

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL****WESTERN ZONE BENCH, PUNE****Appeal No. 88/2023(WZ)**

Asif Ruabali khan

Appellant

Versus

The CPCB &amp;Ors

Respondent(s)

**Chronology of Events**

<b>Sr. No.</b>	<b>Date</b>	<b>Events</b>
1.	November 2019	M/s. Aarti Drugs Ltd. is having industrial plant located at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155 and obtained CCA for production of Metformin Hydrochloride vide consent order no. AWH 108687, which is valid up to 19/07/2025 and amended time to time.  Copy of Consent is attached as an Annexure-1.
2.	October 2021	Notice of Direction issued u/s. 5 of the EPA, 1986 on 30/10/2021 for the reason "Unit has sent truck filled with spent carbon (hazardous waste) for unauthorized disposal to M/s. RSPL (i.e. Common disposal facility) without manifest which is non-compliance of CCA conditions."  Copy of Notice of Direction is attached as an Annexure-2.
3.	January 2022	For the aforesaid violation under the Hazardous and Other Wastes (Management and Transboundary Movement) (HOWM) Rules, 2016 an amount of Rs. 5 lakhs was levied as a Financial Penalty after prior approval from CPCB as per the provision of Rule 23(2) of Hazardous & other wastes (Management & Transboundary Movement) Rules, 2016.  • In this regards unit has paid Rs. 5 lakhs as Financial Penalty on 10/01/2022.  Copy of CPCB approval and letter regarding levied Financial Penalty is attached as an Annexure-3.
4.	March	For the illegal disposal of Hazardous waste, GPCB has issued

	2022	<p>Closure Direction to the unit u/s. 5 of the EPA, 1986 on 30/03/2022 with immediate effect and Interim Environmental compensation of Rs. 1 Crore on unit and Rs. 2 Lakhs on transporter imposed, respectively.</p> <ul style="list-style-type: none"> <li>In this regards unit has paid total Rs. 1.02 Crore as an Interim EC on 08/04/2022.</li> </ul> <p>Copy of Closure of Direction is attached as an Annexure-4.</p>
5.	April 2022	<p>Unit has applied for revocation and based compliance verified during inspection on 13/04/2022, Revocation was issued on 30/04/2022 for three months, which is further extended on 21/09/2022 for six months.</p> <ul style="list-style-type: none"> <li>At present unit has applied for further extension of revocation, which is under process.</li> </ul> <p>Copy of Revocation order is attached as an Annexure-5.</p>
6.	DEC 2022	<p>On 06/12/2022 inspection was carryout with respect to the complaint of Mr. Mohshin J. Sahikh, Bhilad received to this office on dated 13/10/2022, regarding hazardous waste disposal and dumping within factory premises.</p> <p>Conclusion as per the inspection report of visit dated 06/12/2022</p> <ul style="list-style-type: none"> <li>During inspection it is observed that maximum carpet area of premises is covered with RCC flooring and Office building, production plant building, warehouse, raw/finish goods building, utility, ETP, Haz waste storage area etc., so no any decision can be taken regarding deep burial of chemical waste within premises as mentioned in complaint.</li> <li>Unit has been instructed to carry out monitoring of geological survey at different places within premises by reputed institute i.e. NEERI, NPC, IIT, Scheduled-1 Auditors, etc.</li> </ul> <p>Copy of Inspection report dated 06/12/2022 is attached as an Annexure-6.</p>
7.	March 2023	<p>Geological survey report prepare by Dr. Jivraj Mehta Institute of technology, Environment Testing &amp; Resarched Laboratory &amp;</p>

		<p>Conclusions as;</p> <p>“Considering the facts mentioned in this report, it can be stated that the soil in the premises is maintained in its natural state and contamination in the soil is not severe and the threat to human health or the environment is ruled out. Constructive remedial measures like the development of green belts/areas are always welcome to step. Due care must be taken not to violate any norms as directed by authorities.”</p> <p>Copy of Geological survey report is attached as an Annexure-7.</p>
8.	March 2023	<p>On 23/03/2023 unit was inspected with respect to complaint of Mr. Prashant Panchal received to this office on dated 23/03/2023 regarding unit has discharged their untreated waste water in GIDC open drain illegally and create water pollution.</p> <p>Based on non-compliance observed during inspection; Notice of Direction issued u/s 33(A) of the Water Act, 1974 on 25/04/2023.</p> <p>Copy of Inspection report dated 23/03/2023 is attached as an Annexure-8.</p>
9.	April 2023	<p>On 18/04/2023 M/s. Aarti Drugs Ltd &amp; group of industrial units were inspected with reference to Hazardous waste Management and representation received from Mr. Asif R. Khan vide letter dated 07/03/2023.</p> <p>Findings of the inspection report of visit dated 18/04/2023</p> <p>The Hazardous Waste generation of process waste/residue is 1394.593 MT/Year and spent carbon/spent charcoal is 857.162 MT/Year as against production 10156 MT/Year, which is within CC&amp;A limit. • However, considering mass balance in case of the full production as per CC&amp;A, the hazardous waste quantity may be higher than quantity mention in Authorization.</p> <p>Copy of inspection report dated 18/04/2023 is attached as an Annexure-9.</p>
10.		<p>On 19/06/2023 unit was inspected with respect to regarding revocation of closure direction.</p>

	JUN 2023	<p>Findings of the inspection report of visit dated 19/06/2023 as;</p> <ul style="list-style-type: none"><li>• The Hazardous Waste generation of process waste/residue is 1394.593 MT/Year and spent carbon/spent charcoal is 857.162 MT/Year as against production 10156 MT/Year, which is within CC&amp;A limit. • However, considering mass balance in case of the full production as per CC&amp;A, the hazardous waste quantity may be higher than quantity mention in Authorization.</li><li>• Other hazardous waste disposal details are nil.</li><li>• Stock of hazardous waste is ETP sludge — 6 MT, Process waste — 15.452 MT, Spent carbon/Charcoal — 7.924 MT, Used oil — 0 MT and Discarded containers — 3.5 MT.</li></ul> <p>Copy of inspection report dated 19/06/2023 is attached as an Annexure-10.</p>
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**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

**By RPAD**

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 the Hazardous and Other Waste (Management and Transboundary Movement) Rules'2016, framed under the EP Act-1986.

And whereas Board has received on line consolidated application **Inward ID No: 176029** dated **-29/05/2020** 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 afore said environmental acts)

To,

M/s. Aarti Drugs Ltd

Plot no- 211, 213, Road No. 2,

GIDC Sarigam- 396155,

Tal-Umbergaon, Dist- Valsad.

Consent Order No: AWH – 10868 Date of Issue:10/07/2020.

The consents for use of outlet for the discharge of trade effluent and emission due to operation of industrial plant for manufacture of the following items / products:

Sr No.	Products	Quantity
1	Metformin Hydrochloride	1200 MT/Month

The validity of this order will be up to 19/07/2025.

**CONDITIONS UNDER WATER ACT 1974:**

- The quantity of total water consumption shall not exceed **245 KLPD** as per below break up
  - Industrial: **222 KLPD.**
  - Domestic: **23 KLPD.(3 Domestic + 20 Gardening)**
- The quantity of total of waste water generation shall not exceed **41.5KLPD** as per below break up
  - Industrial:**39 KLPD.**
  - Domestic: **2.5 KLPD.**

M/s. Aarti Drugs Ltd(Unit-2) (ID: 43373) Page 1 of 5

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Outward No: 572019/311/2020

**Trade Effluent**

1. The generated Effluent shall be treated In ETP and then shall be evaporated in evaporator there by achieving ZLD.
2. The GIDC drainage connection given by the GIDC for discharge of industrial effluent shall be disconnected & the outlet shall be sealed.
3. Domestic waste water shall be disposed off through septic tank/soak pit system.

**CONDITIONS UNDER AIR ACT 1981:**

1. Following shall be used as fuel:

Sr. No.	Fuel	Quantity
1	Diesel	40 Lit/Hr
2	Natural gas	414 Nm <sup>3</sup> /Hr
3	Briquettes	1.9 MT/Hr

2. The flue gas emission through stack attached to stack shall conform to the following standards:

Sr. No	Stack attached to	Stack height in meter	APCM	Parameters	Permissible limit
1	Steam Boiler (6 TPH)	30	Multi cyclone Bag Filter	Particulate Matter	150 mg/Nm <sup>3</sup>
2	D. G. Set (500 KVA) Stand by	11	--	SO <sub>2</sub> NO <sub>x</sub>	100 ppm 50 ppm

3. There shall be no process emission from the manufacturing process as well as any other ancillary operations.
4. Ambient air quality within the premises of the industry shall conform to the following standards:

PARAMETERS	PERMISSIBLE LIMIT	
	Annual	24 Hrs Average
Particulate Matter-10 (PM <sub>10</sub> )	60 Microgram/m <sup>3</sup>	100 Microgram/m <sup>3</sup>
Particulate Matter- 2.5 (PM <sub>2.5</sub> )	40 Microgram/m <sup>3</sup>	60 Microgram/m <sup>3</sup>
SO <sub>2</sub>	50 Microgram/m <sup>3</sup>	80 Microgram/m <sup>3</sup>
NO <sub>x</sub>	40 Microgram/m <sup>3</sup>	80 Microgram/m <sup>3</sup>

5. 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.



