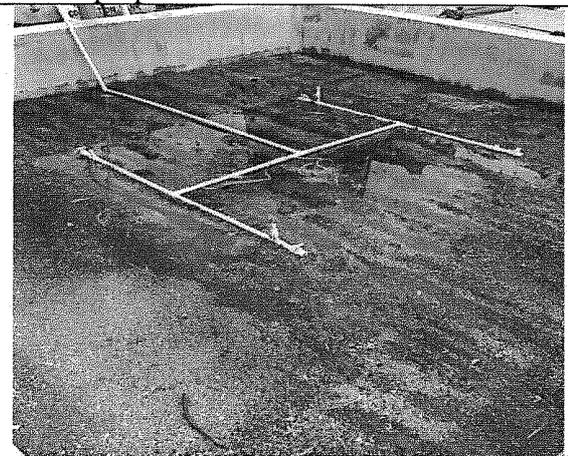
Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank



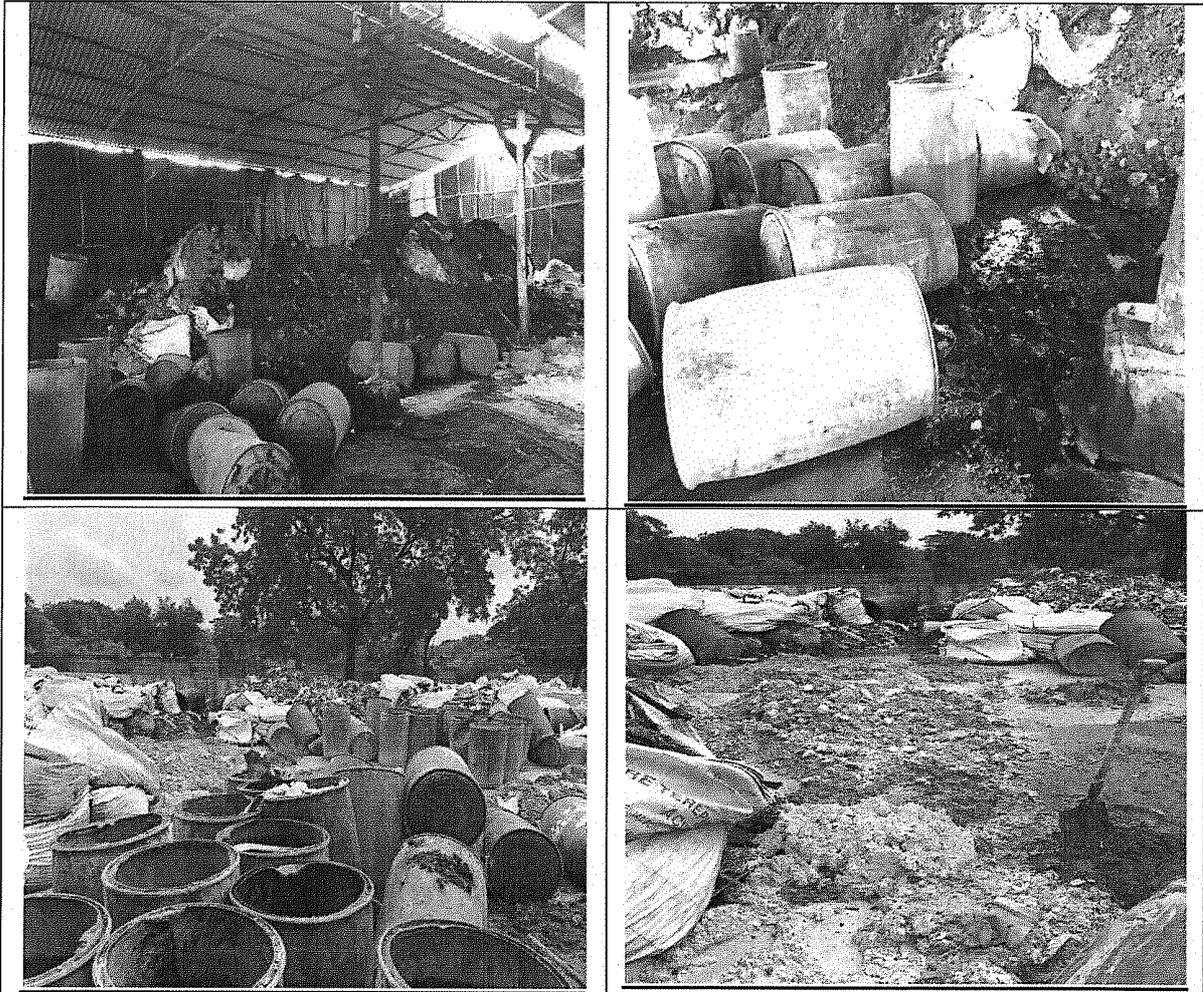
There are many PVC/HDPE pipelines observed lying in the ETP area without proper identification and purpose



Non-operational Bio filter plant



Sand-gravel & Carbon filter bed



Hazardous waste stored in haphazard manner



# ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ

સી-૧/૧૧૯/૩, ઝ.આઈ.ડી.સી., ફેઝ-૨, નર્મદાનગર, ભરૂચ-૩૯૨ ૦૧૫. ફોન : (૦૨૬૪૨) ૨૪૬૩૩૩  
ઈમેઈલ : ro-gpcb-bhar@gujarat.gov.in વેબ સાઈટ : www.gpcb.gujarat.gov.in

## તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

PCB ID- 15812

તારીખ : ૨૦/૦૯/૨૦૨૨

પાણી અધિનિયમ ૧૯૭૪ની કલમ-૨૩, હવા અધિનિયમ ૧૯૮૬ની કલમ-૨૪ અને પર્યાવરણ (સુરક્ષા) અધિનિયમ - ૧૯૮૬ની કલમ-૧૦ હેઠળ અમોને મનેલ સત્તાની રૂએ અમો નીચે સહી કરનાર અમોને જરૂરી લાગે તેની સહાય લઈને તમામ સમયે નીચેના હેતુઓ માટે આપની જગ્યામાં દાખલ થવાનો અને તપાસ કરવાનો અધિકાર ધરાવીએ છીએ.

- (૧) અમોને સોંપેલા રાજ્ય બોર્ડ/કેન્દ્ર સરકારના કાર્ય બજાવવાના હેતુ માટે,
- (૨) આવા કોઈ કાર્યો બજાવવાના છે કે કેમ અને તેમ હોય તો કઈ રીતે તે બજાવવાના છે અથવા આ અધિનિયમ અથવા તે હેઠળ કરેલા નિયમોની અથવા આ અધિનિયમ હેઠળ બજાવેલી કોઈ નોટીસની, કરેલા કોઈ દુકમની, આદેશની અથવા આપેલા કોઈ અધિકારપત્રની કોઈ ખેતવાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે,
- (૩) કોઈ સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુની તપાસ કરવા અને તેની કસોટી કરવાના હેતુ માટે અથવા જે જગ્યામાં તેને એમ માનવાને કારણે હોય કે આ કાયદા કે તે હેઠળ કરેલા નિયમો મુજબ કોઈ ગુનો કરવામાં આવ્યો છે, અથવા થવાની તૈયારીમાં છે, તેવી કોઈ જગ્યાની ઝડતી લેવા માટે અને તેને એમ માનવાને કારણે હોય કે આ કાયદા કે તે હેઠળ કરેલ નિયમો હેઠળ વિશ્વાસપાત્ર કોઈ ગુનો કર્યાનો પુરાવો, તેવા સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુ કબજે લેવા માટે અને નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ/કારખાનામાં દાખલ થવાનો સમય : ૧૧:૩૫ hrs. તા. ૨૦ / ૦૯ / ૨૦૨૨

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે.

૧. N. Semwa (Scientist C, CPCB)
૨. P.S. Chaudhary (AEE), R.O. Vadodura.
- ૩.

પ્રતિ,

M/s TMC Industries Ltd  
Plot No: ૩૩-P, ૩૪-P, ૩૬, ૩૭, ૩૯  
At and Post: Piploda  
Tal: Jamkhusar, Dist: Shubrah.

સહી :-.....  
અધિકારીનું નામ :-.....A.H. V...  
હોદ્દો :-.....AEE

આ સૂચના (નોટીસ) મેળવનારની સહી :-.....Dixit Patel (Senior Manager)



# ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ

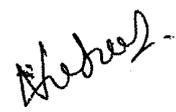
સી-૧/૧/૧૧૯/૩, જી.આઇ.ડી.સી., નર્મદાનગર, ભરૂચ - ૩૯૨ ૦૧૫. ફોન : (૦૨૬૪૨) ૨૪૬૩૩૩  
 ઇમેઇલ : ro-gpcb-bhar@gujarat.gov.in ઇમેઇલ : યુનિટ હેડ uh-gpcb-bhar@gujarat.gov.in  
 વેબસાઇટ : http://gpcb.xgn.gujarat.gov.in

<b>સ્થળ તપાસની નિરિક્ષણ નોંધ</b>	
આઇ.ડી.નં.: <u>15812</u> કેટેગરી/સ્કેલ: <u>R</u> / <u>L</u> Latitude/longitude: ..... / .....	
<p>શ્રીમાન,</p> <p>આપશ્રીને જણાવવાનું કે, આજ તા. <u>20/09/22</u> ના રોજ આપશ્રીના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઇન્સ્પેક્શન કરેલ છે જે દરમિયાન હવા/પાણી/બોખમી કચરા/.....ના..... /...../.....નમૂના પૃથ્થકરણ અર્થે એકત્રીત કરેલ છે.</p> <p>આપશ્રીના એકમની મુલાકાત દરમિયાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ/ક્ષતિઓ જોવા/જણાવા મળેલ છે, જે આઘાટે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને/અથવા કાયદાકીય પગલાં લેતા અને/અથવા પર્યાવરણ નુકશાન વળતર લેતા પહેલા કુદરતી વ્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખિતમાં સ્થળસ્થિતિ/મુદ્દાઓ/સુચનાઓ આપવામાં આવે છે.</p> <p>આ પરત્વે આપશ્રી નીચે લેખિતમાં રજૂઆત કરી શકો છો અથવા લેખિત ખુલાસો/સ્પષ્ટતા/પુર્વતા અહેવાલ કામકાજના દિન-૦૩ માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખિતમાં અથવા XGN પર અથવા Email થી રજૂ કરવા બોટીસ આપવામાં આવે છે.</p>	
સ્થળ તપાસ દરમિયાન જોવા મળેલ સ્થળસ્થિતિ/ત્રુટીઓ/ક્ષતિઓ/ખામીઓ :	
૧) As per Annexure - I	
૨)	
૩)	
ગુ.પ્ર.નિ. બોર્ડના નામે અને વતી, <u>A. H. Vasava</u> (અધિકારીઓના નામ, હોદ્દો, સહી): <u>(Aee) Akhwa</u>	
મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનિધીની રજૂઆત:(જે લાગુ પડે તેની સામે જ સહી કરવી)	
મુલાકાત દરમિયાન અધિકારીશ્રીઓએ.....મુદ્દાઓ માટે સ્થળસ્થિતિ /સુચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે, જેમાં	
(૧) આ સ્થળસ્થિતિ/સુચનાઓ સાથે હું, નીચે સહી કરનાર સંપૂર્ણ સહમત છું	✓
(૨) જેમા દર્શાવેલ સ્થળસ્થિતિ/સુચનાઓમાંથી મુદ્દા નં..... સાથે હું, નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજૂઆત છે.:	✓
એકમના પ્રતિનિધી / આ નોંધ મેળવનારનું નામ, હોદ્દો અને સહી:	
તા.: <u>ms - Dixit Patel (G manager)</u>	

Annexure-I

- Proper operation & maintenance of ETP needs to be ensured.
- There are many PVC pipelines layed in the ETP area without proper identification and purpose.
- ) All the pipeline in the ETP needs to be above ground.
- ) Proper nomenclature of different ETP units needs to be provided.
- ⇒ Highly alkaline <sup>unaccounted</sup>  $\text{CaCO}_3$  was found flowing in a <sup>open</sup> drain in the ETP area, which is finally terminating in a underground tank. There was no provision for treatment of the same.
- 6) The outlet of biofilter was observed acidic (@4-5 on pH strip) which is not inline with the treatment system of ETP. since the Biofilter feed is alkaline  $\text{CaCO}_3$  from Aeration tank-I as per the ETP design system.
- 7) Huge quantity of solid and semisolid sludge found stored under a shed and some ~~of~~ sludge also found stored in open behind the shed.

  
 MS. DIXIT Patel  
 (SS. Manager)

  
 A. H. Vasava  
 (AEE)

1188

o/c



Ref. No.: TML/PIL/GPCB/186/2022-23

Date: 26/09/2022

**PCB ID – 15812**

To,  
Regional Office,  
Gujarat Pollution Control Board  
C-1/119/3, GIDC, Phase-2  
Narmdanagar,  
Bharuch-392015.

Reference: Site visit on 20/09/2022 by GPCB officials from your good office.

Dear Sir,  
Our representation on your points/ suggestions is as below;

S.No.	Query	Reply												
1	Proper operation & maintenance of ETP needs to be ensured.	<p>Last 2 GPCB analysis of our treated Waste Water, VECL's monthly analysis &amp; Online TOC meter data showing our treated Waste water Quality which is summarized below &amp; details are attached as Annexure 1.</p> <table border="1"> <thead> <tr> <th></th> <th>pH</th> <th>COD(ppm)</th> </tr> </thead> <tbody> <tr> <td>Sample GPCB dated :21/04/22</td> <td>7.64</td> <td>105</td> </tr> <tr> <td>Sample GPCB dated :30/06/22</td> <td>7.85</td> <td>83</td> </tr> <tr> <td>VECL (Aug-Sep'22) month's avg. analysis</td> <td>7.38</td> <td>118</td> </tr> </tbody> </table> <p>Our Plant is very Old, surely Needs maintenance as per your observations, We ensure proper Operations &amp; Maintenance by providing adequate necessary resources. Current work done on immediate basis can be seen in photographs attached in next points.</p>		pH	COD(ppm)	Sample GPCB dated :21/04/22	7.64	105	Sample GPCB dated :30/06/22	7.85	83	VECL (Aug-Sep'22) month's avg. analysis	7.38	118
	pH	COD(ppm)												
Sample GPCB dated :21/04/22	7.64	105												
Sample GPCB dated :30/06/22	7.85	83												
VECL (Aug-Sep'22) month's avg. analysis	7.38	118												
2	There are many PVC pipeline laid in the ETP area without proper identification and purpose.	<p>As seen in photographs, Material of construction (MOC) of all pipelines used in ETP are PP-R or HDPE instead of PVC.</p> <p>Proper identification work of pipelines is already carried out which can be seen in attached photographs.</p>												

Post Received  
Gujarat Pollution Control Board  
BHARUCH  
27/9/22

V.V.P  
28/9/2022  
Gujarat Pollution Control Bd  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

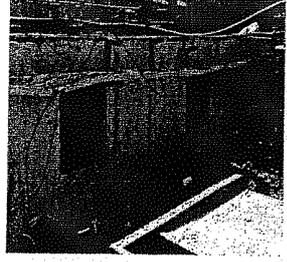
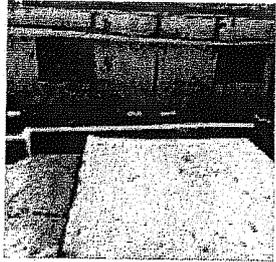
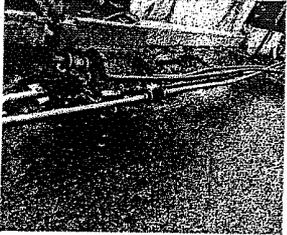
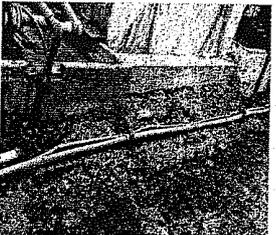
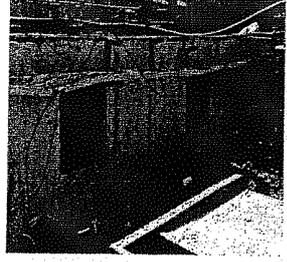
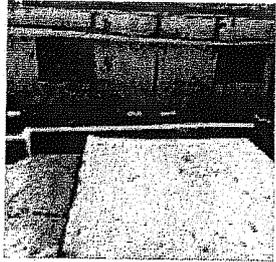
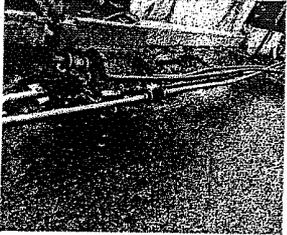
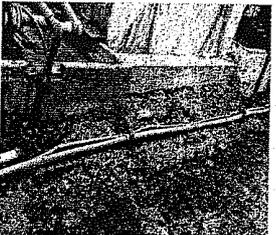
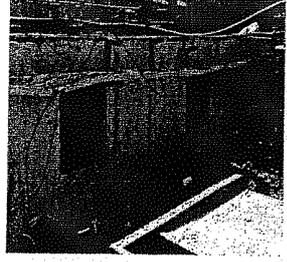
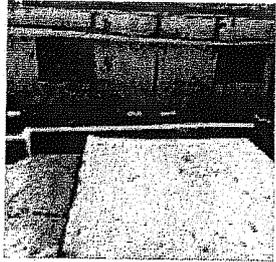
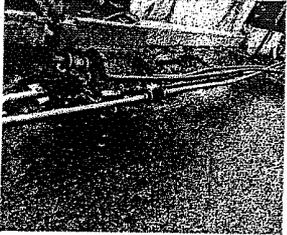
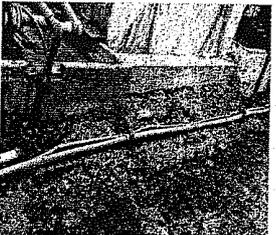
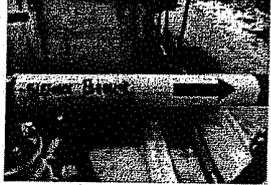
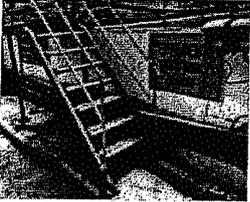
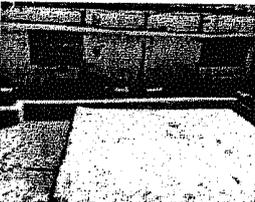
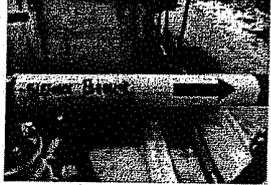
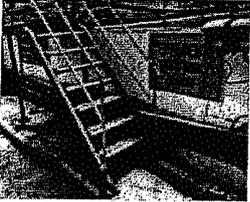
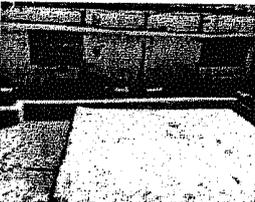
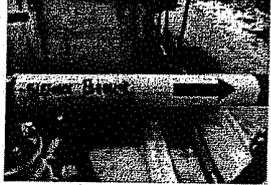
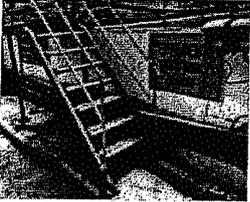
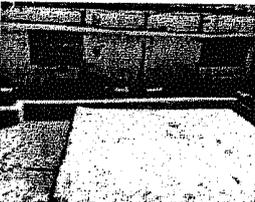
Corporate Office : 601, 'B' Tower, Alkapuri Arcade, R. C. Dutt Road, Vadodara-390007, Gujarat, India. Tel.: +91 265 2343302/04, 2341375

Works [1] : At & Post : Piludra - 391 816, Taluka : Jambusar, District : Bharuch, Gujarat, India. Tel.: +91 2644 237227 / 8 / 237372, Tele - Fax: +91 2644 237229

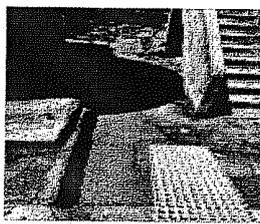
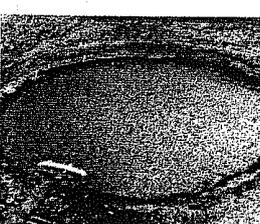
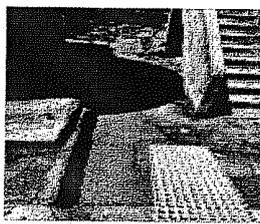
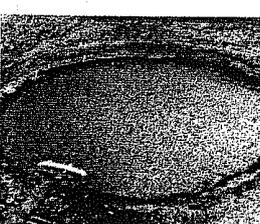
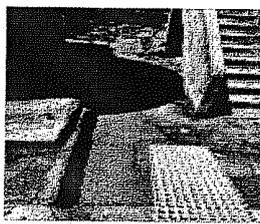
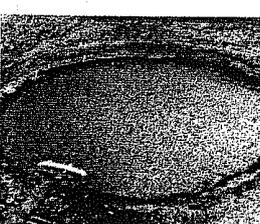
Works [2] : Canal Road, At & Post : Karakhadi - 391 450, Taluka : Padra, District : Vadodara. Gujarat, India. Tel.: +91 2662 273469 / 273563 Fax: +91 2662 273321

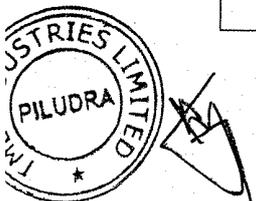
CIN : U74120GJ1989PLC012329

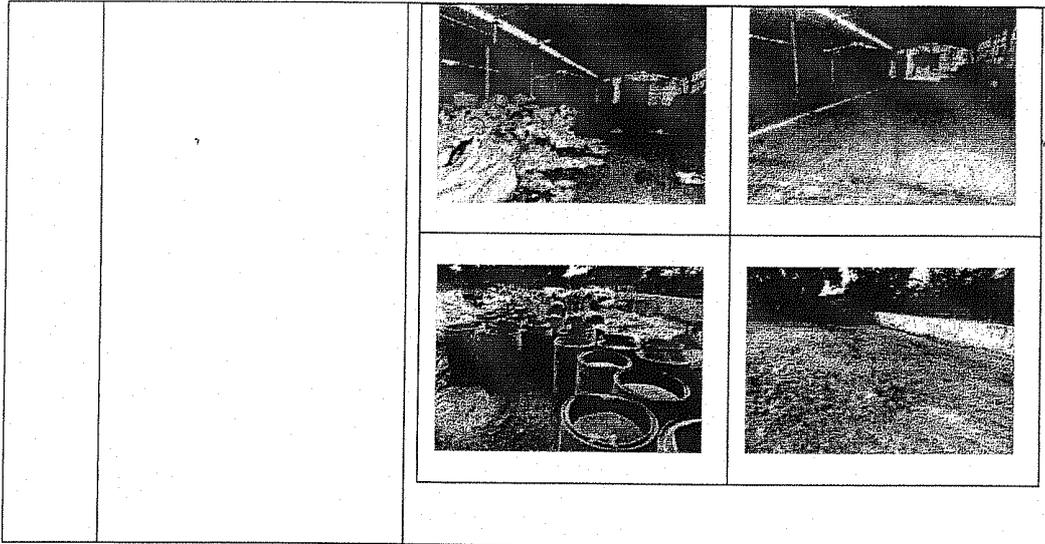
www.tmlind.com

		<table border="1"> <thead> <tr> <th>Before</th> <th>After</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Before	After				
Before	After							
								
								
3	All the pipeline in the ETP needs to be above ground.	Our majority of Pipelines are above ground except Inlet to Bio-filer & it's outlet due to service road. Your observations are noted and we will do the necessary action for taking pipelines above ground within 2 months.						
4	Proper nomenclature of different ETP units needs to be provided.	Painting work is already going on at ETP site, which was visible during your visit also. Work is completed for nomenclature of different ETP units, photograph are given.						
		<table border="1"> <tbody> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>						
								
								
5	Highly alkaline unaccounted w/w was found flowing in an open drain in the ETP area which is finally terminating in a	Wastewater of highly alkaline removed from the underground tank and taken to the ETP for the further treatment. Photograph of empty underground tank and drain is attached.  We have already closed open drain in the ETP area. So it						



	<p>underground tank. There was no provision for treatment of the same.</p>	<p>will be not in operation now onwards. Photographs is attached.</p> <table border="1" data-bbox="699 293 1321 873"> <tr> <th data-bbox="699 293 1007 331">Before</th> <th data-bbox="1007 293 1321 331">After</th> </tr> <tr> <td data-bbox="699 331 1007 600"></td> <td data-bbox="1007 331 1321 600"></td> </tr> <tr> <td data-bbox="699 600 1007 873"></td> <td data-bbox="1007 600 1321 873"></td> </tr> </table>	Before	After						
Before	After									
										
										
<p>6</p>	<p>The outlet of biofilter was observed acidic (4-5 on pH strip) which is not inline with the treatment system of ETP. Since the Biofilter feed is alkaline w/w from Aeration tank-1 as per the ETP design system.</p>	<p>In normal operations the treated water from Biofilter Plant is in the range of pH range 6.5-7.5. (Please find attached last one month's data as Annexure 2). But on that particular day since the plant was under shutdown, the treated water in the tank was stagnant for few hours, which was the cause of pH becoming slightly acidic in nature.</p> <p>Further the Biofilter treated water is subjected to polishing treatment, where it is collected and mixed with RO reject and further going for pH correction. So final outlet could not be deviated. pH measurement of VECL and internal lab of the final discharge to the VECL on same date of the visit i.e. 20/09/22 is as below.</p> <table border="1" data-bbox="683 1332 1220 1422"> <thead> <tr> <th data-bbox="683 1332 837 1370" rowspan="2">Date</th> <th colspan="2" data-bbox="837 1332 1220 1370">pH measurement</th> </tr> <tr> <th data-bbox="837 1370 1037 1408">VECL Online</th> <th data-bbox="1037 1370 1220 1408">Internal Lab</th> </tr> </thead> <tbody> <tr> <td data-bbox="683 1408 837 1422">20/09/22</td> <td data-bbox="837 1408 1037 1422">7.7</td> <td data-bbox="1037 1408 1220 1422">7.55</td> </tr> </tbody> </table>	Date	pH measurement		VECL Online	Internal Lab	20/09/22	7.7	7.55
Date	pH measurement									
	VECL Online	Internal Lab								
20/09/22	7.7	7.55								
<p>7</p>	<p>Huge quantity of solid and semisolid sludge found stored under a shed and some sludge also found stored in open behind the shed.</p>	<p>Close down of the TSDF site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused stock of accumulation of 106 Mt solid sludge right now at our solid waste storage yard. As soon as TSDF sites will reopen, we will do the needful.</p> <p>Please find last four months' generation, disposal data of the sludge &amp; current stock is given as Annexure 3.</p> <p>We have shifted sludge contained in HMHDPE drums ( 20 nos- Approx 4 Mt) which contains rain water also being in open area behind the shed to the under the shed.</p> <table border="1" data-bbox="673 1818 1300 1886"> <tr> <th data-bbox="673 1818 986 1856">Before</th> <th data-bbox="986 1818 1300 1856">After</th> </tr> <tr> <td data-bbox="673 1856 986 1886"></td> <td data-bbox="986 1856 1300 1886"></td> </tr> </table>	Before	After						
Before	After									





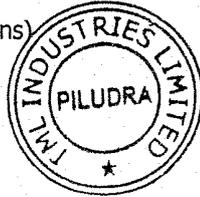
Form Hope above reply is satisfactory.

