

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 616 OF 2019
WRIT PETITION (PIL) NO. 114 OF 2018**

IN THE MATTER OF:

Ramdevbhai Samatbhai Sanjva

... Applicant

Versus

State of Gujarat & Ors.

....Respondents.

**REPLY/ COUNTER AFFIDAVIT FOR AND ON BEHALF OF
RESPONDENT NO. 7 JETPUR DYEING AND PRINTING
ASSOCIATION**

[ADVOCATE FOR THE RESPONDENT NO.7, DHARITA MALKAN]

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REPLY/ COUNTER AFFIDAVIT FOR AND ON BEHALF OF RESPONDENT
NO. 7 JETPUR DYEING AND PRINTING ASSOCIATION

I Dipakkumar Balvantray Bhatt S/o Balvantray J Bhatt, aged about 55 years holding the post of Office Manager, Jetpur Dyeing and Printing Association, Respondent no. 7 herein having office at Kanakia Plot, Jetpur, Rajkot, Gujarat – 360370 do hereby solemnly affirm and state as under:

1. That I am working and holding the post of Office Manager in the Office of Jetpur Dyeing And Printing Association (hereinafter the Answering Respondent no. 7) and as such in my official capacity I am well acquainted with the facts and circumstances of the present case and therefore, competent to swear the present Affidavit.
2. I have read the contents of the Writ Petition (PIL) No. 114 of 2018 which has been transferred from the Hon'ble Gujarat High Court vide order dated 09.05.2019 to this Hon'ble Tribunal and I say that the contents therein to the extent they are inconsistent with submissions



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made hereinafter in this Affidavit are incorrect and as such denied. Unless any averment or contention is specifically admitted or traversed, the same may be treated as denied. The Answering Respondent no. 7 is filing present Counter Affidavit traversing the contentions and allegations that are material and relevant at the present and seeks the liberty of this Hon'ble Tribunal to file additional or detailed Counter Affidavit as and when directed by this Hon'ble Tribunal.

3. That the above captioned matter has been transferred from the Hon'ble Gujarat High Court vide order dated 09.05.2019 in Writ Petition (PIL) No. 114 of 2018 entitled "**Ramdevbhai Samatbhai Sanjva vs. State of Gujarat & Ors.**" wherein the writ petitioner has alleged that dyeing and printing units in Jetpur Taluka were discharging pollutants having hazardous chemicals in Bhadar River. The Respondent no.7 had filed a detailed Affidavit in Reply dated 25.08.2018 in reply to the Writ Petition (PIL) No. 114 of 2018, and the Respondent no.7 craves leave of this Hon'ble Tribunal that contents of the Affidavit in Reply filed by the Respondent be read with the present Counter Affidavit.
4. It is respectfully submitted that the Respondent no. 7 has always been conscious and forthcoming with respect to the protection of environment and prevention of water pollution and ensure that no harm is caused to the River Bhadar on account of the dyeing and printing industry in Jetpur, the Respondent no. 7 even before filing of the above captioned petition by the petitioner has been complying with the



D. S. Chatterjee

directions of the CPCB, GPCB as well as the directions passed by this Hon'ble Tribunal in O.A. No. 673 of 2018 and O.A. No. 727 of 2018 wherein this Hon'ble Tribunal was considering the matter of abatement of pollution of 351 river stretches in the country.

5. It is respectfully submitted that the CPCB vide monitoring report carried out on 17.05.2018 and 18.05.2018 had observed that the Respondent no. 7 has proposed immediate action plan like providing of a new collection well, providing new collection sump of 5 MLD capacity, increase the height of the sidewall of the C-channel along the river Bhadar, providing new pipeline connecting the proposed collecting well and proposed collection sump (5 MLD) and has also submitted the said time bound action plan to GPCB. The CPCB further observed that during the visit of CPCB-RD, the excavation work of across the Bhadar River for laying of new pipeline was observed and that the Respondent no. 7 may be asked to expedite the work of setting up of new CETP at Derdi area for which NOC has already been issued.
6. It is respectfully submitted that the aforesaid monitoring report carried out on 17.05.2018 and 18.05.2018 by CPCB also contained suggestions and observations with respect to the other instrumentalities and authorities such as GPCB and District Collector/ Mamlatdar of Jetpur wherein the CPCB observed that aforesaid authorities may be asked to take immediate steps for demolition of illegal washing ghats and to carry out periodic inspection in that area to

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ensure the restriction of new illegal washing ghats in accordance to the order dated 12.09.2009 of the Hon'ble High Court of Gujarat in SCA No. 254 of 2009. The CPCB also observed that Jetpur Nagar Palika may be asked to expedite the commissioning of STP and sewage collection system for Jetpur in accordance of the order of the Hon'ble High Court.

7. It is respectfully submitted that GPCB vide letter dated 05.11.2018 directed the Respondent no. 7 to prepare a Detailed Project Report for effluent disposal conveyance pipeline onshore and offshore for 100 MLD as the Government of Gujarat was considering to provide disposal pipeline of all the CETP of Gujarat and to have sea disposal. As such, the Respondent no. 7 vide cover letter dated 31.12.2018 submitted its Detailed Project Report for Conveyance of Treated effluent in order to cooperate with the State Government for discharging treated effluent in the deep sea. It was proposed by the Respondent no. 7 to install final disposal pipeline of 65 MLD capacity up to deep sea disposal for Jetpur region and enhance overall CETP capacity and effluent conveyance network capacity to 65 MLD from existing 43 MLD in the region. The proposed final disposal line would connect CETP Jetpur, CETP of Bhatgam washing Ghat and CETP of Derdi and the proposed line from all the aforesaid CETP would be connected to a common point and discharged into deep sea



Dr. J. K. Shah

level. Respondent No.7 has paid Rs. 7 Cr. towards the first installment to Govt. of Gujarat through GPCB.

8. Thereafter, this Hon'ble Tribunal vide order dated 19.12.2018 was pleased to pass certain directions in O.A. No. 673/2018 and O.A. No. 727/2018 and the Respondent no. 7 vide cover letter dated 28.01.2019 submitted Revised Action Plan in compliance of the order dated 19.12.2018 passed by this Hon'ble Tribunal. It is respectfully submitted that the Respondent no. 7 vide Revised Action Plan brought to the attention of this Hon'ble Tribunal that it has already initiated the setting up of CETP at Monpar - Derdi and that the CETP would be commissioned by December 2020. The Respondent no. 7 also brought to the attention the difficulty faced by the Respondent no.7 with respect to the discharge of sewage from Jetpur town in the existing collection system open channel. The open channel was provided to collect the industrial waste water from the member units. However, after the construction and operation of open channel, sewage was also being discharged in the open channel since there was no sewerage network for Jetpur town provided by Nagarpalika.

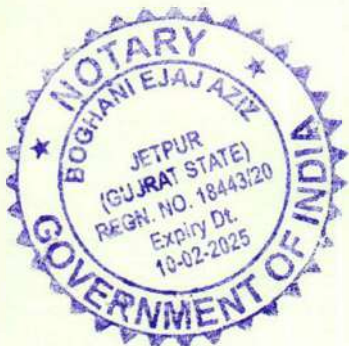
9. It is respectfully submitted that as per the Revised Action Plan, the Respondent no. 7 increased the size of the channel as per flow requirement so as to increase the carrying capacity and maintain the flow without getting the channel to overflow and the combined wastewater entering in to the river Bhadar. Parallely, the sewerage



D. Shah

collection system for Jetpur town was also being set up by Jetpur Nagarpalika, and by then approximately 90% of the work had been completed. The Respondent no. 7 in order to avoid the overflow proposed to increase the manpower for cleaning the channels, and increasing the cleaning and clearing frequency, and further request Nagarpalika for making the drainage network operational and functional by May 2019. The aim has been to ensure that no industrial effluent from open collection network as well as the overflow of the raw effluent collection sump would overflow in to river Bhadar by end of April 2020. The proposed actions to be taken by Respondent no. 7 were based on the aspect that Nagarpalika would make drainage network operational by May 2019. The Respondent no. 7 further stated that it has initiated the assignment for shifting of collection sump cum pump house from the bank of the river Bhadar and the collection sum cum pump house would be operational by April 2020.

10. Furthermore, the Respondent no.7 also ensured that all the textile process units install Caustic Recovery System (CRS) within their units to improve the outlet quality of effluents conveyed to CETP and that the installation of CRS had been completed by December 2019. The Respondent no. 7 also stated that printing units and the process houses, which were the member of the Respondent no. 7 were connected to the common collection system put up by Respondent no.7 and the effluents generated from those units was conveyed and



D. D. Shrivastava

treated at the CETP, however, there were still printing units/ process house units and washing ghats that were not members of JDPA common collection system and that they were discharging untreated/ treated effluent directly into the stream or river and therefore, the Respondent no.7 requested the concerned Government authorities to take action against such units.

11. The Respondent no. 7 also proposed in the Revised Action Plan that it would conduct and audit the existing CETP operations and assess the plant performance with reference to the quality and quantity, and the areas that require upgradation would be identified and a separate assignment for upgradation based on the data observations would be carried out and that the assignment would be completed by August 2019. The Respondent no. 7 also stated that it had a monitoring system in place to control the activities of the member units to control the level of pollution, however, frequency of continuous monitoring would be enhanced. The Respondent no. 7 further stated that all the member units have provided flow meter at the outlet and CETP has installed flow meter at the inlet and outlet. Respondent no.7 also stated that it has already set up 30 MLD CETP for all the Association's printing unit members for washing ghats at village Bhatgam and the CETP was under operation. As such all the member printing units can put up their own washing ghats at village Bhatgam and hence, constructing



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separate washing ghats in Chaparwadi area by the Respondent no. 7 does not arise.