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6. 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 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.

**AUTHORIZATION UNDER THE HAZARDOUS AND OTHER WASTES  
(MANAGEMENT AND TRANSBOUNDARY MOVEMENT) RULES, 2016**

M/s. Aarti Drugs Ltd is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at Plot no- 211, 213, Road No. 2, GIDC Sarigam- 396155, Tal-Umbergaon, Dist- Valsad.

Sr. No.	Waste	Category of Hazardous Waste as per the Schedules I, II and III of these rules		Authorized mode of disposal or recycling or utilization or co-processing, etc.	Quantity
		Schedule	Category		
1.	Process Waste/Residue	I	28.1	Collection, Storage, Transportation recovery disposal through co-processing in cement industry	366.825 MT/Year
2.	Spent Carbon/Spent Charcoal	I	28.3	Collection, Storage, Transportation recovery disposal through co-processing in cement industry	175.200 MT/Month
3.	Chemical Sludge from wastewater treatment	I	35.3	Collection, Storage, Transportation, Disposal at TSDF site.	40.150 MT/Month
4.	Empty barrels/Containers /Liners contaminated with hazardous chemical/waste	I	33.1	Collection, Storage, Decontamination, transpiration and disposal by sending to actual user.	50 MT/Year
5.	Used or Spent oil	I	5.1	Collection, Storage, Transportation, Disposal by selling to registered Re refiners.	0.200 MT/Year

- 5.1 The authorization shall be valid up to 19/07/2025.

M/s. Aarti Drugs Ltd(Unit-2) (ID: 43373) Page 3 of 5

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5.2 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 Environmental (Protection) Act-1986.

**A. GENERAL CONDITIONS UNDER HAZARDOUS AND OTHER WASTES (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES-2016.**

1. The Authorized person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
2. The Authorization or its renewal shall be produced for inspection at the request of an officer Authorized by the State Pollution Control Board.
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.
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.
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;
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. It is the duty of the authorized person to take prior permission of the State Pollution Control Board to close down the facility.
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.
9. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
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.
11. The importer or exporter shall bear the cost of import or export and mitigation of damages if any
12. An application for the renewal of an authorization shall be made as laid down under these Rules.

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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.
14. Annual return shall be filed by June 30<sup>th</sup> for the period ensuring 31<sup>st</sup> March of the year.

**B. SPECIFIC CONDITIONS (WHICHEVER IS APPLICABLE)**

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.
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.
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.
4. The occupier of the facility shall comply standard operating procedure/ guidelines published by MoEF&CC or CPCB or GPCB form time to time.
5. Unit shall comply provisions of E-Waste (Management) Rules, 2016.

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

  
(N. M. Tabliani)

**Deputy Chief Environment Engineer**

No: GPCB/CCA-SRG-453/ID: 43373/

Date:

**ISSUED TO:**

M/s. Aarti Drugs Ltd  
Plot no- 211, 213, Road No. 2,  
GIDC Sarigam- 396155,  
Tal-Umbergaon, Dist- Valsad.

M/s. Aarti Drugs Ltd(Unit-2) (ID: 43373) Page 5 of 5

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Outward No: 52019/11/2024

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**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

**BY R.P.A.D.****CCA-Amendment**

(A-111563)

No: GPCB/ CCA-SRG- 453/ID: 43373/

Date:

To,

M/s. Aarti Drugs Ltd.

Plot No. 211, 213, Road no. 2,

GIDC Sarigam, , Sarigam – 396155

Tal-Umbergaon, Dist- Valsad.

**SUB: Consolidated consent and Authorization (CC & A) under various Environmental Acts/Rules.****REF:** 1) Your CCA Amendment Application Inward ID No. 188017, dated 30/12/2020.

2) CCA order no. AWH-108687 issued vide no: GPCB/CCA-SRG-453/ ID-43373/571733, dated 30/10/2020.

This has reference to the CCA order No. AWH-108687 issued vide letter no. : GPCB/CCA-SRG-453/ ID-43373/571733, dated 30/10/2020 under the various Environmental Act/Rules, which stands amended (corrected) as under.

Sr. No.	Products	Quantity
1	Metformin Hydrochloride	1200 MT/Month

- The validity period of the CCA amendment will up to 19/07/2025.

**CONDITIONS UNDER AIR ACT 1981:**

1. Following shall be used as fuel:

Sr. No.	Fuel	Quantity
1	Diesel	40 Liter/Hr
2	Natural Gas	414 Nm <sup>3</sup> /Hr
2	Briquettes	1.9 MT/Hr

M/s. Aarti Drugs Ltd, (ID-43373) Page 1 of 2

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Outward No: 585775, 15/03/2021

2. The flue gas emission through stack attached to stack shall conform to the following standards:

Sr. No	Stack attached to	Stack height in meter	APCM	Parameters	Permissible limit
1	Steam Boiler (6 TPH) (Existing)	30	Multi cyclone Bag Filter	PM SO <sub>2</sub> NO <sub>x</sub>	150 mg/Nm <sup>3</sup> 100 ppm 50 ppm
	Steam Boiler * (6 TPH) Standby (New)		Multi cyclone Bag Filter		
2	D. G. Set (500 KVA) Stand by	11	Adequate Stack Height		

\*At a time only one boiler shall be operate.

The rest of the conditions of Consolidated Consent (CC&A) AWH-108687 issued vide no: GPCB/CCA-SRG-453/ ID-43373/571733 dated 30/10/2020 shall remain unchanged and industry shall comply with the same judiciously.

For and on behalf of  
Gujarat Pollution Control Board

  
(N. M. Tabhani)

Deputy Chief Environment Engineer

Outward No: 585775, 15/03/2021

**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN, SECTOR 10-A,

GANDHINAGAR - 382010,

(T) 079-23232152

**BY RPAD****CCA-Amendment****(H-121429)****NO: GPCB/SRG-CCA-453(3)/ID 43373/****Date:****TO,****M/s. Aarti Drugs Ltd****Plot No: 211, 213, Road No. 2,****GIDC Sarigam,****Tal: Umbergaon,****Dist: Valsad- 396155.****SUB: Consolidated consent and Authorization (CC&A) under various Environmental Acts/Rules.****REF: 1) Your Application inward no. 225162, dated 24/06/2022.****2) CCA of the Board issued vide order no.AWH-108687 dated 03/11/2020, valid up to 19/07/2025.**

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, The Board has granted CCA vide order No. AWH-108687 issued vide this office order no. GPCB/SRG-CCA-453/ID 43373/572019 dated 03/11/2020, valid up to 19/07/2025.

The Board has right to review and amend the conditions of the said CCA orders. Now, considering your application for CCA amendment inward ID No. 225162, dated 24/06/2022, CCA-Amendment hereby granted for increasing process waste/residue and Decrease quantity of spent carbon/spent charcoal of Hazardous waste with following conditions.

1. The order shall be read as CCA-Amendment order no.:H-121429 Date of Issue: 14/09/2022, valid up to 19/07/2025.

**SUBJECT TO FOLLOWING SPECIFIC CONDITIONS:**

1. There shall be no change in products & its capacity after CCA-Amendment.
2. There shall be no change in water consumption, wastewater water generation & its mode of disposal CCA-Amendment.
3. There shall be no change in fuel consumption, flue gas emission and process gas emission after CCA-Amendment.

M/s. Aarti Drugs Ltd (ID: 43373) Page 1 of 2

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**2. AUTHORIZATION UNDER THE HAZARDOUS AND OTHER WASTES (MANAGEMENT AND TRANSBOUNDARY MOVEMENT) RULES, 2016 SHALL BE AMENDMENEED & READ AS**

**2.1 M/s. Aarti Drugs Ltd is hereby granted an authorization to operate facility for following hazardous wastes on the premises situated at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal: Umbergaon, Dist: Valsad- 396155.**

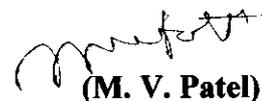
Sr. No.	Waste	Schedule & Cat.	Quantity	Mode of disposal
1	Process Waste/Residue	I-28.1	1421.617 MT/Year	Collection, Storage, Transportation & Disposal through Co-processing at Cement Industry.
2	Spent Carbon/ Spent Charcoal	I-28.3	1011.064 MT/Year	Collection, Storage, Transportation & Disposal through Co-processing at Cement Industry.
3	Chemical Sludge from Wastewater treatment	I-35.3	481.8 MT/Year	Collection, Storage, Transportation & Disposal at Approved TSDF Site.
4	Empty barrels/ Containers/ Liners contaminated with hazardous chemical/ waste	I-33.1	50 MT/Year	Collection, Storage, Transportation & Disposal by selling to registered recyclers.
5	Used Oil	I-5.1	0.2 MT/Year	Collection, Storage, Transportation & Disposal by selling to registered recyclers.