Thanking You.  
Yours Faithfully,

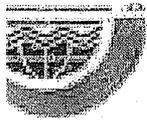
For TML INDUSTRIES LIMITED (UNIT-I)

Mr. K. J. PATEL  
(Dy. General Manager-Operations)

Enclose: as above



CC: Unit Head, Bharuch  
Environmental Engineer,  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector 10-A, Ganhinagar-382010



1192

Sample ID:348911 - Analysis Completion:30/04/2022

Organic Chemicals manufacturing / LAB Inward : 47481

C-1/119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333



TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR, Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 348911  
 Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
 Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
 Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of ETP  
 Flow Details (Remarks) : --  
 Method of Disposal : VECL Channel  
 Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :@7-8 on pH strip  
 Carboys Nos for : Barcode & Color & Appearance :Yellowish  
 Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Parameter : 12 ,Cap No & Weight :

Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.64
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	10558
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	20
Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	BDL
Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard N	1 - 50000 mg/l	4280
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	1118
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	105
Oil Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Phenolic Compounds	mg/l	4 Amino Antipyrine method without Chloroform Extra	0.1 - 50 mg/l	0.38
B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	24

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022

R.C.VASAVA,S.O

1:

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents



## TEST REPORT

st Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 348911  
 Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
 Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
 Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of  
 Flow Details (Remarks) ETP  
 Mode of Disposal : ---  
 Ultimate Receiving Body : VECL Channel  
 Temperature on Collection : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 C/ays Nos for : 31 & pH Range on pH Strip :@7-8 on pH strip  
 : Barcode & Color & Appearance :Yellowish  
 Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000

Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi, 2012	2 - to 99 Hazen & 1-50	10

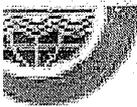
**Laboratory Remarks** : Approved By:399-lab\_399 Dt.: 30/04/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





1194

Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1/119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333



TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 Flow Details (Remarks) : --  
 Method of Disposal : VECL channel through own pipeline  
 Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 Barcodes Nos for : Barcode & Color & Appearance :Faint yellowish  
 Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Parameter : 12 ,Cap No & Weight :

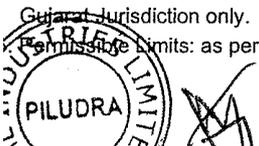
Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.85
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	7134
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	14
Ammonical Nitrogen	mg/l	1). Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	4.48
Chloride	mg/l	Argentometric method. (4500 Cl <sup>-</sup> B APHA Standard M	1 - 50000 mg/l	2990
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	678
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	83
Oil Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Phenolic Compounds	mg/l	4 Amino Antipyrine method without Chloroform Extra	0.1 - 50 mg/l	0.18
B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	18

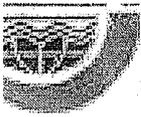
Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022

R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.

Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





# 1195

Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1/119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333

## TEST REPORT

Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
Sample Collected By : Ms Patel. Nancy. A, AEE  
Quantity of Sample Received : 5 lit  
Code No. of the Sample : 353482  
Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
Sampling Point : Final treated wastewater holding tank of ETP ~  
Flow Details (Remarks) : -  
Mode of Disposal : VECL channel through own pipeline  
Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
: Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
Water Consumption & W.W.G (KLPD) : 12 ,Cap No & Weight :

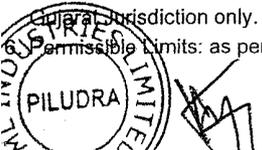
Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	05

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022

R.C.VASAVA,S.O

1. The results relate only to the items sampled and tested.
2. Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
3. The report shall not be reproduced except in full or part without approval of the laboratory.
4. The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
5. Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to

6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents



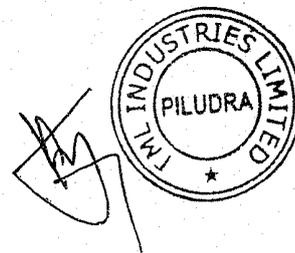
TML Industries Ltd, VECL Analysis data of Last 2 Month												
Sr.No	Parameter	GPCB Limit	Result	Result	Result							
	Date		14-08-2022	16-08-2022	17-08-2022	20-08-2022	25-08-2022	04-09-2022	07-09-2022	10-09-2022		
1	Ph	6.5-8.5	7.33	7.23	7.54	7.37	7.36	7.61	7.29	7.37		
2	COD (ppm)	250	133	161	107	74	119	82	163	103		
3	BOD (ppm)	100	--	--	--	--	--	--	--	--		
4	Ammonical Nitrogen (ppm)	50	5	--	5	5	5	5	5	--		
5	Color (pt.co)	100	30	34	35	26	24	27	20	36		
6	Chloride (ppm)	600	3646	--	3153	2910	3620	3621	2168	--		
7	TSS (ppm)	100	10	--	17	38	15	15	10	--		
8	TDS (ppm)	5000	8292	--	8568	7540	8688	7492	10028	--		
9	Sulphate (ppm)	1000	1158	--	1362	1697	1027	706	590	--		



VECL_TML Industries:20/Sep/2022										
Timestamp	COD(mg/l)	pH(pH)	BOD(mg/l)	FLOW(m3/hr)	TSS(mg/l)	NH4(mg/l)	TEMP.(C)	COLOR(Hazen-eq.)		
20-Sep-2022 16:50	77.34	7.69	10.54	0.54	0.5	66.46	0	31.8		25.67
20-Sep-2022 16:40	76.53	7.69	9.1	0.54	0.54	62.49	0	31.8		1.22
20-Sep-2022 16:30	76.13	7.69	9.52	0.54	0.54	62.81	0	31.7		7.12
20-Sep-2022 16:20	76.25	7.69	9.89	0.54	0.54	63.84	0	31.6		9.75
20-Sep-2022 16:10	76.8	7.68	9.89	0.54	0.54	65.21	0	31.6		9.35
20-Sep-2022 16:00	76.78	7.69	9.73	0.54	0.54	64.3	0	31.5		10.44
20-Sep-2022 15:50	76.76	7.68	9.29	78.14	63.72	63.72	0	31.5		3.94
20-Sep-2022 15:40	77.56	7.68	9.54	79	65.27	65.27	0	31.4		5.56
20-Sep-2022 15:30	77.58	7.68	9.89	79.94	65.93	65.93	0	31.3		11.55
20-Sep-2022 15:20	76.82	7.68	9.14	81.15	64.09	64.09	0	31.3		0.87
20-Sep-2022 15:10	76.65	7.69	9.64	81.81	63.94	63.94	0	31.2		7.19
20-Sep-2022 15:00	76.25	7.68	8.86	82.2	62.71	62.71	0	31.1		0
20-Sep-2022 14:50	76.38	7.68	9.87	82.71	64	64	0	31.1		10.48
20-Sep-2022 14:40	76.4	7.68	9.7	83.38	63.97	63.97	0	31		9.75
20-Sep-2022 14:30	76.89	7.69	9.46	0.5	64.36	64.36	0	30.9		5.56
20-Sep-2022 14:20	77.34	7.69	9.56	0.5	65.75	65.75	0	30.9		7.84
20-Sep-2022 14:10	77.48	7.68	9.02	0.5	64.67	64.67	0	30.8		0
20-Sep-2022 14:00	77.87	7.68	9.82	0.54	66.55	66.55	0	30.7		12.22
20-Sep-2022 13:50	77.47	7.68	8.67	0.54	63.11	63.11	0	30.7		0
20-Sep-2022 13:40	77.27	7.67	10.83	0.5	67.53	67.53	0	30.6		26.94
20-Sep-2022 13:30	76.87	7.67	9.72	0.54	65.64	65.64	0	30.5		7.83
20-Sep-2022 13:20	78.02	7.66	9.27	0.54	66.37	66.37	0	30.5		2.33
20-Sep-2022 13:10	77.56	7.66	8.89	0.5	63.87	63.87	0	30.4		0
20-Sep-2022 13:00	77.13	7.66	10.32	0.54	65.59	65.59	0	30.3		17.23
20-Sep-2022 12:50	77.35	7.66	9.31	0.54	65.25	65.25	0	30.3		1.42
20-Sep-2022 12:40	77.69	7.66	8.93	0.54	64.52	64.52	0	30.2		0
20-Sep-2022 12:30	77.04	7.65	9.78	0.5	65.24	65.24	0	30.2		10.31
20-Sep-2022 12:20	77.27	7.64	9.21	0.54	64.23	64.23	0	30.1		1.25
20-Sep-2022 12:10	76.96	7.63	9.78	0.54	64.93	64.93	0	30		13.88
20-Sep-2022 12:00	77.56	7.62	8.84	0.54	64.73	64.73	0	30		0

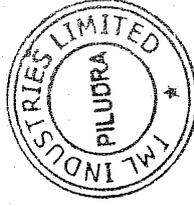


TML Industries Ltd Piludara Biofilter						
Date	Biofilter Feed			Biofilter outlet		
	pH	TDS	COD	pH	TDS	COD
	--	PPM	PPM	--	PPM	PPM
01-09-2022	8	14000	1190	6.8	13300	620
02-09-2022	8.45	13000	1220	6.65	12300	625
03-09-2022	8.36	13000	1220	7.05	12800	620
04-09-2022	8.84	15000	1250	7.3	15000	690
05-09-2022	8.88	13500	1225	7.35	13000	580
06-09-2022	8.46	12000	1190	7.24	12000	610
07-09-2022	8.54	14000	1210	7.15	14000	620
08-09-2022	8.65	13800	1220	7.2	13300	660
09-09-2022	8.87	12900	1260	7.1	12300	670
10-09-2022	8.76	13500	1245	7.15	12800	690
11-09-2022	8.74	13000	1195	7.24	12000	670
12-09-2022	8.57	15000	1275	7.15	14000	660
13-09-2022	8.65	13600	1190	7.1	12300	650
14-09-2022	8.68	13300	1240	7.15	12800	685
15-09-2022	8.48	14400	1260	7.3	15000	625
16-09-2022	8.56	14600	1240	7.35	13000	620
17-09-2022	8.47	13800	1245	7.24	12000	610
18-09-2022	8.59	14700	1050	7.15	14000	590
19-09-2022	8.78	14400	1140	7.08	13300	640
20-09-2022	8.67	13600	1240	6.03	12300	580
21-09-2022	8.57	13300	1260	6.5	12300	670
22-09-2022	8.63	13300	1190	6.9	1250	580



**TML INDUSTRIES LTD PILUDARA**  
**HAZ. WASTE DETAILS**

Sr. No.	Type of waste	Quantity of Generation as per CC&A	Category	Opening as on 1-6-2022 (MT)	Actual Generation (in MT)				Actual Disposal (in MT)				Stock as on 22/09/22 (MT)	Mode of Disposal
					June.-2022	July.-2022	Aug.-22	Sept.-22 (22-9-2022)	June.-2022	July.-2022	Aug.-22	Sept.-22 (9-2022)		
1	ETP WASTE	465.96 MT/MONTH	Sch-I 33.5 (Sch-1)	132.02	27.01	32	17.7	15.55	118	0	0	0	106.5	Collection, Storage, Transportation, Disposal at TSDF BEIL site





1200  
**GUJARAT POLLUTION CONTROL BOARD**

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

R.P.A.D.

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

WHEREAS you **M/s. TML Industries Ltd** having a unit at Plot No. 33-P,34-P, 35,37,39, At & Post, Piludra, Tal: Jambusar, Dist: Bharuch.

AND WHEREAS Board has granted Consolidated Consent and Authorization (CC&A) vide order no. **AWH-122228** valid up to **18/07/2027** for manufacturing of various Organic Chemicals with various conditions mentioned therein.

AND WHEREAS your industry was monitored on **20/09/2022** under Section-23 of the Water Act - 1974 jointly by authorized officers of the CPCB & GPCB and it was observed:

- ✓ 1. At the time of inspection, raw effluent neutralization tank (underground tank) was found almost empty and there was no fixed provision for removal of the sludge from the tank.
- ⊗ 2. The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.
- ✓ 3. The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.
- ✓ 4. There were many PVC/HDPE pipelines observed lying in the ETP area without proper identification and clear intended purpose.
- ✓ 5. Different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.
- ✓ 6. The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@ 4-5 on pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP was not proper or some acidic stream of the effluent is entering the bio Filter unit of ETP directly.
- ✓ 7. There was no continuous flow from secondary treatment units to bio filter plant and tertiary treatment system i.e. Sand & Carbon Filter.
- ✓ 8. Highly alkaline unaccounted waste water observed flowing in an open kuchcha drain in the ETP area, which was finally terminating in an underground tank. There was no provision for treatment of the same.
- ✓ 9. Proper nomenclature and flow diagram were not observed on different units and effluent conveying pipelines in ETP area.
- ✓ 10. Storage of hazardous waste was not satisfactory. Approximately 30-35 MT Solid and semi solid sludge (Hazardous waste) was found stored under a shed in haphazard manner and some sludge also found stored in open area behind the shed.

Outward No. 68150/371/2022

Now, therefore I Irfan Kagzi Environment Engineer proposes to issue Notice under section 33-A of the Water (Prevention and Control of Pollution) Act-1974 as under:

1. Why not to issue direction under section 33-A of the Water (Prevention and control of pollution) Act - 1974 to prohibit you from manufacturing activity?
2. Why not to direct to concern authority for disconnection of Power Supply & Water Supply of your industrial plant?

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

FOR AND ON BEHALF OF  
GUJARAT POLLUTION CONTROL BOARD

*I/KS*  
(IRFAN KAGZI)  
ENVIRONMENT ENGINEER

**NO: GPCB/BRCH-B/CCA-189(18)/ID: 15812/**

**Date: /11/2022**

Issue to:

**M/s. TML Industries Ltd**

Plot No. 33-P, 34-P, 35,37,39,

At & Post, Piludra,

Tal: Jambusar, Dist: Bharuch.

Copy to:

**The Regional Officer,**

Gujarat Pollution Control Board,

Regional Office,

Bharuch..... For monitoring & verification and submission of IR & AR.

Outward No: 687560, 03/11/2022

# TML INDUSTRIES LIMITED

Our Ref: TML/PIL/GPCB/197 / 2022-23

Date: 15<sup>th</sup> November, 2022

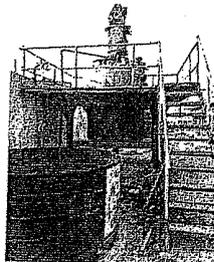
**ID: 15812**

To,  
**The Unit Head- Bharuch**  
 Gujarat Pollution Control Board,  
 Parvavaran Bhavan, Sector 10-A,  
 Gandhinagar- 382 010

**Sub: Show cause notice issued through letter no. GPCB/BRCH-B/CCA-189(16)/ID-15812/687560 dated 03/11/2022**

Dear Sir,

The point wise clarification of your observation mentioned in the show cause notice is given as following:

S. No.	Reason of Notice	Compliance / Reply
1	At the time of inspection, raw effluent neutralization tank (underground tank) was found almost empty and there was no fixed provision for removal of the sludge from the tank.	We have planned filter cloth replacement work in the filter press along with re-route/re-locate pipeline from neutralization tank to filter press-1 from roadside to inside plant side on the day. Due to planned maintenance, we had completed neutralization, filtration, settling & transfer operation in the first half so at the time of inspection raw effluent neutralization tank (underground tank), primary settling tank were found almost empty along with Disconnection of filter press piping.
2	The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.	
3	The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.	<p>The procedure of sludge removal from the primary neutralization/Settling tank(underground tank)are manual, and frequency of cleaning is on periodical basis. There is no any fix provision for the removal of the sludge from the tanks.</p> <p>Based on your suggestions during the visit for further improvement, we have re-located &amp; re-installed our neutralization tank above ground instead of underground along with Sludge removal facility from bottom. Below is the Photograph of the same.</p> <div style="display: flex; justify-content: space-around;">   </div>
4	There were many PVC/HDPE pipelines observed lying in the ETP area without proper identification and clear intended purpose.	Reply & Compliance for this observation is already submitted to your offices on 12/10/2022 which was attached as Annexure 1.

Post Received  
 Gujarat Pollution Control Board  
 BHARUCH

Registered Office : 1006/3, Goship House, Opp. Shree Pragati Vidhyalaya, Bhayli Station Road, Bhayli, Vadodara-391410, Gujarat, INDIA Ph.: +91 9558819257

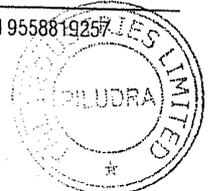
Piludra Plant : At & Post : Piludra - 391816, Taluka : Jambusar, District : Bharuch, Gujarat, INDIA Ph.: +91 2644 237227 / 8

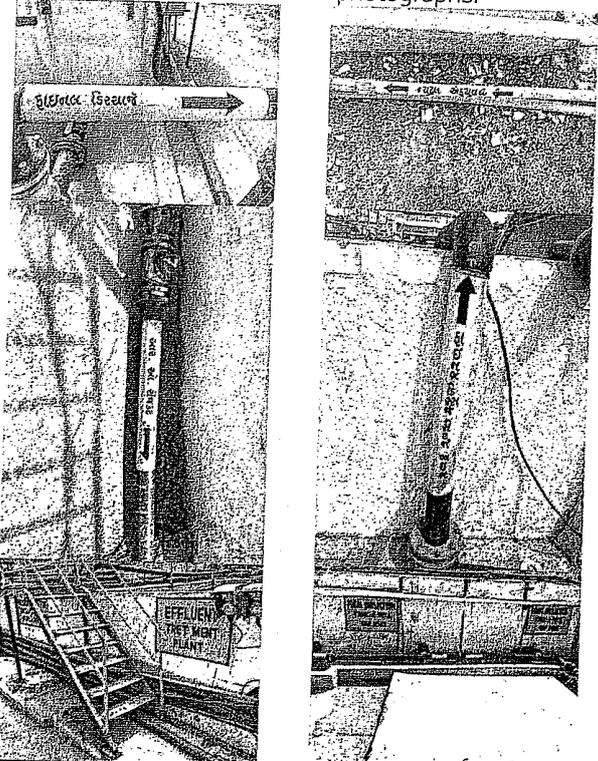
Karakhadi Plant : Canal Road, At & Post : Karakhadi - 391450, Taluka : Padra, District : Vadodara, Gujarat, INDIA Ph.: +91 2662 273563

CIN : U74120GJ1989PLC012329

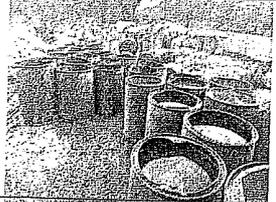
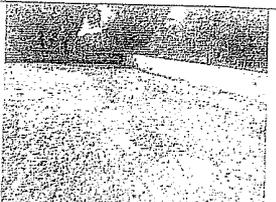
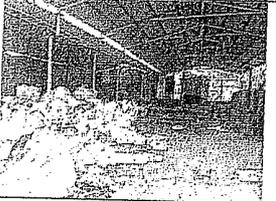
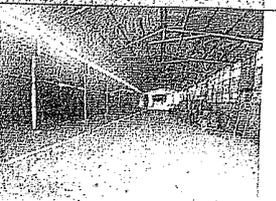
Website: www.tmlind.com

Email : tml@tmlind.com



		<p>We do not use pipelines of PVC (As MoC)/Flexible pipes in our Plant; We use HDPE &amp; PP-R fix pipelines only.</p> <p>Proper identification work of pipeline is already carried out which can be seen in attached photographs.</p> 
<p>5</p>	<p>Different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.</p>	<p>Our majority of pipelines are above ground except inlet to bio-filter &amp; its outlet due to service road.</p> <p>Considering your valuable suggestions, we have already shifted suggested pipelines above the ground. Below are Photographs of the completed work.</p> 
<p>6</p>	<p>The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@4-5 pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP was not proper or some acidic stream of the effluent is entering</p>	<p>No acidic stream is entering in to the Biofilter, In normal operations the treated water from Biofilter plant is in the range of 6.5- 7.5 pH. (Last two month's data were also attached in our reply as Annexure 1).</p> <p>But on that particular day since the treated water in the tank was stagnant for few hours, which might be the cause of pH becoming slightly acidic in nature.</p> <p>Further the Bio-filter treatment being intermediate stage of treatment is sent to polishing treatment, where it is further treated and mixed with RO reject before final</p>

Before	After
	
	
<p>Clouse down of the TSDF site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused accumulation of solid sludge.</p> <p>As on date We have disposed over 100 MT sludge post reopening of TSDF site. Copies of latest dispatches are attached as Annexure 2.</p>	

Hope the details explained would satisfy your good office's requirements and we request you to please remove show cause notice and oblige.

**Thanking you,**

**Yours Faithfully**  
**For TML Industries Ltd (UNIT-I)**

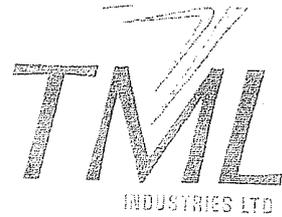
**Mr. Kismat J. Patel**  
**Dy. General Manager (Operations)**  
**Encl: As above**



Cc to:  
 The Regional officer  
 Gujarat Pollution Control Board,  
 C-1/119/3-GIDC-Phase-2,  
 Narmdanagar, Bharuch-392015

✓

o/c



Ref. No.: TML/PIL/GPCB/186/2022-23

Date: 26/09/2022

**PCB ID – 15812**

To,  
Regional Office,  
Gujarat Pollution Control Board  
C-1/119/3, GIDC, Phase-2  
Narmdanagar,  
Bharuch-392015.

Reference: Site visit on 20/09/2022 by GPCB officials from your good office.

Dear Sir,  
Our representation on your points/ suggestions is as below;

S.No.	Query	Reply												
1	Proper operation & maintenance of ETP needs to be ensured.	<p>Last 2 GPCB analysis of our treated Waste Water, VECL's monthly analysis &amp; Online TOC meter data showing our treated Waste water Quality which is summarized below &amp; details are attached as Annexure 1.</p> <table border="1"> <thead> <tr> <th></th> <th>pH</th> <th>COD(ppm)</th> </tr> </thead> <tbody> <tr> <td>Sample GPCB dated :21/04/22</td> <td>7.64</td> <td>105</td> </tr> <tr> <td>Sample GPCB dated :30/06/22</td> <td>7.85</td> <td>83</td> </tr> <tr> <td>VECL (Aug-Sep'22) month's avg. analysis</td> <td>7.38</td> <td>118</td> </tr> </tbody> </table> <p>Our Plant is very Old, surely Needs maintenance as per your observations, We ensure proper Operations &amp; Maintenance by providing adequate necessary resources. Current work done on immediate basis can be seen in photographs attached in next points.</p>		pH	COD(ppm)	Sample GPCB dated :21/04/22	7.64	105	Sample GPCB dated :30/06/22	7.85	83	VECL (Aug-Sep'22) month's avg. analysis	7.38	118
	pH	COD(ppm)												
Sample GPCB dated :21/04/22	7.64	105												
Sample GPCB dated :30/06/22	7.85	83												
VECL (Aug-Sep'22) month's avg. analysis	7.38	118												
2	There are many PVC pipeline laid in the ETP area without proper identification and purpose.	<p>As seen in photographs, Material of construction (MOC) of all pipelines used in ETP are PP-R or HDPE instead of PVC.</p> <p>Proper identification work of pipelines is already carried out which can be seen in attached photographs.</p>												

V.N.P  
28/9/2022  
Gujarat Pollution Control Board  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

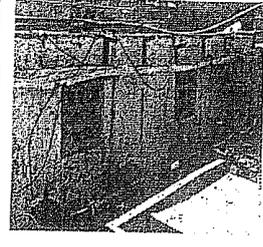
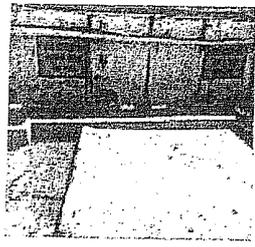
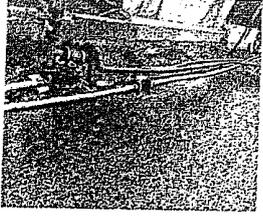
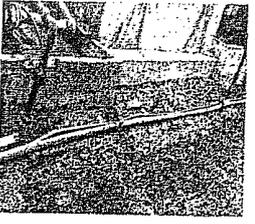
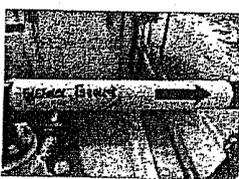
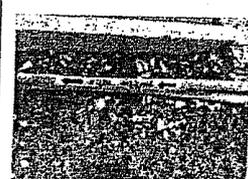
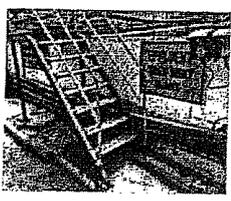
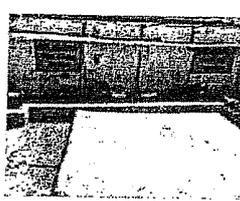
Post Received  
Gujarat Pollution Control Board  
BHARUCH

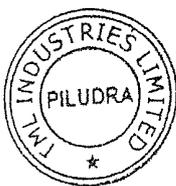
Corporate Office : 601, 'B' Tower, Alkapuri Arcade, R. C. Dutt Road, Vadodara-390007, Gujarat, India. Tel.: +91 265 2343302/04, 2341375  
Works [1] : At & Post : Piludra - 391 816, Taluka : Jambusar, District : Bharuch, Gujarat, India. Tel.: +91 2644 237227 / 8 / 237372, Tele - Fax: +91 2644 237229  
Works [2] : Canal Road, At & Post : Karakhadi - 391 450, Taluka : Padra, District : Vadodara. Gujarat, India. Tel.: +91 2662 273469 / 273563 Fax: +91 2662 273321

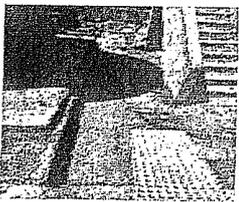
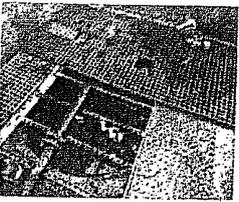
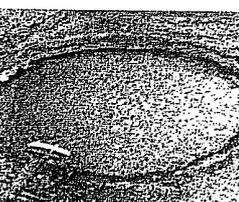
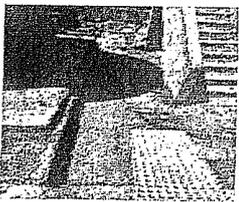
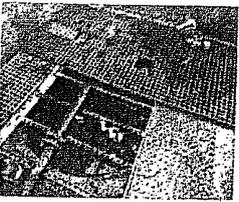
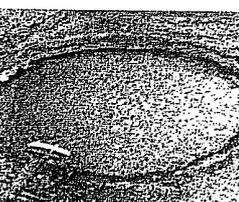
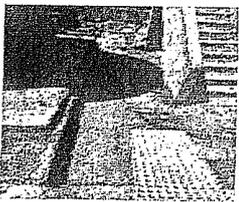
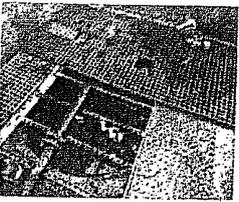
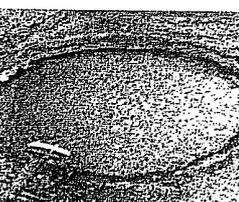
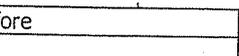
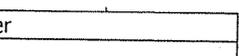
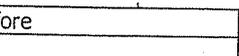
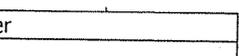
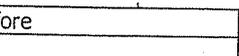
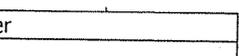
CIN : U74120GJ1989PLC012329

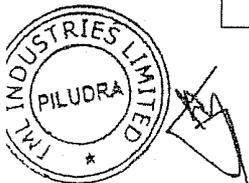
www.tmlind.com

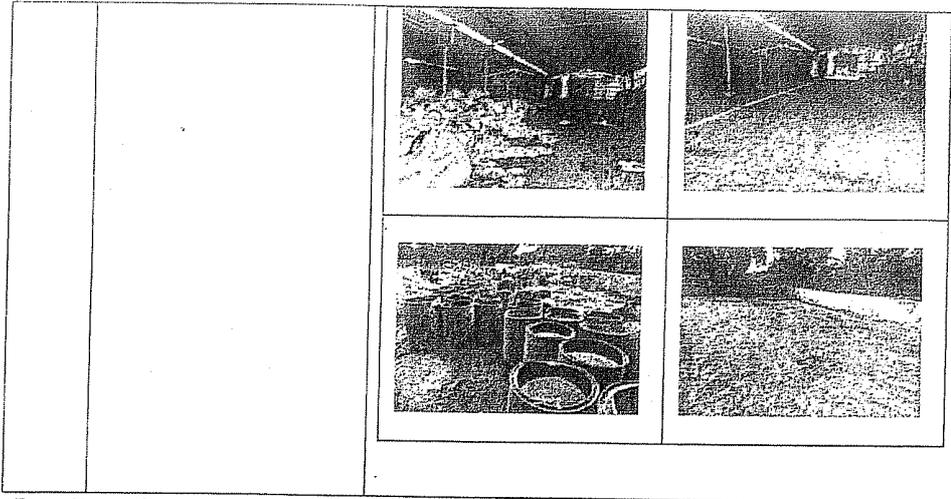


		Before	After
			
			
3	All the pipeline in the ETP needs to be above ground.	Our majority of Pipelines are above ground except Inlet to Bio-filer & it's outlet due to service road. Your observations are noted and we will do the necessary action for taking pipelines above ground within 2 months.	
4	Proper nomenclature of different ETP units needs to be provided.	Painting work is already going on at ETP site, which was visible during your visit also. Work is completed for nomenclature of different ETP units, photograph are given.	
			