12. The Respondent no. 7 also stated in its action plan that it was already exploring the possibility of safe disposal of treated trade effluent to the deep-sea disposal and the Detailed Project Report for collection of treated effluent from Jetpur and surrounding CETP's, conveying the same to shore point and then disposing the same to off shore is considered and put to the Government for approval.
13. It is respectfully submitted that before the actions as stipulated in the Revised Action Plan dated 28.01.2019 could be implemented and timelines as stipulated in the Revised Action Plan could be met, this Hon'ble Tribunal vide order dated 06.12.2019 for hearing conducted on 29.11.2019, wherein the Respondent no. 7 remained unrepresented, directed the GPCB and District Collector, Jetpur to take action and file an action report so as to prevent pollution, recover compensation for damages from the Respondent no. 7. This Hon'ble Tribunal also requested Justice B.C. Patel, former Chief Justice of Delhi High Court to oversee the remedial action and furnish a report to this this Hon'ble Tribunal within 3 months as well as directed the formation of joint committee of CPCB and GPCB to take further action by carrying out monitoring of river Bhadar and polluting industries by following the model as per this Hon'ble Tribunal's order dated 19.12.2018 in O.A.



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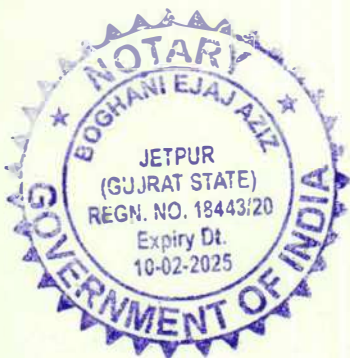
No. 673/2018 and file action taken report to this Hon'ble Tribunal within one month from the date of the order.

14. It is respectfully submitted that the directions passed by this Hon'ble Tribunal vide order dated 06.12.2019 for hearing conducted on 29.11.2019 were passed without being made available and apprised of the fact either by the Petitioner or other Respondents that the Respondent no. 7 has already submitted Detailed Project Report dated 31.12.2018 and the Revised action plan dated 28.01.2019 to the GPCB, since, the Respondent no. 7 remain unrepresented in the proceedings.
15. That since, the order dated 29.11.2019 was passed by this Hon'ble Tribunal without affording any opportunity to Respondent no. 7 to present its response, the Respondent no. 7 was constrained to approach the Hon'ble Supreme Court and the Hon'ble Supreme Court vide order dated 18.03.2020 in C.A. No. 1807 of 2020 entitled "**Jetpur Dyeing and Printing Association vs. Ramdevbhai Samatbhai Sanjva**" was pleased to issue notice and stay the prosecution of Respondent no. 7 and recovery of alleged damages from Respondent no. 7.
16. It is further submitted that even CPCB and GPCB in their report dated 18.02.2020 prepared in furtherance of the directions of this Hon'ble Tribunal vide order dated 06.12.2019 failed to make any reference to



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the suggestion, Detailed Project Report dated 31.12.2018 and the Revised action plan dated 28.01.2019. Without any reference to the action plan as suggested by the Respondent no. 7, the CPCB and GPCB visited Jetpur on 19.12.2019 and 20.12.2019 and carried out the monitoring of River Bhadar, CETP, STPs and industries and reported that the units were mostly using groundwater as their source for production process without obtaining NOC from Central Ground Water Authority and no record for consumption of water or water extracted from the ground was maintained. The Report, however, recognized the limitation of Respondent no. 7 that C-Channel was constructed for the conveyance of industrial effluent but domestic sewage from the residential area is also being discharged in the C-Channel. Therefore, the C-Channel conveys the mixture of effluent and sewage to the collection sumps followed by a pumping sump from where it is pumped to CETP of Respondent no.7. Since, the main collection sumps and a pumping sump were located in the bed of Bhadar River, GPCB directed the Respondent no.7 to shift the collection sump located in the bed of Bhadar River to other environmentally safe location. The Report further observed that due to discharge of sewage in the existing C-channel, the C-channel cannot cater the carrying of combined load of effluent and sewage and therefore, chances of overflowing of effluent-sewage mix to the low-lying areas / drains and River Bhadar is possible. CPCB reported that presently, about 11 MLD of sewage is being generated in Jetpur and being conveyed in the open C-channel in addition to the 7



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to 8 MLD of effluent from industries in Jetpur area thereby exceeding the carrying capacity of C-channel.

17. The Report further observed that upon the directions of GPCB to repair and increase the capacity of C-channel as well as collection sump carrying waste water in Jetpur area so as to stop overflow of untreated waste water to River Bhadar, the Respondent no. 7 has asked its member industries to curtail the production by 50% and operate the process units during night and individual printing units to operate during day and constructed a new collection sump for receiving the effluents from process units through tankers. With respect to the monitoring of the drains, the report observed that samples collected from six natural drains which are converging in Bhadar River in the Jetpur area shows significantly high contamination of industrial effluent sewage. The drains receive unaccounted industrial waste water from illegal washing ghats overflowing of C-channel and domestic sewage from residential area and these drains were major source of pollution in Bhadar River.
18. The report suggested that strengthening and augmentation of operation and maintenance of primary effluent treatment plants of all industries should be ensured by industries as well as CETPs to meet the inlet norms of CETP and the CETP and STPs may be asked to provide tertiary treatment system so as to treat the wastewater and reuse for industrial purpose to the extent possible. Furthermore, the STP of the Respondent no.7 should be designated as CETP and



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accordingly the treated effluent norms should be revised as STP is presently treating the mix of effluent and sewage. It was further recommended that the collection sump & receiving well located in the bed of River Bhadar should be relocated immediately so as to stop untreated effluent overflowing into the River. The open C-Channel located in the bed of River Bhadar and in Jetpur city should be replaced with the underground pipeline, so as to stop untreated effluent overflowing into the River. The Report further observed that small scale printing and dyeing industries in Jetpur city are located in small lanes which makes difficult for any possibilities towards tankers movement for effluent disposal of CETP and any such arrangements may lead to drastic increase in the traffic movement thereby increasing pollution in the city.

19. It is respectfully submitted that the bare perusal of the aforesaid monitoring report would suggest that the CPCB while at one hand recognized the limitations faced by Respondent no. 7 as well as the steps taken by the Respondent no. 7 to curb the water pollution, but failed to take into consideration the action plan of the Respondent no. 7, and prescribed several other remedial measures in addition to the ones already being undertaken by the Respondent no. 7. Pertinently, the suggestion and the recommendations of the CPCB in addition to the action plan undertaken by the Respondent no. 7 has to led to multiplicity of suggestion and recommendations along with fastening



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severe penalty and liability on the Respondent no.7 without taking into consideration that the Respondent no. 7 is not the only body responsible for causing water pollution in Jetpur.

20. That similarly, Justice BC Patel vide email dated 03.03.2020 also submitted and confirmed the purported short comings and violation and mentioned purported illegal withdrawal of ground water, illegal construction of ghats by various units on agricultural land in violation of Gujarat Tenancy and Agricultural lands acts, 1948 and the Bombay Land Revenue Code, 1879 collection of effluents on both sides of river bed from where the untreated sewage percolates in the ground water. Once again, the Report submitted by Justice Patel did not take into consideration the steps taken by the Respondent no. 7 to mitigate the damages of water pollution as well as the detailed project report submitted to GPCB for curbing the pollution. Justice Patel suggested that immediate action must be taken by GPCB, the Collector and other authorities to restrain CETP/ Respondent no. 7 from collecting and storing the trade effluent in the river bed for any purpose including the transportation from one side of river bed to the other side of the river. The report also suggested that operators of sari printing and such other units must be shifted out of the city in an industrial zone so that with proper technology, the industrial estate can be erected which would take care of various problems and Jetpur would be free from hazards of industrial effluent and the state government would have to take



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initiative by providing the land nearby area at a reasonable rate or to undertake the establishment of industrial area through its own Gujarat Industrial Development Corporation so as to the solve various problems.

21. That the Respondent no. 7 in view of the order dated 18.03.2020 vide letter dated 18.06.2020 requested this Hon'ble Tribunal to adjourn the matter suitably. However, despite the stay granted by the Hon'ble Supreme Court and despite the fact that the matter had been pending before the Hon'ble Supreme Court, this Tribunal vide order dated 29.06.2020 once again based on the report dated 18.02.2020 submitted jointly by CPCB and GPCB as well as the report dated 03.03.2020 submitted by Justice BC Patel passed slew of directions in absence of the Respondent no. 7 and directed GPCB to take meaningful remedial action to stop polluting activities till suitable remedial measures are adopted to ensure that no further and continuing damage is caused to the environment and further directed the joint committee comprising GPCB and CPCB to file a compliance report within 3 months from the date of its order.

22. That since, the order dated 29.06.2020 was once again passed by this Hon'ble Tribunal without affording any opportunity to the Respondent no. 7, the Respondent no. 7 was constrained to once again approach the Hon'ble Supreme Court, and the Hon'ble Supreme Court vide order



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dated 21.08.2020 in Civil Appeal no. 2901 of 2020 was pleased to issue notice.

23. Thereafter, vide letter dated 24.11.2020, the Respondent no. 7 brought to the attention of this Hon'ble Tribunal the factum of stay of the O.A. no. 616 of 2019 and also apprising this Hon'ble Tribunal the fact that the Respondent no. 7 had never been issued the notice of hearing by this Hon'ble Tribunal after the matter was transferred from Hon'ble Gujarat High Court to this Hon'ble Tribunal and that in view of non-issuance of notice of hearing, the Respondent no. 7 has been constrained to approach the Hon'ble Supreme Court and that the matter was pending before the Hon'ble Supreme Court and therefore, in the interest of justice the matter was to be adjourned till the Hon'ble Supreme Court decides all the issues. Furthermore, on account of unprecedented Covid – 19 pandemics, it was difficult for Respondent no. 7 to organize defense in the cases against itself from distance at Jetpur in Gujarat.