**2.2 The authorization shall be valid up to 19/07/2025.**

**2.3 The authorization is subject to the conditions stated below and such other conditions as may be specified in the rules form time to time under the Environmental (Protection) Act-1986.**

**3. The rest of the conditions of Consolidated Consent (CC&A) order No. AWH-108687 issued vide order no. GPCB/SRG-CCA-453/ID 43373/572019 dated 03/11/2020, valid up to 19/07/2025 and amendment thereof shall remain unchanged and industry shall comply with the same judiciously.**

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

  
(M. V. Patel)

**Environment Engineer**



# 188 GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

**BY R.P.A.D**

**NOTICE OF DIRECTION UNDER SECTION-5 OF ENVIRONMENT (PROTECTION) ACT, 1986 FOR THE VIOLATIONS OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES -2016 AS AMENDED FROM TIME TO TIME.**

WHEREAS, you are having industrial plant at Plot No. 211, 213, Road no. 2, GIDC Sarigam, Tal-Umbergaon, Dist- Valsad – 396 155 for the manufacturing of Metformin Hydrochloride.

ANDWHEREAS, the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A) vide Consent Order No. AWH- 108687 dated 30/10/2020, which was valid up to 19/07/2025 for the manufacturing of above said product with certain conditions mentioned therein.

ANDWHEREAS, during the inspection of your industrial plant on 09/09/2021 under Section-10 of the Environment (Protection) Act, 1986 by the authorized officers of the Board, it has been noticed that,

1. You have sent truck filled with spent carbon (hazardous waste) for unauthorized [to M/s. RSPL (i.e. Common disposal facility)] disposal without manifest which is non-compliance of CCA.

Now, therefore I, A.V.SHAH, Member Secretary of Gujarat Pollution Control Board in exercise of the power conferred on file no. Legal-G-28 under Section (5) of the Environment (Protection) Act-1986, proposes to issue directions as under:-

1. Why not to issue direction under section 5 of the Environment (Protection) Act, 1986 to prohibit you from manufacturing activity?
2. Why not to direct to concern authority for disconnection of Power Supply & Water Supply of Power supply of your industrial plant?
3. Industry shall dispose Hazardous waste as per Consent Conditions and regularly use the online manufacturing system for disposal of Hazardous waste.
4. Unit shall comply with the CCA conditions.

You are hereby directed to reply within 15 days from the date of service 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 Environment (protection) Act 1986 for non-compliance of Hazardous and Other Waste (Management and Transboundary Movement) Rules – 2016 & amendments thereof.

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

**(A. V. Shah)**

**Member Secretary**

*Clean Gujarat Green Gujarat*

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

Outward No: 605353/1/2021

NO: GPCB/ CCA-SRG-453/ ID 43373/

Date:

**Issued to:**

M/s. Aarti Drugs Ltd.

Plot No. 211, 213, Road no. 2,

GIDC Sarigam,

Tal-Umbergaon,

Dist- Valsad 396 155

Outward No: 605375, 30/10/2021



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केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD

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

SPEED POST

File No. CP-21/10/2021-WM-II-HO-CPCB-HO

December 16, 2021

To

**The Member Secretary**  
Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector-10A,  
Gandhinagar-382010, Gujarat

**Sub: Enforcement of Rule 23 (2) of the Hazardous and Other Wastes (Management and Transboundary Movement) (HOWM) Rules, 2016 with respect to implementing liabilities for environmental damage including financial penalty on M/s Aarti Drugs Ltd., Gujarat.**

**Ref: Letter no. GPCB/CCA-SRG-453/ID 43373/606903 dated 03.11.2021.**

Sir,

This has reference to above referred letter for approval to impose Financial Penalty of Rs. 4,00,000/- (Rupees Four lakhs only) on M/s Aarti Drugs Ltd., Valsad, for violation of provisions of HOWM Rules, 2016.

In the referred letter the violations with respect to rules has not been clearly mentioned. However, after examining the proposal & inspection report, following five violations were found:

- Rule 6: Transporting hazardous waste for unauthorized/ illegal disposal.
- Rule 17: Not labelled HW in Form 8.
- Rule 18(1): Transportation of HW through unauthorized vehicle and
- Rule 18(2): Not provided relevant information to transporter in Form 9.
- Rule 19: Movement of HW without generating Manifest in Form 10

In this regard, Competent Authority, CPCB has accorded approval for imposition of Financial Penalty of Rs. 5,00,000/- (Rs. Five Lakh only) on M/s Aarti Drugs Ltd., GIDC Sarigam, Valsad @ Rs. 1 lakh per violation for violation of (Rules 6, 17, 18(1)&(2) and 19) of HOWM Rules, 2016.

Yours faithfully,

(A. Sudhakar)

Division Head  
Waste Management-II

*Handwritten notes:*  
Aarti  
M/s Aarti Drugs Ltd.  
Sry. mib  
24/12  
25/12

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in



# 191 GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

RPAD

NO: GPCB/CCA-SRG-453/ID- 43373/

Date:

To,

M/s. Aarti Drugs Ltd.

Plot No. 211, 213, Road no. 2,

GIDC Sarigam,

Tal-Umbergaon,

Dist- Valsad – 396 155

**Sub:** Financial Penalty for violation of the Hazardous and Other Wastes (Management and Transboundary Movement) (HOWM) Rules, 2016

**Ref.:** 1. Notice of direction issued u/s. 5 of the Environment (Protection) Act, 1986 on 30/10/2021.

2. CPCB letter vide no. CP-21/10/2021-WM-II-HO-CPCB-HO dated 16/12/2021 regarding approval financial penalty for violation of the HOWM Rules, 2016

WHEREAS, you are having industrial plant at Plot No. 211, 213, Road no. 2, GIDC Sarigam, Tal-Umbergaon, Dist- Valsad – 396 155 for the manufacturing of Metformin Hydrochloride.

ANDWHEREAS, the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A) vide Consent Order No. AWH- 108687 dated 30/10/2020, which was valid up to 19/07/2025 for the manufacturing of above said product with certain conditions mentioned therein.

ANDWHEREAS, Notice of direction issued u/s. 5 of the Environment (Protection) Act, 1986 on 30/10/2021 based on violation observed on inspected dated 09/09/2021 and CPCB had been requested to grant permission to levy financial penalty as per Rule 23(2) of Hazardous & other wastes (Management & Transboundary Movement) Rules, 2016.

ANDWHEREAS, Competent Authority, CPCB has accorded approval for imposition of Financial Penalty of Rs. 5,00,000/- (Rs. Five Lakh only) to your unit for violation of (Rules 6, 17, 18(1)&(2) and 19) of HOWM Rules, 2016.

Thus, you are hereby informed to pay **Rs. 5,00,000/- (Five Lakhs Only)** as a Financial Penalty for violation of the HOWM Rules, 2016.

RTGS details are as following:-

A	Name of Payee	GUJARAT POLLUTION CONTROL BOARD
B	Bank Account Number	10325062238
C	Type of Account	CURRENT
D	Bank	STATE BANK OF INDIA
E	Branch	GANDHINAGAR ZONAL BRANCH
F	Branch Address	SECTOR-10 /B, IN FRONT OF NEW SACHIVALAYA, GANDHINAGAR-382010
G	IFSC Code	SBIN0001355

*Clean Gujarat Green Gujarat*

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

Details regarding action taken in this regard shall be communicated on following mail especially with UTR No.

1) nuh-gpcb-acc5@gujarat.gov.in

2) nuh-gpcb-sari@gujarat.gov.in

This order is issued after approval of competent authority.

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



**(M. V. Patel)  
Environment Engineer**

Outward No: 620302, 04/01/2022

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**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in



GPCB

BY R.P.A.D

**CLOSURE DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986 FOR THE VIOLATION OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES, 2016 AS AMENDED FROM TIME TO TIME**

WHEREAS you M/s. Aarti Drugs Ltd. is having industrial plant located at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155 for production of Metformin Hydrochloride.

ANDWHEREAS, Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A), AWH-108687, dated 10/07/2020, valid up to 19/07/2025 and amended thereof with certain conditions for the production of product mentioned therein.

ANDWHEREAS, Police Department, Bhilad has caught Tanker no. GJ 15 AV 2810 without any documents, filled with Process Waste/ Residue (Liquid) generated during manufacturing of Metformin Hydrochloride. Tanker Owner/Driver has informed that hazardous waste is being dumped at Unknown location. During interrogation of Police with Tanker Owner/Driver, they said waste is from M/s. Aarti Drugs Ltd., Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155.