			
5	Highly alkaline unaccounted w/w was found flowing in an open drain in the ETP area which is finally terminating in a	Wastewater of highly alkaline removed from the underground tank and taken to the ETP for the further treatment. Photograph of empty underground tank and drain is attached. We have already closed open drain in the ETP area. So it	



	<p>underground tank. There was no provision for treatment of the same.</p>	<p>will be not in operation now onwards. Photographs is attached.</p> <table border="1" style="width: 100%;"> <tr> <th style="width: 50%;">Before</th> <th style="width: 50%;">After</th> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table>	Before	After						
Before	After									
										
										
<p>6</p>	<p>The outlet of biofilter was observed acidic (4-5 on pH strip) which is not inline with the treatment system of ETP. Since the Biofilter feed is alkaline w/w from Aeration tank-1 as per the ETP design system.</p>	<p>In normal operations the treated water from Biofilter Plant is in the range of pH range 6.5-7.5. (Please find attached last one month's data as Annexure 2). But on that particular day since the plant was under shutdown, the treated water in the tank was stagnant for few hours, which was the cause of pH becoming slightly acidic in nature.</p> <p>Further the Biofilter treated water is subjected to polishing treatment, where it is collected and mixed with RO reject and further going for pH correction. So final outlet could not be deviated. pH measurement of VECL and internal lab of the final discharge to the VECL on same date of the visit i.e. 20/09/22 is as below.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Date</th> <th colspan="2">pH measurement</th> </tr> <tr> <th>VECL Online</th> <th>Internal Lab</th> </tr> </thead> <tbody> <tr> <td>20/09/22</td> <td>7.7</td> <td>7.55</td> </tr> </tbody> </table>	Date	pH measurement		VECL Online	Internal Lab	20/09/22	7.7	7.55
Date	pH measurement									
	VECL Online	Internal Lab								
20/09/22	7.7	7.55								
<p>7</p>	<p>Huge quantity of solid and semisolid sludge found stored under a shed and some sludge also found stored in open behind the shed.</p>	<p>Close down of the TSDF site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused stock of accumulation of 106 Mt solid sludge right now at our solid waste storage yard. As soon as TSDF sites will reopen, we will do the needful.</p> <p>Please find last four months' generation, disposal data of the sludge &amp; current stock is given as Annexure 3.</p> <p>We have shifted sludge contained in HMHDPE drums ( 20 nos- Approx 4 Mt) which contains rain water also being in open area behind the shed to the under the shed.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <th style="width: 50%;">Before</th> <th style="width: 50%;">After</th> </tr> <tr> <td></td> <td></td> </tr> </table>	Before	After						
Before	After									
										





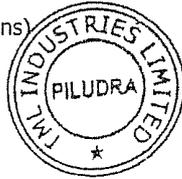
Form Hope above reply is satisfactory.

Thanking You.  
Yours Faithfully,

For TML INDUSTRIES LIMITED (UNIT-I)

Mr. K. J. PATEL  
(Dy. General Manager-Operations)

Enclose: as above



CC: Unit Head, Bharuch  
Environmental Engineer,  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector 10-A, Ganhinagar-382010





Sample ID:348911 - Analysis Completion:30/04/2022

Organic Chemicals manufacturing / LAB Inward : 47481

 C-1/119/3, GIDC Phase-2  
 Narmadanagar  
 Bharuch-392015  
 Tele:(0264)2246333


TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Test Report No. : 47481

Date: 30/04/2022

1. Name of the Customer : TML Industries Ltd. - 15812
2. Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In
3. Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)
4. Sample Collected By : Ms Patel. Nancy. A, AEE
5. Quantity of Sample Received : 5 lit
6. Code No. of the Sample : 348911
7. Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022
8. Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022
9. Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of ETP
10. ( ) Details (Remarks) : ---
11. ( ) Mode of Disposal : VECL Channel
12. Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi
13. Temperature on Collection : 31 & pH Range on pH Strip :@7-8 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance : Yellowish
15. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000
16. Parameter : 12 ,Cap No & Weight :

Sl. No.	Parameter	Unit	Test Method	Range of Testing	Result
1	Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
2	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.64
3	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	10558
4	Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	20
5	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	BDL
6	Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard	1 - 50000 mg/l	4280
7	Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	1118
8	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	105
9	Oil & Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
10	Aromatic Compounds	mg/l	4 Amino Antipyrine method without Chloroform Extra	0.1 - 50 mg/l	0.38
11	B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirm	05-50000 mg/l	24

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022



R.C.VASAVA,S.O

Note :

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as amended by Second and Third amendment 1993 for Effluents



## TEST REPORT

Test Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 348911  
 Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
 Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
 Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of  
 ETP  
 1. Flow Details (Remarks) :  
 1. Mode of Disposal : --  
 2. Ultimate Receiving Body : VECL Channel  
 3. Temperature on Collection : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 4. ( ) Sys Nos for : 31 & pH Range on pH Strip :@7-8 on pH strip  
 : Barcode & Color & Appearance :Yellowish  
 5. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000

Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi, 2012	2 - to 99 Hazen & 1-50	10

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022

  
 R.C.VASAVA,S.O

- e :
- The results relate only to the items sampled and tested.
  - Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
  - The report shall not be reproduced except in full or part without approval of the laboratory.
  - The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
  - Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
  - Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

 C-1/119/3, GIDC Phase-2  
 Narmadanagar  
 Bharuch-392015  
 Tele:(0264)2246333


TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / - / - / Validity: 29/12/2023

## TEST REPORT

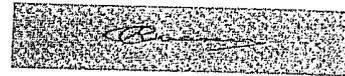
Test Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 0. Flow Details (Remarks) : -  
 1. Mode of Disposal : VECL channel through own pipeline  
 2. Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 3. Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 4. Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
 5. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 6. Parameter : 12 ,Cap No & Weight :

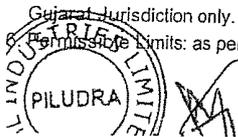
Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.85
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	7134
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	14
Ammonical Nitrogen	mg/l	1). Titrimetric method (4500 NH3 B & C APHA Standal	1 - 2000 mg/l.	4.48
Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard N	1 - 50000 mg/l	2990
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	678
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	83
Oil & Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Biological Compounds	mg/l	4 Amino Antiprene method without Chloroform Extra	0.1 - 50 mg/l	0.18
BOD (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	18

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
  - Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
  - The report shall not be reproduced except in full or part without approval of the laboratory.
  - The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
  - Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat jurisdiction only.
- Permissible limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333

## TEST REPORT

Test Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 Flow Details (Remarks) : -  
 Mode of Disposal : VECL channel through own pipeline  
 Intermediate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
 Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Water Consumption & W.W.G (KLPD) : 12 ,Cap No & Weight :

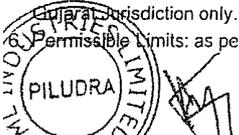
Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pl.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	05

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as amended by Second and Third amendment 1993 for Effluents

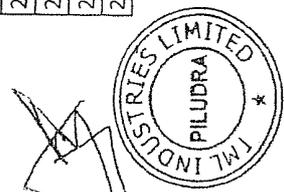


Sr.No	Parameter	GPCB Limit	TML Industries Ltd, VECL Analysis data of Last 2 Month									
			Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
1	Date	--	14-08-2022	16-08-2022	17-08-2022	20-08-2022	25-08-2022	04-09-2022	07-09-2022	10-09-2022		
2	Ph	6.5-8.5	7.33	7.23	7.54	7.37	7.36	7.61	7.29	7.37		
3	COD (ppm)	250	133	161	107	74	119	82	163	103		
4	BOD (ppm)	100	--	--	--	--	--	--	--	--		
5	Ammonical Nitrogen (ppm)	50	5	--	5	5	5	5	5	--		
6	Color (pt.co)	100	30	34	35	26	24	27	20	36		
7	Chloride (ppm)	600	3646	--	3153	2910	3620	3621	2168	--		
8	TSS (ppm)	100	10	--	17	38	15	15	10	--		
9	TDS (ppm)	5000	8292	--	8568	7540	8688	7492	10028	--		
	Sulphate (ppm)	1000	1158	--	1362	1697	1027	706	590	--		



VECL\_TML Industries:20/Sep/2022

Timestamp	COD(mg/l)	pH(pH)	BOD(mg/l)	FLOW(m3/hr)	TSS(mg/l)	NH4(mg/l)	TEMP.(C)	COLOR(Hazen-eq.)
20-Sep-2022 16:50	77.34	7.69	10.54	0.5	66.46	0	31.8	25.67
20-Sep-2022 16:40	76.53	7.69	9.1	0.54	62.49	0	31.8	1.22
20-Sep-2022 16:30	76.13	7.69	9.52	0.54	62.81	0	31.7	7.12
20-Sep-2022 16:20	76.25	7.69	9.89	0.54	63.84	0	31.6	9.75
20-Sep-2022 16:10	76.8	7.68	9.89	0.54	65.21	0	31.6	9.35
20-Sep-2022 16:00	76.78	7.69	9.73	0.54	64.3	0	31.5	10.44
20-Sep-2022 15:50	76.76	7.68	9.29	78.14	63.72	0	31.5	3.94
20-Sep-2022 15:40	77.56	7.68	9.54	79	65.27	0	31.4	5.56
20-Sep-2022 15:30	77.58	7.68	9.89	79.94	65.93	0	31.3	11.55
20-Sep-2022 15:20	76.82	7.68	9.14	81.15	64.09	0	31.3	0.87
20-Sep-2022 15:10	76.65	7.69	9.64	81.81	63.94	0	31.2	7.19
20-Sep-2022 15:00	76.25	7.68	8.86	82.2	62.71	0	31.1	0
20-Sep-2022 14:50	76.38	7.68	9.87	82.71	64	0	31.1	10.48
20-Sep-2022 14:40	76.4	7.68	9.7	83.38	63.97	0	31	9.75
20-Sep-2022 14:30	76.89	7.69	9.46	0.5	64.36	0	30.9	5.56
20-Sep-2022 14:20	77.34	7.69	9.56	0.5	65.75	0	30.9	7.84
20-Sep-2022 14:10	77.48	7.68	9.02	0.5	64.67	0	30.8	0
20-Sep-2022 14:00	77.87	7.68	9.82	0.54	66.55	0	30.7	12.22
20-Sep-2022 13:50	77.47	7.68	8.67	0.54	63.11	0	30.7	0
20-Sep-2022 13:40	77.27	7.67	10.83	0.5	67.53	0	30.6	26.94
20-Sep-2022 13:30	76.87	7.67	9.72	0.54	65.64	0	30.5	7.83
20-Sep-2022 13:20	78.02	7.66	9.27	0.54	66.37	0	30.5	2.33
20-Sep-2022 13:10	77.56	7.66	8.89	0.5	63.87	0	30.4	0
20-Sep-2022 13:00	77.13	7.66	10.32	0.54	65.59	0	30.3	17.23
20-Sep-2022 12:50	77.35	7.66	9.31	0.54	65.25	0	30.3	1.42
20-Sep-2022 12:40	77.69	7.66	8.93	0.54	64.52	0	30.2	0
20-Sep-2022 12:30	77.04	7.65	9.78	0.5	65.24	0	30.2	10.31
20-Sep-2022 12:20	77.27	7.64	9.21	0.54	64.23	0	30.1	1.25
20-Sep-2022 12:10	76.96	7.63	9.78	0.54	64.93	0	30	13.88
20-Sep-2022 12:00	77.56	7.62	8.84	0.54	64.73	0	30	0



TML Industries Ltd Piludara Biofilter						
Date	Biofilter Feed			Biofilter outlet		
	pH	TDS PPM	COD PPM	pH	TDS PPM	COD PPM
01-09-2022	8	14000	1190	6.8	13300	620
02-09-2022	8.45	13000	1220	6.65	12300	625
03-09-2022	8.36	13000	1220	7.05	12800	620
04-09-2022	8.84	15000	1250	7.3	15000	690
05-09-2022	8.88	13500	1225	7.35	13000	580
06-09-2022	8.46	12000	1190	7.24	12000	610
07-09-2022	8.54	14000	1210	7.15	14000	620
08-09-2022	8.65	13800	1220	7.2	13300	660
09-09-2022	8.87	12900	1260	7.1	12300	670
10-09-2022	8.76	13500	1245	7.15	12800	690
11-09-2022	8.74	13000	1195	7.24	12000	670
12-09-2022	8.57	15000	1275	7.15	14000	660
13-09-2022	8.65	13600	1190	7.1	12300	650
14-09-2022	8.68	13300	1240	7.15	12800	685
15-09-2022	8.48	14400	1260	7.3	15000	625
16-09-2022	8.56	14600	1240	7.35	13000	620
17-09-2022	8.47	13800	1245	7.24	12000	610
18-09-2022	8.59	14700	1050	7.15	14000	590
19-09-2022	8.78	14400	1140	7.08	13300	640
20-09-2022	8.67	13600	1240	6.03	12300	580
21-09-2022	8.57	13300	1260	6.5	12300	670
22-09-2022	8.63	13300	1190	6.9	1250	580



TML INDUSTRIES LTD PILUDARA  
HAZ. WASTE DETAILS

Sr. No.	Type of waste	Quantity of Generation as per CC&A	Category	Opening as on 1-6-2022 (MT)	Actual Generation (in MT)					Actual Disposal (in MT)					Stock as on 22/09/22 (MT)	Mode of Disposal
					June-2022	July-2022	Aug-22	Sept-22 (22-9-2022)	June-2022	July-2022	Aug-22	Sept-22 (20-9-2022)	June-2022	July-2022		
1	ETP WASTE	465.96 MT/MONTH	Sch-I 33.5 (Sch-1)	132.02	27.01	32	17.7	15.55	118	0	0	0	0	106.5	Collection, Storage, Transportation, Disposal at TSDF BEIL site.	



## Annexure 2

ETP Sludge Dispatched To TSDF

1. Manifest Number : 1886541  
Date : 12/11/2022  
Weight : 25.570 MT
2. Manifest Number : 1887367  
Date : 13/11/2022  
Weight : 24.730 MT
3. Manifest Number : 1887443  
Date : 13/11/2022  
Weight : 31.000 MT
4. Manifest Number : 1888049  
Date : 14/11/2022  
Weight : 27.780 MT

Total Weight : 109.08 MT



1218



Safe Enviro Private Limited [53681]

 Manifest No:  
1886541  
12/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST. PILUDRA,, TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	25.570MT	Consistency	Solid
Transporter Details					
Name	Khera Transport Co.	Contact Details	9925065555 khera.transport@gmail.com		
Address	Near Cargo motors,Ranoli District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX6565 (IMEI No :862095058924702)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Ghanshyam Mishra	Driver Contact No	7096621807		
Waste Transportation Details					
Vehicle Depart.	12/11/2022 1:00PM	Number of Drums	0	Loose Waste	25.570
Remarks	ETP SLUDGE SEND TO M/S Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> At & Post: Piludra, 391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AABCT0793K1Z7			For TML Industries Ltd. Signature: Kismat Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b> Stamp:		Date: 12/11/22		Signature: 	
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

Date:

Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)

Print by 15812@12/11/2022 12:14:02 PM

88fad2aa-ab82-4de8-a8ee-369633621a12

Page 1 of 1



1219



Safe Enviro Private Limited [53681]

 Manifest No:  
1887367  
13/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

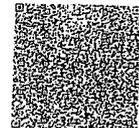
Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST.PILUDRA,,TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF.		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	24.730MT	Consistency	Solid
Transporter Details					
Name	Khera Transport Co.	Contact Details	9925065555 khera.transport@gmail.com		
Address	Near Cargo motors,Ranoli District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX6565 (IMEI No :862095058924702)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Ghanshyam Mishra	Driver Contact No	7096621807		
Waste Transportation Details					
Vehicle Depart.	13/11/2022 12:15PM	Number of Drums	0	Loose Waste	24.730
Remarks	ETP SLUDGE SEND TO M/S Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> At & Post: Piludra-391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AAE0793K1Z7			For TML Industries Ltd.  Signature: Kismat Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b>					
Stamp:		Date:	Signature:		
		13/11/22			
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

Date:

Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)



Print by 15812 @ 13/11/2022 11:26:41 AM 725eccb1-e832-4bf0-8b68-bb3e4d2d9ad6

Page 1 of 1





Safe Enviro Private Limited [53681]

 Manifest No:  
1887443  
13/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST.PILUDRA,,TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	31.000MT	Consistency	Solid
Transporter Details					
Name	krishana roadline	Contact Details	9925065555 khera.transport@gmail.com		
Address	GACL Ranoli road opposite BPCL petrol pump,GACL Ranoli road opposite BPCL petrol pump District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX2282 (IMEI No :358980100228627)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Naseer bhai	Driver Contact No	9622628225		
Waste Transportation Details					
Vehicle Depart.	13/11/2022 1:20PM	Number of Drums	0	Loose Waste	31.000
Remarks	Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> Name and stamp of sender: At. & Post, Piludra, 391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AABCT0793K1Z7			For TML Industries Ltd. Signature: Kisma Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b> Stamp:			Date: 13/11/22 Signature: Naseer		
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

Date:

Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)

Print by 15812 @ 13/11/2022 12:31:44 PM a96fefd7-514b-4b9a-9f5d-51b0937dbf2d

Page 1 of 1



✓ TML Industries Limited-Piludra GPCB ID 15812

Year	GPCB's Visits	Orders		Directions Issued	Notice of Directions Issued	Show Cause Notice Issued
<u>Pre Joint Inspection dated 20/09/2022</u>						
2019	2	3	Amendment to CTE dated 16/03/2019 Amendment to CCA dated 16/03/2019 Amendment to CCA dated 16/05/2019	0	0	1
2020	2	0		0	0	1
2021	1	0		0	1	
2022	6	3	Amendment to CTE dated 08/08/2022 Amendment to CTE dated 12/09/2022	0	0	1
<u>Post Joint Inspection dated 20/09/2022</u>						
			New CCA dated 26/12/2022		1	
2023	3	2	Amendment to CTE dated 07/08/2023 Amendment to CCA dated 07/08/2023	0	0	0

TEST REPORT																			
Sr.No.	Parameters	Unit	16.05.2023	03.06.2023	05.06.2023	07.06.2023	08.06.2023	09.06.2023	10.06.2023	12.06.2023	13.06.2023								
1	pH	mg/L	7.85	8.02	7.74	8.05	7.99	8.17	8.16	7.95	8.33								
2	COD	mg/L	59.00	155.00	213.00	115.00	93.00	150.00	51.00	64.00	97.00								
3	BOD	mg/L	NA																
4	Ammonical Nitrogen	mg/L	5.04	< 5	6.16	5.04	< 5	< 5	< 5	< 5	< 5								
5	Color	mg/L	39.00	40.00	54.00	50.00	31.00	38.00	44.00	39.00	114.00								
6	Chlorides	mg/L	NA	3621.00	3400.00	4607.00	2784.00	3128.00	3082.00	3277.00	3742.00								
7	TSS	mg/L	39.00	59.00	48.00	39.00	32.00	31.00	30.00	13.00	49.00								
8	TDS	mg/L	9704.00	9736.00	10508.00	11416.00	7888.00	8760.00	8424.00	9116.00	10988.00								
9	Phenol	mg/L	NA																
10	Total Chromium	mg/L	NA																
11	Nickel	mg/L	NA																
12	Cadmium	mg/L	NA																
13	Zinc	mg/L	NA																
14	Copper	mg/L	NA																
15	Lead	mg/L	NA																
16	Sulphates	mg/L	NA																





TEST REPORT															
Sr.No.	Parameters	Unit	23.03.2023	28.03.2023	01.02.2023	11.02.2023	12.02.2023	13.02.2023	14.02.2023	15.02.2023	16.02.2023	24.02.2023			
1	pH	mg/L	7.79	8.43	7.65	NA									
2	COD	mg/L	59.00	65.00	126	135.00	160.00	166.00	141.00	171.00	176.00	74.00			
3	BOD	mg/L	NA												
4	Ammonical Nitrogen	mg/L	NA	< 5	5.04	< 5	NA	NA	NA	< 5	NA	7.28			
5	Color	mg/L	49.00	24.00	40	41.00	28.00	39.00	29.00	28.00	31.00	23.00			
6	Chlorides	mg/L	4123.00	3128.00	3898	4256.00	4182.00	5479.00	4410.00	4262.00	3840.00	2788.00			
7	TSS	mg/L	NA	13.00	54	15.00	NA	NA	NA	< 10	NA	23.00			
8	TDS	mg/L	NA	8368.00	11036	10760.00	NA	NA	NA	10136.00	NA	8328.00			
9	Phenol	mg/L	NA												
10	Total Chromium	mg/L	NA												
11	Nickel	mg/L	NA												
12	Cadmium	mg/L	NA												
13	Zinc	mg/L	NA	BDL	NA	BDL	NA	NA	NA	BDL	NA	BDL			
14	Copper	mg/L	NA	BDL	NA	BDL	NA	NA	NA	BDL	NA	BDL			
15	Lead	mg/L	NA												
16	Sulphates	mg/L	NA	2024.00	NA	NA									

TEST REPORT																	
Sr.No.	Parameters	Unit	25.02.2023	01.02.2023	02.02.2023	03.02.2023	06.02.2023	23.01.2023	24.01.2023	27.01.2023	19.01.2023	03.01.2023					
1	pH	mg/L	NA	7.74	7.21	8.04	NA	7.66	7.65	7.68	7.86	8.07					
2	COD	mg/L	99.00	207.00	114.00	236.00	195.00	223.00	214.00	109.00	120.00	83.00					
3	BOD	mg/L	NA														
4	Ammonical Nitrogen	mg/L	NA	5.04	NA	< 5	NA	< 5	< 5	< 5	5.04	7.28					
5	Color	mg/L	34.00	60.00	26.00	26.00	34.00	30.00	27.00	33.00	34.00	22.00					
6	Chlorides	mg/L	3013.00	3595.00	3664.00	5110.00	4525.00	4329.00	3938.00	3885.00	3424.00	3923.00					
7	TSS	mg/L	NA	16.00	NA	17.00	NA	16.00	18.00	16.00	12.00	17.00					
8	TDS	mg/L	NA	9504.00	NA	10876.00	NA	11128.00	10628.00	11348.00	8540.00	11456.00					
9	Phenol	mg/L	NA														
10	Total Chromium	mg/L	NA														
11	Nickel	mg/L	NA														
12	Cadmium	mg/L	NA														
13	Zinc	mg/L	NA	BDL	NA	BDL	NA	1.12	1.07	0.96	BDL	0.85					
14	Copper	mg/L	NA	BDL	NA	BDL	NA	BDL	BDL	BDL	BDL	BDL					
15	Lead	mg/L	NA														
16	Sulphates	mg/L	NA	2768.00	1180.00	NA											







TEST REPORT								
Sr.No.	Parameters	Unit						
1	pH	mg/L	03.08.2022	04.08.2022	05.08.2022	10.08.2022		
			7.36	7.44	7.55	7.26		
2	COD	mg/L	145.00	< 50	58.00	66.00		
3	BOD	mg/L	NA	NA	NA	NA		
4	Ammonical Nitrogen	mg/L	< 5	NA	NA	5.04		
5	Color	mg/L	42.00	43.00	41.00	38.00		
6	Chlorides	mg/L	3008.00	NA	NA	2924.00		
7	TSS	mg/L	19.00	NA	NA	< 10		
8	TDS	mg/L	7812.00	NA	NA	10302.00		
9	Phenol	mg/L	BDL	NA	NA	BDL		
10	Total Chromium	mg/L	NA	NA	NA	NA		
11	Nickel	mg/L	NA	NA	NA	NA		
12	Cadmium	mg/L	NA	NA	NA	NA		
13	Zinc	mg/L	BDL	NA	NA	BDL		
14	Copper	mg/L	BDL	NA	NA	BDL		
15	Lead	mg/L	NA	NA	NA	NA		
16	Sulphates	mg/L	1668.00	NA	NA	NA		

GPCB Test Report - TML-PILUDRA						
Sr. No.	Parameter	Norms	Date	Date	Date	Date
1	Temperature	40 c	30--04--22	12--07--22	18--05--23	8/8/2023
2	PH	6.5 to 8.5	31	31	30	30
3	Total Dissolved Solids	5000 mg/l	7.64	7.85	7.47	7.34
4	Suspended solids	100 mg/l	10558	7134	10046	6952
5	Ammonical Nitrogen	50 mg/l	20	14	22	10
6	Chloride	600 mg/l	BDL	4.48	BDL	2.24
7	Sulphate	1000 mg/l	4280	2990	3650	3400
8	Chemical Oxygen Demand	250 mg/l	1118	678	1631	1026
9	Oil & Grease	10 mg/l	105	83	139	177
10	Phenolic Compounds	01 mg/l	BDL	BDL	BDL	BDL
11	B.O.D ( 3 Days 27oC)	100 mg/l	0.38	0.18	BDL	BDL
12	Colour		24	18	32	40
			10	5	10	20

Parameter	30/06/2022	17/09/2022
So2 Stack( mg/nm3)	13.19	29.39
Nox Stack( mg/nm3)	BDL	BDL
HCL Stack( mg/nm3)	BDL	15.75

Confidential

**FINAL REPORT  
ON**

**WATER AUDIT STUDY**

(As per the guidelines of CGWA, Ministry of Jal Shakti)

At



**M/s TML INDUSTRIES LIMITED**

Plot no: 33,34,35,37 & 39 At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch,  
Gujarat, India

**PREPARED BY,**



NATIONAL PRODUCTIVITY COUNCIL

**NATIONAL PRODUCTIVITY COUNCIL**

(Under Ministry of Commerce & Industry)  
E - 5, G. I. D. C ELECTRONIC ESTATE

GANDHINAGAR - 382 026

PHONE : 91 79 23287343, 23287344

Website: [www.npcindia.gov.in](http://www.npcindia.gov.in)

Date: 07/03/2023

**Acknowledgment:**

National Productivity Council, NPC places on record its sincere thanks to M/s TML Industries Limited. At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch, for entrusting the task of conducting Water Audit Study as per CGWA guidelines at M/s TML Industries Limited. At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch.