24. Thereafter, GPCB filed its further report on 05.11.2020 mentioning the status of waste water management in industrial units, status of CETP and STP, C-channel and Collection Sumps/Pumping Stations and status of river Bhadar and natural drains and reported that the Respondent no. 7 has constructed 03 collection sumps outside the river bed for collection of waste water from member textile units through tankers and the textile units have started discharging the



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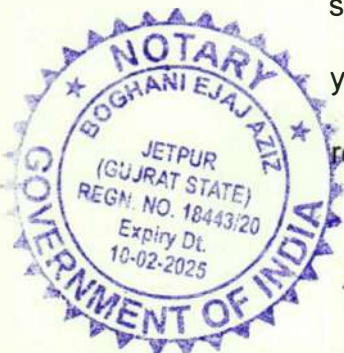
effluent mostly through tankers to these newly constructed collection sumps. The Report further observed that the sewage from the Jetpur area and primary treated effluent from textile units located in the residential area of Jetpur is still being discharged in open C-Channel and gets collected at the collection sumps located in the bed of River Bhadar and the collections sumps and receiving wells in the bed of River Bhadar are not dismantled. The Report recommended that the construction work of 23.5 MLD STP by Jetpur – Navagadh Nagarpalika should be completed at the earliest and made operational so that the sewage from the entire Jetpur area is treated in this STP and thereby discharge of sewage in the C-Channel should be stopped completely. The report further recommended that GPCB and Respondent no. 7 should ensure that industrial unit dispose their effluents only through tankers to the CETP of Respondent no. 7 and no effluent is discharged in C-Channel and CCA of individual textile units should be amended for disposal of primary treated effluent only through tankers in place of discharge through C-channel on priority. The Report also recommended that the Respondent no. 7 may be asked to explore the possibility of recycle/ reuse of the treated wastewater in the industrial process as the quantity of wastewater generated from CETPs and STP is huge compared to the land available for irrigation which will reduce the consumption of fresh water resource and disposal load in the environment.



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25. It is respectfully submitted that the report dated 18.02.2020 submitted jointly by CPCB and GPCB as well as the report dated 03.03.2020 submitted by Justice BC Patel highlighted the causes, issues, and gravity of the pollution, however, failed to take into consideration the measures that had been adopted by the Respondent no. 7 to mitigate the damages and effects of water pollution and the ongoing measures that were being undertaken by the Respondent no. 7 in terms of its Revised Action Plan dated 28.01.2019. The resultant effect of excluding the Respondent no. 7 from assessing the actual situation and the preparation of Reports has resulted in a situation wherein multiple directions, suggestions and recommendations have been poured in from several authorities without assessing the actual result that has been achieved by the Respondent no. 7. The Respondent no. 7 without being represented and able to pitch in finds itself in a difficult situation wherein it is required to comply with every report and directions passed by different authorities and this Hon'ble Tribunal along with fastening the liability on Respondent no.7 while overlooking the progress that has been achieved by the Respondent no. 7 in mitigating water pollution in Jetpur.

26. It is respectfully submitted that despite the fact that recommendations, suggestions have been passed in absence of the Respondent no. 7, yet the Respondent no.7 has ensured that all the directions, recommendations and suggestions have been complied with and

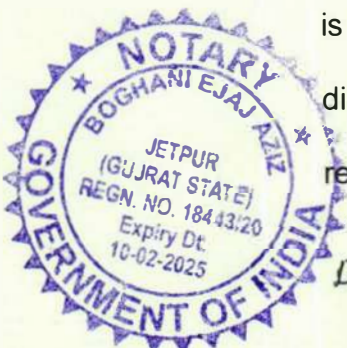


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implemented to ensure that water pollution is mitigated. It is further submitted that preservation and protection of environment and to curb the water pollution cannot be achieved in isolation by Respondent no. 7 and Respondent no. 7 could only achieve its aim while working in tandem and cooperation with various authorities and stakeholders such as CPCB, GPCB, Nagarpalika, Mamlatdars etc.

27. It is respectfully submitted that in the aforesaid facts and circumstances, Respondent no. 7 prays before this Hon'ble Tribunal that a joint committee may be instituted wherein Respondent no. 7 is adequately represented wherein the Detailed Project Report dated 31.12.2018 and Action Plan dated 28.01.2019 could be assessed by GPCB and CPCB and progress achieved by the Respondent no. 7 could be assessed and further monitored. This approach would ensure that authorities and stakeholders work in tandem towards a common objective and there is no multiplicity or duplicity of recommendations, directions and suggestion.

28. It is respectfully submitted that despite the constraints and challenges, the Answering Respondent no. 7 has fully implemented suggestions of this Hon'ble Tribunal and CPCB and GPCB to re-locate the effluent collection sumps from nearby the Bank of River Bed of Bhadar River. It is respectfully submitted that the main reason for waste water discharge to river was overflowing due to mix effluent of industries and residents to C type open channel whereas now almost C type open



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channel is discontinued and waste water from individual units is transferred through tankers to the newly constructed collection sumps. C type open channel is completely removed. It is submitted that from the beginning, industrial effluents were mixed with domestic effluent. To carry this effluent for treatment, open 'c' type channels were provided all along the area and effluent was taken to CETP and STP for further treatment.

It was observed that the main reason of contaminated waste water in river Bhadar was due to the overflowing of combined effluent from channel due to choking of channel. The channel was provided on the bank of river Bhadar also.

To solve this problem permanently, domestic and industrial effluent is to be separated. Underground drain and STP are to be provided by Nagarpalika and industrial effluent shall be collected separately and conveyed to CETP for further treatment so that 'c' type channels can be permanently removed.

For industrial effluent, it was decided to collect the effluent generated from individual industries by tanker and shall be collected in the four collection sumps having 10 lakhs liter storage capacity located at different area and from these sumps effluent will be sent to CETP for further treatment.

29. It is further submitted that the Answering Respondent no. 7 has constructed four Collection Sumps cum Pump House at different

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location of the different industries far away from near River Bed of Bhadar River. Among these four Collection Sumps cum Pump House are:

- a. Mercerizing Collection Sump and Pump House at R.S. No. 782 & 783, NarsangTekari, Jetpur.
- b. Rabarika Road Collection Sump and Pump House at R.S. No. 852/3, Rabarika Road, Jetpur – Two No.
- c. Derdi Road Collection Sump and Pump House at R.S. No. 969/2 & 3 paiky, Derdi Road, Jetpur- One No.
- d. Nandaniya Nagar Collection Sump and Pump House at R.S. No. 787/ paiky 6 & 10, Nandaniya Nagar, Jetpur- One No.

30. It is respectfully submitted that the aforesaid four Collection Sumps are having sufficient collection capacity of effluent water of all member units and all collection sumps have been provided the efficient machinery i.e., the electric motors and pumps and standby generator (if power failure occurs) for the transferring effluent water from collection sumps to CETP site through adequate diameter closed pipeline network. Thus, to establish the new mechanism for disposal of effluent water by member units at these four-collection sump, the Answering Respondent no. 7 has incurred the cost of establish this facility at Rs. 2 Crores and 38 Lakhs. The photographs and details of all four collection sumps are annexed hereto and marked as an **Annexure- R1**.



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31. It is further submitted that towards the operating cost of running these four collection sumps and pump house, the Answering Respondent no. 7 is bearing additional expense of Rs. 16 Lakh per month for the operation and maintenance. The Answering Respondent no. 7 humbly states and submits that Answering Respondent no. 7 has already broken and removed the collection sump near the Bank of River Bed of Bhadar River and all open 'C' type channels from all different areas and main channels near River Bank of Bhadar River as per the suggestion of GPCB. The photographs of dismantled sump and 'C' type open channel are annexed hereto and marked as an **Annexure- R2**.
32. It is respectfully submitted that the problems of occasional overflow of channel due to various reasons have been solved wherein previously, the member units which were discharging their effluent water into open 'C' type open channel, their unit's outlets have been sealed and each member unit has established the storage cum holding tank of effluent water for further disposal at collection sump. Since majority of member units are micro and small-scale units, their quantity of effluent water is about 5000 liters within two days whereas the medium type units are generating effluent water between 5000 liters to 10000 liters per day. As the new system of conveying the effluent water through tanker to the different collection sump, the member units are bearing charge of transportation have incurred about Rs. 6000/- per month and to all 1341 units have additional burden of Rs. 78 to 80 lakhs per month.



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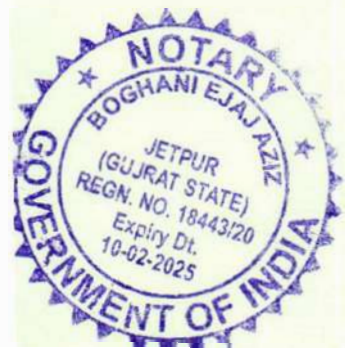
33. The Answering Respondent no. 7 humbly states and submits that as the Answering Respondent no. 7 has fully implemented the suggestion of this Hon'ble Tribunal and GPCB to relocate the collection sump and pump house and to remove the open 'C' type channel, the work was done in true spirit on war footing basis. Therefore, the problems of overflow of 'C' type open channel carrying industrial effluent along with overloaded domestic sewage have been completely solved by Answering Respondent no. 7 through implementation of mode of effluent conveyance and transfer to CETP. Because of this full proof mechanism developed by Answering Respondent no. 7, now there is no effluent water of the member units being discharged in the River Bhadar and this system is being monitored by GPCB on regular basis. Even the joint inspection team of CPCB and GPCB have taken the visit at Jetpur and have seen the action taken by the Answering Respondent no. 7. It is respectfully submitted that on account of the aforesaid actions being taken by the Answering Respondent no. 7, now whatever the sewage or effluent which may come into the river, it is not of any member units of Answering Respondent no. 7 and may be from the other sources of effluent coming into river over which the Answering Respondent no. 7 does not have any control.
34. It is respectfully submitted with regard to suggestion of GPCB to make a tertiary plant, that the plants are not required to be converted into tertiary plants, but a much better and effective alternative is proposed

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and presented by the Answering Respondent no.7 to provide a much better and advanced upgraded system for mercerizing effluent to reduce the treatment load on the main CETP treating a comparatively docile effluent, and thereby solving the problem of occasional fluctuations during the treatment. Even though recovering caustic by individual units, some quantity of caustic was still remaining in waste water. To recover this quantity Association has decided to provide Common Caustic Recover Plant. The Answering Respondent no.7 has given a work order for Common Caustic Recovery and Reuse Plant for mercerizing effluent to reduce the pollutant load on the existing CETP to Aquarius H2O Dynamics Pvt. Ltd., Ahmedabad at the cost of Rs. 25 Crores. The above said work has been completed on March-2023 and since then the newly constructed Caustic Recovery Plant is in operational and the performance statement of the plant is annexed herewith and marked as **Annexure- R3**. Furthermore, GPCB also have granted the Consent to Operate (CTO) for the same project. The copy of Consent to Operate is annexed hereto and marked as **Annexure- R4**. Thus, by functioning of Common Caustic Recovery Plant, 78% of pollutant load will be reduced because of product will be recovered from effluent. Thus, existing CETP will run more efficiently.