ANDWHEREAS, Your industrial plant (M/s. Aarti Drugs Ltd.) was inspected under section 10 of the Environment (Protection) Act, 1986 on 20/02/2022 & 24/02/2022 with reference to above matter by the authorized officers of the Board, following observations are made:-

1. Unit has sent this waste (Process waste/Residue) into tanker No. GJ15AV2810 without any document (manifest, etc.) which is caught by the Police Department. This clearly indicates that unit may be illegally disposing their generated Hazardous Waste at unknown location.
2. During inspection, Tanker No. GJ15AV2810 filled with liquid chemical (Process waste) observed under custody of Bhilad Police.
3. Tanker owner has shown us the location in M/s. Aarti Drugs Limited (Plot No. 211, 213, Road No. 2, GIDC Sarigam) from where he had filled/load his tanker No. GJ15AV2810
4. The sample collected from this tanker and sample collected from tank of your unit from which tanker was filled within your premises is observed identical from its physical appearance & pH.
5. During inspection, it is found that this waste is a process waste/residue generated during manufacturing of Metformin Hydrochloride and as per CC&A (AWH-108687) condition; this waste shall be dispose for co-processing to cement industry.
6. During inspection dated 24/02/2022, Unit has submitted material balance. From the said material balance and production details submitted during inspection and record of disposal of hazardous waste by the unit from XGN, it is concluded that during the period of January – 2021 to January – 2022 unit has manufactured 9116.462 MT of Metformin

M/s. Aarti Drugs Ltd. (ID 43373) Page 1 of 4

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Hydrochloride and as per material balance generation of process waste/residue is 619.919 MT and carbon waste is 583.453 MT. However as per XGN records unit has disposed only 202.37 MT of Process waste/residue and 169.55 MT of carbon waste through manifest and disposal of remaining 417.549 MT of process waste and 413.88 MT of carbon waste is of question. Hence written instruction is given for clarification to this unit. However, unit has not replied till date in this regard and hence it may be concluded that unit has disposed off 417.549 MT of process waste and 413.88 MT of carbon waste (as per material balance submitted by the unit) in unauthorized manner.

AND WHEREAS, Chance of Hearing was given vide letter dated 24/02/2022. In this regards, your submission vide letter dated 28/02/2022 is not convincing.

AND WHEREAS, as per the fingerprint analysis report of Hazardous waste sample collected from tanker No. GJ15AV2810 in custody of Bhilad Police and Hazardous Waste sample collected from residue storage tank of M/s. Aarti Drugs Limited, it seems that both sample are identical.

### ORDER

UNDER THE CIRCUMSTANCES, I A. V. Shah, Member Secretary of Gujarat Pollution Control Board in exercise of the power conferred under file No. Legal-G-28 under Section 5 of the Environment (Protection) act, 1986 issue Directions as under with **immediate effect** from the date of issue this order:

1. To close the operation of your industrial plant on the above mentioned site.
2. You shall stop operation of your industrial plant including D.G. Set and Captive Power Plant with immediate effect from date of issue of this order.
3. This order will be effective with immediate effect.
4. Industry shall dispose hazardous waste as per CCA Conditions and maintain its complete records.
5. Unit shall comply with CCA conditions.
6. Industry shall pay Rs. 1 Crore as an Interim Environmental Compensation (Interim EC) immediately in following A/C.

A	Name of Payee	GUJARAT POLLUTION CONTROL BOARD
B	Bank Account Number	10325062238
C	Type of Account	CURRENT
D	Bank	STATE BANK OF INDIA
E	Branch	GANDHINAGAR ZONAL BRANCH
F	Branch Address	SECTOR-10 /B, IN FRONT OF NEW SACHIVALAYA, GANDHINAGAR-382010
G	IFSC Code	SBIN0001355

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**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in



GPCB

Details regarding action taken in this regard shall be communicated on following mail especially with UTR No.

1) nuh-gpcb-acc5@gujarat.gov.in      2) nuh-gpcb-sari@gujarat.gov.in

IF the above directions are not complied, you are liable for prosecution under Section 15 of the Environment (Protection) Act, 1986 which provides punishment with imprisonment for a term which may extend to five year and with fine which may extend to Rs. one lac or both.

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

*- sol -*

**(A. V. Shah)**

**Member Secretary**

**NO: GPCB/CCA-SRG-453(2)/ID-43373/**

**Date:**

**To:-**

**M/s. Aarti Drugs Ltd.,**

**Plot No: 211, 213, Road No. 2,**

**GIDC Sarigam, Tal. Umbergaon,**

**Dist: Valsad 396 155**

**Copy To:**

**1. The Deputy Engineer (O&M),**

**Dakshin Gujarat Vij Company Ltd,**

**GIDC Sarigam,**

**Dist: Valsad.....I am directed to request you to disconnect supply of electricity (except single phase) with **immediate effect** from the date of issue of this order to the industrial plant of M/s. Aarti Drugs Ltd, Located at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155 & intimate to us accordingly**

**2. The Deputy Engineer,**

**Gujarat Industrial Development Corporation,**

**Sarigam,**

**Dist: Valsad.....I am direct to request you to disconnect supply of water **immediate effect** from the date of issue of this order to the industrial plant of M/s. Aarti Drugs Ltd, Located at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155 & intimate to us accordingly.**

**3. The Regional Transport Officer (ARTO),**

**Dist. Valsad,**

**Gujarat 384265.....I am directed to request you to cancel the Registration of Tanker no. GJ- 15- AV-2810 as it was involved in illegal transportation of Hazardous waste.**

M/s. Aarti Drugs Ltd. (ID 43373) Page 3 of 4

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Outward No. 7019, 30/03/2022

**4. Mr. Mujeebul Khan**

(Owner of Tanker no. GJ-15-AV-2810)

Malik Niwas, opp. Imran nagar,

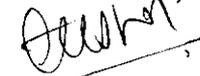
Vapi, Valsad-396191.....To direct you to pay Rs. 2 lakhs as an Interim Environmental Compensation (EC)/Penalty immediately in following A/C

A	Name of Payee	GUJARAT POLLUTION CONTROL BOARD
B	Bank Account Number	10325062238
C	Type of Account	CURRENT
D	Bank	STATE BANK OF INDIA
E	Branch	GANDHINAGAR ZONAL BRANCH
F	Branch Address	SECTOR-10 /B, IN FRONT OF NEW SACHIVALAYA, GANDHINAGAR-382010
G	IFSC Code	SBIN0001355

**5. The Regional Officer,**

Regional office, Sarigam.....To ensure the compliances of this Directions &amp; submit detailed IR with AR.

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



**(A. V. Shah)  
Member Secretary**

Outward No: 637019, 30/03/2022

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**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN

Sector-10-A, **Gandhinagar**-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in



GPCB

BY RPAD

**REVOCAION OF CLOSURE DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986 FOR THE VIOLATION OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES, 2016 AS AMENDED FROM TIME TO TIME**

WHEREAS you M/s. Aarti Drugs Ltd. is having industrial plant located at Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad 396 155 for production of Metformin Hydrochloride.

ANDWHEREAS, Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A), AWH-108687, dated 10/07/2020, valid up to 19/07/2025 and amended thereof with certain conditions for the production of product mentioned therein.

ANDWHEREAS, Gujarat Pollution Control Board has issued Closure Direction under Section 5 of the Environment (Protection) Act- 1986 vides this office order no. GPCB/CCA-SRG-453(2)/ID 43373/637019 dated 30/03/2022 for the reasons mentioned therein.

ANDWHEREAS, you have applied for revocation vide online application inward no. 5000582, dated 12/04/2022 with relevant documents, undertaking and submitted Bank Guarantee of Rs 10 Lakhs of IDBI Bank, which is valid up to 04/03/2023.

ANDWHEREAS, you have paid interim Environmental Compensation of Rs. 1,00,00,000/- (1 Crore) and Rs 2,00,000/- (2 Lakhs) on behalf of the transporter to the Board on 08/04/2022.

ANDWHEREAS, your industrial plant was inspected on 13/04/2022 under Section-10 of the Environment (Protection) Act by the authorized officer of the Board, and observed that:

1. During inspection industrial unit was found not in operation and no production activity was going on.
2. Power supply of the unit was disconnected by DGVCL on 07/04/2022 and water supply of the unit was sealed by GIDC on 05/04/2022.
3. Unit has submitted notarized undertaking and ensure that they will not dispose waste (Process waste/residue) illegally at unknown location and further ensure that in future they will dispose of Hazardous Waste as per CCA Conditions under GPCB guideline as amended from time to time.
4. Unit has given assurance to comply CCA conditions.

**ORDER**

Under the above circumstances, I, A. V. Shah, Member Secretary, Gujarat Pollution Control Board, in exercise of the power conferred under file no. Legal-G-28, for under Section-5 of Environment (Protection) Act-1986 is directed to revoke Closure Directions issued vide order

Page 1 of 2

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no. GPCB/CCA-SRG-453(2)/ID 43373/637019 dated 30/03/2022 for **three months** from the issue date of this order with following conditions;

1. Unit shall disposed hazardous waste as per CCA condition and maintained record for the same.
2. Unit shall comply with CCA conditions.