We hereby express our sincere thanks to:

Mr. Kuldeep rathod (Executive -EHS)  
Mr. Nilesh P Parekh (Sr. Manager -QA)  
Mr. A.I.Motka (Dy. Manager-Egg.)  
Mr. Liyakat Malek (Sr. Officer-utility)  
Mr. Kalpesh Thakkar ( Sr. Officer-people care)  
Mr. Mansukh Parmar (Officer Instrument)

From TML for their proactive support and courtesy extended to the NPC Team during field study.

We also thank other officials & Staff of M/s TML Industries Limited for their cooperation and support provided during data collection. We are also grateful to all those we interacted with during the audit who gave us operational insights.

  
Regional Director  
National Productivity Council  
RD, Gandhinagar



Date: 07/03/2023

***Confidential*****FINAL REPORT  
ON****WATER AUDIT STUDY**

(As per the guidelines of CGWA, Ministry of Jal Shakti)

At

**TML INDUSTRIES LIMITED.**

Plot No-33,34,35,37 & 39 At & Po: Piludra- 391816, Taluka: Jambusar,  
Dist. Bharuch, Gujarat, India

**PREPARED BY,**

NATIONAL PRODUCTIVITY COUNCIL

**NATIONAL PRODUCTIVITY COUNCIL**

(Under Ministry of Commerce &amp; Industry)

E - 5, G. I. D. C ELECTRONIC ESTATE

GANDHINAGAR - 382 026

PHONE : 91 79 23287343, 23287344

Website: [www.npcindia.gov.in](http://www.npcindia.gov.in)

Date: 31/12/2021

**Acknowledgment:**

National Productivity Council, NPC places on record its sincere thanks to TML Industries Limited. At & Po: Piludra- 39186, Taluka: Jambusar, Dist. Bharuch, for entrusting the task of conducting Water Audit Study as per CGWA guidelines at TML Industries Limited. At & Po: Piludra- 39186, Taluka: Jambusar, Dist. Bharuch.

We hereby express our sincere thanks to:

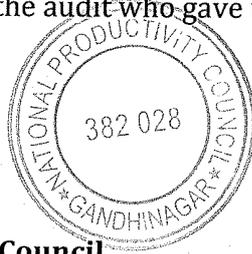
Mr. Kismat Patel (Dy. General Manager - Operations)  
Mr. Nilesh P.Parekh (Sr.Manager- Quality Management.)  
Mr. A.I.Motaka (Dy.Manager -Engg.Services.)  
Mr. Kuldeep Rathod (Senior Officer - EHS)  
Mr. Sandeep Padhiyar (Executive - People care)  
Mr. Malik (Officer- Utility.)  
Miss. Ruhika Vaghela (Officer - EPD Dept.)

From TML for their proactive support and courtesy extended to the NPC Team during field study.

We also thank other officials & Staff of TML Industries Limited for their cooperation and support provided during data collection. We are also grateful to all those we interacted with during the audit who gave us operational insights.



**Regional Director  
National Productivity Council**

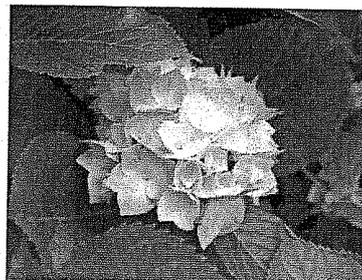
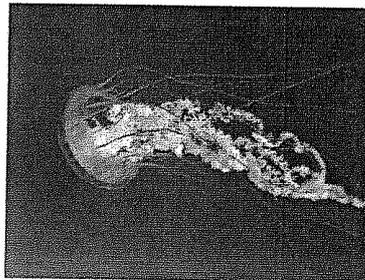
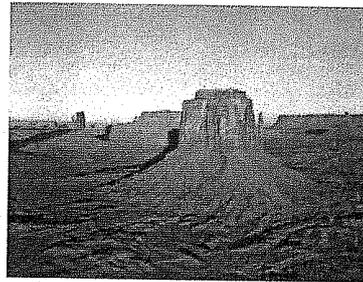
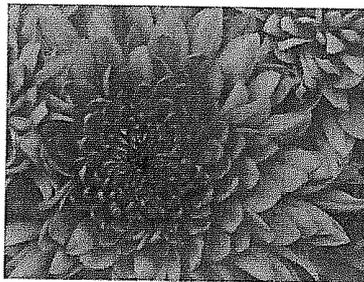


**Date: 31/12/2021**

**TML INDUSTRIES LTD**

**UNDERGROUND UTILITY  
ENGINEERING SURVEY USING  
GROUND PENETRATING RADAR (GPR)  
FOR INTERNET CABLE LAYING  
PROJECT AT SURVEY NO. 35 TO 47, 51  
TO 55 & 60 A VILLAGE PILUDARA,  
TALUKA JAMBUSAR, DIST. BHARUCH,  
GUJARAT**

**JUNE 2020**



**Kadam**

**Environmental Consultants**  
[www.kadamenviro.com](http://www.kadamenviro.com)

**Environment for Development**



Ref. No. TML/PIL/GPCB/002/2020-21  
Date: 19<sup>th</sup> May, 2020

To,  
Member Secretary  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector -10 A  
Gandhinagar: 380010

ID-15812

**Sub: - Ground penetrating Radar (GPR) survey of our site M/s TML Industries Limited- Unit-I**

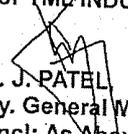
**Ref: Meeting held on March 6<sup>th</sup> 2020 at 12.00 noon at the VECL Auditorium at Dhanora.**

Respected Sir,

With reference to above subject, we have allocate the GPR survey of our TML Industries Limited-Unit-I (ID: 15812) At.Piludara, Ta.Jambusar, Dist.Bharuch to M/s Geocrate Radar Technology Pvt. Ltd.Indian institute of Technology Gandhinagar.The copy of LOI dated 19<sup>th</sup> May,2020.is attached as per Annex. A. P.O will be sending your office within short time.

Thanking you,

Yours faithfully  
For TML INDUSTRIES LTD. Unit-I

  
J. PATEL  
Dy. General Manager – Operations.  
Encl: As Above

Cc to: Unit Head-Bharuch  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector -10 A  
Gandhinagar: 380010

ate Office : 601, "B" Tower Alkapuri Arcade, R. C. Dutt Road, Vadodara - 390 007, Gujarat, INDIA. Tel. : +91 265 2343302 / 04, 2341375

[1] : At & Post : Piludra - 391 816, Tal. : Jambusar, District : Bharuch, Gujarat, INDIA. Tel. : +91 2644 237227 / 8 / 237372, Tele - Fax : +91 2644 237229

[2] : Canal Road, At & Post : Karakhadi - 391 450, Tal. : Padra, District : Vadodara, Gujarat, INDIA. Tel. : +91 2662 273469 / 273563, Fax : +91 2662 273321

CIN : U74120GJ1989PLC012329

www.tmlind.com

Date : 19<sup>th</sup> May, 2020.

To,  
Geocrate Radar Technology Pvt. Ltd.  
Indian Institute of Technology Gandhinagar  
Palag, Gandhinagar – 382355



Kind attn. : Madam Silky Agrawal

Sub – LOI For Ground Penetrating Radar

Reference : Commercial offer dated 09<sup>th</sup> March, 2020.

Dear Madam,

We are pleased to issue the order confirmation for subject package to M/s Geocrate Radar

Technology with following terms and conditions. Purchase Order will be issued shortly.

Scope of Supply:

Item	Description	Total Price
1	GPR Survey Fee	Rs.2,40,000/-
2	Mobilization & Accommodation	12500/-

Commercial terms and Conditions :

1. Payment terms: 20% advance for mobilisation 60% after site work completion and 20% after submission of report.
2. GST: 18% applicable.
3. Billing address :

TML INDUSTRIES LTD  
AT & POST - PILUDRA, TA : JAMBUSAR  
DIST: BHARUCH  
Gujarat - 391816

GST NO – 24AABCT0793K1Z7

Thanks & Regards,

For TML INDUSTRIES LIMITED,

(ismat Patel)  
Jy. Gen Manager

Office : 601, "B" Tower Alkapuri Arcade, R. C. Dutt Road, Vadodara - 390 007, Gujarat, INDIA. Tel. : +91 265 2343302 / 04, 2341375  
& Post : Piludra - 391 816, Tal. : Jambusar, District : Bharuch, Gujarat, INDIA. Tel. : +91 2644 237227 / 8 / 237372, Tele - Fax : +91 2644 237229  
National Road, At & Post : Karakhadi - 391 450, Tal. : Padra, District : Vadodara, Gujarat, INDIA. Tel. : +91 2662 273469 / 273563, Fax : +91 2662 273321

CIN : U74120GJ1989PLC012329

www.tmlind.com

Scanned with CamScanner



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

**ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)**

**RAKESH PATEL**

.. **APPLICANT**

**V/s**

**M/s LOXIM INDUSTRIES  
AND OTHERS**

.. **RESPONDENTS**

**VAKALATNAMA**

KNOW ALL to whom these present shall come that we, the above named do hereby appoint:

**Saurabh Kulkarni,  
Advocate**

**Prashant Bhat  
Advocate**

**M/s.D.V. Kulkarni & Co., Advocates**  
420, Shaniwar Peth, Near Ahilya Devi School,  
Next to Sudarshan Hall, Pune – 411 030.  
Ph(O) 24459027  
(Email) [sdkadvocate@gmail.com](mailto:sdkadvocate@gmail.com)

Hereinafter called the Advocates to be, **M/s TML INDUSTRIES LIMITED Respondents.6** Advocates in the above noted case & authorize them;

To, act appear and plead in the above noted case in this court or in any other court in which the same may tried or heard.

To sign file, verify and present pleadings, appeals, cross-objections or petitions fee executions review, revision, withdraw compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the execution of the said case in all its stages subject to payment for fees for each stage.

To file and take back document, to admit &/or deny the document of opposite party

To take execution proceedings.

And I the undersigned do hereby agree to ratify and confirm all acts done by the Advocates or their substitute in the matter as my/our own acts, as if done by me/us intents and purposes.

1240

AND I/We undertake that I/We or My/Our duly authorized agent would appear in court on all hearing & will inform the Advocate for appearance when the case is called IN WITNESS WHEREOF we do hereunto set our hand to their presents the contents of which have been understood by us on this 20<sup>th</sup> day of September 2023



ADVOCATES

Signature

 (Kismat Patel)

I am not a member of Advocates Welfare Fund and therefore stamp of Rs.2 is not affixed herewith.



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

WESTERN ZONE BENCH, PUNE

AT PUNE

ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)

RAKESH PATEL

.. APPLICANT

V/s

M/s LOXIM INDUSTRIES  
AND OTHERS

.. RESPONDENTS

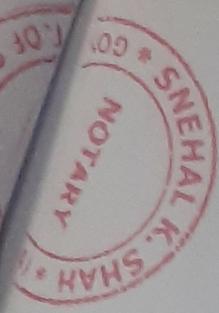
AFFIDAVIT TO THE REPLY ON BEHALF OF RESPONDENT  
NO.6

MAY IT PLEASE THE HON'BLE COURT:

I, Kismat Patel, Age 53 years, working with M/s TML INDUSTRIES LIMITED the Respondent No.6 herein above, do hereby state on solemn affirmation as under:-

01. That the Respondent No.6 is filing the reply to the present Original Application. The facts and circumstances are well set out in the main body of the Reply. The Respondent No.6 adopts, maintains, confirms, repeats and reiterate whatever has been stated in the main body of the reply and for the sake of brevity, convenience and in order to avoid repetition, craves leave of this Hon'ble Tribunal to treat the statements, averments and submissions in the main body of the Reply as part and parcel of this Affidavit as if the



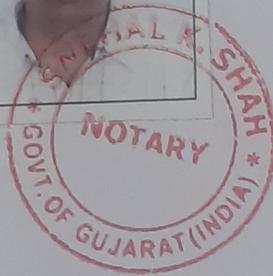


same are reproduced herein ad-seriatim, with a view to avoid repetition and for the sake of brevity.

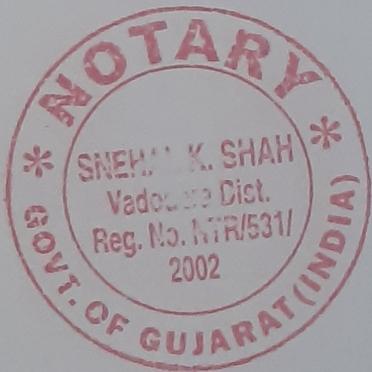
02. I say that whatever stated in the Reply and the present Affidavit is true and correct to the best of my knowledge, information and belief and the legal advice, which I believe to be true.

Solemnly affirmed at 29, on 29 day of September, 2023.

**NOTARY**



*[Signature]*  
Deponent



Solemnly Affirmed/Declared  
Sworn Before me

*[Signature]*

**SNEHAL K. SHAH**  
NOTARY, VADODARA  
Govt. of Gujarat (INDIA)

29/09/2023

1243



IN-GJ50387347868642V



सत्यमेव जयते

**INDIA NON JUDICIAL**  
**Government of Gujarat**  
**Certificate of Stamp Duty**

Certificate No. : IN-GJ50387347868642V  
 Certificate Issued Date : 29-Sep-2023 11:15 AM  
 Account Reference : IMPACC (CS)/ gj13260019/ BARODA/ GJ-BA  
 Unique Doc. Reference : SUBIN-GJGJ1326001925003309731549V  
 Purchased by : TML INDUSTRIES LIMITED  
 Description of Document : Article 4 Affidavit  
 Description : AFFIDAVIT  
 Consideration Price (Rs.) : 0  
 (Zero)  
 First Party : TML INDUSTRIES LIMITED  
 Second Party : Not Applicable  
 Stamp Duty Paid By : TML INDUSTRIES LIMITED  
 Stamp Duty Amount(Rs.) : 300  
 (Three Hundred only)

Regd. No. : 253  
 Date : 29-09-2023



IE 0010678257

## Statutory Alert:

- The authenticity of this Stamp certificate should be verified at 'www.shrestamp.com' or using e-Stamp Mobile App of Stock Holding.
- Any discrepancy in the details on this Certificate and as available on the website / Mobile App renders it invalid.
- The use of cloning the legitimacy is on the users of the certificate.
- In case of any discrepancy please inform the Competent Authority.



- Kindly contact Stock Holding Branch / Centre in case of discrepancy.
- For information related to e-Stamping you may write to us on our email id [estamp.ahmedabad@stockholding.com](mailto:estamp.ahmedabad@stockholding.com) or visit our Branch/Centre.

### સુચના

- આ ઈ-સ્ટેમ્પ પ્રમાણપત્રની વિગતો [www.shcilestamp.com](http://www.shcilestamp.com) દ્વારા અથવા સ્ટોક હોલ્ડિંગની "ઈ-સ્ટેમ્પિંગ" મોબાઈલ એપ્લિકેશન અથવા સ્ટોક હોલ્ડિંગની શાખા / કેન્દ્ર (જેની વિગતો [www.stockholding.com](http://www.stockholding.com) પર ઉપલબ્ધ છે) પર જઈ ને ચકાસી શકાય છે.
- આ પ્રમાણપત્રમાં કરેલ કોઈપણ ફેરફાર અમાન્ય છે અને તે ફોજદારી ગુનો બને છે.
- આ ઈ-સ્ટેમ્પ પ્રમાણપત્રમાં કોઈપણ વિસંગતતા જણાય તો સ્ટોક હોલ્ડિંગની શાખા / કેન્દ્ર પર સંપર્ક કરવો.
- ઈ-સ્ટેમ્પિંગ સંબંધિત જાણકારી માટે અમને [estamp.ahmedabad@stockholding.com](mailto:estamp.ahmedabad@stockholding.com) પર ઈ-મેઈલ કરવો અથવા અમારી શાખા / કેન્દ્ર ની મુલાકાત લેવી.

INDEX		
<u>Sr No</u>	<u>Perticular</u>	<u>Ref</u>
1	NGT Notice dated 9th Aug 2023 to TML-Karkhadi Unit	Annexure 1
2	NGT Order dated 3rd Aug 2023	Annexure 2

RPAD

BEFORE THE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH, PUNE

ORIGINAL APPLICATION NO. 65/2023 WZ  
EARLIER ORIGINAL APPLICATION NO. 276/2022 PB LP

RAKESH PATEL

VS.

M/S LOXIM INDUSTRIES LTD. &amp; ORS.

To,

1. M/s Chemstar Organics (i) Limited,  
Through Managing Director,  
Plot No. 474, 475, 578, 579, 580, 581,  
Vill: Umraya, Tal: Padra, Dist: Vadodra-391440.

Respondent No.5

✓ 2. M/s TML Industries Limited (Unit: II),  
Through Managing Director,  
Plot No. 1896-A, 1902, 1903,  
ECP Road, Vill: Karakhadi,  
Tal: Padra, Dist: Vadodra-391440.

Respondent No.6

**NOTICE**

1. The above titled Original Application is posted for hearing on **11.10.2023** at 10.30 AM through Video Conferencing before The National Green Tribunal, Western Zone Bench, Pune.
2. Please note that you shall make yourself available, or represent through authorized legal representative, on the date and place indicated herein above, in default, the said Original Application will be heard and determined in your absence.
3. Given under my hand and the seal of this Tribunal, this the 09.08.2023.

Registrar,  
NGT, WZB, Pune



Item No.5

(Pune Bench)

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

[THROUGH PHYSICAL HEARING (WITH HYBRID OPTION)]

**ORIGINAL APPLICATION NO.65 OF 2023 (WZ)  
[Earlier Original Application No.276/2022 (PB) (L.P.)]**

Rakesh Patel

.... Applicant

Versus

M/s Loxim Industries Ltd. &amp; Ors.

.... Respondents

Date of Hearing : 03.08.2023

**CORAM: HON'BLE MR. JUSTICE DINESH KUMAR SINGH, JUDICIAL MEMBER  
HON'BLE DR. VIJAY KULKARNI, EXPERT MEMBER**

Applicant

: Mr. Ivo D'Costa, Advocate along with  
Mr. Shivshankar Swaminathan, Advocate

Respondents

: Ms. Manvi Damle, Advocate for R1  
Mr. Saurabh Kulkarni, Advocate for R-2  
Mr. Maulik Nanavati, Advocate for GPCB**ORDER**

1. The petitioner/applicant Mr. Rakesh Patel has sent a complaint on 24.02.2022 stating therein that many chemical companies like M/s Bodal Chemicals Ltd, M/s Loxim Industries Ltd. and M/s Mayur Dye Chem Intermediates Pvt. Ltd. produce polluted water/effluent and the same is being discharged in Padra Canal through pipeline without treatment. On this letter/complaint, cognizance was taken by the Principal Bench of this Tribunal on 28.04.2022 and a Joint Committee was constituted with a direction to furnish factual and action taken report within two months.
2. In pursuance of the aforesaid order, the Joint Committee had submitted its report dated 19.07.2022, which was considered by the previous Bench on 21.07.2022. By the order passed on 21.07.2022, the Joint Committee report was directed to be sent to the

Chairman/Managing Directors of respondent Nos.1 to 4 Companies, requiring them to file reply against the allegations made in the application. It was further directed that the Joint Committee shall take site inspection and look into the allegations regarding highly polluted and dangerous chemicals mixed water effluent, being discharged in Padra Canal through pipeline without requisite treatment. It was also directed that since the same appeared to be due to improper working of CETPs and mismanagement of channel by VECL, the Joint Committee was directed to verify factual position of quality of effluents discharged and also compliance of the consent conditions and environmental norms, including compliance of the provisions under Coastal Regulation Zone (CRZ) Notification. The Joint Committee was, therefore, directed to take appropriate remedial action by following due process of law.

3. Next the matter was considered on 21.10.2022, on which date it was recorded that the service of notice was sufficient on all respondents – industries. All the respondents had taken objection with respect to territorial jurisdiction of the Principal Bench, which is recorded in the said order and thereafter, this matter stood transferred to this Bench.

4. In compliance with the order passed by the previous Bench on 21.07.2022, the Joint Committee submitted its second report, which is annexed at pages 675 to 682 of the paper-book, wherein following conclusions are drawn:

- “1. It is to mention that the concentration of various monitored parameters has shown decreasing concentration trend since April-2022 onwards. This improvement is mainly because of stringent monitoring in Zone 3 by GPCB and consequent less discharge or no discharge (the unit installed Zero Liquid Discharge facility) by many of the industries especially those located in Zone 3.
2. The analysis results of samples collected from final discharge point of 02 CETPs inspected by the joint team were found within prescribed CCA standards for key parameters namely COD, BOD and Ammonical Nitrogen in both the CETPs,

Concentration of Chloride, Sulphate & TDS in the treated effluent are exceeding the prescribed CCA standards in both the CETPs. However, considering all treated effluent through VECL is being finally discharged into Estuarine zone, CETPs are seeking exemption from the norms of such inorganic parameters under the reference of MOEF & CC Notification dated 01/01/2016. VECL is going for detailed study to be conducted by reputed agency like IITs in this regard as informed by VECL to GPCB.

3. The joint team visited 30 industries other than 02 CETPs. Out of 30 units visited by the joint team, the effluent management system of 03 units namely (i) M/s Bodal Chemicals Ltd. Unit-VIII, Vill:Ekalbara, Tq. Padra, Dist. Vadodara (ii) M/s Chemstar Organics (I) Limited, Vill: Umraya, Tq. Padra, Dist. Vadodara and (iii) M/s TML Industries Ltd., Vill: Piludra, Tq. Jambusar, Dist. Vadodara were found unsatisfactory. There was no major noticeable violation observed in the other 27 units at the time of visit.
4. The observations on analysis results of 06 nos of auto samplers installed by GPCB in Zone-3 of VECL channel as part of stringent monitoring show that there is increase in COD concentration between upstream & downstream of Zone 3, means the potential contribution of COD in VECL is appeared to be from dyes and dye intermediate units located in Zone-3.
5. Though significant improvement observed in the quality of effluent being discharged at J point when compared to analysis data of prior to Apr 2022. However, quality of effluent being discharged through VECL channel at J Point is still exceeding the prescribed CCA standards. Especially the presence of cyanide which was not found earlier and therefore required to be revisited and rechecked for conforming its presence beyond norms.
6. VECL is still discharging some of the effluent through old open channel in the downstream of Vedach pumping station.
7. VECL is discharging the effluent in the estuarine zone of River Mahi. As per CCA specific condition no.11, VECL shall provide deep sea tamper proof pipeline system as observed and advised by NIO and NEERI, Nagpur. However, VECL is still discharging the treated effluent in the estuarine zone of River Mahi at the J Point downstream of village Sarod, Taluka Jambusar, Dist. Bharuch.
8. It is observed that all the visited industries have installed ETP. But looking to the above conclusion, it appears that these industries are probably not operating their system properly, to save on the operational costs.

Therefore, the Joint Committee proposes that :

*(a) There should be CCTV Surveillance System with proper IP Address connected to the control room of VECL and GPCB so that any lacunae of operation shall be dealt with.*

*(b) A Third Party Expert Agency may be engaged on regular and continuous basis to monitor the systems & ensure proper operations of infrastructure of these companies."*

5. This report has not been considered by the Principal Bench, nor by this Bench. But we find that there are two action taken reports filed from the side of GPCB, one dated 02.11.2022 and another dated 12.07.2023.

6. In the second Joint Committee report, it is recorded that the Joint Committee visited 30 industries other than two CETPs. Out of 30 units visited by the Joint Committee, the effluent management system of three units i.e. (i) M/s Bodal Chemicals Ltd. Unit-VIII – respondent No.4 (ii) M/s Chemstar Organics (I) Limited and (iii) M/s TML Industries Ltd. were found unsatisfactory, while there was no major violation in other 27 units at the time of visit. It is also recorded in this report that the quality of effluent being discharged through VECL channel at J Point is still exceeding the prescribed CCA standards. Especially the presence of cyanide, which was not found earlier, was required to be revisited and rechecked. It is also recorded that VECL is still discharging some of the effluent through old open channel in the downstream of Vedach pumping station and VECL is discharging the effluent in the estuarine zone of River Mahi.

7. From the above conclusions, it is apparent that two industries namely M/s Chemstar Organics (I) Ltd and M/s TML Industries Ltd also emerge as violators and they are not made parties in this Original Application. We, therefore, direct the Registry to implead them as party-respondents and issue notice to them, returnable four weeks.

8. Since the GPCB has found these two industries – M/s Chemstar Organics (I) Ltd and M/s TML Industries Ltd to be unsatisfactory, why they were found to be unsatisfactory has to be clarified by way of affidavit

and what action was taken regarding this has also to be made clear by the GPCB. The affidavit in this regard shall be filed before the next date.