35. It is respectfully submitted that the concern of this Hon'ble Tribunal pertaining traffic problem due to the movement of tanker plying on different road in various area of Jetpur may be unfounded, because



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Jetpur is not a big city and it is a small-town place with rural background having lesser traffic and adequately broad roads. Moreover, the survey of all the three roads leading to collection sumps was conducted by the Answering Respondent no.7 which revealed that all the tankers do not ply at one point of time but the frequency of plying tankers varies during the different part of the day and thereby there is no any traffic problem and this is more so because of other vehicular traffic is too less. Furthermore, the sump at Nandaniya Nagar (Survey No. 787, Paiki 10, 787 Paiki 6) CETP Road Jetpur has also helped in reducing the traffic load.

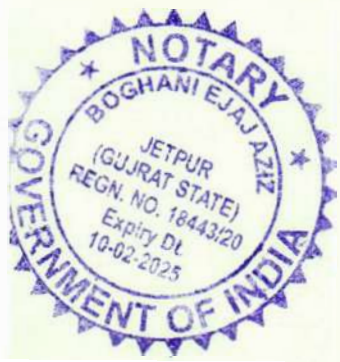
36. The Answering Respondent no. 7 further submits that it has also addressed the concern of this Hon'ble Tribunal of dusting due to vehicular movement leading to collection sumps. Among four collection sump, two collection sumps at Rabarika Road and Derdi Road were already Pakka Road. While another two Collection Sump - one at Nandaniya Nagar; CETP Road, and one Mercerizing Collection Sump; Near CETP, Narasang Tekari, Jetpur were having only metal road. But before six months, the Association have contributed with Nagarpalika for Public Private Partnership Scheme for the development of Heavy Duty CC Road leading to the Nandaniya Nagar Collection Sump and Mercerizing Collection Sump, Near CETP, Jetpur. The Answering Respondent no. 7 has contributed Rs. 2.5 Crores to develop this road towards collection sump. And by now, there is no problem of dusting



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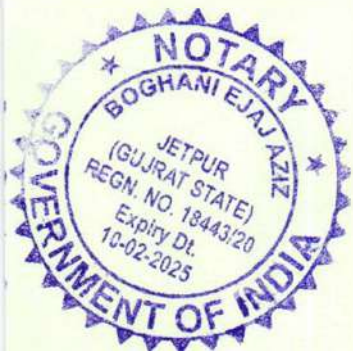
due to vehicular movement leading to any collection sumps. The photographs of newly developed Heavy Duty CC Road are annexed hereto and marked as an **Annexure- R5**.

37. It is respectfully submitted that the Answering Respondent no. 7 has also constructed additional equalization cum Aeration Tank with capacity of 10,000 M³ at the cost of Rs. 4 Crores. This newly established equalization and aeration tank have been made fully functional in one year. Thus, the effluent water of printing units from three different collection sumps and the effluent water of mercerizing units from mercerizing collection sump are being transferred to this equalization and collection sump where these two different types of effluent water are being mixed and equalized and at the same time being aerated. Thereafter, the effluent water meeting an inlet norm of CETP is being sent for further treatment at CETP. Thus, these equalized and aerated effluent will nullify the occasional shock load effect on CETP function due to uneven and variable flow of two different type of effluent. Thus, as functioning of new equalization and aeration tank, the effluent water will be fine-tuned with the inlet norms of CETP like COD, BOD, SS, TDS and then as said the performance of CETP's treatment process have become smooth operation. The photographs of the equalization cum aeration tank are annexed hereto and marked as an **Annexure-R6**.



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38. The Answering Respondent no. 7 humbly states and submits that it has also initiated the modification of dewatering system for leachates. For this set up: (a) Adequate Sludge Thickener system have been installed and already made functional (b) Two additional Filter Press have put up and made functional (c) Constructed additional sludge storage shed for safe storage and handling of ETP sludge and for these Sludge Thickener, Filter Press and Storage Shed etc. have incurred the cost about Rs. 6 Crores. The photographs of above facilities are annexed hereto and marked as an **Annexure-R7**.
39. The Answering Respondent no. 7 humbly states and submits that Association have conveyed and implemented the order of the Hon'ble Supreme Court for setting of primary ETP in member units. Among 1341 member units of CETP, all member units have put up and made function of primary ETP in their premises which have incurred the cost of Rs.5 Lakhs for each unit and all together borne a total cost of about Rs.7.7 Crores. The Answering Respondent no. 7 further submits that it has fully implemented the suggestion of GPCB for installation of Caustic Recovery Plant at member mercerizing units. All 37-member mercerizing units have already installed and made functional of Caustic Recovery Plant for about Rs.35 Lakh in each unit and all together Rs.13 crores. Earlier, this effluent containing caustic was discharge to CETP and now with separation of caustic, load on CETP is reduced. As



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such on account of the aforesaid actions by the Answering Respondent no. 7, the following outcomes have been achieved-

- a. By removing all open 'C' type channel and collection sump near river bed of Bhadar River, the occasional problem of overflowing of effluent water in River have been permanently solved.
- b. As member printing units have installed and operational primary ETP and member mercerizing unit have installed and made function Caustic Recovery Plant. And at CETP, Jetpur by putting additional facilities of (i) Equalization cum Aeration Tank (ii) Sludge Thickener (iii) Sludge Filter Press (iv) Sludge Storage Shed etc. which have resulted in smooth functioning of ETP. After completion of all above narrated action, it submitted that the final outlet norms have been achieved at CETP and wastewater to river Bhadar is stopped. The copy of last three month's Analysis Reports of CETP received from GPCB have been attached herewith and marked as **Annexure R-8**.

40. It is respectfully submitted that despite the fact that recommendations, suggestions have been passed in absence of the Respondent no. 7, yet the Respondent no.7 has ensured that all the directions, recommendations and suggestions have been complied with and implemented to ensure that water pollution is mitigated. It is further submitted that preservation and protection of environment and to curb the water pollution cannot be achieved in isolation by Respondent no. 7 and Respondent no. 7 could only achieve its aim while working in



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tandem and cooperation with various authorities and stakeholders such as CPCB, GPCB, Nagarpalika, Mamlatdars etc.

41. It is respectfully submitted that Answering Respondent no. 7 and its members have spent as the following amount to implement the direction of this Hon'ble Tribunal and direction of GPCB:

Sr. No.	Nature of Work	Cost Incurred / to be incurred figure in Crores
1	4 No of Collection Sump cum Pump House	Rs. 2.38
2	Equalization and Aeration Tank	Rs. 4.00
3	Additional Sludge Dewatering System	Rs. 6.00
4	Primary ETP in all units	Rs. 7.70
5	Caustic Recovery Plant in Mercerizing Units	Rs. 13.00
6	RCC Road to Collection Sump	Rs. 2.50
7	Common Caustic Recovery and Reuse Plant	Rs. 29.50
8	Deep Sea Disposal Pipeline Project's Contribution	Rs. 137.80
	Total	Rs. 202.88

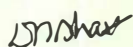


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42. It is further submitted that the over and above the aforesaid amount, the Answering Respondent no. 7 Association is incurring Rs. 12 Cr. /Year as an operating cost for environment management system. The Answering Respondent no. 7 humbly states and submits that the cotton textile printing industry is facing recession and increase in price of cotton fabrics and other raw materials. Due to heavy burden of price hike, this industry is running very badly almost 30-40% age capacity and hard to survive. But even though all these adverse condition, the Answering Respondent no. 7 and its member units are bearing the expense willingly to comply the various directions given by competent authority.
43. It is respectfully submitted that the action taken by Answering Respondent no.7 and member units, the pollution load in River Bhadar has substantially reduced. GPCB is taking regular water sample from river at Dublipat to know the contamination in river Bhadar. As per results, up to July 2024 which shows reduction in pollution load in Bhadar River.