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

*sd*  
**(A.V. Shah)**

**Member Secretary**

**Date:**

**NO: GPCB/CCA-SRG-453(2)/ID-43373/**

**ISSUED To:-**

**Aarti Drugs Ltd.,**

**Plot No. 211, 213, Road No.2,**

**GIDC Sarigam,**

**Ta: Umbergaon, Dist: Valsad 396 155**

**Copy To:**

1. **The Deputy Engineer (O&M),  
Dakshin Gujarat Vij Company Ltd  
GIDC Sarigam,**

**Dist: Valsad.....** With a request reconnect the supply of electricity for **Three Months** from the date of issue of this order to the industrial plant of M/s. Aarti Drugs Ltd., Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad-396155 & intimate to us accordingly.

2. **The Deputy Engineer  
Gujarat Industrial Development Corporation  
Sarigam,**

**Dist: Valsad.....** With a request reconnect the water supply for **Three Months** from the date of issue of this order to the industrial plant of M/s. Aarti Drugs Ltd., Plot No: 211, 213, Road No. 2, GIDC Sarigam, Tal. Umbergaon, Dist: Valsad-396 155 & intimate to us accordingly.

3. **The Regional Officer,  
Regional office,**

**Sarigam.....** To ensure compliance of this order & submit IR.

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

*sd*

**(A. V. Shah)**

**Member Secretary**

Page 2 of 2



**BY R/PAD**

**REVOCAION OF CLOSURE DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT (PROTECTION) ACT, 1986 FOR THE VIOLATION OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES, 2016 AS AMENDED FROM TIME TO TIME**

WHEREAS you M/s. Aarti Drugs Ltd. is having industrial plant located at Plot No 211, 213, Road No. 2, GIDC Sarigam, Tal: Umbergaon Dist: Valsad-396 155 for manufacturing of Metformin Hydrochloride.

AND WHEREAS, Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A), AWH-108687, dated 03/11/2020, valid up to 19/07/2025 and amended thereof with certain conditions.

AND WHEREAS, Gujarat Pollution Control Board has issued Closure Direction under Section 5 of the Environment (Protection) Act- 1986 vide this office order no. GPCB/CCA-SRG-453(2)/ID 43373/637019 dated 30/03/2022 for the reasons mentioned therein.

AND WHEREAS, you have applied for revocation with relevant documents, undertaking and submitted bank guarantee of Rs. 10,00,000/- of IDBI Bank, which is valid up to 10/04/2023 and you have paid Interim Environmental Compensation of Rs. 1,00,00,000/- (1 Crore) and Rs. 2,00,000/- (2 lakhs) on behalf of the transporter to the Board on 08/04/2022. Subsequently, trail revocation was issued on 30/04/2022 for three months with the Conditions mentioned therein.

AND WHEREAS, with respect to your revocation application of Closure Direction, your industrial plant on 12/08/2022 under Section-10 of the Environment (Protection) Act by the authorized officer of the Board and observed that:

1. As per Hon'ble Umbergaon court order, unit has sent waste (Process waste/Residue) 19.28 MT to M/s Eco Waste Management through manifest number 1717802, dated.07/05/2022, which was previously caught by Police Department and incustody of Bhilad Police Station, Bhilad.
2. Unit has applied for CC&A amendment vide inward ID - 225162, dated 24/06/2022 with revised calculation of hazardous waste generation during the manufacturing of Metformin Hydrochloride.
3. Unit has submitted notarized undertaking dated 11/04/2022 to ensure that generated Hazardous Waste will be disposed properly only through online manifest system for disposal of Hazardous Waste through authorized vehicle as per condition of Consolidated Consent and Authorization

**Order**

Under the above circumstances, I, **D. M. Thaker, Member Secretary**, Gujarat Pollution Control Board, in exercise of the power conferred under file no. Legal-G-28, for under

Page 1 of 2

Section-5 of Environment (Protection) Act-1986 is directed to extend the Revocation order issued vide order no. GPCB/CCA-SRG-453(2)/ID 43373/660905 dated 30/04/2022 for **Six Months** with following conditions;

1. Industry shall comply with the CCA conditions.

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

*Sd/-*  
**(D. M. Thaker)**

**Member Secretary**

**NO: GPCB/CCA-SRG-453(3)/ID 43373/**

**Date**

**To:-**

**M/s. Aarti Drugs Ltd,  
Plot No 211, 213, Road No. 2,  
GIDC Sarigam,  
Tal: Umbergaon, Dist: Valsad-396 155.**

**COPY TO: -**

1. **The Deputy Engineer, (O & M),  
Dakshin Gujarat Vij Company Ltd  
GIDC Sarigam,**

**Dist : Valsad.....**With a request connect the supply of electricity for **Six Months** from the date of issue of this order of M/s. Aarti Drugs Ltd, Plot No 211, 213, Road No. 2, GIDC Sarigam, Tal: Umbergaon Dist: Valsad-396 155 & intimate to us accordingly.

2. **The Deputy Engineer  
Gujarat Industrial Development Corporation  
Sarigam,**

**Dist : Valsad.....**With a request connect the water supply for **Six Months** from the date of issue of this order of M/s. Aarti Drugs Ltd, Plot No 211, 213, Road No. 2, GIDC Sarigam, Tal: Umbergaon Dist: Valsad-396 155 & intimate to us accordingly

3. **The Regional Officer,  
Regional officer, Sarigam.....**To compliance monitoring & submit IR.

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

*D. M. Thaker*  
*20/9/22*

**(D. M. Thaker)**

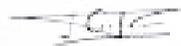
**Member Secretary**

**201**

1.	Complaint Received from	Written complaint of Mr. Mohshin J. Sahikh (M.No.9662224888), office at Flat no.301-A, Sai Complex, Near Bhandari Samaj Hall, Bhilad West, Bhilad, Tal Umbergaon, dist- Valsad, Gujarat
2.	Complaint Received against	M/s. Aarti Drugs Ltd. (ID-43373), PLOT NO. 211, 213, GIDC Estate, Sarigam
3.	Complaint Received Date	13/10/2022.
4.	Date of Inspection & time	06/12/2022 at 13:55 Hrs on wards.
5.	Person Contacted during Investigation	Mr. Sachin Tambe - Unit Head
6.	Grievances with respect to the pollution issues	---
6(i)	Water Pollution	---
7.	Verification during inspection	
7(i)	Land Pollution	<p>Written complaint of Mr. Mohshin J. Sahikh, Bhilad received to this office on dated 13/10/2022, regarding hazardous waste disposal and dumping within factory premises. On that basis inspection is carried out of the unit. Unit is engaged in manufacturing of Metforming HCL. During visit unit is found in operation and production of Metforming HCL is going on. During inspection it is observed that maximum carpet area of premises is covered with RCC flooring and Office building, production plant building, warehouse, raw/finish goods building, utility, ETP, Haz waste storage area etc., so no any decision can be taken regarding deep burial of chemical waste within premises as mentioned in complaint. So in this regard and during on observation of the unit, it is instructed that:</p> <ol style="list-style-type: none"> <li>1. Unit has been instructed to carry out monitoring of geological survey at different places within premises by reputed institute i.e. NEERI,NPC,IIT, Scheduled 1 Auditors, etc. and submit the report to this office as earliest. In this regards also instruction was also given on dated 12/08/2022 to submit the report of reputed institute.</li> <li>2. During inspection VOC felt from Oil &amp; Grease removal tank of ETP, hence instructed to take precautionary measure to avoid VOC.</li> <li>3. During inspection sludge drying beds are observed full with semi sludge covered with shed and looking to the condition of SDB, it has not adequate for sludge drying hence instructed to provided sludge decanter instead of SDB for the removing of sludge</li> <li>4. During inspection generated steam with VOC from psychometric evaporator goes directly into atmosphere is observe, hence instructed to provide latest system i.e. MEE/MVR instead of psychometric evaporator to avoid VOC.</li> <li>5. During inspection @ 35 to 40 MT Carbon waste is found store within storage area and in open near storage area, hence instructed to sent on priority basis at Common disposal site.</li> </ol> <p>Unit has provided ETP for treatment of generated wastewater and treated waste water from treated wastewater holding tank is evaporated in psychometric Evaporator. Flow meter provided at inlet &amp; final outlet of ETP &amp; reading recorded as 2282.5 KL &amp; 3407 KL respectively. During inspection ETP &amp; Evaporator is found in operation. Two waste water</p>

		sample is collected as mention in sample details column in IR. Mother liquor generated from process is reused in mfg. process. Unit has two numbers of briquette fired steam boiler (cap. 6 TPH) attached with common stack and provided separate dust collector followed by bag filter as APCM. During visit one steam boiler is found in operation and other as standby. Unit has provided diesel based D.G set (500 KVA), as standby facility. Approx. 35 to 40 MT spent carbon and approx. 30 KL process residue waste is found stored in storage area.
8.	Collection of Samples	(02) 1. from reuse tank (evaporator condensate) . 2. sample collected from collection tank of etp.
9.	Grievances other than pollution issues	--
10.	Conclusion	During inspection it is observed that maximum carpet area of premises is covered with RCC flooring and Office building, production plant building, warehouse, raw/finish goods building, utility, ETP, Haz waste storage area etc., so no any decision can be taken regarding deep burial of chemical waste within premises as mentioned in complaint. Unit has been instructed to carry out monitoring of geological survey at different places within premises by reputed institute i.e. NEERI,NPC,IIT, Scheduled 1 Auditors, etc. and submit the report to this office as earliest. In this regards also instruction was also given on dated12/08/2022 to submit the report of reputed institute.
11.	Remarks	-

Inspection By:



**J.C.Rana**  
(AEE)



**R.K.Mehta**  
(SO)

203

**CONFIDENTIAL****By RPAD**

**Complainant:** Mohsin J. Shaikh  
 Office at: Flat No. 301 - A, Sai Complex,  
 Near Bhandari Samaj Hall, Bhilad West,  
 Bhilad, Taluka Umbergaon,  
 District Valsad, Gujarat - 396 105  
 Mobile No.: +91-96622 24888  
 Date:- 6<sup>th</sup> October 2022

To,

The Regional Officer  
 Gujarat Pollution Control Board  
 Plot No. 2114/2, GIDC Sarigam,  
 Tal - Umbergaon, Dist - Valsad,  
 Gujarat - 396155.