9. Put up this matter for next consideration on 11.10.2023.

Dinesh Kumar Singh, JM

Dr. Vijay Kulkarni, EM

August 03, 2023  
O.A. No.65/2023 (WZ)  
npj



INDEX		
<u>Sr No</u>	<u>Perticular</u>	<u>Ref</u>
1	Joint inspection report filed as JWC as Annexure 32(TML Piludra) as part of JWC report dated 20th Sept 2022	Annexure 3P
2	Notice of entry of Joint inspections & Observations (CPCB/CGWA/GPCB) dated 19th & 20th Sept 2022	Annexure 4P
3	Compliance dated on Joint inspection reports	Annexure 5P
4	Showcause notice dated 03/11/2022 - TML Piludra	Annexure 6
5	Compliance dated on Notice dated 15/11/2022 - TML Piludra	Annexure 7
6	Summary of GPCB Notice of entry, compliance date, Orders & legal orders- Pre joint inspection & Post Joint inspection	Annexure 8
7	VECL samples records of last 2 years	Annexure 9
8	GPCB Water & Air samples report of last 2 years	Annexure 10
9	CGWA Joint inspection reports ( <i>Photo copies of report 1st &amp; 2nd pages only</i> ) TML Piludra dated - 2022 & 2023	Annexure 11
10	GPR survey done dated 2021 & information to Member Secretary GPCB for TML TML Piludra. ( <i>Photo copies of report 1st &amp; 2nd pages only</i> )	Annexure 12

**Annexure A 32**  
**Inspection Report**

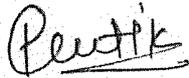
ANNEXURE-3

1	<b>Name &amp; Address of unit</b>	M/s. TML industries Ltd Plot no. 33-P, 34-P, 35, 37, 39, At & Po: Piludra, Tal: Jambusar, Dist: Bharuch.
2	<b>Date &amp; Time of Inspection</b>	20/09/2022, 11:35 Hrs.
3	<b>Name, designation &amp; contact number of industry representative</b>	Mr. Dixit Patel, Sr. Manager– Mo. 9898508393
4	<b>Operational status of unit at the time of inspection</b>	In operation.
5	<b>Validity of CCA</b>	AWH-88278 and subsequent amendments valid up to 18/07/2022. Unit has applied for CCA-Renewal, which is under process.
6	<b>Products/Sector</b>	Organic Chemicals manufacturing (TCAC, Sodium salt of trichloro pyridinol, Chloropyriphos, Triclopyr, Triclopyr Ethyl Ester, Triclopyr Methyl Ester, Vinyl Laurate, ChloroSulphonic Acid)
7	<b>a. Source of Water Supply b. Status of CGWA permission, if GW is being used</b>	Borewell (1 nos.) provided in the premises Unit has valid CGWA permission (up to 06/12/2023) for abstraction of ground water (582 KLD).
8	<b>ETP system provided</b>	<b>The unit has provided ETP consisting of following treatment units.</b> Neutralization Tank (lime dosing) → Filter Press (01 Nos.) → Primary Settling tank → Equalization tank → Filter press (01 Nos.) → Aeration Tank (01 Nos.) → Bio filter plant collection tank → Bio filter plant → Sand-Gravel & Carbon bed → Collection tank → Aeration Tank (01 Nos.) → Collection tank → Treated Effluent Tank (02 nos.) → Discharged into VECL
9	<b>ETP operational status</b>	<ul style="list-style-type: none"> <li>● During inspection, unit was in operation. The operational condition of ETP was unsatisfactory in view of following observations:</li> <li>● The raw effluent neutralization tank (underground tank) was almost empty and there was no fixed provision for removal of the sludge from the tank.</li> <li>● The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.</li> <li>● The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.</li> <li>● There are many PVC/HDPE pipelines observed lying in the ETP</li> </ul>

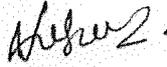
		<p>area without proper identification and clear intended purpose.</p> <ul style="list-style-type: none"> <li>• It is observed that different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.</li> <li>• The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@ 4-5 on pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP is not proper or some acidic stream of the effluent is entering the bio Filter unit of ETP directly.</li> <li>• There was no continuous flow from secondary treatment units to bio filter plant and tertiary treatment system i.e. Sand &amp; Carbon Filter. 02 nos. of final treated waste water holding cum disposal tank of ETP were found empty. And therefore sample of treated w/w could not be collected.</li> <li>• Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank. There was no provision for treatment of the same.</li> <li>• Proper nomenclature and flow diagram not observed on different units and effluent conveying pipelines in ETP area.</li> <li>• Photographs taken during inspection are attached herewith.</li> </ul>
10	Is treated effluent discharge line provided above ground?	No
11	Is treated effluent discharge observed into VECL at the time of inspection, if yes then analysis results of the sample collected	No
12	Operational status of OCEMS	OCEMS installed but connectivity to VECL is pending
13	Results showing in OCEMS, including discharge flow rate	--
14	Any bypass line / unauthorized discharge / accumulation of wastewater in premises	<ul style="list-style-type: none"> <li>• Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank. There was no provision for treatment of the same.</li> </ul>

	observed?							
15	Is proper logbook maintained regarding operation of ETP?	No						
16	Quantity of effluent discharged into VECL in last 3 months (to be verified from flow meter record)	<table border="1"> <thead> <tr> <th>June'22</th> <th>July'22</th> <th>August'22</th> </tr> </thead> <tbody> <tr> <td>2863.52 m3</td> <td>3702.13 m3</td> <td>2957.07 m3</td> </tr> </tbody> </table> <p>Source: Received from VECL via Email on 07/10/2022</p>	June'22	July'22	August'22	2863.52 m3	3702.13 m3	2957.07 m3
June'22	July'22	August'22						
2863.52 m3	3702.13 m3	2957.07 m3						
16	Is hazardous waste found stored & disposed as per Rules?	<ul style="list-style-type: none"> <li>Storage of hazardous waste was not satisfactory. Approximately 30-35 MT Solid and semi solid sludge (Hazardous waste) was found stored under a shed in haphazard manner and some sludge also found stored in open area behind the shed.</li> <li>As per XGN manifest records, unit has disposed 716.44 MT Chemical sludge to common facility i.e. TSDF during last one year (01-09-2021 to 31-08-2022).</li> </ul>						

## Inspection by:



P. S. Chaudhary  
AEE, GPCB RO Vadodara



A. H. Vasava  
AEE, GPCB RO Bharuch

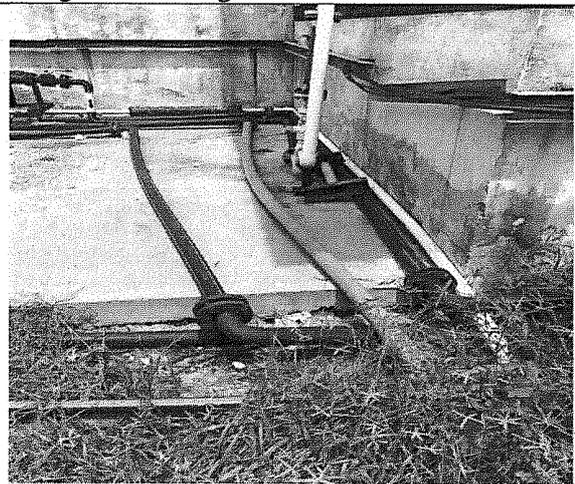
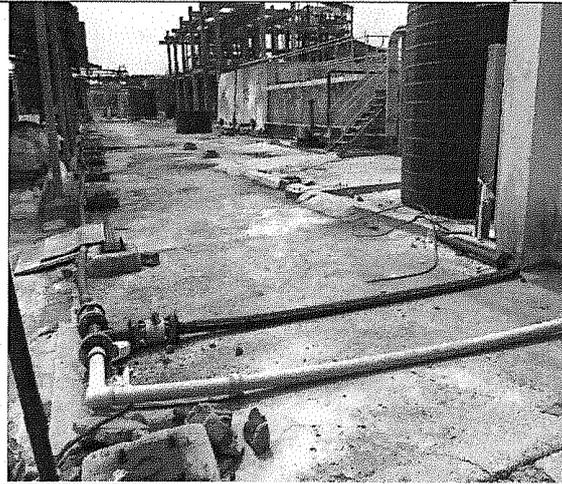


Dr. N. Semwal  
Scientist-C, CPCB RD Vadodara

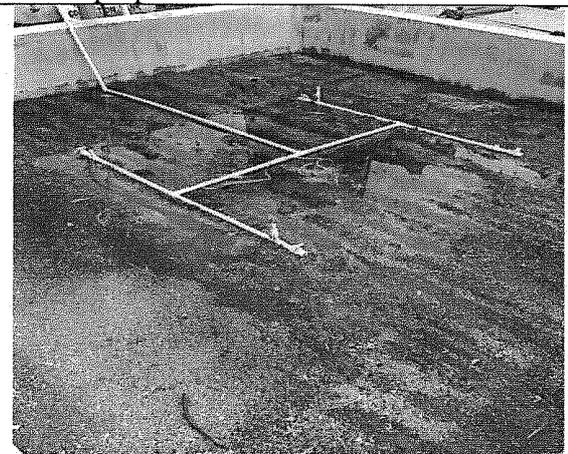
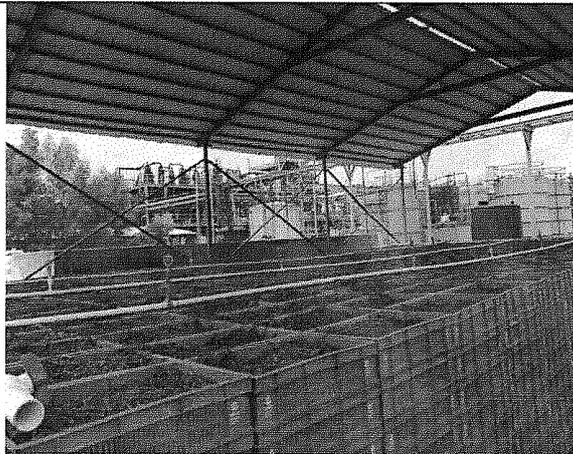
Photographs taken during Inspection



Highly alkaline unaccounted waste water was observed flowing in an open kutchcha drain in the ETP area, which is finally terminating in an underground tank

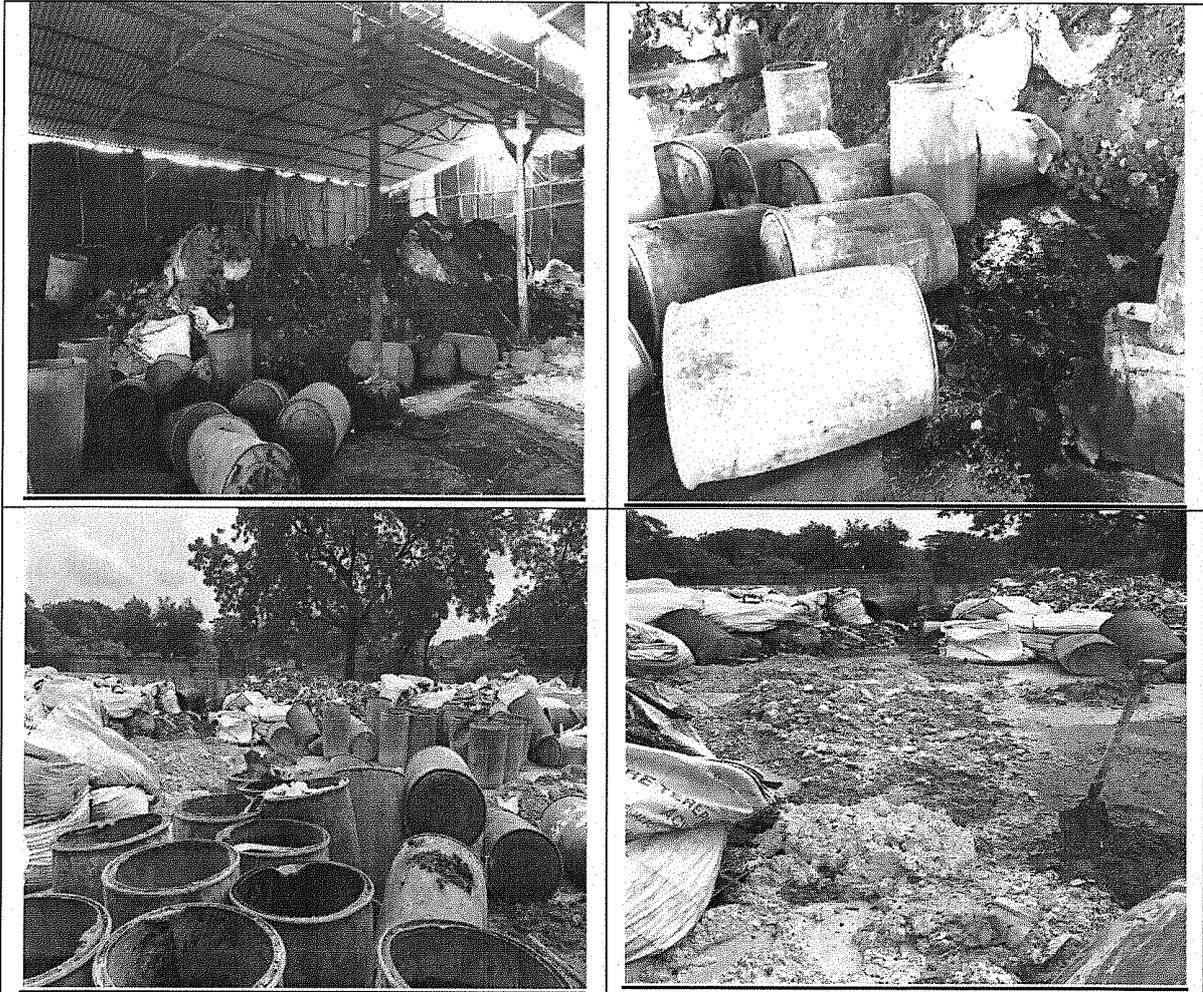


There are many PVC/HDPE pipelines observed lying in the ETP area without proper identification and purpose



Non-operational Bio filter plant

Sand-gravel & Carbon filter bed



Hazardous waste stored in haphazard manner



# ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ

સી-૧/૧૧૯/૩, જી.આઈ.ડી.સી., ફેઝ-૨, નર્મદાનગર, ભરૂચ-૩૬૨ ૦૧૫. ફોન : (૦૨૬૪૨) ૨૪૬૩૩૩  
ઈમેઈલ : ro-gpcb-bhar@gujarat.gov.in વેબ સાઈટ : www.gpcb.gujarat.gov.in

## તપાસ માટે દાખલ થવાની સૂચના (નોટીસ)

PCB ID- 15812

તારીખ : ૨૦/૦૯/૨૦૨૨

પાણી અધિનિયમ ૧૯૭૪ની કલમ-૨૩, હવા અધિનિયમ ૧૯૮૬ની કલમ-૨૪ અને પર્યાવરણ (સુરક્ષા) અધિનિયમ - ૧૯૮૬ની કલમ-૧૦ હેઠળ અમોને મળેલ સત્તાની રૂએ અમો નીચે સહી કરનાર અમોને જરૂરી લાગે તેની સહાય લઈને તમામ સમયે નીચેના હેતુઓ માટે આપની જગ્યામાં દાખલ થવાનો અને તપાસ કરવાનો અધિકાર ધરાવીએ છીએ.

- (૧) અમોને સોંપેલા રાજ્ય બોર્ડ/કેન્દ્ર સરકારના કાર્ય બજાવવાના હેતુ માટે,
- (૨) આવા કોઈ કાર્યો બજાવવાના છે કે કેમ અને તેમ હોય તો કઈ રીતે તે બજાવવાના છે અથવા આ અધિનિયમ અથવા તે હેઠળ કરેલા નિયમોની અથવા આ અધિનિયમ હેઠળ બજાવેલી કોઈ નોટીસની, કરેલા કોઈ દુકમની, આદેશની અથવા આપેલા કોઈ અધિકારપત્રની કોઈ ખોટાઈનું પાલન કરવામાં આવી રહ્યું છે કે પાલન કરવામાં આવ્યું છે કે કેમ તે નક્કી કરવાના હેતુ માટે,
- (૩) કોઈ સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુની તપાસ કરવા અને તેની કસોટી કરવાના હેતુ માટે અથવા જે જગ્યામાં તેને એમ માનવાને કારણે હોય કે આ કાયદા કે તે હેઠળ કરેલા નિયમો મુજબ કોઈ ગુનો કરવામાં આવ્યો છે, અથવા થવાની તૈયારીમાં છે, તેવી કોઈ જગ્યાની ઝડપી લેવા માટે અને તેને એમ માનવાને કારણે હોય કે આ કાયદા કે તે હેઠળ કરેલ નિયમો હેઠળ વિશ્વાસપાત્ર કોઈ ગુનો કર્યાનો પુરાવો, તેવા સાધન સામગ્રી, ઔદ્યોગિક પ્લાન્ટ, રેકર્ડ, રજીસ્ટર, દસ્તાવેજ અથવા અન્ય કોઈ મહત્વની વસ્તુ કબજે લેવા માટે અને નીચે જણાવેલ સમયે દાખલ થઈએ છીએ.

ઉદ્યોગ/કારખાનામાં દાખલ થવાનો સમય : ૧૧:૩૫ hrs. તા. ૨૦ / ૦૯ / ૨૦૨૨

અમારી સાથે સહાય માટે નીચેની વ્યક્તિઓ પણ છે.

૧. N. Semwa (Scientist C, CPCB)
૨. P.S. Chaudhary (CAEE), R.O. Vadodura.
- ૩.

પ્રતિ,

M/s TMC Industries Ltd  
Plot No: ૩૩-P, ૩૪-P, ૩૬, ૩૭/૩૯  
At and Post: Piploda  
Tal: Jamkhusar, Dist: Shubrah.

સહી :-.....  
અધિકારીનું નામ :-.....A.H. V...  
હોદ્દો :-.....AEE

આ સૂચના (નોટીસ) મેળવનારની સહી :-.....Dixit Patel (Senior Manager)



# ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ

સી-૧/૧/૧૧૯/૩, જી.આઇ.ડી.સી., નર્મદાનગર, ભરૂચ - ૩૯૨ ૦૧૫. ફોન : (૦૨૬૪૨) ૨૪૬૩૩૩  
 ઇમેઇલ : ro-gpcb-bhar@gujarat.gov.in ઇમેઇલ : યુનિટ હેડ uh-gpcb-bhar@gujarat.gov.in  
 વેબસાઇટ : http://gpcb.xgn.gujarat.gov.in

<b>સ્થળ તપાસની નિરિક્ષણ નોંધ</b>	
આઇ.ડી.નં.: <u>15812</u> કેટેગરી/સ્કેલ: <u>R</u> / <u>L</u> Latitude/longitude:...../.....	
<p>શ્રીમાન,</p> <p>આપશ્રીને જણાવવાનું કે, આજ તા. <u>20/09/22</u> ના રોજ આપશ્રીના એકમની મુલાકાત લઈ સ્થળ તપાસ કરી ઇન્સ્પેક્શન કરેલ છે જે દરમિયાન હવા/પાણી/બોખમી કચરા/.....ના..... /...../.....નમૂના પૃથ્થકરણ અર્થે એકત્રીત કરેલ છે.</p> <p>આપશ્રીના એકમની મુલાકાત દરમિયાન પર્યાવરણીય કાયદાઓના સંદર્ભે ત્રુટીઓ/ક્ષતિઓ જોવા/જણાવા મળેલ છે, જે આઘાટે પડતર અરજી સંદર્ભે નિર્ણય લેતા પહેલા અને/અથવા કાયદાકીય પગલાં લેતા અને/અથવા પર્યાવરણ નુકશાન વળતર લેતા પહેલા કુદરતી વ્યાયના સિદ્ધાંત મુજબ આપશ્રીને સાંભળવાની તક પુરી પાડવાના હેતુથી અત્રે લેખિતમાં સ્થળસ્થિતિ/મુદ્દાઓ/સુચનાઓ આપવામાં આવે છે.</p> <p>આ પરત્વે આપશ્રી નીચે લેખિતમાં રજૂઆત કરી શકો છો અથવા લેખિત ખુલાસો/સ્પષ્ટતા/પુર્વતા અહેવાલ કામકાજના દિન-૦૩ માં બોર્ડની વડી કચેરી, ગાંધીનગર તેમજ અત્રેની કચેરીને લેખિતમાં અથવા XGN પર અથવા Email થી રજૂ કરવા નોટીસ આપવામાં આવે છે.</p>	
સ્થળ તપાસ દરમિયાન જોવા મળેલ સ્થળસ્થિતિ/ત્રુટીઓ/ક્ષતિઓ/ખામીઓ :	
૧) <u>As per Annexure-I</u>	
૨)	
૩)	
ગુ.પ્ર.નિ. બોર્ડના નામે અને વતી, <u>A. H. Vasava</u> (અધિકારીઓના નામ, હોદ્દો, સહી): <u>(Aee) Akhwa2</u>	
મુલાકાત લેવામાં આવેલ હોય તે એકમના પ્રતિનિધીની રજૂઆત:(જે લાગુ પડે તેની સામે જ સહી કરવી)	
મુલાકાત દરમિયાન અધિકારીશ્રીઓએ.....મુદ્દાઓ માટે સ્થળસ્થિતિ /સુચનાઓ/સુધારાત્મક પગલાં ભરવા જણાવેલ છે, જેમાં	
(૧) આ સ્થળસ્થિતિ/સુચનાઓ સાથે હું, નીચે સહી કરનાર સંપૂર્ણ સહમત છું	✓
(૨) જેમા દર્શાવેલ સ્થળસ્થિતિ/સુચનાઓમાંથી મુદ્દા નં..... સાથે હું, નીચે સહી કરનાર અસહમત છું. જેના માટે મારી નીચે પ્રમાણેની રજૂઆત છે.:	✓
એકમના પ્રતિનિધી / આ નોંધ મેળવનારનું નામ, હોદ્દો અને સહી:	
તા.: <u>ms- Dixit Patel (G manager)</u>	

Annexure-I

- Proper operation & maintenance of ETP needs to be ensured.
- There are many PVC pipelines layed in the ETP area without proper identification and purpose.
- ) All the pipeline in the ETP needs to be above ground.
- ) Proper nomenclature of different ETP units needs to be provided.
- ⇒ Highly alkaline <sup>unaccounted</sup>  $\text{CaCO}_3$  was found flowing in a <sup>open</sup> drain in the ETP area, which is finally terminating in a underground tank. There was no provision for treatment of the same.
- 6) The outlet of biofilter was observed acidic (@4-5 on pH strip) which is not inline with the treatment system of ETP. since the Biofilter feed is alkaline  $\text{CaCO}_3$  from Aeration tank-I as per the ETP design system.
- 7) Huge quantity of solid and semisolid sludge found stored under a shed and some ~~of~~ sludge also found stored in open behind the shed.

  
 MS. DIXIT Patel  
 (SS. Manager)

  
 A. H. Vasava  
 (AEE)

1261

o/c



ANNEXURE - 5

Ref. No.: TML/PIL/GPCB/186/2022-23

Date: 26/09/2022

**PCB ID – 15812**

To,  
Regional Office,  
Gujarat Pollution Control Board  
C-1/119/3, GIDC, Phase-2  
Narmdanagar,  
Bharuch-392015.

Reference: Site visit on 20/09/2022 by GPCB officials from your good office.

Dear Sir,  
Our representation on your points/ suggestions is as below;

S.No.	Query	Reply												
1	Proper operation & maintenance of ETP needs to be ensured.	<p>Last 2 GPCB analysis of our treated Waste Water, VECL's monthly analysis &amp; Online TOC meter data showing our treated Waste water Quality which is summarized below &amp; details are attached as Annexure 1.</p> <table border="1"> <thead> <tr> <th></th> <th>pH</th> <th>COD(ppm)</th> </tr> </thead> <tbody> <tr> <td>Sample GPCB dated :21/04/22</td> <td>7.64</td> <td>105</td> </tr> <tr> <td>Sample GPCB dated :30/06/22</td> <td>7.85</td> <td>83</td> </tr> <tr> <td>VECL (Aug-Sep'22) month's avg. analysis</td> <td>7.38</td> <td>118</td> </tr> </tbody> </table> <p>Our Plant is very Old, surely Needs maintenance as per your observations, We ensure proper Operations &amp; Maintenance by providing adequate necessary resources. Current work done on immediate basis can be seen in photographs attached in next points.</p>		pH	COD(ppm)	Sample GPCB dated :21/04/22	7.64	105	Sample GPCB dated :30/06/22	7.85	83	VECL (Aug-Sep'22) month's avg. analysis	7.38	118
	pH	COD(ppm)												
Sample GPCB dated :21/04/22	7.64	105												
Sample GPCB dated :30/06/22	7.85	83												
VECL (Aug-Sep'22) month's avg. analysis	7.38	118												
2	There are many PVC pipeline laid in the ETP area without proper identification and purpose.	<p>As seen in photographs, Material of construction (MOC) of all pipelines used in ETP are PP-R or HDPE instead of PVC.</p> <p>Proper identification work of pipelines is already carried out which can be seen in attached photographs.</p>												

Post Received  
Gujarat Pollution Control Board  
BHARUCH  
27/9/22

V.V.P  
28/9/2022  
Gujarat Pollution Control Bd  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

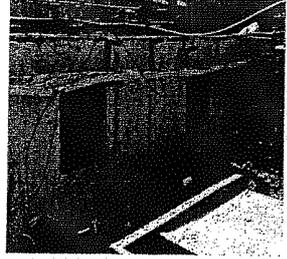
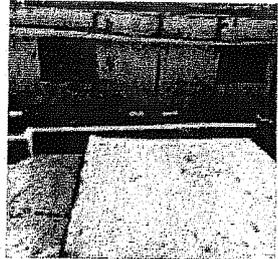
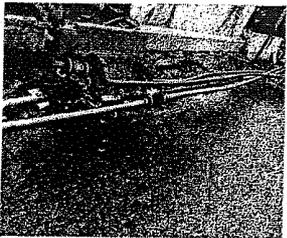
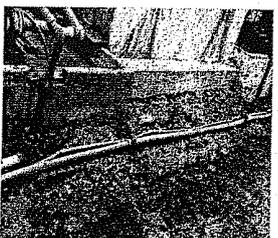
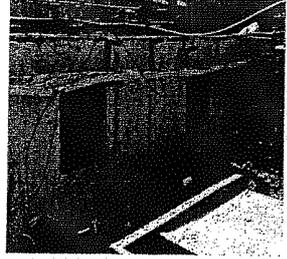
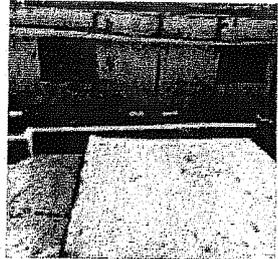
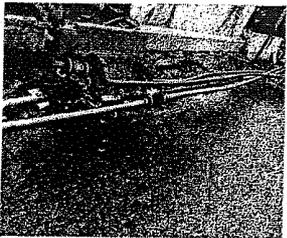
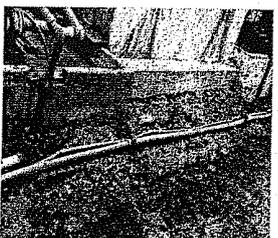
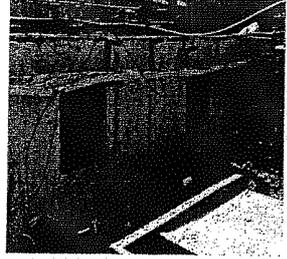
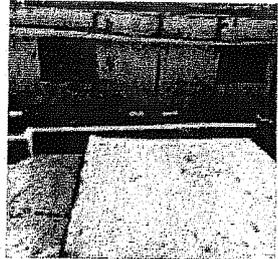
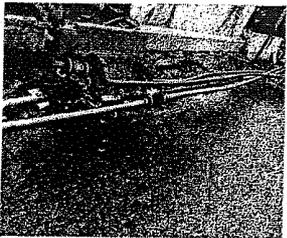
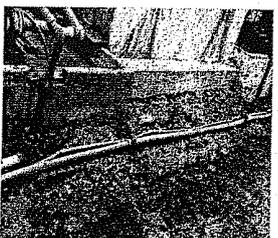
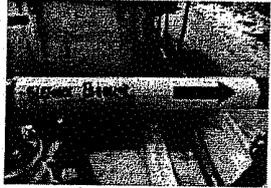
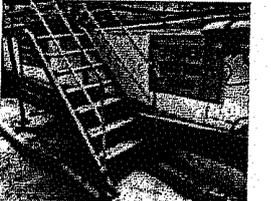
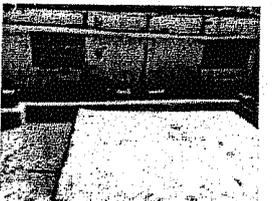
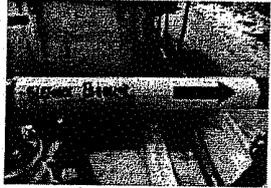
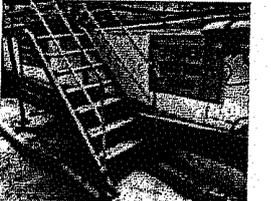
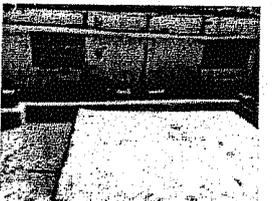
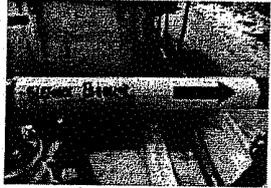
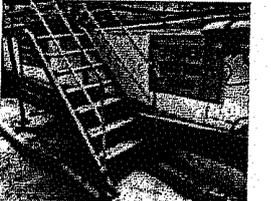
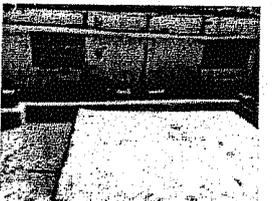
Corporate Office : 601, 'B' Tower, Alkapuri Arcade, R. C. Dutt Road, Vadodara-390007, Gujarat, India. Tel.: +91 265 2343302/04, 2341375