Bhadar River Water Quality Data

Sr. No	Month	Name of Location	Parameter					
			DO (mg/l)	pH	BOD (mg/l)	COD (mg/l)	Total Coliform (MPN/100 ml)	Fecal Coliform (MPN/100 ml)
1	Jan-2019	Dublipat	0	7.48	136	456	22	140
2	Feb-2019	Dublipat	0	7.82	66.27	555	22	110
3	Mar-2019	Dublipat	0	7.74	174.99	577	17	130
4	Apr-2019	Dublipat	0	7.73	72.72	719	22	130




5	May-2019	Dublifat	BDL	7.44	138.88	877	17	110
6	Jun-2019	Dublifat	0	7.59	258.62	837	49	170
7	Jul-2019	Dublifat	BDL	7.48	42.85	383	---	---
8	Aug-2019	Dublifat	BDL	8.78	33.75	116	---	---
9	Sep-2019	Dublifat	3.4	8.28	7.25	41	---	---
10	Oct-2019	Dublifat	6.7	7.78	2.2	8	---	---
11	Nov-2019	Dublifat	5.7	7.52	2.4	6	---	---
12	Dec-2019	Dublifat	3.8	7.89	7.36	44	---	---
13	Jan-2020	Dublifat	0	8.07	42	173	---	---
14	Feb-2020	Dublifat	0	7.34	34	147	---	---
15	Mar-2020	Dublifat	0	7.96	238	818	---	---
16	Apr-2020	Dublifat	0	7.80	88	411	---	---
17	May-2020	Dublifat	4.3	7.63	13	89	---	---
18	Jun-2020	Dublifat	1.2	7.60	108	391	---	---
19	Jul-2020	Dublifat	0.0	7.88	65	206	---	---
20	Aug-2020	Dublifat	0.6	8.43	6.66	52	---	---
21	Sep-2020	Dublifat	----					
22	Oct-2020	Dublifat	5.1	7.82	5.9	18	---	---
23	Nov-2020	Dublifat	4.1	7.73	2.9	18.4	---	---
24	Dec-2020	Dublifat	5.0	7.82	2.9	12.36	<1.8	<1.8
25	Jan-2021	Dublifat	1.1	7.30	3.9	18.09	39	13
26	Feb-2021	Dublifat	1.5	8.40	7	25	43	11
27	Mar-2021	Dublifat	3.4	7.55	5.2	28	110	21
28	Apr-2021	Dublifat	BDL	8.15	12	39.25	430	170
29	May-2021	Dublifat	4.2	8.09	0.4	39.6	540	170
30	Jun-2021	Dublifat	BDL	8.26	18	54.37	540	150
31	July-2021	Dublifat	BDL	8.23	22	72	540	220
32	Aug-2021	Dublifat	BDL	7.87	6	29.6	210	540
33	Sep-2021	Dublifat	6	7.45	2.6	18.38	170	540
34	Oct-2021	Dublifat	6.2	7.59	2.3	8	110	350
35	Nov-2021	Dublifat	5.9	7.86	2.4	10.4	140	350
36	Dec-2021	Dublifat	BDL	8.38	14	55	150	350
37	Jan-2022	Dublifat	1.5	8.02	9	34	140	350
38	Feb-2022	Dublifat	BDL	8.5	21	62	170	350
39	Mar-2022	Dublifat	BDL	8.18	69	202	350	920
40	Apr-2022	Dublifat	BDL	8.26	39	128	350	920
41	May-2022	Dublifat	4.1	7.91	25.45	147	540	920
42	Jun-2022	Dublifat	3.1	7.67	7.75	42.14	350	920
43	Jul-2022	Dublifat	5.8	7.98	2.4	14.15	280	920
44	Aug-2022	Dublifat	2	7.61	13	39.6	220	920
45	Sep-2022	Dublifat	6.1	6.79	2.2	10.67	240	920
46	Oct-2022	Dublifat	4.8	8.1	4	21.2	170	540
47	Nov-2022	Dublifat	5.5	8.42	2.5	15.05	140	540
48	Dec-2022	Dublifat	BDL	8.05	32	92	110	350
49	Jan-2023	Dublifat	BDL	8.37	25	77	94	280
50	Feb-2023	Dublifat	BDL	8.42	20	74	79	240



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51	Mar-2023	Dublifat	BDL	8.06	29	85	70	220
52	Apr-2023	Dublifat	BDL	8.4	45	129	79	280
53	May-2023	Dublifat	BDL	8.22	22.7	149	70	220
54	Jul-2023	Dublifat	6.2	7.18	2.2	14.01	13	49
55	Aug-2023	Dublifat	6.5	7.54	2.1	8.91	6.8	21
56	Sep-2023	Dublifat	5.5	7.17	5.8	26.71	4.5	22
57	Oct-2023	Dublifat	2.5	7.59	14	47.39	14	47
58	Nov-2023	Dublifat	5.5	8.14	7	27.52	33	140
59	Dec-2023	Dublifat	2.7	7.54	12	41	34	170
60	Jan-2024	Dublifat	BDL	8.09	28	115	70	170
61	Feb-2024	Dublifat	BDL	7.94	25	78	49	140
62	Mar-2024	Dublifat	BDL	8.24	28	86	46	110
63	Apr-2024	Dublifat	BDL	8.18	27	83	39	140
64	Jul-2024	Dublifat	6.5	8.1	1.9	17	<1.8	<1.8

44. It is respectfully submitted that the Answering Respondent no.7 has commissioned four Collection sump in July 19 and the effluent from all the member were taken through tanker, and 'C' type open channel was gradually removed. The result of sample collected by GPCB (1) From Sep 2019 to July 2024 total 56 Sample were taken by GPCB (2) Out of which DO observed in the sample after July 2019 is up to 6.7 Mg/l, earlier before September DO was nil. It can be said that there is substantial improvement in the river Bhadar water quality. (3) Out of 56 sample, for 28 sample BOD Is observed less than 10 Mg/l. (4) for 25 sample BOD is less than 50 Mg/l. Before commissioning of collection sump DO recorded nil and BOD was more than 150. From the above river sample results which indicate substantial improvement.

45. It is further submitted that G. P. C. B. is regularly carrying monitoring of C. E. T. P. and the individual industrial units as a part of the compliance of the provision of various environmental laws. G. P. C. B. is also



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regularly checking the river water quality at different locations as part of river monitoring programme. When GPCB finds any violation, GPCB is taking action as per their norms. GPCB is issuing the closure order under the provision of various environment acts In case of violation. After the compliance, GPCB is granting trial revocation after deposition of required amount bank guarantee to ensure the compliance. If further violation observed than the amount of bank guarantee are forfeited.

After this Hon'ble Tribunal's direction, GPCB has started imposing the Environment Damage Compensation (EDC) as per the CPCB guideline. So far towards EDC, Association has paid following amount of EDC and amount in term of Bank Guarantee forfeited. GPCB is regularly monitoring the member units to check the compliance of the provision of various environment laws. In case of violations, actions including closure are being taken by GPCB. As per the general direction of this Hon'ble Tribunal, these closure order are revoked after recovering EDC from the member units.

EDC Paid By Association	Rs.
06/12/2019	2500000
19/07/2019	1000000
12/11/2020	1360000
	4860000

Forfeited Bank Guarantee By GPCB	Rs.
01/02/2019	500000
02/03/2019	500000
29/07/2019	500000
	1500000



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So far the amount for Environment Damage Compensation and Forfeited Bank Guarantee paid by Association is Rs. 63.60 Lakhs. Regarding EDC paid by member units, detail may be obtain from GPCB.

46. It is respectfully submitted that the Answering Respondent no. 7 has assured the Hon'ble Court in the previous petition that they will not take membership beyond 1400 till Derdi Project is implemented. Actually Derdi Project is for further expansion, hence the Answering Respondent no. 7 will not expand till Derdi Project becomes operational. Derdi Project was actually proposed to keep in view future need of expansion and it has nothing to do with present working capacity of the industry.
47. It is respectfully submitted that the Respondent no. 7 has to the best of its ability placed qualitative facts within the knowledge of the Respondent no. 7, however, in case any aspect has been left out inadvertently on account of oversight, the Respondent no. 7 craves the leave of this Hon'ble Tribunal to file further reply.

Solemnly affirmed at Jetpur on this 10Th day of December, 2024.



DEPONENT

[Signature]

Verification

Verified at Jetpur on this 10th day of December, 2024 that the contents of the present Affidavit are correct to the best of information knowledge and belief, no part of it is false and nothing material has been concealed therefrom.

DM
DEPONENT

Book No. 02/2024
Page No. 88
Serial No. 6388
Date 10/12/2024

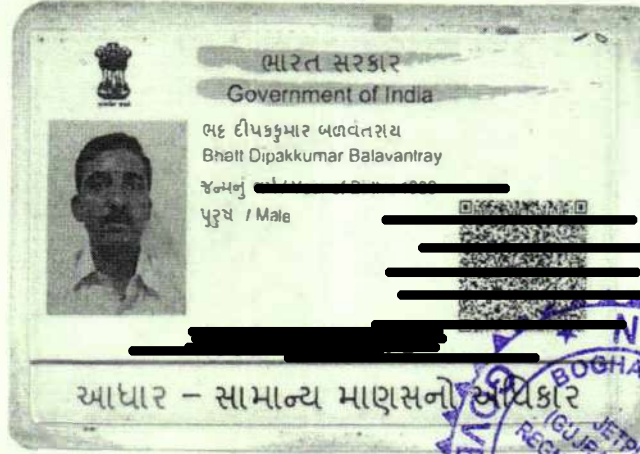
Solemnly Affirmed Before me by Dipak Kumar Balvendra Sheth
who is identified by
Whom I know personally



BJ
BOGHANI EJAJ AZIZ
NOTARY
GOVT. OF INDIA

10/12/2024





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Annexure-R1

Photographs showing collecting of effluent from member unit of CETP of JDBA at Collection sump Rabarika Road (Survey No. 852/3 Rabarika Road, Jetpur, Dist.-Rajkot) through Tanker



Photographs showing collecting of effluent from member unit of CETP of JDPa at Collection sump Rabarika Road (Survey No. 852/3 Rabarika Road, Jetpur, Dist.-Rajkot) through Tanker



Photographs showing collecting of effluent from member unit of CETP of JDPa at Collection sump Derdi (Survey No. 969/2&3/p, Derdi Road, Jetpur, Dist-Rajkot) through Tanker



Photographs showing collecting of effluent from member unit of CETP of JDBA at Collection sump Derdi (Survey No. 969/2&3/p, Derdi Road, Jetpur, Dist-Rajkot) through Tanker



**Photographs showing collecting of effluent from member mercerizing unit
of CETP of JDPA at Collection sump
(Survey No. 782 & 783 Narsang Tekri, Jetpur, Dist.-Rajkot) through Tanker**



Annexure-R2

Photographs of Dismantled sump & Channels



Photographs of Dismantled sump & Channels



Photographs showing collecting of effluent from member unit of CETP of JDPA at Collection sump Nandaniya Nagar



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Annexure-R3**Work Completion Photographs of Common Caustic Recovery Plant**

Performance Statement

**M/s. Common industrial facilities for Jetpur dyeing and printing association
(Tenent: Jetpur integrated treatment plant association)(ID: 83396)**

Statement of 2023

Month	Total received quantity of caustic bearing from member units (3.5% caustic) ltrs	Recovered caustic (21%) ltrs	Waste Water quantity from CRP to CETP after recovered caustic ltrs
April	4500000	787500	3341250
May	4800000	840000	4244400
June	4950000	868250	3673575
July	5250000	918750	3898125
August	5400000	945000	4009000
September	5400000	945000	4009200
October	5700000	997500	4232200
November	6000000	1050000	4455000
Total	42000000	7352000	31862840

	pH	TDS(ppm)	COD(ppm)
Inlet caustic bearing waste water from member units	12-14	30000-50000	20000-30000
Outlet after recovered caustic	7-8	600-800	1000-1500



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852 46 ANNEXURE - R4
GUJARAT POLLUTION CONTROL BOARD

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

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)-1981 and Authorization under rule 6(2) of the Hazardous And Other Waste (Management And Transboundary) Rules, 2016 framed under the Environment (Protection) Act-1986.