**Subject: Complaint regarding illegal hazardous waste disposal and dumping within factory premises by a RED category LARGE scale Polluting unit in GIDC SARIGAM.**

**Reference: 1, PCB ID 43373 - M/s. Aarti Drugs Limited.  
 2, PCB ID 22982 - M/s. Aarti Drugs Limited.  
 3, PCB ID 23925 - M/s. Aarti Drugs Limited.**

The complainant is a public welfare spirited citizen and complains as follows:

- A. That every individual from the moment of birth, inherits certain rights. One such right, which is as old as man himself, is right to live in a clean environment. All human being have a right to a healthy, pollution-free environment in order to enjoy their very existence on earth. The Constitution, under art 51(1)(g), also imposes a duty on the individual to protect and improve the natural environment and to have compassion for living.
- B. That anti-pollution laws have been passed by the parliament in order to provide for a clean and healthy environment regime seeking to curtail environmental pollution through certain

15/10

<b>INWARD</b>	
No.	14475
Date	13/10/2022
G. P. C. BOARD, SARIGAM	

CONFIDENTIAL

preventive and punitive measures. For its effective implementation, these Acts impose statutory obligation on state authorities, like the Central Pollution Control Board and State Pollution Control Boards, to take effective steps for proper preservation of natural resources and abatement of pollution.

- C. That Sarigam Estate of Gujarat Industrial Development Corporation and nearby areas will soon be identified as Critically Polluted Spots and there would be stringent living conditions pertaining to high pollution level and damaged Eco-system caused by the Polluting units. Certain Chemical companies have been illegally / willfully disposing off the hazardous wastes at various isolated spots at remote locations or then illegally dumping the hazardous wastes within its premises.
- D. That M/s. Aarti Drugs Limited – PCB ID 43373 – PCB ID 22892 – PCB ID 23925 an Active Pharmaceutical Ingredient (API), Bulk Drugs manufacturing unit situated in GIDC Sarigam, Taluka Umbergaon, District Valsad, is in continuous default and recently during multiple incidents the polluting units were caught red handed violating conditions of CC&A and causing substantial environmental damage / causing serious threat to the environment. Whereas the polluting unit had received certain closure directions under section 5 of the Environment (Protection) Act, 1986. However the irony of the situation is that The GPCB thought it fit to revoke the closure order within a short time and once again the polluting unit was caught red handed and closure directions under section 5 of the Environment (Protection) Act, 1986. However again the GPCB thought it fit to revoke the closure order within a short time. To my understanding it seems that GPCB is hand in glove with the polluting unit.
- E. Whereas be informed that the polluting unit has dug up a very huge pits within all its plant premises situated at (1) Plot no. 211, 213, Road no. 2, GIDC Sarigam (2) Plot no. 2509, 2902, 2904, 2601, 2602, 2603, 2604 and 2605, GIDC Sarigam (3) Plot no. 2520, 2522 and 3325, GIDC Sarigam, and buried its various

hazardous wastes in huge quantities. Certain pictures of the said activity are annexed with this complaint.

- F. Whereas it is the responsibility of the GPCB to ensure that polluting units follow the regulations. The important enforcement powers vesting in GPCB are laying down standards and securing their compliance, inspection, and monitoring of all sources of pollution, issuance of notice with time limit to comply with the legal requirements, closure of the defaulter unit in grave cases and prosecution in cases of serious violation.

Further, Industrial corporate houses generally exploit the environment by producing quantities higher than their CC&A and dispose off the hazardous wastes illegally. If dehumanized industrialisation, with all profit-hungry vulgarity and its ecological insensitivity, invades Nature without enlightened resistance from society and persons or depletes all the resources of land, water, air, the crucifixion of humanity is a certainty and the resurrection of the race, a lost possibility, unless we begin the battle for human values against barbarity incorporated, right now and therefore I recommend that criminal liability be imposed on the decision makers / beneficiary / directors for intentionally doing act which are prohibited and causing significant Environmental Damage.

UNDER THE FACTS AND CIRCUMSTANCES AS ABOVE-MENTIONED, I call upon you to kindly verify the facts of the complaint and issue closure orders within a PERIOD OF 7 DAYS failing which the complainant would be constrained to escalate the matter to higher authorities:-

- I. Further inspect the Goods and Service Tax data to arrive at the actual quantity manufactured.
- II. Further inspect the MEE (inlet and outlet readings) and Production Register.
- III. Logbook of CETP (inlet and outlet readings).
- IV. Waste generation records and its disposal.
- V. Further inspect the Raw Material Purchase Registers.
- VI. Further inspect the CCTV camera footage at their entry and exit gates.

- VII. On finding above-mentioned true, instruct the Police Department to register an FIR.
- VIII. On finding the above-mentioned illegal activities to be true at site, issue permanent closure order along with criminal prosecution of the Directors and Managers involved in this cartel and set an example for other such polluting units.

**Yours Faithfully**

  
**Mohsin J Shaikh**

**+91-96622 24888**

**ENCLOSURE:**

- 1) Photographs.





ANALYSIS REPORT FOR  
WATER / WASTE WATER SAMPLE **208**

Gujarat Pollution Control Board  
Vapi  
C5/124, GIDC Vapi,  
Near Hotel Pritam,  
Vapi - 396 195  
Tele:(0260) 2432089



Sample ID:366088 - Analysis Completion:22/12/2022

Pharmaceuticals / LAB Inward : 60044

TC10419

Accreditation Standards & NABL Certificate Details : TC10419 / -- / Issue: 17/03/2022 / Validity: 16/03/2024

TEST REPORT

Test Report No. : 60044

Date: 22/12/2022

1. Name of the Customer : Aarti Drugs Ltd. - 43373
2. Address : Plot No. 211, 213, Road no. 2, GIDC Sarigam,  
Sarigam-396155, Taluka : Umbergaon, District : Valsad-Sarigam, GIDC :
3. Nature of Sample : REP-Representative/Grab, (Insp Type : REV-On/For Revocation)
4. Sample Collected By : R.K. Maheta, SO
5. Quantity of Sample Received : 5 lit
6. Code No. of the Sample : 366088
7. Date & Time of Collection & Inwarding : 06/12/2022 , (1410 to 1410) & 07/12/2022
8. Date of Start & Completion of Analysis : 07/12/2022 & 22/12/2022
9. Sampling Point : Sample collected from collection tank of ETP ~ ---
10. Flow Details (Remarks) : ---
11. Mode of Disposal : For further treatment into ETP and Evaporator
12. Ultimate Receiving Body : Zero liquid Discharge unit
13. Temperature on Collection : 28 & pH Range on pH Strip : @ 7 - 8 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance : Brown
15. Water Consumption & W.W.G (KLPD) : Ind :242.000 , Dom :3.000 & Ind :39.000 , Dom :2.500
16. Parameter : 11 , Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2017	1 – 14 pH value As or	7.77
2	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 – 200000 mg/L	4400
3	Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 – 10000 mg/L	302
4	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	3.36
5	Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard M	1 - 50000 mg/l	1550
6	Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	592
7	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-2	5.0- 50000 mg/l	14566
8	B.O.D (3 Days 27oC)	mg/l	3 – Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05–50000 mg/l	3425.0

Laboratory Remarks : Freeze By:279-R.O\_279 Dt.: 22/12/2022

*Singh*

R. N. Patel, SSO

Note :

1. The results refer only to the tested samples and applicable parameters. Endorsement of products is neither inferred nor implied.
2. Samples will be destroyed after 10 days from the date of issue of test report unless otherwise specified.
3. This report is not to be reproduced wholly or in part or used in any advertising media without the permission of the Board in writing.
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
7. Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
8. Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