Works [1] : At & Post : Piludra - 391 816, Taluka : Jambusar, District : Bharuch, Gujarat, India. Tel.: +91 2644 237227 / 8 / 237372, Tele - Fax: +91 2644 237229

Works [2] : Canal Road, At & Post : Karakhadi - 391 450, Taluka : Padra, District : Vadodara. Gujarat, India. Tel.: +91 2662 273469 / 273563 Fax: +91 2662 273321

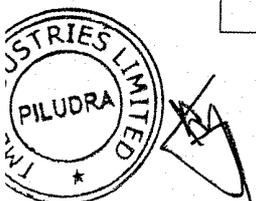
CIN : U74120GJ1989PLC012329

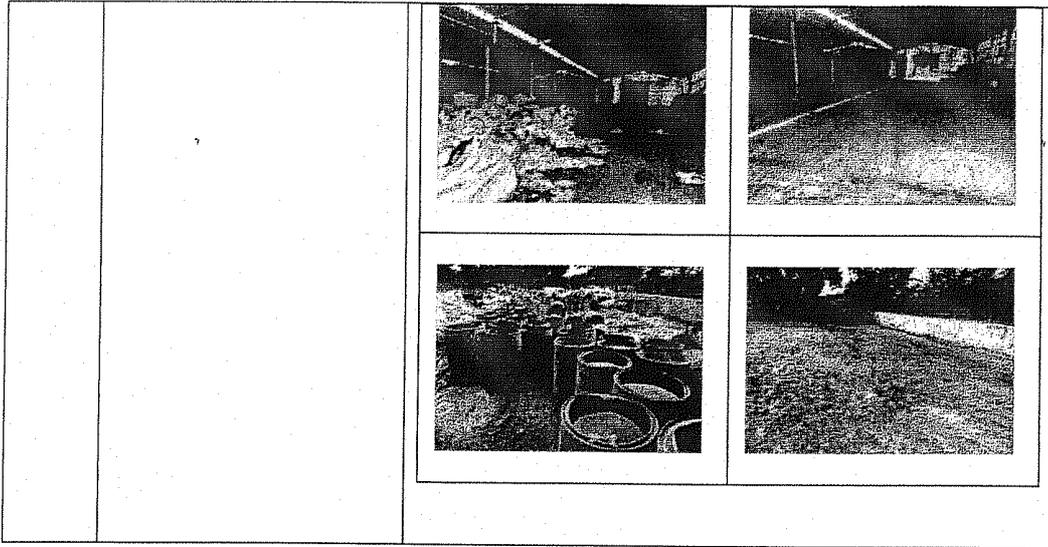
www.tmlind.com

		<table border="1"> <thead> <tr> <th>Before</th> <th>After</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Before	After				
Before	After							
								
								
3	All the pipeline in the ETP needs to be above ground.	Our majority of Pipelines are above ground except Inlet to Bio-filer & it's outlet due to service road. Your observations are noted and we will do the necessary action for taking pipelines above ground within 2 months.						
4	Proper nomenclature of different ETP units needs to be provided.	Painting work is already going on at ETP site, which was visible during your visit also. Work is completed for nomenclature of different ETP units, photograph are given.						
		<table border="1"> <tbody> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>						
								
								
5	Highly alkaline unaccounted w/w was found flowing in an open drain in the ETP area which is finally terminating in a	Wastewater of highly alkaline removed from the underground tank and taken to the ETP for the further treatment. Photograph of empty underground tank and drain is attached.  We have already closed open drain in the ETP area. So it						



	<p>underground tank. There was no provision for treatment of the same.</p>	<p>will be not in operation now onwards. Photographs is attached.</p> <table border="1"> <tr> <th data-bbox="702 291 1005 324">Before</th> <th data-bbox="1005 291 1316 324">After</th> </tr> <tr> <td data-bbox="702 324 1005 593"></td> <td data-bbox="1005 324 1316 593"></td> </tr> <tr> <td data-bbox="702 593 1005 862"></td> <td data-bbox="1005 593 1316 862"></td> </tr> </table>	Before	After							
Before	After										
											
											
<p>6</p>	<p>The outlet of biofilter was observed acidic (4-5 on pH strip) which is not inline with the treatment system of ETP. Since the Biofilter feed is alkaline w/w from Aeration tank-1 as per the ETP design system.</p>	<p>In normal operations the treated water from Biofilter Plant is in the range of pH range 6.5-7.5. (Please find attached last one month's data as Annexure 2). But on that particular day since the plant was under shutdown, the treated water in the tank was stagnant for few hours, which was the cause of pH becoming slightly acidic in nature.</p> <p>Further the Biofilter treated water is subjected to polishing treatment, where it is collected and mixed with RO reject and further going for pH correction. So final outlet could not be deviated. pH measurement of VECL and internal lab of the final discharge to the VECL on same date of the visit i.e. 20/09/22 is as below.</p> <table border="1"> <thead> <tr> <th data-bbox="686 1332 837 1366">Date</th> <th colspan="2" data-bbox="837 1332 1220 1366">pH measurement</th> </tr> <tr> <td data-bbox="686 1366 837 1400"></td> <th data-bbox="837 1366 1037 1400">VECL Online</th> <th data-bbox="1037 1366 1220 1400">Internal Lab</th> </tr> </thead> <tbody> <tr> <td data-bbox="686 1400 837 1422">20/09/22</td> <td data-bbox="837 1400 1037 1422">7.7</td> <td data-bbox="1037 1400 1220 1422">7.55</td> </tr> </tbody> </table>	Date	pH measurement			VECL Online	Internal Lab	20/09/22	7.7	7.55
Date	pH measurement										
	VECL Online	Internal Lab									
20/09/22	7.7	7.55									
<p>7</p>	<p>Huge quantity of solid and semisolid sludge found stored under a shed and some sludge also found stored in open behind the shed.</p>	<p>Close down of the TSDF site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused stock of accumulation of 106 Mt solid sludge right now at our solid waste storage yard. As soon as TSDF sites will reopen, we will do the needful.</p> <p>Please find last four months' generation, disposal data of the sludge &amp; current stock is given as Annexure 3.</p> <p>We have shifted sludge contained in HMHDPE drums ( 20 nos- Approx 4 Mt) which contains rain water also being in open area behind the shed to the under the shed.</p> <table border="1"> <tr> <th data-bbox="678 1825 981 1859">Before</th> <th data-bbox="981 1825 1300 1859">After</th> </tr> <tr> <td data-bbox="678 1859 981 1886"></td> <td data-bbox="981 1859 1300 1886"></td> </tr> </table>	Before	After							
Before	After										





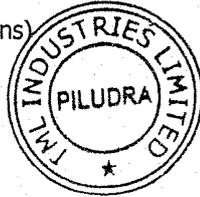
Form Hope above reply is satisfactory.

Thanking You.  
Yours Faithfully,

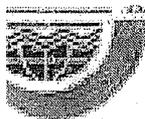
For TML INDUSTRIES LIMITED (UNIT-I)

Mr. K. J. PATEL  
(Dy. General Manager-Operations)

Enclose: as above



CC: Unit Head, Bharuch  
Environmental Engineer,  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector 10-A, Ganhinagar-382010



1265

Sample ID:348911 - Analysis Completion:30/04/2022

Organic Chemicals manufacturing / LAB Inward : 47481

C-1/119/3, GIDC Phase-2  
Narmadanagar  
Bharuch-392015  
Tele:(0264)2246333

TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 348911  
 Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
 Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
 Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of ETP  
 Flow Details (Remarks) : --  
 Method of Disposal : VECL Channel  
 Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :@7-8 on pH strip  
 Carboys Nos for : Barcode & Color & Appearance :Yellowish  
 Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Parameter : 12 ,Cap No & Weight :

Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.64
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	10558
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	20
Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	BDL
Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard N	1 - 50000 mg/l	4280
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	1118
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	105
Oil Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Phenolic Compounds	mg/l	4 Amino Antipyrine method without Chloroform Extra	0.1 - 50 mg/l	0.38
B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	24

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022

R.C.VASAVA,S.O

1:

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents



## TEST REPORT

st Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
Sample Collected By : Ms Patel. Nancy. A, AEE  
Quantity of Sample Received : 5 lit  
Code No. of the Sample : 348911  
Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of  
Flow Details (Remarks) ETP  
Mode of Disposal : ---  
Ultimate Receiving Body : VECL Channel  
Temperature on Collection : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
C/ oys Nos for : 31 & pH Range on pH Strip :@7-8 on pH strip  
Barcode & Color & Appearance :Yellowish  
Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000

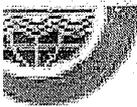
Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi, 2012	2 - to 99 Hazen & 1-50	10

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022

  
R.C.VASAVA,S.O

1. The results relate only to the items sampled and tested.
2. Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
3. The report shall not be reproduced except in full or part without approval of the laboratory.
4. The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
5. Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





1267

Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1/119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333



TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 Flow Details (Remarks) : --  
 Method of Disposal : VECL channel through own pipeline  
 Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 Barcodes Nos for : Barcode & Color & Appearance :Faint yellowish  
 Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Parameter : 12 ,Cap No & Weight :

Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.85
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	7134
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	14
Ammonical Nitrogen	mg/l	1). Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	4.48
Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard M	1 - 50000 mg/l	2990
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	678
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	83
Oil Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Phenolic Compounds	mg/l	4 Amino Antipyrene method without Chloroform Extra	0.1 - 50 mg/l	0.18
B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	18

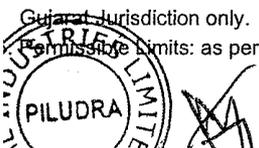
Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022

R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to

Gujarat Jurisdiction only.

Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





1268

Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1/119/3, GIDC Phase-2  
Narmadanagar  
Bharuch-392015  
Tele:(0264)2246333

TEST REPORT

Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 Flow Details (Remarks) : -  
 Mode of Disposal : VECL channel through own pipeline  
 Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
 : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Water Consumption & W.W.G (KLPD) : 12 ,Cap No & Weight :

Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	05

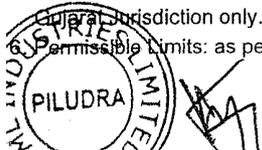
Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to

6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents  
 General Jurisdiction only.



Annexure - I

TML Industries Ltd, VECL Analysis data of Last 2 Month												
Sr.No	Parameter	GPCB Limit	Result	Result	Result							
	Date		14-08-2022	16-08-2022	17-08-2022	20-08-2022	25-08-2022	04-09-2022	07-09-2022	10-09-2022		
1	Ph	6.5-8.5	7.33	7.23	7.54	7.37	7.36	7.61	7.29	7.37		
2	COD (ppm)	250	133	161	107	74	119	82	163	103		
3	BOD (ppm)	100	--	--	--	--	--	--	--	--		
4	Ammonical Nitrogen (ppm)	50	5	--	5	5	5	5	5	--		
5	Color (pt.co)	100	30	34	35	26	24	27	20	36		
6	Chloride (ppm)	600	3646	--	3153	2910	3620	3621	2168	--		
7	TSS (ppm)	100	10	--	17	38	15	15	10	--		
8	TDS (ppm)	5000	8292	--	8568	7540	8688	7492	10028	--		
9	Sulphate (ppm)	1000	1158	--	1362	1697	1027	706	590	--		

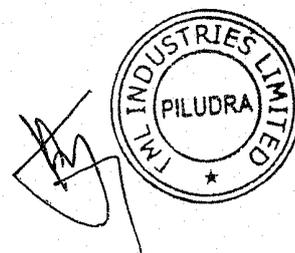


Annexure - I

VECL_TML Industries:20/Sep/2022										
Timestamp	COD(mg/l)	pH(pH)	BOD(mg/l)	FLOW(m3/hr)	TSS(mg/l)	NH4(mg/l)	TEMP.(C)	COLOR(Hazen-eq.)		
20-Sep-2022 16:50	77.34	7.69	10.54	0.5	66.46	0	31.8	25.67		
20-Sep-2022 16:40	76.53	7.69	9.1	0.54	62.49	0	31.8	1.22		
20-Sep-2022 16:30	76.13	7.69	9.52	0.54	62.81	0	31.7	7.12		
20-Sep-2022 16:20	76.25	7.69	9.89	0.54	63.84	0	31.6	9.75		
20-Sep-2022 16:10	76.8	7.68	9.89	0.54	65.21	0	31.6	9.35		
20-Sep-2022 16:00	76.78	7.69	9.73	0.54	64.3	0	31.5	10.44		
20-Sep-2022 15:50	76.76	7.68	9.29	78.14	63.72	0	31.5	3.94		
20-Sep-2022 15:40	77.56	7.68	9.54	79	65.27	0	31.4	5.56		
20-Sep-2022 15:30	77.58	7.68	9.89	79.94	65.93	0	31.3	11.55		
20-Sep-2022 15:20	76.82	7.68	9.14	81.15	64.09	0	31.3	0.87		
20-Sep-2022 15:10	76.65	7.69	9.64	81.81	63.94	0	31.2	7.19		
20-Sep-2022 15:00	76.25	7.68	8.86	82.2	62.71	0	31.1	0		
20-Sep-2022 14:50	76.38	7.68	9.87	82.71	64	0	31.1	10.48		
20-Sep-2022 14:40	76.4	7.68	9.7	83.38	63.97	0	31	9.75		
20-Sep-2022 14:30	76.89	7.69	9.46	0.5	64.36	0	30.9	5.56		
20-Sep-2022 14:20	77.34	7.69	9.56	0.5	65.75	0	30.9	7.84		
20-Sep-2022 14:10	77.48	7.68	9.02	0.5	64.67	0	30.8	0		
20-Sep-2022 14:00	77.87	7.68	9.82	0.54	66.55	0	30.7	12.22		
20-Sep-2022 13:50	77.47	7.68	8.67	0.54	63.11	0	30.7	0		
20-Sep-2022 13:40	77.27	7.67	10.83	0.5	67.53	0	30.6	26.94		
20-Sep-2022 13:30	76.87	7.67	9.72	0.54	65.64	0	30.5	7.83		
20-Sep-2022 13:20	78.02	7.66	9.27	0.54	66.37	0	30.5	2.33		
20-Sep-2022 13:10	77.56	7.66	8.89	0.5	63.87	0	30.4	0		
20-Sep-2022 13:00	77.13	7.66	10.32	0.54	65.59	0	30.3	17.23		
20-Sep-2022 12:50	77.35	7.66	9.31	0.54	65.25	0	30.3	1.42		
20-Sep-2022 12:40	77.69	7.66	8.93	0.54	64.52	0	30.2	0		
20-Sep-2022 12:30	77.04	7.65	9.78	0.5	65.24	0	30.2	10.31		
20-Sep-2022 12:20	77.27	7.64	9.21	0.54	64.23	0	30.1	1.25		
20-Sep-2022 12:10	76.96	7.63	9.78	0.54	64.93	0	30	13.88		
20-Sep-2022 12:00	77.56	7.62	8.84	0.54	64.73	0	30	0		



TML Industries Ltd Piludara Biofilter						
Date	Biofilter Feed			Biofilter outlet		
	pH	TDS	COD	pH	TDS	COD
	--	PPM	PPM	--	PPM	PPM
01-09-2022	8	14000	1190	6.8	13300	620
02-09-2022	8.45	13000	1220	6.65	12300	625
03-09-2022	8.36	13000	1220	7.05	12800	620
04-09-2022	8.84	15000	1250	7.3	15000	690
05-09-2022	8.88	13500	1225	7.35	13000	580
06-09-2022	8.46	12000	1190	7.24	12000	610
07-09-2022	8.54	14000	1210	7.15	14000	620
08-09-2022	8.65	13800	1220	7.2	13300	660
09-09-2022	8.87	12900	1260	7.1	12300	670
10-09-2022	8.76	13500	1245	7.15	12800	690
11-09-2022	8.74	13000	1195	7.24	12000	670
12-09-2022	8.57	15000	1275	7.15	14000	660
13-09-2022	8.65	13600	1190	7.1	12300	650
14-09-2022	8.68	13300	1240	7.15	12800	685
15-09-2022	8.48	14400	1260	7.3	15000	625
16-09-2022	8.56	14600	1240	7.35	13000	620
17-09-2022	8.47	13800	1245	7.24	12000	610
18-09-2022	8.59	14700	1050	7.15	14000	590
19-09-2022	8.78	14400	1140	7.08	13300	640
20-09-2022	8.67	13600	1240	6.03	12300	580
21-09-2022	8.57	13300	1260	6.5	12300	670
22-09-2022	8.63	13300	1190	6.9	1250	580



Annexure - 3

**TML INDUSTRIES LTD PILUDARA**  
**HAZ. WASTE DETAILS**

Sr. No.	Type of waste	Quantity of Generation as per CC&A	Category	Opening as on 1-6-2022 (MT)	Actual Generation (in MT)				Actual Disposal (in MT)				Stock as on 22/09/22 (MT)	Mode of Disposal
					June.-2022	July.-2022	Aug.-22	Sept.-22 (22-9-2022)	June.-2022	July.-2022	Aug.-22	Sept.-22 (9-2022)		
1	ETP WASTE	465.96 MT/MONTH	Sch-I 33.5 (Sch-1)	132.02	27.01	32	17.7	15.55	118	0	0	0	106.5	Collection, Storage, Transportation, Disposal at TSDF BEIL site





1273 ANNEXURE-6  
GUJARAT POLLUTION CONTROL BOARD

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

R.P.A.D.

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

WHEREAS you M/s. TML Industries Ltd having a unit at Plot No. 33-P,34-P, 35,37,39, At & Post, Piludra, Tal: Jambusar, Dist: Bharuch.

AND WHEREAS Board has granted Consolidated Consent and Authorization (CC&A) vide order no. AWH-122228 valid up to 18/07/2027 for manufacturing of various Organic Chemicals with various conditions mentioned therein.

AND WHEREAS your industry was monitored on 20/09/2022 under Section-23 of the Water Act - 1974 jointly by authorized officers of the CPCB & GPCB and it was observed:

1. At the time of inspection, raw effluent neutralization tank (underground tank) was found almost empty and there was no fixed provision for removal of the sludge from the tank.
2. The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.
3. The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.
4. There were many PVC/HDPE pipelines observed lying in the ETP area without proper identification and clear intended purpose.
5. Different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.
6. The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@ 4-5 on pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP was not proper or some acidic stream of the effluent is entering the bio Filter unit of ETP directly.
7. There was no continuous flow from secondary treatment units to bio filter plant and tertiary treatment system i.e. Sand & Carbon Filter.
8. Highly alkaline unaccounted waste water observed flowing in an open kuchcha drain in the ETP area, which was finally terminating in an underground tank. There was no provision for treatment of the same.
9. Proper nomenclature and flow diagram were not observed on different units and effluent conveying pipelines in ETP area.
10. Storage of hazardous waste was not satisfactory. Approximately 30-35 MT Solid and semi solid sludge (Hazardous waste) was found stored under a shed in haphazard manner and some sludge also found stored in open area behind the shed.

Outward No. 68150/371/2022

Now, therefore I Irfan Kagzi Environment Engineer proposes to issue Notice under section 33-A of the Water (Prevention and Control of Pollution) Act-1974 as under:

1. Why not to issue direction under section 33-A of the Water (Prevention and control of pollution) Act - 1974 to prohibit you from manufacturing activity?
2. Why not to direct to concern authority for disconnection of Power Supply & Water Supply of your industrial plant?

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

FOR AND ON BEHALF OF  
GUJARAT POLLUTION CONTROL BOARD

*I/KS*  
(IRFAN KAGZI)  
ENVIRONMENT ENGINEER

**NO: GPCB/BRCH-B/CCA-189(18)/ID: 15812/**

**Date: /11/2022**

Issue to:

**M/s. TML Industries Ltd**

Plot No. 33-P, 34-P, 35,37,39,

At & Post, Piludra,

Tal: Jambusar, Dist: Bharuch.

Copy to:

**The Regional Officer,**

Gujarat Pollution Control Board,

Regional Office,

Bharuch..... For monitoring & verification and submission of IR & AR.

Outward No: 687560, 03/11/2022

## TML INDUSTRIES LIMITED

Our Ref: TML/PIL/GPCB/197 / 2022-23

Date: 15<sup>th</sup> November, 2022

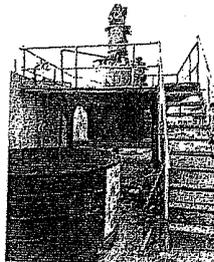
ID: 15812

To,  
**The Unit Head- Bharuch**  
 Gujarat Pollution Control Board,  
 Parvavaran Bhavan, Sector 10-A,  
 Gandhinagar- 382 010

Sub: Show cause notice issued through letter no. GPCB/BRCH-B/CCA-189(16)/ID-15812/687560 dated 03/11/2022

Dear Sir,

The point wise clarification of your observation mentioned in the show cause notice is given as following:

S. No.	Reason of Notice	Compliance / Reply
1	At the time of inspection, raw effluent neutralization tank (underground tank) was found almost empty and there was no fixed provision for removal of the sludge from the tank.	We have planned filter cloth replacement work in the filter press along with re-route/re-locate pipeline from neutralization tank to filter press-1 from roadside to inside plant side on the day. Due to planned maintenance, we had completed neutralization, filtration, settling & transfer operation in the first half so at the time of inspection raw effluent neutralization tank (underground tank), primary settling tank were found almost empty along with Disconnection of filter press piping.
2	The pipeline from neutralization tank to filter press for transferring the effluent was found disconnected.	
3	The primary settling tank was almost empty and there was no fixed provision for removal of the sludge from the tank.	<p>The procedure of sludge removal from the primary neutralization/Settling tank(underground tank)are manual, and frequency of cleaning is on periodical basis. There is no any fix provision for the removal of the sludge from the tanks.</p> <p>Based on your suggestions during the visit for further improvement, we have re-located &amp; re-installed our neutralization tank above ground instead of underground along with Sludge removal facility from bottom. Below is the Photograph of the same.</p> <div style="display: flex; justify-content: space-around;">   </div>
4	There were many PVC/HDPE pipelines observed lying in the ETP area without proper identification and clear intended purpose.	Reply & Compliance for this observation is already submitted to your offices on 12/10/2022 which was attached as Annexure 1.

Post Received  
 Gujarat Pollution Control Board  
 BHARUCH

Registered Office : 1006/3, Goship House, Opp. Shree Pragati Vidhyalaya, Bhayli Station Road, Bhayli, Vadodara-391410, Gujarat, INDIA Ph.: +91 9558819257

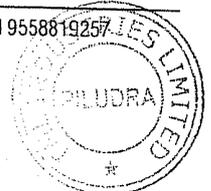
Piludra Plant : At & Post : Piludra - 391816, Taluka : Jambusar, District : Bharuch, Gujarat, INDIA Ph.: +91 2644 237227 / 8

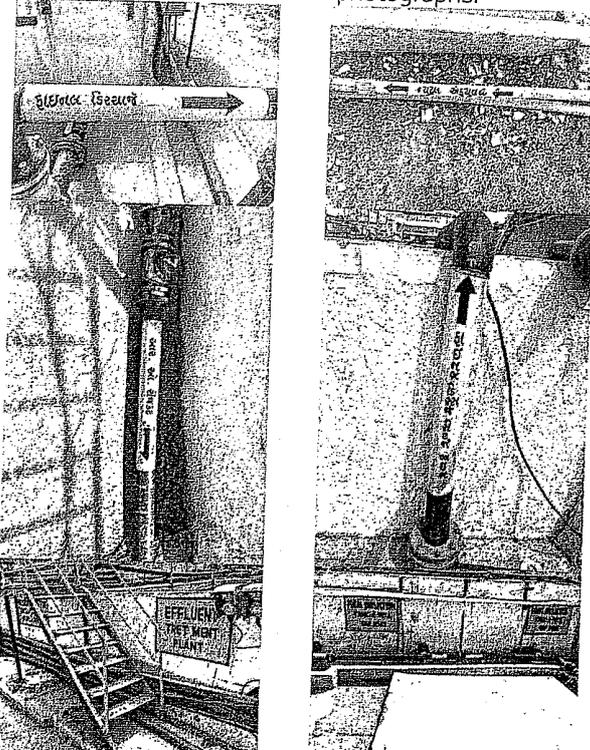
Karakhadi Plant : Canal Road, At & Post : Karakhadi - 391450, Taluka : Padra, District : Vadodara, Gujarat, INDIA Ph.: +91 2662 273563

CIN : U74120GJ1989PLC012329

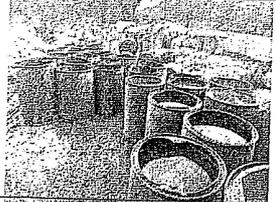
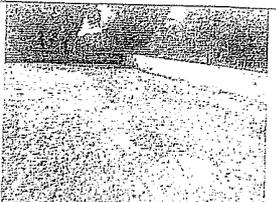
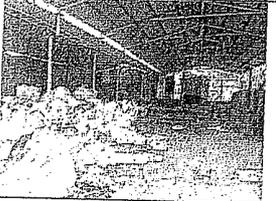
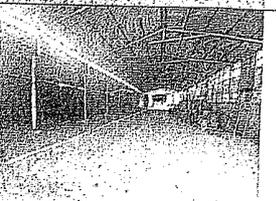
Website: www.tmlind.com

Email : tml@tmlind.com



		<p>We do not use pipelines of PVC (As MoC)/Flexible pipes in our Plant; We use HDPE &amp; PP-R fix pipelines only.</p> <p>Proper identification work of pipeline is already carried out which can be seen in attached photographs.</p> 
<p>5</p>	<p>Different units of ETP are situated sporadically in the premises leading to long transfer pipelines, which are mostly underground.</p>	<p>Our majority of pipelines are above ground except inlet to bio-filter &amp; its outlet due to service road.</p> <p>Considering your valuable suggestions, we have already shifted suggested pipelines above the ground. Below are Photographs of the completed work.</p> 
<p>6</p>	<p>The bio filter plant provided after primary and secondary treatment units was observed non-operational. The effluent coming out from the bio filter plant was observed acidic (@4-5 pH strip), whereas the effluent from the inlet of ETP was made alkaline by adding lime. It indicates that either channelization of the effluent in the ETP was not proper or some acidic stream of the effluent is entering</p>	<p>No acidic stream is entering in to the Biofilter, In normal operations the treated water from Biofilter plant is in the range of 6.5- 7.5 pH. (Last two month's data were also attached in our reply as Annexure 1).</p> <p>But on that particular day since the treated water in the tank was stagnant for few hours, which might be the cause of pH becoming slightly acidic in nature.</p> <p>Further the Bio-filter treatment being intermediate stage of treatment is sent to polishing treatment, where it is further treated and mixed with RO reject before final</p>

Before	After
	
	

Clouse down of the TSDF site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused accumulation of solid sludge.