And whereas Board has received consolidated consent application Inward No.189385 dated: **06/08/2022** for the **Consolidated Consent and Authorization (Fresh) (CC & A)** of this Board under the provisions/rules of the aforesaid acts. Consents & Authorization are hereby granted as under:

CONSENTS AND AUTHORISATION:

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

To,

**M/S. Common Industrial Facilities for Jetpur Dyeing and Printing Association (ID-83396),
S.No.763p2, Plot No. 1,2,3,
Narsang Takri, Near CETP-JDPA,
Jetpur-360370, Dist: Rajkot.**

1. **Consent Order No.: AWH- 126476 date of issue: 25/05/2023.**
2. The consents shall be **valid up to 02/03/2028** for use of outlet for the discharge of trade effluent arising as a result of the Recovered Caustic lye (35%) unit of the following items/products:

Sr. No.	Product	Quantity
1.	Recovered Caustic lye (35%)	3000 MT/Month

3. SUBJECT TO SPECIFIC CONDITION:

- 3.1 Industry shall manage Solid Wastes generated from industrial activities as per Solid Waste Management Rules-2016 (solid waste as defined in Rule-3(46)).
- 3.2 As per Provisions of Rule 18 of Solid Waste Management Rules-2016 you are directed to make an arrangement in Utilities to replace at least five percent (5%) of your solid fuel requirement by 'refused derived fuel'.
- 3.3 Industry shall provide dedicated storage facility for fly ash.
- 3.4 Industry shall comply with fly ash notification 1999 as amended from time to time.
- 3.5 Industry shall obtain permission of CGWA for ground water extraction and submit to GPCB.
- 3.6 Industry shall not carry out any type of activity which without to EIA notification.
- 3.7 Industry shall comply with coal handing guideline.
- 3.8 Industry shall submit membership certificate of TSDf within one month and the Recovered Caustic will be sent to member unit for reuse compulsory.
- 3.9 Industry shall submit authorized TSDf site certificate for disposal of sludge & filtrate cake.
- 3.10 The applicant shall give membership only to those mercerizing industries which are engaged in Mercerizing of cotton fabrics and such units shall have valid "Consent to Establishment "of this Board.
- 3.11 Member Units of the applicant shall stopped production activity from which caustic wash liquor is generated or provide separate storage for caustic wash liquor if Common Caustic Recovery Plant (CCRP) is under maintenance/closed till the plant run.

- 3.12 Member Units of the applicant shall transferred caustic wash liquor through Tanker at CCRP and maintain record for the same.
- 3.13 The applicant shall ensure that any unauthorized drainage connection for disposal of industrial effluent or sewage is not connected to the collections, treatment and disposal system of this CCRP.
- 3.14 The applicant shall provide fix pump and pipe line among all units of CCRP.
- 3.15 The applicant shall provide Water Meter at Intake of bore well as well as inlet and outlet of CCRP.
- 3.16 The applicant shall have to provide separate energy meter for CCRP. Daily record for the same shall have to be maintained.
- 3.17 The applicant shall have to maintain daily record of CCRP operations in separator register and shall have to submit the monthly report of the same report by first week of next month at Regional office and Head office of this Board.
- 3.18 The applicant shall be provided with on-line monitoring instruments as per the Central Pollution Control Board (CPCB) guideline.

4. **CONDITIONS UNDER WATER(PREVENTION AND CONTROL OF POLLUTION)ACT 1974:**

- 4.1 The quantity of total water consumption shall not exceed **1.5 KLD** as per below break up as mentioned in form D submitted for consent application under Water (Prevention and Control of Pollution) Act-1974. Source of fresh water shall be Borewell.
- a) Industrial: **1.0 KLD**
b) Domestic: **0.5 KLD**
- 4.2 Total quantity of waste water generated from manufacturing process and other ancillary operation discharge in to CETP-JDPA.
- 4.3 The quality of industrial effluent shall conform to the following standards (CETP-JDPA inlet norms): (Whichever is applicable).

PARAMETERS	CETP Inlet NORMS for member units
pH	10.5 -12.0
Temperature	< 45° C
Colour (pt.co.scale) in units	350 units
Suspended Solids	2000 mg/l
Oil and Grease	20 mg/l
BOD (3 days at 27° C)	350 mg/l
COD	1000 mg/l
Chlorides	2500 mg/l
Sulphates	3500 mg/l
Fixed dissolved solids	2100 mg/l
Ammonical Nitrogen	75 mg/l
Percent sodium	60 %
Total Chromium	5 mg/l
Sulphides	10 mg/l
Sodium absorption ratio	26
Phenolic Compounds	5 mg/l
Fluorides	5 mg/l
Insecticides /Pesticides	Absent
Boron	5.0 mg/l
Bio Assay Test	-

*All efforts shall be made to remove colour & unpleasant odor as far as practicable.



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GUJARAT POLLUTION CONTROL BOARD

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

- 4.4 The effluent conforming to the above standards shall be discharged in to CETP of JDPA.
4.5 The quantity of the domestic waste water (sewage) shall not exceed 0.4 KLD.
4.6 The sewage shall dispose of through septic tank/soak pit system.

5. CONDITIONS UNDER THE AIR (PREVENTION AND CONTROL OF POLLUTION) ACT 1981:

- 5.1 The following shall be used as fuel in the Boiler & DG Sets.

Sr. No.	Fuel	Quantity
1	Coal	50 MT/Day
2	Diesel	60 Ltr/Hr

- 5.2 The flue gas emission through stack shall confirm to the following standards:

Stack No.	Stack attached to	Stack height in Meter	APCM	Parameter	Permissible Limit
1.	Boiler (6 TPH)	35	Multi Cyclone Separator + Bag Filter + Alkali Scrubber	PM SO ₂ NO _x	150 mg/NM ³ 100 ppm 50 pm
2.	Boiler (6 TPH)	35	Multi Cyclone Separator + Bag Filter + Alkali Scrubber	PM SO ₂ NO _x	150 mg/NM ³ 100 ppm 50 pm
3.	D.G. Sets (500 KVA)	11	Acoustic hood	PM SO ₂ NO _x	150 mg/NM ³ 100 ppm 50 pm

NOTE: - You shall comply with circular dated: 27/08/2021 regarding Retrofitting of emission control device/equipments in DG set with capacity of 125 KVA and above in state of Gujarat.

- 5.3 The concentration of the following substances in the ambient air within the premises of the industry and at a distance of 10 meters from the source (other than the stack / vent with height of more than 9 meters from the ground level) shall not exceed the following levels:

Sr. No.	Pollutant	Time Weighted Average	Concentration in Ambient air in µg/M ³
1.	Sulphur Dioxide (SO ₂)	Annual 24 Hours	50 80
2.	Nitrogen Dioxide (NO ₂)	Annual 24 Hours	40 80
3.	Particulate Matter (Size less than 10 µm) OR PM ₁₀	Annual 24 Hours	60 100
4.	Particulate Matter (Size less than 2.5 µm) OR PM _{2.5}	Annual 24 Hours	40 60
5.	Carbon Monoxide (CO) mg/m ³	8 Hours 1 Hour	02 04

- 5.4 All measures for the control of environmental pollutant shall be provided before commencing production & Ambient Air quality within the factory premises of the industry shall confirm to the following parameters and other parameter and standards mentioned in NAAQS

6. D.G. SETS CONDITIONS:

- 6.1 The D.G. Set shall have acoustic enclosure and shall comply with the standards specified at Sr. no. 95 of Schedule-I of the rule-3 of E.P. Rules -1986 and Noise pollution level as per the Air Act-1981.
- 6.2 Industry shall comply with circular dated: 27/08/2021 regarding Retrofitting of emission control device/equipments in DG set with capacity of 125 KVA and above in state of Gujarat.
- 6.3 D.G. Sets standards: - The flue gas emission through stack attached to D.G. Sets shall conform to the following standards.
- 6.4 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.
- 6.5 Noise from DG set shall be controlled by providing an acoustic enclosure or by treating the room acoustically, at the users end.
- 6.6 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.
- 6.7 The D.G. Set shall be provided with proper exhaust muffler with insertion loss of minimum 25 dB (A).
- 6.8 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.
- 6.9 Installation of a D.G. Sets must be strictly in compliance with the recommendations of the D.G.Set manufacturer.
- 6.10 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.

7. CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (MANAGEMENT AND TRANSBOUNDARY MOVEMENT) RULES, 2016:

- 7.1 Form for grant of authorization for occupier or operator handling Hazardous waste.
- 7.2 Authorization order no. **AWH- 126476** date of issue: **25/05/2023**.
- 7.3 **M/S. Common Industrial Facilities for Jetpur Dyeing and Printing Association (ID-83396)** is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at **S.No.763p2, Plot No. 1,2,3, Narsang Takri, Near CETP-JDPA, Jetpur-360370, Dist: Rajkot.**

Sr. No.	Type of Waste	Category/ Schedule	Quantity	Mode of Disposal
1.	Sludge & Filtrate Cake	I - 8.2	2000 MT/Yr	Collection, Storage, Transportation and disposal to the authorized TSDF site.