Sample ID:366088 - Analysis Completion:22/12/2022

Pharmaceuticals / LAB Inward : 60044

TEST REPORT

Test Report No. : 60044

Date: 22/12/2022

1. Name of the Customer : Aarti Drugs Ltd. - 43373  
2. Address : Plot No. 211, 213,Road no. 2, GIDC Sarigam,  
Sarigam-396155, Taluka : Umbergaon, District : Valsad-Sarigam, GIDC :  
3. Nature of Sample : REP-Representative/Grab, (Insp Type : REV-On/For Revocation)  
4. Sample Collected By : R.K. Maheta,SO  
5. Quantity of Sample Received : 5 lit  
6. Code No. of the Sample : 366088  
7. Date & Time of Collection & Inwarding : 06/12/2022 , (1410 to 1410) & 07/12/2022  
8. Date of Start & Completion of Analysis : 07/12/2022 & 22/12/2022  
9. Sampling Point : Sample collected from collection tank of ETP ~ ---  
10. Flow Details (Remarks) : ---  
11. Mode of Disposal : For further treatment into ETP and Evaporator  
12. Ultimate Receiving Body : Zero liquid Discharge unit  
13. Temperature on Collection : 28 & pH Range on pH Strip :@ 7 - 8 on pH strip  
14. Carboys Nos for : Barcode & Color & Appearance :Brown  
: Ind :242.000 , Dom :3.000 & Ind :39.000 , Dom :2.500  
15. Water Consumption & W.W.G (KLPD) : 11 ,Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	Temperature	Centigrade	IS: 3025 (Part – 9) – 1984(Reaffirmed 2006)	Ambient oC - 60 oC	28
2	Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 23rd edi. 2017	2 - to 99 Hazen & 1-50	300
3	Oil & Grease	mg/l	Liquid – Liquid Partition Gravimetric method. (5520 B	01 – 1000 mg/l	28.4

**Laboratory Remarks** : Freeze By:279-R.O\_279 Dt.: 22/12/2022

R. N. Patel, SSO

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6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
7. Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
8. Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



ANALYSIS REPORT FOR  
WATER / WASTE WATER SAMPLE **210**

Gujarat Pollution Control Board  
Vapi  
C5/124, GIDC Vapi,  
Near Hotel Pritam,  
Vapi - 396 195  
Tele:(0260) 2432089



Sample ID:366087 - Analysis Completion:21/12/2022

Pharmaceuticals / LAB Inward : 60043

TC10419

Accreditation Standards & NABL Certificate Details : TC10419 / -- / Issue: 17/03/2022 / Validity: 16/03/2024

TEST REPORT

Test Report No. : 60043

Date: 21/12/2022

1. Name of the Customer : Aarti Drugs Ltd. - 43373
2. Address : Plot No. 211, 213, Road no. 2, GIDC Sarigam,  
Sarigam-396155, Taluka : Umbergaon, District : Valsad-Sarigam, GIDC :
3. Nature of Sample : REP-Representative/Grab, (Insp Type : REV-On/For Revocation)
4. Sample Collected By : R.K. Maheta, SO
5. Quantity of Sample Received : 5 lit
6. Code No. of the Sample : 366087
7. Date & Time of Collection & Inwarding : 06/12/2022 , (1405 to 1405) & 07/12/2022
8. Date of Start & Completion of Analysis : 07/12/2022 & 21/12/2022
9. Sampling Point : From reuse tank (evaporator condensate) ~
10. Flow Details (Remarks) : ----
11. Mode of Disposal : Reuse/Recycling
12. Ultimate Receiving Body : Zero liquid Discharge unit
13. Temperature on Collection : 70 & pH Range on pH Strip : @ 7 - 8 on pH strip
14. Carboys Nos for : Barcode & Color & Appearance : Colourless
15. Water Consumption & W.W.G (KLPD) : Ind :242.000 , Dom :3.000 & Ind :39.000 , Dom :2.500
16. Parameter : 11 , Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	pH	pH Units	4500 H+ B APHA Standard Methods 23rd edi.2017	1 – 14 pH value As or	7.99
2	Total Dissolved Solids	mg/l	Gravimetric method. (2540 C APHA Standard Method	10 – 200000 mg/L	204
3	Suspended Solids	mg/l	Gravimetric method. (2540 D APHA Standard Method	2 – 10000 mg/L	8
4	Ammonical Nitrogen	mg/l	1).Titrimetric method (4500 NH3 B & C APHA Stand	1 - 2000 mg/l.	5.04
5	Chloride	mg/l	Argentometric method. (4500 Cl? B APHA Standard M	1 - 50000 mg/l	66
6	Sulphate	mg/l	APHA(23rd edi) 4500 SO4 E	2-40mg/l	6
7	Chemical Oxygen Demand	mg/l	APHA (23rd Edition)- 5220 B Open Reflux Method-20	5.0- 50000 mg/l	45
8	B.O.D (3 Days 27oC)	mg/l	3 – Day BOD test. (IS 3025 (Part 44) 1993 Reaffirme	05–50000 mg/l	7.0

Laboratory Remarks : freeze By:279-R.O\_279 Dt.: 21/12/2022

*Singh*

R. N. Patel, SSO

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6. Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
7. Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
8. Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.



Sample ID:366087 - Analysis Completion:21/12/2022

Pharmaceuticals / LAB Inward : 60043

**TEST REPORT**

Test Report No. : 60043

Date: 21/12/2022

1. Name of the Customer : Aarti Drugs Ltd. - 43373  
 2. Address : Plot No. 211, 213,Road no. 2, GIDC Sarigam,  
 Sarigam-396155, Taluka : Umbergaon, District : Valsad-Sarigam, GIDC :  
 3. Nature of Sample : REP-Representative/Grab, (Insp Type : REV-On/For Revocation)  
 4. Sample Collected By : R.K. Maheta,SO  
 5. Quantity of Sample Received : 5 lit  
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 7. Date & Time of Collection & Inwarding : 06/12/2022 , (1405 to 1405) & 07/12/2022  
 8. Date of Start & Completion of Analysis : 07/12/2022 & 21/12/2022  
 9. Sampling Point : From reuse tank (evaporator condensate) ~  
 10. Flow Details (Remarks) : ----  
 11. Mode of Disposal : Reuse/Recycling  
 12. Ultimate Receiving Body : Zero liquid Discharge unit  
 13. Temperature on Collection : 70 & pH Range on pH Strip :@ 7 - 8 on pH strip  
 14. Carboys Nos for : Barcode & Color & Appearance :Colourless  
 : Ind :242.000 , Dom :3.000 & Ind :39.000 , Dom :2.500  
 15. Water Consumption & W.W.G (KLPD) : 11 ,Cap No & Weight :

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	Temperature	Centigrade	IS: 3025 (Part – 9) – 1984(Reaffirmed 2006)	Ambient oC - 60 oC	70
2	Colour	Pt.Co.Sc.	2120 B APHA Standard Methods 23rd edi. 2017	2 - to 99 Hazen & 1-50	2.5
3	Oil & Grease	mg/l	Liquid – Liquid Partition Gravimetric method. (5520 B	01 – 1000 mg/l	BDL

**Laboratory Remarks** : freeze By:279-R.O\_279 Dt.: 21/12/2022

**R. N. Patel, SSO**

**Note :**

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- Permissible Limits: as per Schedule VI of EPA Rules, 1986 as ammended by Second and Third ammendment 1993 for Effluents
- Physicochemical and microbiological parameters, Std.Methods for Water and Waste Water- 23nd Edition by APHA.
- Bioassay test (for toxicity) -IS:6582:Part-2:2001; Reaffirmed 2007.

# **GEOLOGICAL SURVEY REPORT**

of

**M/s. AARTI DRUGS LTD. (UNIT 2)**

Plot No. 211, 213, GIDC, Sarigam

Ta. Umbergaon, Dist. Valsad-396155

Prepared By



**Dr. Jivraj Mehta Institute of Technology,  
Environmental Testing & Research Laboratory,  
National Highway No. 8, Near Sankara Eye Hospital, Mogar,  
Anand, Gujarat - 388340.**



Dr. Jivraj Mehta Institute of Technology  
(An Institute approved by AICTE, New Delhi & Affiliated to  
Gujarat Technological University, Ahmedabad)  
Managed by: Charuttar Education & Navrachana Trust

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## PREFACE

Dr. Jivraj Mehta Institute of Technology has been recognized by Gujarat Pollution Control Board (GPCB), Gandhinagar as Schedule-I Environment Auditor vide its Letter No: GPCB/EA-392/588766 dated 23 April 2021 and re-recognized vide Letter No: GPCB/EA-392/701834 dated 24 January 2023 as produced on the next page.

As per the comments given by GPCB Sarigam regional office dt. 27/12/2022, the geological survey report is prepared and presented herewith after scrutiny and analysis.



**Dr. Jivraj Mehta Institute of Technology**  
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 Gujarat Technological University, Ahmedabad)  
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**GUJARAT POLLUTION CONTROL BOARD**

Paryavaran Bhavan

Sector - 10 A, Gandhinagar - 382 015

Environmental Audit Cell

R.P.A.D.