As on date We have disposed over 100 MT sludge post reopening of TSDF site. Copies of latest dispatches are attached as Annexure 2.

Hope the details explained would satisfy your good office's requirements and we request you to please remove show cause notice and oblige.

**Thanking you,**

**Yours Faithfully**  
**For TML Industries Ltd (UNIT-I)**

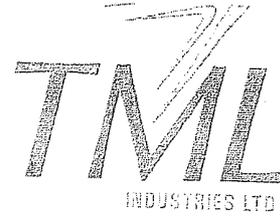
**Mr. Kismat J. Patel**  
**Dy. General Manager (Operations)**  
**Encl: As above**



Cc to:  
 The Regional officer  
 Gujarat Pollution Control Board,  
 C-1/119/3-GIDC-Phase-2,  
 Narmdanagar, Bharuch-392015

✓

o/c



Ref. No.: TML/PIL/GPCB/186/2022-23

Date: 26/09/2022

**PCB ID – 15812**

To,  
Regional Office,  
Gujarat Pollution Control Board  
C-1/119/3, GIDC, Phase-2  
Narmdanagar,  
Bharuch-392015.

Reference: Site visit on 20/09/2022 by GPCB officials from your good office.

Dear Sir,  
Our representation on your points/ suggestions is as below;

S.No.	Query	Reply												
1	Proper operation & maintenance of ETP needs to be ensured.	<p>Last 2 GPCB analysis of our treated Waste Water, VECL's monthly analysis &amp; Online TOC meter data showing our treated Waste water Quality which is summarized below &amp; details are attached as Annexure 1.</p> <table border="1"> <thead> <tr> <th></th> <th>pH</th> <th>COD(ppm)</th> </tr> </thead> <tbody> <tr> <td>Sample GPCB dated :21/04/22</td> <td>7.64</td> <td>105</td> </tr> <tr> <td>Sample GPCB dated :30/06/22</td> <td>7.85</td> <td>83</td> </tr> <tr> <td>VECL (Aug-Sep'22) month's avg. analysis</td> <td>7.38</td> <td>118</td> </tr> </tbody> </table> <p>Our Plant is very Old, surely Needs maintenance as per your observations, We ensure proper Operations &amp; Maintenance by providing adequate necessary resources. Current work done on immediate basis can be seen in photographs attached in next points.</p>		pH	COD(ppm)	Sample GPCB dated :21/04/22	7.64	105	Sample GPCB dated :30/06/22	7.85	83	VECL (Aug-Sep'22) month's avg. analysis	7.38	118
	pH	COD(ppm)												
Sample GPCB dated :21/04/22	7.64	105												
Sample GPCB dated :30/06/22	7.85	83												
VECL (Aug-Sep'22) month's avg. analysis	7.38	118												
2	There are many PVC pipeline laid in the ETP area without proper identification and purpose.	<p>As seen in photographs, Material of construction (MOC) of all pipelines used in ETP are PP-R or HDPE instead of PVC.</p> <p>Proper identification work of pipelines is already carried out which can be seen in attached photographs.</p>												

V.N.P.  
28/9/2022  
Gujarat Pollution Control Board  
Head Office  
Sector No.-10-A,  
Gandhinagar-382010

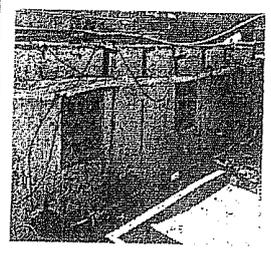
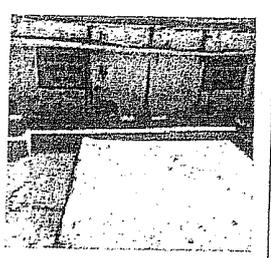
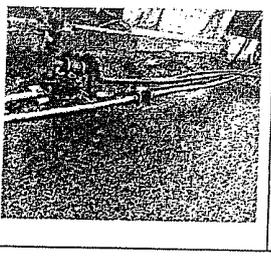
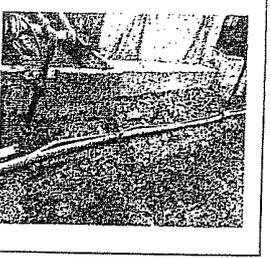
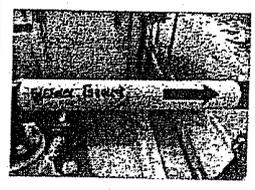
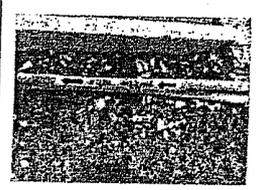
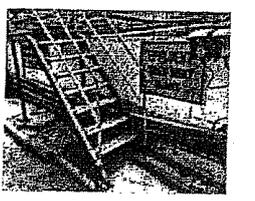
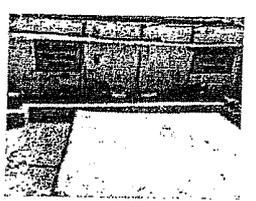
Post Received  
Gujarat Pollution Control Board  
BHARUCH  
26/9/22

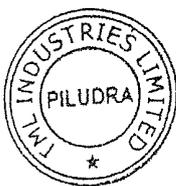
Corporate Office : 601, 'B' Tower, Alkapuri Arcade, R. C. Dutt Road, Vadodara-390007, Gujarat, India. Tel.: +91 265 2343302/04, 2341375  
Works [1] : At & Post : Piludra - 391 816, Taluka : Jambusar, District : Bharuch, Gujarat, India. Tel.: +91 2644 237227 / 8 / 237372, Tele - Fax: +91 2644 237229  
Works [2] : Canal Road, At & Post : Karakhadi - 391 450, Taluka : Padra, District : Vadodara, Gujarat, India. Tel.: +91 2662 273469 / 273563 Fax: +91 2662 273321

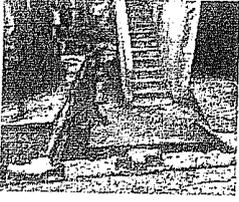
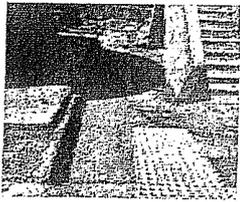
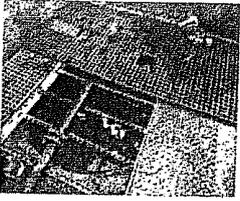
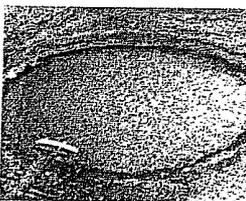
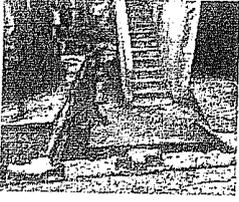
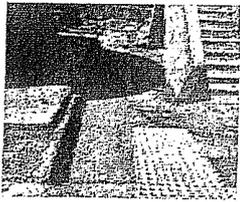
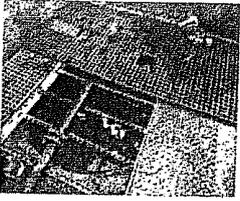
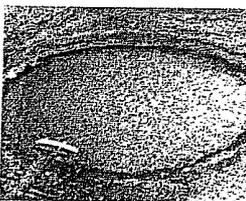
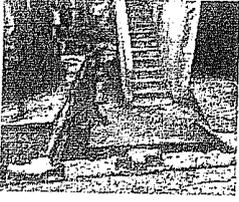
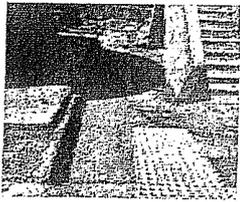
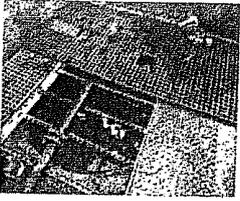
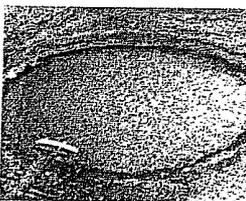
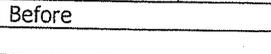
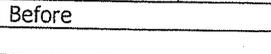
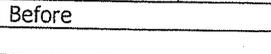
CIN : U74120GJ1989PLC012329

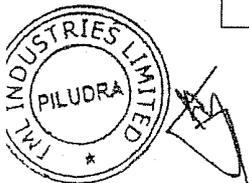
www.tmlind.com

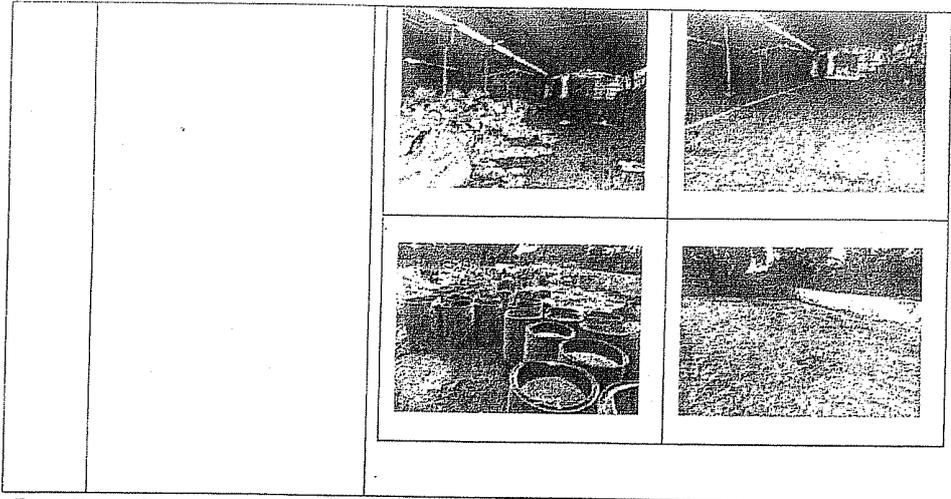


		Before	After
			
			
3	All the pipeline in the ETP needs to be above ground.	Our majority of Pipelines are above ground except Inlet to Bio-filer & it's outlet due to service road. Your observations are noted and we will do the necessary action for taking pipelines above ground within 2 months.	
4	Proper nomenclature of different ETP units needs to be provided.	Painting work is already going on at ETP site, which was visible during your visit also. Work is completed for nomenclature of different ETP units, photograph are given.	
			
			
5	Highly alkaline unaccounted w/w was found flowing in an open drain in the ETP area which is finally terminating in a	Wastewater of highly alkaline removed from the underground tank and taken to the ETP for the further treatment. Photograph of empty underground tank and drain is attached. We have already closed open drain in the ETP area. So it	



	<p>underground tank. There was no provision for treatment of the same.</p>	<p>will be not in operation now onwards. Photographs is attached.</p> <table border="1" style="width: 100%;"> <tr> <th style="width: 50%;">Before</th> <th style="width: 50%;">After</th> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table>	Before	After						
Before	After									
										
										
<p>6</p>	<p>The outlet of biofilter was observed acidic (4-5 on pH strip) which is not inline with the treatment system of ETP. Since the Biofilter feed is alkaline w/w from Aeration tank-1 as per the ETP design system.</p>	<p>In normal operations the treated water from Biofilter Plant is in the range of pH range 6.5-7.5. (Please find attached last one month's data as Annexure 2). But on that particular day since the plant was under shutdown, the treated water in the tank was stagnant for few hours, which was the cause of pH becoming slightly acidic in nature.</p> <p>Further the Biofilter treated water is subjected to polishing treatment, where it is collected and mixed with RO reject and further going for pH correction. So final outlet could not be deviated. pH measurement of VECL and internal lab of the final discharge to the VECL on same date of the visit i.e. 20/09/22 is as below.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th rowspan="2">Date</th> <th colspan="2">pH measurement</th> </tr> <tr> <th>VECL Online</th> <th>Internal Lab</th> </tr> </thead> <tbody> <tr> <td>20/09/22</td> <td>7.7</td> <td>7.55</td> </tr> </tbody> </table>	Date	pH measurement		VECL Online	Internal Lab	20/09/22	7.7	7.55
Date	pH measurement									
	VECL Online	Internal Lab								
20/09/22	7.7	7.55								
<p>7</p>	<p>Huge quantity of solid and semisolid sludge found stored under a shed and some sludge also found stored in open behind the shed.</p>	<p>Close down of the TSDf site of SAFE and BEIL from 1<sup>st</sup> July 2022 due to monsoon season caused stock of accumulation of 106 Mt solid sludge right now at our solid waste storage yard. As soon as TSDf sites will reopen, we will do the needful.</p> <p>Please find last four months' generation, disposal data of the sludge &amp; current stock is given as Annexure 3.</p> <p>We have shifted sludge contained in HMHDPE drums ( 20 nos- Approx 4 Mt) which contains rain water also being in open area behind the shed to the under the shed.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <th style="width: 50%;">Before</th> <th style="width: 50%;">After</th> </tr> <tr> <td></td> <td></td> </tr> </table>	Before	After						
Before	After									
										





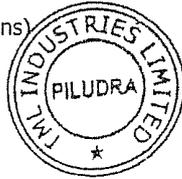
Form Hope above reply is satisfactory.

Thanking You.  
Yours Faithfully,

For TML INDUSTRIES LIMITED (UNIT-I)

Mr. K. J. PATEL  
(Dy. General Manager-Operations)

Enclose: as above



CC: Unit Head, Bharuch  
Environmental Engineer,  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector 10-A, Ganhinagar-382010





Sample ID:348911 - Analysis Completion:30/04/2022

Organic Chemicals manufacturing / LAB Inward : 47481

 C-1/119/3, GIDC Phase-2  
 Narmadanagar  
 Bharuch-392015  
 Tele:(0264)2246333


TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / -- / -- / Validity: 29/12/2023

## TEST REPORT

Test Report No. : 47481

Date: 30/04/2022

1. Name of the Customer : TML Industries Ltd. - 15812
2. Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In
3. Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)
4. Sample Collected By : Ms Patel. Nancy. A, AEE
5. Quantity of Sample Received : 5 lit
6. Code No. of the Sample : 348911
7. Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022
8. Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022
9. Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of ETP
10. Details (Remarks) : ---
11. Mode of Disposal : VECL Channel
12. Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi
13. Temperature on Collection : 31 & pH Range on pH Strip :@7-8 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance : Yellowish
15. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000
16. Parameter : 12 ,Cap No & Weight :

Sl. No.	Parameter	Unit	Test Method	Range of Testing	Result
1	Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
2	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.64
3	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	10558
4	Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	20
5	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	BDL
6	Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard	1 - 50000 mg/l	4280
7	Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	1118
8	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	105
9	Oil & Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
10	Aromatic Compounds	mg/l	4 Amino Antipyrine method without Chloroform Extra	0.1 - 50 mg/l	0.38
11	B.O.D (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirm	05-50000 mg/l	24

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022



R.C.VASAVA,S.O

Note :

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible limits: as per Schedule VI of EPA Rules, 1986 as amended by Second and Third amendment 1993 for Effluents



## TEST REPORT

Test Report No. : 47481

Date: 30/04/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : HOR-H.O.Reference)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 348911  
 Date & Time of Collection & Inwarding : 21/04/2022 , (1545 to 1547) & 22/04/2022  
 Date of Start & Completion of Analysis : 22/04/2022 & 30/04/2022  
 Sampling Point : ## Final Outlet of the ETP ~ Final treated waste water holding tank of  
 ETP  
 1. Flow Details (Remarks) : ---  
 1. Mode of Disposal : ---  
 2. Ultimate Receiving Body : VECL Channel  
 3. Temperature on Collection : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 4. ( ) Sys Nos for : 31 & pH Range on pH Strip :@7-8 on pH strip  
 : Barcode & Color & Appearance :Yellowish  
 5. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000

Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 22nd edi, 2012	2 - to 99 Hazen & 1-50	10

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 30/04/2022



R.C.VASAVA,S.O

e :

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

 C-1/119/3, GIDC Phase-2  
 Narmadanagar  
 Bharuch-392015  
 Tele:(0264)2246333


TC-7844

Accreditation Standards &amp; NABL Certificate Details : TC-7844 / - / - / Validity: 29/12/2023

## TEST REPORT

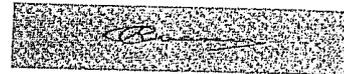
Test Report No. : 48036

Date: 12/07/2022

. Name of the Customer : TML Industries Ltd. - 15812  
 . Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 . Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 . Sample Collected By : Ms Patel. Nancy. A, AEE  
 . Quantity of Sample Received : 5 lit  
 . Code No. of the Sample : 353482  
 . Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 . Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 . Sampling Point : Final treated wastewater holding tank of ETP ~  
 0. Flow Details (Remarks) : -  
 1. Mode of Disposal : VECL channel through own pipeline  
 2. Ultimate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 3. Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 4. Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
 5. Water Consumption & W.W.G (KLPD) : Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 6. Parameter : 12 ,Cap No & Weight :

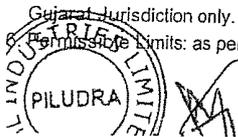
Parameter	Unit	Test Method	Range of Testing	Result
Temperature	Centigrade	IS: 3025 (Part - 9) - 1984(Reaffirmed 2006)	Ambient oC - 60 oC	31
pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2012	1 - 14 pH value As or	7.85
Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 - 200000 mg/L	7134
Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 - 10000 mg/L	14
Ammonical Nitrogen	mg/l	1). Titrimetric method (4500 NH3 B & C APHA Standal	1 - 2000 mg/l.	4.48
Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard M	1 - 50000 mg/l	2990
Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	678
Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5520 B Open Reflux Method-2	5.0- 50000 mg/l	83
Oil & Grease	mg/l	Liquid - Liquid Partition Gravimetric method. (5520 B	01 - 1000 mg/l	BDL
Biological Compounds	mg/l	4 Amino Antiprene method without Chloroform Extra	0.1 - 50 mg/l	0.18
BOD (3 Days 27oC)	mg/l	3 - Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05-50000 mg/l	18

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
  - Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
  - The report shall not be reproduced except in full or part without approval of the laboratory.
  - The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
  - Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat jurisdiction only.
- Permissible limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents





Sample ID:353482 - Analysis Completion:11/07/2022

Organic Chemicals manufacturing / LAB Inward : 48036

C-1119/3, GIDC Phase-2

Narmadanagar

Bharuch-392015

Tele:(0264)2246333

## TEST REPORT

Test Report No. : 48036

Date: 12/07/2022

Name of the Customer : TML Industries Ltd. - 15812  
 Address : 33-P,34-P, 35,37,39,AT. & POST.PILUDRA,,TAL. JAMBUSAR,  
 Piludra-391816, Taluka : Jambusar, District : Bharuch, GIDC : Not In  
 Nature of Sample : REP-Representative/Grab, (Insp Type : APP-On Application)  
 Sample Collected By : Ms Patel. Nancy. A, AEE  
 Quantity of Sample Received : 5 lit  
 Code No. of the Sample : 353482  
 Date & Time of Collection & Inwarding : 30/06/2022 , (1705 to 1710) & 01/07/2022  
 Date of Start & Completion of Analysis : 01/07/2022 & 11/07/2022  
 Sampling Point : Final treated wastewater holding tank of ETP ~  
 Flow Details (Remarks) : -  
 Mode of Disposal : VECL channel through own pipeline  
 Intermediate Receiving Body : Vadodara Enviro Channel(VECL) Estuary of River Mahi  
 Temperature on Collection : 31 & pH Range on pH Strip :7-8 on pH strip  
 Carboys Nos for : Barcode & Color & Appearance :Faint yellowish  
 Ind :594.000 , Dom :18.000 & Ind :234.000 , Dom :15.000  
 Water Consumption & W.W.G (KLPD) : 12 ,Cap No & Weight :

Parameter	Unit	Test Method	Range of Testing	Result
Colour	Pl.Co.Sc.	2120 B APHA Standard Methods 22nd edi. 2012	2 - to 99 Hazen & 1-50	05

Laboratory Remarks : Approved By:399-lab\_399 Dt.: 12/07/2022



R.C.VASAVA,S.O

- The results relate only to the items sampled and tested.
- Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
- The report shall not be reproduced except in full or part without approval of the laboratory.
- The Board is not responsible for the authenticity for the samples not collected by the Board's officials.
- Total liability of our laboratory is limited to the invoiced amount. Any dispute arising out of this report is subject to Gujarat Jurisdiction only.
- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as amended by Second and Third amendment 1993 for Effluents



Annexure - 1

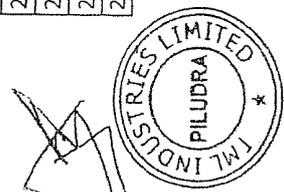
Sr.No	Parameter	GPCB Limit	TML Industries Ltd, VECL Analysis data of Last 2 Month									
			Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
1	Date	--	14-08-2022	16-08-2022	17-08-2022	20-08-2022	25-08-2022	04-09-2022	07-09-2022	10-09-2022		
2	Ph	6.5-8.5	7.33	7.23	7.54	7.37	7.36	7.61	7.29	7.37		
3	COD (ppm)	250	133	161	107	74	119	82	163	103		
4	BOD (ppm)	100	--	--	--	--	--	--	--	--		
5	Ammonical Nitrogen (ppm)	50	5	--	5	5	5	5	5	--		
6	Color (pt.co)	100	30	34	35	26	24	27	20	36		
7	Chloride (ppm)	600	3646	--	3153	2910	3620	3621	2168	--		
8	TSS (ppm)	100	10	--	17	38	15	15	10	--		
9	TDS (ppm)	5000	8292	--	8568	7540	8688	7492	10028	--		
	Sulphate (ppm)	1000	1158	--	1362	1697	1027	706	590	--		



Annexure - I

VECL\_TML Industries:20/Sep/2022

Timestamp	COD(mg/l)	pH(pH)	BOD(mg/l)	FLOW(m3/hr)	TSS(mg/l)	NH4(mg/l)	TEMP.(C)	COLOR(Hazen-eq.)
20-Sep-2022 16:50	77.34	7.69	10.54	0.5	66.46	0	31.8	25.67
20-Sep-2022 16:40	76.53	7.69	9.1	0.54	62.49	0	31.8	1.22
20-Sep-2022 16:30	76.13	7.69	9.52	0.54	62.81	0	31.7	7.12
20-Sep-2022 16:20	76.25	7.69	9.89	0.54	63.84	0	31.6	9.75
20-Sep-2022 16:10	76.8	7.68	9.89	0.54	65.21	0	31.6	9.35
20-Sep-2022 16:00	76.78	7.69	9.73	0.54	64.3	0	31.5	10.44
20-Sep-2022 15:50	76.76	7.68	9.29	78.14	63.72	0	31.5	3.94
20-Sep-2022 15:40	77.56	7.68	9.54	79	65.27	0	31.4	5.56
20-Sep-2022 15:30	77.58	7.68	9.89	79.94	65.93	0	31.3	11.55
20-Sep-2022 15:20	76.82	7.68	9.14	81.15	64.09	0	31.3	0.87
20-Sep-2022 15:10	76.65	7.69	9.64	81.81	63.94	0	31.2	7.19
20-Sep-2022 15:00	76.25	7.68	8.86	82.2	62.71	0	31.1	0
20-Sep-2022 14:50	76.38	7.68	9.87	82.71	64	0	31.1	10.48
20-Sep-2022 14:40	76.4	7.68	9.7	83.38	63.97	0	31	9.75
20-Sep-2022 14:30	76.89	7.69	9.46	0.5	64.36	0	30.9	5.56
20-Sep-2022 14:20	77.34	7.69	9.56	0.5	65.75	0	30.9	7.84
20-Sep-2022 14:10	77.48	7.68	9.02	0.5	64.67	0	30.8	0
20-Sep-2022 14:00	77.87	7.68	9.82	0.54	66.55	0	30.7	12.22
20-Sep-2022 13:50	77.47	7.68	8.67	0.54	63.11	0	30.7	0
20-Sep-2022 13:40	77.27	7.67	10.83	0.5	67.53	0	30.6	26.94
20-Sep-2022 13:30	76.87	7.67	9.72	0.54	65.64	0	30.5	7.83
20-Sep-2022 13:20	78.02	7.66	9.27	0.54	66.37	0	30.5	2.33
20-Sep-2022 13:10	77.56	7.66	8.89	0.5	63.87	0	30.4	0
20-Sep-2022 13:00	77.13	7.66	10.32	0.54	65.59	0	30.3	17.23
20-Sep-2022 12:50	77.35	7.66	9.31	0.54	65.25	0	30.3	1.42
20-Sep-2022 12:40	77.69	7.66	8.93	0.54	64.52	0	30.2	0
20-Sep-2022 12:30	77.04	7.65	9.78	0.5	65.24	0	30.2	10.31
20-Sep-2022 12:20	77.27	7.64	9.21	0.54	64.23	0	30.1	1.25
20-Sep-2022 12:10	76.96	7.63	9.78	0.54	64.93	0	30	13.88
20-Sep-2022 12:00	77.56	7.62	8.84	0.54	64.73	0	30	0



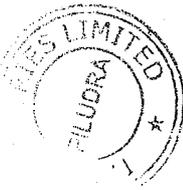
TML Industries Ltd Piludara Biofilter						
Date	Biofilter Feed			Biofilter outlet		
	pH	TDS PPM	COD PPM	pH	TDS PPM	COD PPM
01-09-2022	8	14000	1190	6.8	13300	620
02-09-2022	8.45	13000	1220	6.65	12300	625
03-09-2022	8.36	13000	1220	7.05	12800	620
04-09-2022	8.84	15000	1250	7.3	15000	690
05-09-2022	8.88	13500	1225	7.35	13000	580
06-09-2022	8.46	12000	1190	7.24	12000	610
07-09-2022	8.54	14000	1210	7.15	14000	620
08-09-2022	8.65	13800	1220	7.2	13300	660
09-09-2022	8.87	12900	1260	7.1	12300	670
10-09-2022	8.76	13500	1245	7.15	12800	690
11-09-2022	8.74	13000	1195	7.24	12000	670
12-09-2022	8.57	15000	1275	7.15	14000	660
13-09-2022	8.65	13600	1190	7.1	12300	650
14-09-2022	8.68	13300	1240	7.15	12800	685
15-09-2022	8.48	14400	1260	7.3	15000	625
16-09-2022	8.56	14600	1240	7.35	13000	620
17-09-2022	8.47	13800	1245	7.24	12000	610
18-09-2022	8.59	14700	1050	7.15	14000	590
19-09-2022	8.78	14400	1140	7.08	13300	640
20-09-2022	8.67	13600	1240	6.03	12300	580
21-09-2022	8.57	13300	1260	6.5	12300	670
22-09-2022	8.63	13300	1190	6.9	1250	580



Annexure - 3

TML INDUSTRIES LTD PILUDARA  
HAZ. WASTE DETAILS

Sr. No.	Type of waste	Quantity of Generation as per CC&A	Category	Opening as on 1-6-2022 (MT)	Actual Generation (in MT)					Actual Disposal (in MT)				Stock as on 22/09/22 (MT)	Mode of Disposal
					June-2022	July-2022	Aug-22	Sept-22 (22-9-2022)	June-2022	July-2022	Aug-22	Sept-22 (20-9-2022)			
1	ETP WASTE	465.96 MT/MONTH	Sch-I 33.5 (Sch-1)	132.02	27.01	32	17.7	15.55	118	0	0	0	106.5	Collection, Storage, Transportation, Disposal at TSDF BEIL site.	