856 50
GUJARAT POLLUTION CONTROL BOARD

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

2.	Used or spent oil	I - 5.1	0.1 MT/Yr	Collection, Transportation and reuse as lubricant.
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- 7.4 The authorization shall be **valid up to 02/03/2028**.
- 7.5 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.
- 7.6 The authorization is granted to operate a facility for collection, storage within factory premises transportation and ultimate disposal of Hazardous wastes as per condition no 6.3 to the industry having valid CCA of this Board.

7.7 TERMS AND CONDITIONS OF AUTHORISATION (IF Applicable)

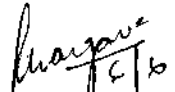
- a) The applicant shall comply with the provisions of the Environment (Protection) Act-1986 and the rules made there under.
- b) The applicant maintain a record of hazardous and other wastes managed by him in Form 3 and prepare and submit to the State Pollution Control Board, an annual return containing the details specified in Form 4 on or before the 30 day of June following the financial year to which that return relates.
- c) The authorization or its renewal shall be produced for inspection at the request of an officer authorized by the Gujarat Pollution Control Board.
- d) The persons authorized shall not rent, lend, sell, and transfer or otherwise transport the hazardous wastes without obtaining prior permission of the Gujarat Pollution Control Board.
- e) Any unauthorized change in personnel, equipment or working conditions as mentioned in the authorization order by the persons authorized shall constitute a breach of this authorization.
- f) It is the duty of the authorized person to take prior permission of the Gujarat Pollution Control Board to close down the facility.
- g) An application for the renewal of an authorization shall be made as laid down under Haz. And other Waste (Management, & Tran boundary Movement) Rules, 2016.
- h) 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.

8. GENERAL CONDITIONS: -

- 8.1 Any change in personnel, equipment or working conditions as mentioned in the consents form/order should immediately be intimated to this Board.
- 8.2 The waste generator shall be totally responsible for (I.E. Collection, storage, transportation and ultimate disposal) of the wastes generated.
- 8.3 Records of waste generation, its management and annual return shall be submitted to Gujarat Pollution Control Board in Form - 4 by 31st January of every year.
- 8.4 In case of any accident, details of the same shall be submitted in Form - 5 to Gujarat Pollution Control Board.
- 8.5 As per "Public liability Insurance Act-91 Company shall get Insurance policy, if applicable.
- 8.6 Empty drums and containers of toxic and hazards material shall be treated as per guideline published for "management & handling of discarded containers". Records of the same shall be maintained and forwarded to Gujarat Pollution Control Board regularly.
- 8.7 In no case any kind of hazardous waste shall be imported without prior approval of appropriate authority.

- 8.8 In case of transport of hazardous waste to a facility for (I.E. Treatment, Storage and disposal) existing in a state other than the state where hazardous waste are generated, the occupier shall obtain "No Objection certificate" from the state pollution Control Board, the Committee of the concerned state or Union territory Administration where the facility exists.
- 8.9 Unit shall take all concrete measures to show tangible results in waste generation reduction, avoidance, reuse and recycle. Action taken in this regards shall be submitted within three months and also along with Form - 4.
- 8.10 Industry shall have to display the relevant information with regard to hazardous waste as indicated in the Hon Supreme Court's order in W.P. No.657 of 1995 dated 14th October 2003.
- 8.11 Industry shall have to display on-line data outside the main factory gate with regard to quantity and nature of hazardous chemicals being handled in the plant, including wastewater and air emissions and solid hazardous waste generated within the factory premises.
- 8.12 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.
- 8.13 The Board reserves the right to make modifications in the conditions of the Consolidate Consent and Authorization (CC&A) which it deems fit in accordance with provision of Water Act- 1974.
- 8.14 In case of failure of pollution control equipments, the production process connected to it shall be stopped. Remedial actions/measures shall be implemented immediately to bring entire situation normal.
- 8.15 The Environmental audit shall be carried out yearly and the environmental statements pertaining to the previous year shall be submitting to this State Board latest by 30th September every year.
- 8.16 Applicant shall also comply with the general conditions given in annexure 1.


For And On Behalf Of
Gujarat Pollution Control Board


(Smt. S. V. Bhargava)
EE & Unit Head, Jetpur

NO: GPCB/CCA/JET- 2321/ID- 83396/

Issued to:-

M/S. Common Industrial Facilities for Jetpur Dyeing and
Printing Association (ID-83396),
S.No.763p2, Plot No. 1,2,3,
Narsang Takri, Near CETP-JDPA,
Jetpur-360370, Dist: Rajkot

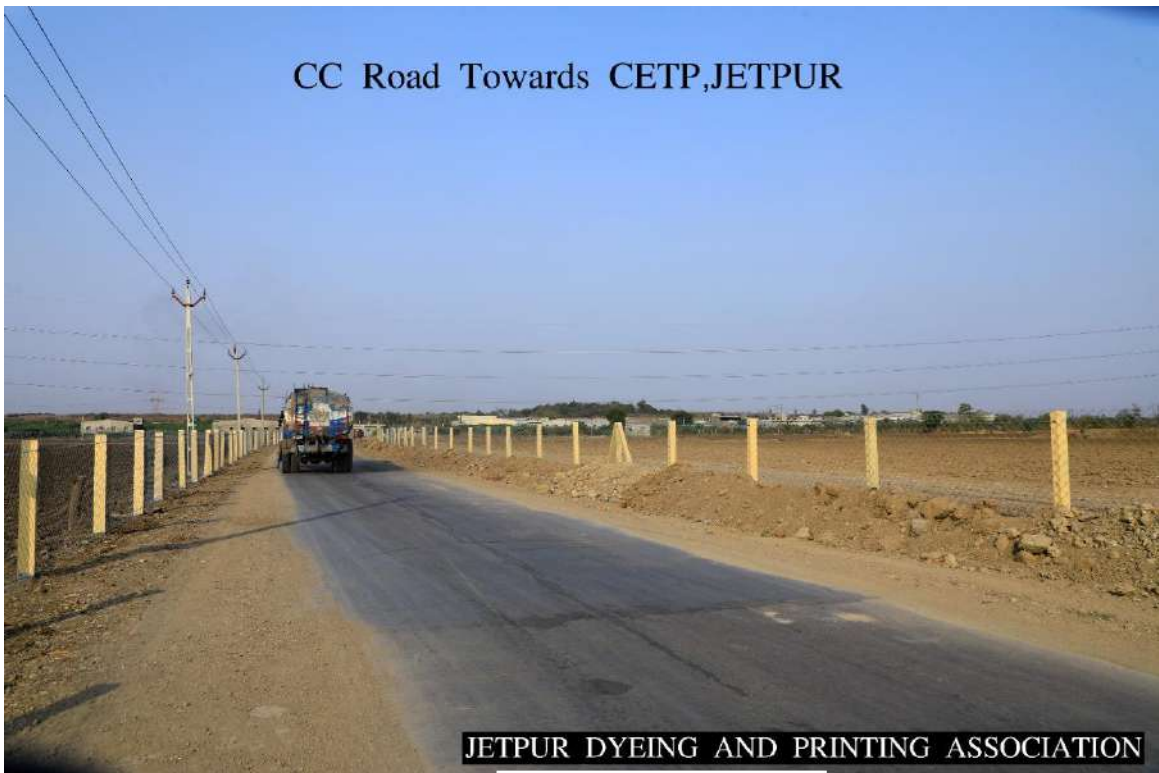
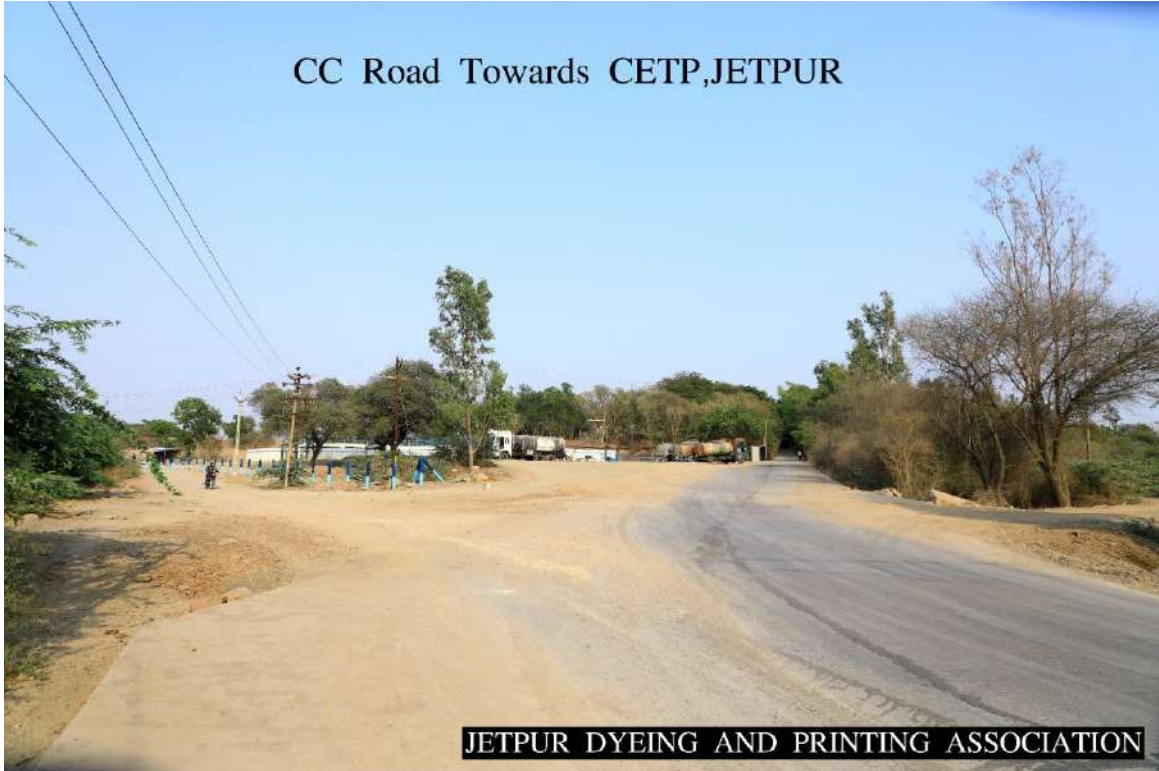