Annexure 2

ETP Sludge Dispatched To TSDF

1. Manifest Number : 1886541  
Date : 12/11/2022  
Weight : 25.570 MT
2. Manifest Number : 1887367  
Date : 13/11/2022  
Weight : 24.730 MT
3. Manifest Number : 1887443  
Date : 13/11/2022  
Weight : 31.000 MT
4. Manifest Number : 1888049  
Date : 14/11/2022  
Weight : 27.780 MT

Total Weight : 109.08 MT





Safe Enviro Private Limited [53681]

 Manifest No:  
1886541  
12/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST.PILUDRA,,TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	25.570MT	Consistency	Solid
Transporter Details					
Name	Khera Transport Co.	Contact Details	9925065555 khera.transport@gmail.com		
Address	Near Cargo motors,Ranoli District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX6565 (IMEI No :862095058924702)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Ghanshyam Mishra	Driver Contact No	7096621807		
Waste Transportation Details					
Vehicle Depart.	12/11/2022 1:00PM	Number of Drums	0	Loose Waste	25.570
Remarks	ETP SLUDGE SEND TO M/S Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> At & Post: Piludra, 391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AABCT0793K1Z7			For TML Industries Ltd. Signature: Kismat Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b> Stamp:		Date: 12/11/22		Signature: 	
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

Date:

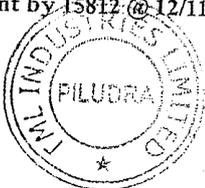
Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)

Print by 15812@12/11/2022 12:14:02 PM

88fad2aa-ab82-4de8-a8ee-369633621a12

Page 1 of 1





Safe Enviro Private Limited [53681]

 Manifest No:  
1887367  
13/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST.PILUDRA,,TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF.		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	24.730MT	Consistency	Solid
Transporter Details					
Name	Khera Transport Co.	Contact Details	9925065555 khera.transport@gmail.com		
Address	Near Cargo motors,Ranoli District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX6565 (IMEI No :862095058924702)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Ghanshyam Mishra	Driver Contact No	7096621807		
Waste Transportation Details					
Vehicle Depart.	13/11/2022 12:15PM	Number of Drums	0	Loose Waste	24.730
Remarks	ETP SLUDGE SEND TO M/S Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> At & Post: Piludra-391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AAECT0793K1Z7			For TML Industries Ltd.  Signature: Kismat Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b>					
Stamp:		Date:	Signature:		
		13/11/22			
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

Date:

Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)

Print by 15812 @ 13/11/2022 11:26:41 AM 725eccb1-e832-4bf0-8b68-bb3e4d2d9ad6

Page 1 of 1





Safe Enviro Private Limited [53681]

 Manifest No:  
1887443  
13/11/2022

Copy 1

To be forwarded by To be forwarded by the occupier to the State Pollution Control Board or Committee.

Sender's Details					
Sender Name	TML Industries Ltd. [15812]				
Address	AT. & POST. PILUDRA,,TAL. JAMBUSAR, Taluka :JAM Distict:BHA Pin no:391816				
Contact Details	9898508387 kismat@tmlind.com	GPS Coordinates	Lat :22.158949976473494 Long :72.85772323608398		
Receiver's Details					
State	Gujarat	Type of Facility	Common TSDF		
Facility Details	Safe Enviro Private Limited [53681]				
Contact Details	9510860178 info@detoxindia.com	GPS Coordinates	Lat :22.038579882827026 Long:72.85685783252949		
Address	966 to 976, 1040 , 1045 to 1049,- Taluka :JAM Distict:BHA Pin no:392150				
Waste Details					
Waste Details	I~35~35.3~Chemical sludge from waste water treatment				
Waste Intended for	LandFill	Total Qty	31.000MT	Consistency	Solid
Transporter Details					
Name	krishana roadline	Contact Details	9925065555 khera.transport@gmail.com		
Address	GACL Ranoli road opposite BPCL petrol pump,GACL Ranoli road opposite BPCL petrol pump District :Vadodara Taluka :Vadodara				
Vehicle Details					
Vehicle no	GJ06AX2282 (IMEI No :358980100228627)	GPS Enabled	Yes	Type of Vehicle	Truck
Driver name	Naseer bhai	Driver Contact No	9622628225		
Waste Transportation Details					
Vehicle Depart.	13/11/2022 1:20PM	Number of Drums	0	Loose Waste	31.000
Remarks	Safe Enviro Private Limited~966 to 976, 1040 , 1045 to 1049,- City :MAGNAD Taluka :JAMBUSAR Distict:BHARUCH		No of bags	0	
<b>Sender's Declaration :</b>					
1. I hereby declare that contents of the consignment are fully and accurate described above by proper shipping name and are categorized , packed, marked , and labeled , and are all in all respects in proper condition for transport by road according to applicable national government regulations.					
2. I hereby declare that we have obtained membership of common facility / carried out agreement with actual user for disposal/ actual use of hazardous waste.					
<b>TML INDUSTRIES LTD.</b> Name and stamp of sender: AT. & POST. PILUDRA, 391810, Tal. Jambusar, Dist. Bharuch. GSTIN: 24AABCT0793K1Z7			For TML Industries Ltd. Signature: Kisma Patel Factory Manager		
<b>Transporter's Acknowledgement of Receipt of waste</b>					
Stamp:		Date:	Signature:		
		13/11/22	Naseer		
<b>Receiver's Certification of Receipt of Hazardous waste</b>					

Stamp:

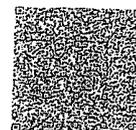
Date:

Signature:

By scanning QR code, copy of transporter will be display. (All copy has same information)

Print by 15812 @ 13/11/2022 12:31:44 PM a96fefd7-514b-4b9a-9f5d-51b0937dbf2d

Page 1 of 1



ANNEXURE - 8

✓ TML Industries Limited-Piludra GPCB ID 15812

Year	GPCB's Visits	Orders		Directions Issued	Notice of Directions Issued	Show Cause Notice Issued
<b>Pre Joint Inspection dated 20/09/2022</b>						
2019	2	3	Amendment to CTE dated 16/03/2019 Amendment to CCA dated 16/03/2019 Amendment to CCA dated 16/05/2019	0	0	1
2020	2	0		0	0	1
2021	1	0		0	1	
2022	6	3	Amendment to CTE dated 08/08/2022 Amendment to CTE dated 12/09/2022	0	0	1
<b>Post Joint Inspection dated 20/09/2022</b>						
			New CCA dated 26/12/2022		1	
2023	3	2	Amendment to CTE dated 07/08/2023 Amendment to CCA dated 07/08/2023	0	0	0

ANNEXURE-9

Sr.No.		TEST REPORT																	
Parameters		Unit	16.05.2023	03.06.2023	05.06.2023	07.06.2023	08.06.2023	09.06.2023	10.06.2023	12.06.2023	13.06.2023								
1	pH	mg/L	7.85	8.02	7.74	8.05	7.99	8.17	8.16	7.95	8.33								
2	COD	mg/L	59.00	155.00	213.00	115.00	93.00	150.00	51.00	64.00	97.00								
3	BOD	mg/L	NA																
4	Ammonical Nitrogen	mg/L	5.04	< 5	6.16	5.04	< 5	< 5	< 5	< 5	< 5								
5	Color	mg/L	39.00	40.00	54.00	50.00	31.00	38.00	44.00	39.00	114.00								
6	Chlorides	mg/L	NA	3621.00	3400.00	4607.00	2784.00	3128.00	3082.00	3277.00	3742.00								
7	TSS	mg/L	39.00	59.00	48.00	39.00	32.00	31.00	30.00	13.00	49.00								
8	TDS	mg/L	9704.00	9736.00	10508.00	11416.00	7888.00	8760.00	8424.00	9116.00	10988.00								
9	Phenol	mg/L	NA																
10	Total Chromium	mg/L	NA																
11	Nickel	mg/L	NA																
12	Cadmium	mg/L	NA																
13	Zinc	mg/L	NA																
14	Copper	mg/L	NA																
15	Lead	mg/L	NA																
16	Sulphates	mg/L	NA																





TEST REPORT															
Sr.No.	Parameters	Unit	23.03.2023	28.03.2023	01.02.2023	11.02.2023	12.02.2023	13.02.2023	14.02.2023	15.02.2023	16.02.2023	24.02.2023			
			Date												
1	pH	mg/L	7.79	8.43	7.65	NA									
2	COD	mg/L	59.00	65.00	126	135.00	160.00	166.00	141.00	171.00	176.00	74.00			
3	BOD	mg/L	NA												
4	Ammonical Nitrogen	mg/L	NA	< 5	5.04	< 5	NA	NA	NA	< 5	NA	7.28			
5	Color	mg/L	49.00	24.00	40	41.00	28.00	39.00	29.00	28.00	31.00	23.00			
6	Chlorides	mg/L	4123.00	3128.00	3898	4256.00	4182.00	5479.00	4410.00	4262.00	3840.00	2788.00			
7	TSS	mg/L	NA	13.00	54	15.00	NA	NA	NA	< 10	NA	23.00			
8	TDS	mg/L	NA	8368.00	11036	10760.00	NA	NA	NA	10136.00	NA	8328.00			
9	Phenol	mg/L	NA												
10	Total Chromium	mg/L	NA												
11	Nickel	mg/L	NA												
12	Cadmium	mg/L	NA												
13	Zinc	mg/L	NA	BDL	NA	BDL	NA	NA	NA	BDL	NA	BDL			
14	Copper	mg/L	NA	BDL	NA	BDL	NA	NA	NA	BDL	NA	BDL			
15	Lead	mg/L	NA												
16	Sulphates	mg/L	NA	2024.00	NA	NA									

TEST REPORT																	
Sr.No.	Parameters	Unit	25.02.2023	01.02.2023	02.02.2023	03.02.2023	06.02.2023	23.01.2023	24.01.2023	27.01.2023	19.01.2023	03.01.2023					
1	pH	mg/L	NA	7.74	7.21	8.04	NA	7.66	7.65	7.68	7.86	8.07					
2	COD	mg/L	99.00	207.00	114.00	236.00	195.00	223.00	214.00	109.00	120.00	83.00					
3	BOD	mg/L	NA														
4	Ammonical Nitrogen	mg/L	NA	5.04	NA	< 5	NA	< 5	< 5	< 5	5.04	7.28					
5	Color	mg/L	34.00	60.00	26.00	26.00	34.00	30.00	27.00	33.00	34.00	22.00					
6	Chlorides	mg/L	3013.00	3595.00	3664.00	5110.00	4525.00	4329.00	3938.00	3885.00	3424.00	3923.00					
7	TSS	mg/L	NA	16.00	NA	17.00	NA	16.00	18.00	16.00	12.00	17.00					
8	TDS	mg/L	NA	9504.00	NA	10876.00	NA	11128.00	10628.00	11348.00	8540.00	11456.00					
9	Phenol	mg/L	NA														
10	Total Chromium	mg/L	NA														
11	Nickel	mg/L	NA														
12	Cadmium	mg/L	NA														
13	Zinc	mg/L	NA	BDL	NA	BDL	NA	1.12	1.07	0.96	BDL	0.85					
14	Copper	mg/L	NA	BDL	NA	BDL	NA	BDL	BDL	BDL	BDL	BDL					
15	Lead	mg/L	NA														
16	Sulphates	mg/L	NA	2768.00	1180.00	NA											









TEST REPORT								
Sr.No.	Parameters	Unit						
1	pH	mg/L	03.08.2022	04.08.2022	05.08.2022	10.08.2022		
			7.36	7.44	7.55	7.26		
2	COD	mg/L	145.00	< 50	58.00	66.00		
3	BOD	mg/L	NA	NA	NA	NA		
4	Ammonical Nitrogen	mg/L	< 5	NA	NA	5.04		
5	Color	mg/L	42.00	43.00	41.00	38.00		
6	Chlorides	mg/L	3008.00	NA	NA	2924.00		
7	TSS	mg/L	19.00	NA	NA	< 10		
8	TDS	mg/L	7812.00	NA	NA	10302.00		
9	Phenol	mg/L	BDL	NA	NA	BDL		
10	Total Chromium	mg/L	NA	NA	NA	NA		
11	Nickel	mg/L	NA	NA	NA	NA		
12	Cadmium	mg/L	NA	NA	NA	NA		
13	Zinc	mg/L	BDL	NA	NA	BDL		
14	Copper	mg/L	BDL	NA	NA	BDL		
15	Lead	mg/L	NA	NA	NA	NA		
16	Sulphates	mg/L	1668.00	NA	NA	NA		

GPCB Test Report - TML-PILUDRA						
Sr. No.	Parameter	Norms	Date	Date	Date	Date
1	Temperature	40 c	30--04--22	12--07--22	18--05--23	8/8/2023
2	PH	6.5 to 8.5	31	31	30	30
3	Total Dissolved Solids	5000 mg/l	7.64	7.85	7.47	7.34
4	Suspended solids	100 mg/l	10558	7134	10046	6952
5	Ammonical Nitrogen	50 mg/l	20	14	22	10
6	Chloride	600 mg/l	BDL	4.48	BDL	2.24
7	Sulphate	1000 mg/l	4280	2990	3650	3400
8	Chemical Oxygen Demand	250 mg/l	1118	678	1631	1026
9	Oil & Grease	10 mg/l	105	83	139	177
10	Phenolic Compounds	01 mg/l	BDL	BDL	BDL	BDL
11	B.O.D ( 3 Days 27oC)	100 mg/l	0.38	0.18	BDL	BDL
12	Colour		24	18	32	40
			10	5	10	20

Parameter	30/06/2022	17/09/2022
So2 Stack( mg/nm3)	13.19	29.39
Nox Stack( mg/nm3)		BDL
HCL Stack( mg/nm3)	BDL	15.75

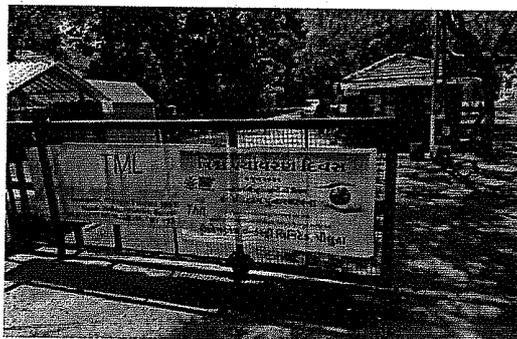
Confidential

**FINAL REPORT  
ON**

**WATER AUDIT STUDY**

(As per the guidelines of CGWA, Ministry of Jal Shakti)

At



**M/s TML INDUSTRIES LIMITED**

Plot no: 33,34,35,37 & 39 At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch,  
Gujarat, India

**PREPARED BY,**



NATIONAL PRODUCTIVITY COUNCIL

**NATIONAL PRODUCTIVITY COUNCIL**

(Under Ministry of Commerce & Industry)  
E - 5, G. I. D. C ELECTRONIC ESTATE

GANDHINAGAR - 382 026

PHONE : 91 79 23287343, 23287344

Website: [www.npcindia.gov.in](http://www.npcindia.gov.in)

Date: 07/03/2023

**Acknowledgment:**

National Productivity Council, NPC places on record its sincere thanks to M/s TML Industries Limited. At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch, for entrusting the task of conducting Water Audit Study as per CGWA guidelines at M/s TML Industries Limited. At & Po: Piludra- 391816, Taluka: Jambusar, Dist. Bharuch.

We hereby express our sincere thanks to:

Mr. Kuldeep rathod (Executive -EHS)  
Mr. Nilesh P Parekh (Sr. Manager -QA)  
Mr. A.I.Motka (Dy. Manager-Egg.)  
Mr. Liyakat Malek (Sr. Officer-utility)  
Mr. Kalpesh Thakkar ( Sr. Officer-people care)  
Mr. Mansukh Parmar (Officer Instrument)

From TML for their proactive support and courtesy extended to the NPC Team during field study.

We also thank other officials & Staff of M/s TML Industries Limited for their cooperation and support provided during data collection. We are also grateful to all those we interacted with during the audit who gave us operational insights.

  
Regional Director  
National Productivity Council  
RD, Gandhinagar



Date: 07/03/2023

***Confidential*****FINAL REPORT  
ON****WATER AUDIT STUDY**

(As per the guidelines of CGWA, Ministry of Jal Shakti)

At

**TML INDUSTRIES LIMITED.**

Plot No-33,34,35,37 & 39 At & Po: Piludra- 391816, Taluka: Jambusar,  
Dist. Bharuch, Gujarat, India

**PREPARED BY,**

NATIONAL PRODUCTIVITY COUNCIL

**NATIONAL PRODUCTIVITY COUNCIL**

(Under Ministry of Commerce &amp; Industry)

E - 5, G. I. D. C ELECTRONIC ESTATE

GANDHINAGAR - 382 026

PHONE : 91 79 23287343, 23287344

Website: [www.npcindia.gov.in](http://www.npcindia.gov.in)

Date: 31/12/2021

**Acknowledgment:**

National Productivity Council, NPC places on record its sincere thanks to TML Industries Limited. At & Po: Piludra- 39186, Taluka: Jambusar, Dist. Bharuch, for entrusting the task of conducting Water Audit Study as per CGWA guidelines at TML Industries Limited. At & Po: Piludra- 39186, Taluka: Jambusar, Dist. Bharuch.

We hereby express our sincere thanks to:

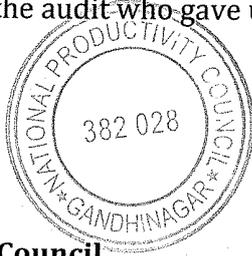
Mr. Kismat Patel (Dy. General Manager - Operations)  
Mr. Nilesh P.Parekh (Sr.Manager- Quality Management.)  
Mr. A.I.Motaka (Dy.Manager -Engg.Services.)  
Mr. Kuldeep Rathod (Senior Officer - EHS)  
Mr. Sandeep Padhiyar (Executive - People care)  
Mr. Malik (Officer- Utility.)  
Miss. Ruhika Vaghela (Officer - EPD Dept.)

From TML for their proactive support and courtesy extended to the NPC Team during field study.

We also thank other officials & Staff of TML Industries Limited for their cooperation and support provided during data collection. We are also grateful to all those we interacted with during the audit who gave us operational insights.



**Regional Director  
National Productivity Council**

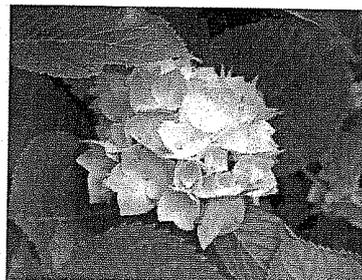
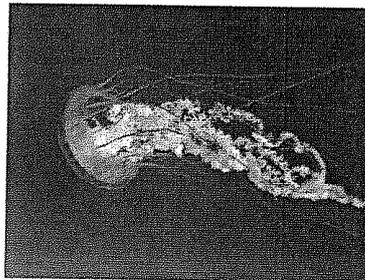
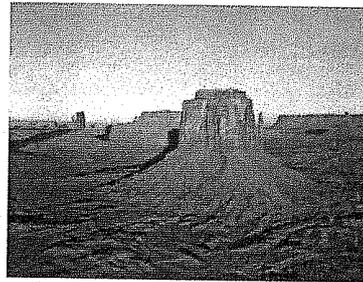
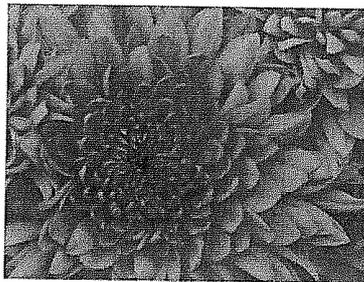


**Date: 31/12/2021**

**TML INDUSTRIES LTD**

**UNDERGROUND UTILITY  
ENGINEERING SURVEY USING  
GROUND PENETRATING RADAR (GPR)  
FOR INTERNET CABLE LAYING  
PROJECT AT SURVEY NO. 35 TO 47, 51  
TO 55 & 60 A VILLAGE PILUDARA,  
TALUKA JAMBUSAR, DIST. BHARUCH,  
GUJARAT**

**JUNE 2020**



**Kadam**

Environmental Consultants  
[www.kadamenviro.com](http://www.kadamenviro.com)

Environment for Development



Ref. No. TML/PIL/GPCB/002/2020-21  
Date: 19<sup>th</sup> May, 2020

To,  
Member Secretary  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector -10 A  
Gandhinagar: 380010

ID-15812

**Sub: - Ground penetrating Radar (GPR) survey of our site M/s TML Industries Limited- Unit-I**

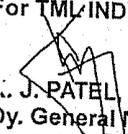
**Ref: Meeting held on March 6<sup>th</sup> 2020 at 12.00 noon at the VECL Auditorium at Dhanora.**

Respected Sir,

With reference to above subject, we have allocate the GPR survey of our TML Industries Limited-Unit-I (ID: 15812) At.Piludara, Ta.Jambusar, Dist.Bharuch to M/s Geocrate Radar Technology Pvt. Ltd.Indian institute of Technology Gandhinagar.The copy of LOI dated 19<sup>th</sup> May,2020.is attached as per Annex. A. P.O will be sending your office within short time.

Thanking you,

Yours faithfully  
For TML INDUSTRIES LTD. Unit-I

  
J. PATEL  
Dy. General Manager – Operations.  
Encl: As Above

Cc to: Unit Head-Bharuch  
Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector -10 A  
Gandhinagar: 380010

ate Office : 601, "B" Tower Alkapuri Arcade, R. C. Dutt Road, Vadodara - 390 007, Gujarat, INDIA. Tel. : +91 265 2343302 / 04, 2341375

[1] : At & Post : Piludra - 391 816, Tal. : Jambusar, District : Bharuch, Gujarat, INDIA. Tel. : +91 2644 237227 / 8 / 237372, Tele - Fax : +91 2644 237229

[2] : Canal Road, At & Post : Karakhadi - 391 450, Tal. : Padra, District : Vadodara, Gujarat, INDIA. Tel. : +91 2662 273469 / 273563, Fax: +91 2662 273321

CIN : U74120GJ1989PLC012329

www.tmlind.com

Date : 19<sup>th</sup> May, 2020.

To,  
Geocrate Radar Technology Pvt. Ltd.  
Indian Institute of Technology Gandhinagar  
Palag, Gandhinagar – 382355



Kind attn. : Madam Silky Agrawal

Sub – LOI For Ground Penetrating Radar

Reference : Commercial offer dated 09<sup>th</sup> March, 2020.

Dear Madam,

We are pleased to issue the order confirmation for subject package to M/s Geocrate Radar

Technology with following terms and conditions. Purchase Order will be issued shortly.

Scope of Supply:

Item	Description	Total Price
1	GPR Survey Fee	Rs.2,40,000/-
2	Mobilization & Accommodation	12500/-

Commercial terms and Conditions :

1. Payment terms: 20% advance for mobilisation 60% after site work completion and 20% after submission of report.
2. GST: 18% applicable.
3. Billing address :

TML INDUSTRIES LTD  
AT & POST - PILUDRA, TA : JAMBUSAR  
DIST: BHARUCH  
Gujarat - 391816

GST NO – 24AABCT0793K1Z7

Thanks & Regards,

For TML INDUSTRIES LIMITED,

(ismat Patel)  
Jy. Gen Manager

Office : 601, "B" Tower Alkapuri Arcade, R. C. Dutt Road, Vadodara - 390 007, Gujarat, INDIA. Tel. : +91 265 2343302 / 04, 2341375  
& Post : Piludra - 391 816, Tal. : Jambusar, District : Bharuch, Gujarat, INDIA. Tel. : +91 2644 237227 / 8 / 237372, Tele - Fax : +91 2644 237229  
National Road, At & Post : Karakhadi - 391 450, Tal. : Padra, District : Vadodara, Gujarat, INDIA. Tel. : +91 2662 273469 / 273563, Fax : +91 2662 273321

CIN : U74120GJ1989PLC012329

www.tmlind.com

Scanned with CamScanner



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

WESTERN ZONE BENCH, PUNE

AT PUNE

ORIGINAL APPLICATION NO. 65 OF 2023 (WZ)

RAKESH PATEL

..

APPLICANT

V/s

M/s LOXIM INDUSTRIES  
AND OTHERS

..

RESPONDENTS

VAKALATNAMA

KNOW ALL to whom these present shall come that we, the above named do hereby appoint:

**Saurabh Kulkarni,**  
**Advocate**

**Prashant Bhat**  
**Advocate**

**M/s.D.V. Kulkarni & Co., Advocates**  
420, Shaniwar Peth, Near Ahilya Devi School,  
Next to Sudarshan Hall, Pune – 411 030.  
Ph(O) 24459027  
(Email) [sdkadvocate@gmail.com](mailto:sdkadvocate@gmail.com)

Hereinafter called the Advocates to be, **M/s TML INDUSTRIES LIMITED Respondents.6** Advocates in the above noted case & authorize them;

To, act appear and plead in the above noted case in this court or in any other court in which the same may tried or heard.

To sign file, verify and present pleadings, appeals, cross-objections or petitions fee executions review, revision, withdraw compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the execution of the said case in all its stages subject to payment for fees for each stage.

To file and take back document, to admit &/or deny the document of opposite party

To take execution proceedings.

And I the undersigned do hereby agree to ratify and confirm all acts done by the Advocates or their substitute in the matter as my/our own acts, as if done by me/us intents and purposes.

1314

AND I/We undertake that I/We or My/Our duly authorized agent would appear in court on all hearing & will inform the Advocate for appearance when the case is called IN WITNESS WHEREOF we do hereunto set our hand to their presents the contents of which have been understood by us on this 20<sup>th</sup> day of September 2023



ADVOCATES

Signature

  
(Kismat Patel)

I am not a member of Advocates Welfare Fund and therefore stamp of Rs.2 is not affixed herewith.