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Outward No: 744068, 06/06/2023

Annexure-R5

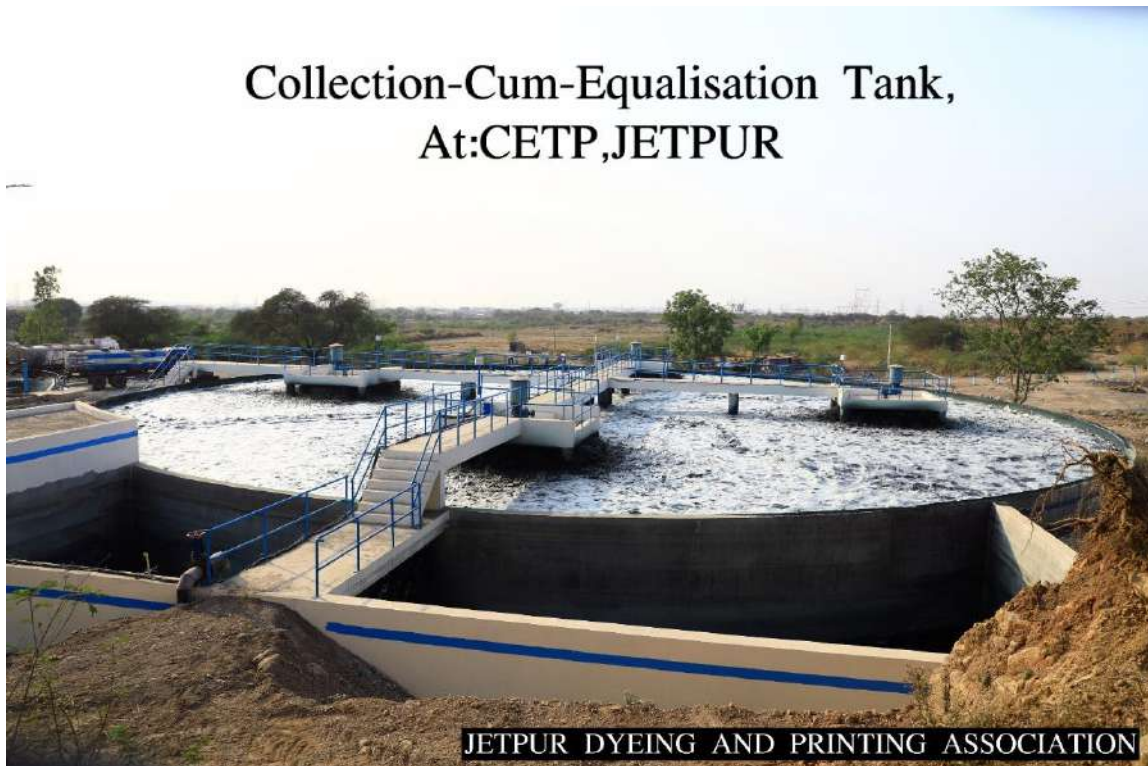
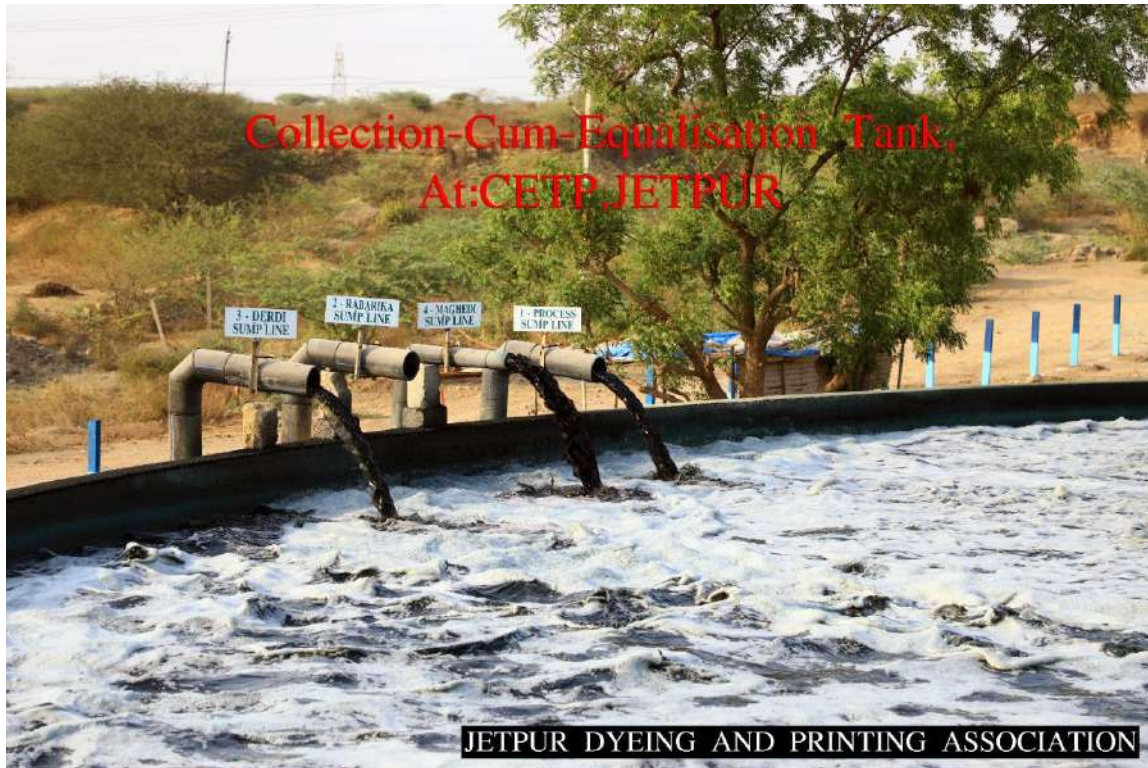
Photographs of Newly Constructed RCC Road



[Handwritten signature]

Annexure-R6

Photographs of Equalisation cum aeration tank



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TRUE COPY

Annexure-R7**Photograph of Sludge Thickener**

Photograph of Filter Press



Photograph of Sludge Storage Shed



V. J. Jangir

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Annexure-R8

CETP Outlet Analysis report of last year

Sr. No	Date	Outlet Effluent Parameter				
		pH	COD	BOD	SS	Color
Permissible Limit by GPCB		6.5-9.0	250 ppm	100 ppm	100 ppm	100 co. pt. unit
1	24-01-2023	7.81	262	75	88	200
2	07-02-2023	7.93	269	88	122	10
3	04-03-2023	7.66	382	125	118	40
4	05-04-2023	7.88	228	66	32	40
5	03-07-2023	8.05	243	73	168	150
6	07-08-2023	7.57	232	78	70	50
7	14-09-2023	8.18	181	65	36	100
8	27-10-2023	8.11	180	55	34	50
9	30-11-2023	7.56	218	71	126	100

**Note:-As per the above analysis report after starting the common caustic recovery plant (April-2023) the improvement was observed in our CETP performance.



TRUE COPY

864



Ryan Singh <adv.singhryan@gmail.com>

Service of the Reply/ Counter Affidavit on behalf of Respondent no. 7 Jetpur Dyeing and Printing Association in OA No. 616 of 2019 pending before Hon'ble NGT

2 messages

Ryan Singh <adv.singhryan@gmail.com> Mon, Dec 16, 2024 at 1:46 PM
To: "np_jetpur@yahoo.co.in" <np_jetpur@yahoo.co.in>, collector-raj@gujarat.gov.in, ccb.cpcb@nic.in, "chiefsecretary@gujarat.gov.in" <chiefsecretary@gujarat.gov.in>, chairman-gpcb@gujarat.gov.in, uh-gpcb-jetpur@gujarat.gov.in
Cc: Dharita Malkan <advocatedharitamalkan@gmail.com>

Dear Concern,

Kindly find attached the Reply/ Counter Affidavit on behalf of Respondent no. 7 i.e., Jetpur Dyeing and Printing Association in the matter entitled "**Ramdevbhai Samatbhai Sanjva vs. State of Gujarat**" Original Application No. 616 of 2019 pending before the Hon'ble National Green Tribunal.

Regards

Ryan Singh

Advocate for Respondent no. 7

 **Reply - Ramdevbhai Samatbhai Sanjva vs State of Gujarat.pdf**
8649K

postmaster@gujarat.gov.in <postmaster@gujarat.gov.in>
To: adv.singhryan@gmail.com

Mon, Dec 16, 2024 at 1:46 PM

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uh-gpcb-jetpur@gujarat.gov.in

The email address you entered couldn't be found. Please check the recipient's email address and try to resend the message. If the problem continues, please contact your email admin.

Diagnostic information for administrators:

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Received-SPF: Pass (postmaster.gujarat.gov.in: domain of adv.singhryan@gmail.com designates 209.85.221.182 as permitted sender) identity=MAILFROM; client-ip=209.85.221.182; envelope-from=adv.singhryan@gmail.com; helo=mail-vk1-f182.google.com)

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From: Ryan Singh <adv.singhryan@gmail.com>

866

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 Jetpur Dyeing and Printing Association in OA No. 616 of 2019 pending before
 Hon'ble NGT
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 <chairman-gpcb@gujarat.gov.in>, <uh-gpcb-jetpur@gujarat.gov.in>
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