No. GPCB/EA-392 / 558-266

23 APR 2021

To,  
 Dr. Jivraj Mehta Institute of Technology  
 Nr. Sanhara Eye Hospital, N.H.No. 4,  
 Ramnagar Road, Village Mogar,  
 Anand - 388340

Subj: Recognition as Schedule-I Environmental Auditor.

Sir,

This refers to your application for recognition as Schedule-I Environmental Auditor, subsequent interview and visit of your Laboratory by Environment Audit Committee members. It is recommended by the Environment Audit Committee members, to recognize your firm as Schedule-I Environmental Auditor for carrying out the Environmental Audit under Environment Audit Scheme with following conditions:

- 1) Recognition is valid upto 31/12/2022.
- 2) You shall have maximum 02 teams for the Environment Audit.
- 3) You shall carry out maximum 12 nos. of Environment Audit in a year.
- 4) Team members shall be as under:

Sr. No.	Name	Designation
1	Dr. Devang Shah	Environment Engineer
2	Mr. Rajeshsingh Sengar	Chemical Engineer
3	Ms. Mansi Patel	Chemist
4	Ms. Darshna Suthar	Microbiologist

- 5) You shall prepare and submit the Environment Audit report and to comply the conditions for Environment Auditors as per the Hon'ble High Court order dated 20/12/1996, 13/03/1997, 16/09/1999, and also the Guidelines prepared by Gujarat Pollution Control Board in this regard, for the Environment Audit Scheme along with the Adequacy and Efficacy certificates as per prescribed format.
- 6) Environment Audit reports shall be submitted in prescribed format.
- 7) You shall apply for renewal of recognition as Environmental Auditor 3 months before expiry of the recognition with the statutory fees to this Board.

Clean Gujarat Green Gujarat

AS ISO 9001: 2008 & ISO 14001: 2004 Certified Organization



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**GUJARAT POLLUTION CONTROL BOARD**  
 Paryavaran Bhavan  
 Sector - 10 A, Gandhinagar - 382 010  
 Environment Audit Cell

No. GPCB/EA/392/2015

Date: 24-11-2015

To,  
 Dr. Jivraj Mehta Institute of Technology  
 Nr. Sankha Bye Hospital, N.B. No. 2,  
 Kinningar Road, Village, Moga,  
 Dist. Anand-388340

Sub: Renewal of Recognition as Scheduled Environmental Auditor

Sir,

This refers to your application for renewal of the recognition as Scheduled Environmental Auditor and subsequent interview by Environment Audit Committee members. It is recommended by the Environment Audit Committee members, to renew the recognition of your firm as Scheduled Environmental Auditor for carrying out the Environmental Audit under Environment Act, 1986.

- 1) Recognition is valid till 31/12/2017.
- 2) You shall have maximum 03 members in your team.
- 3) You shall carry out the audits as per Environment Act, 1986.
- 4) Team members shall be as follows:

Sr. No.	Name	Designation
1	Dr. Deepak Shah	Environmental Engineer
2	Mr. Rajendra Shah	Chemical Engineer
3	Mr. Manoj Shah	Chemist
4	Ms. Darshini Shah	Microbiologist

- 5) You shall prepare and submit the Environment Audit report and to comply the conditions for Environment Auditors as per the Hon'ble High Court order dated 20/12/1996, 13/03/1997, 16/09/1999, and also the Guidelines prepared by Gujarat Pollution Control Board in this regard. The Environment Audit Scheme along with the Adequacy and Efficacy certificate as per prescribed format.
- 6) Environment Audit Report shall be submitted in prescribed format.

Clean Gujarat Green Gujarat P.T.O  
 An ISO 9001: 2008 & ISO 14001: 2004 Certified Organisation



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## **EXECUTIVE SUMMARY**

After visiting the location and thoroughly studying the parameters it was observed that the site is having soil strata as well as boulders and soft rock at higher depths. After conducting testing, it was found that contaminating parameters are well below the screening and response levels and hence exposure of the land to contaminants is not severe enough to bring the levels of the contaminants beyond threshold limits except for Nickel. The samples were collected from the site and proper analysis was carried out the results were compared with the Soil Quality Guidelines for the Protection of Environmental and Human Health as given in Volume II-2.1-b-Screening and Response levels of a Guidance document for assessment and remediation of contaminated sites in India available on CPCB website. All the contaminants' levels were found well below the threshold limits except for Nickel, hence Soluble Threshold Limit Concentration (STLC) and Waste Extraction Test (WET) Procedure given in Appendix II of section 66261 of Title 22 of California Code regulation (CCR) as mentioned in Hazardous Waste Management Rules 2016 was carried out for Nickel and the results were found well below the limits. So, no remediation of soil is required and seemingly no environmental damage is observed.



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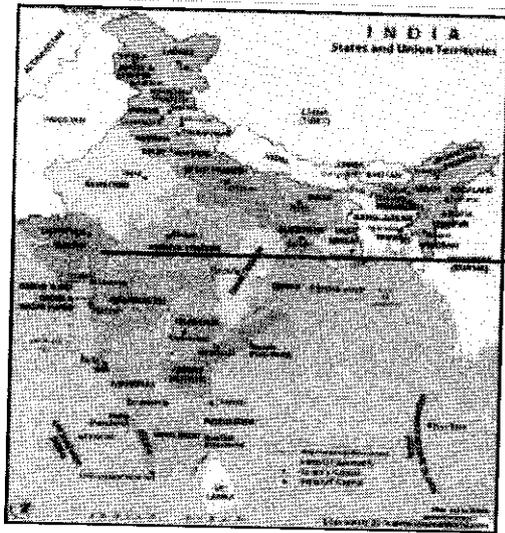
### 1. BACKGROUND

**Objective:**

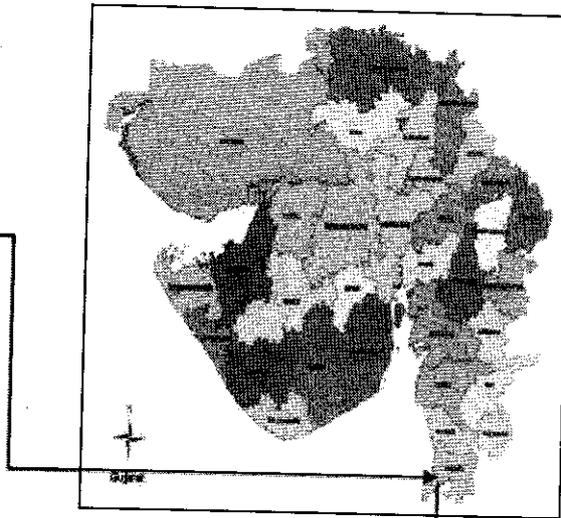
During a site visit on 06/12/2022 by officers from the regional office, of Gujarat Pollution Control Board, Sarigam the comment was given in writing to carry out a geological survey of the location. Henceforth the site investigation was carried out and the results are produced for scrutiny.

Dr. Jivraj Mehta Institute of Technology (DJMIT) was approached by M/s Aarti Drugs Ltd. Unit-II in this regard and consultancy is provided by DJMIT for the preparation of this report.

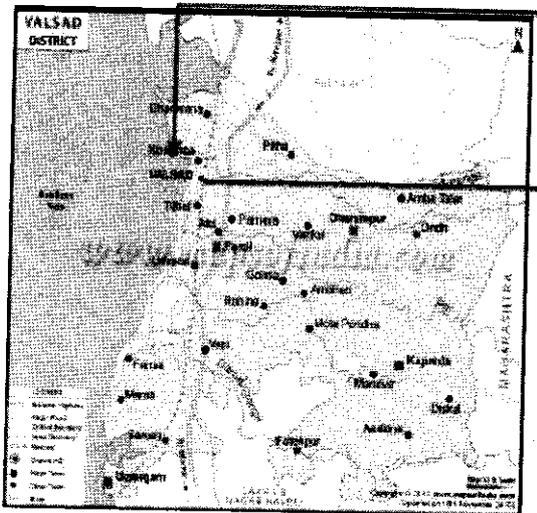
Location: M/s Aarti Drugs Ltd. is situated in Sarigam GIDC which is located in Umbergaon Taluka of Valsad District.



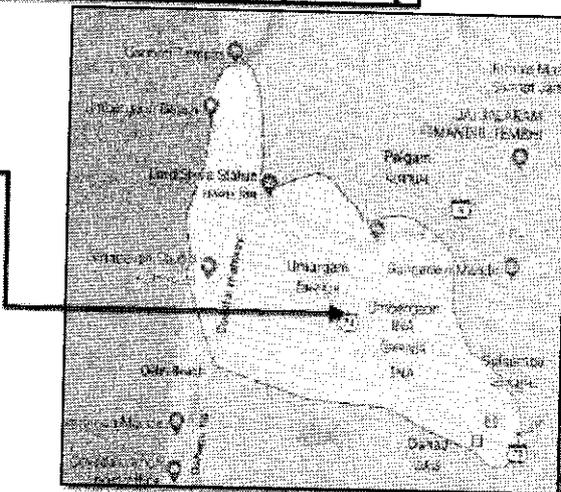
**India Map**



**Gujarat Map**

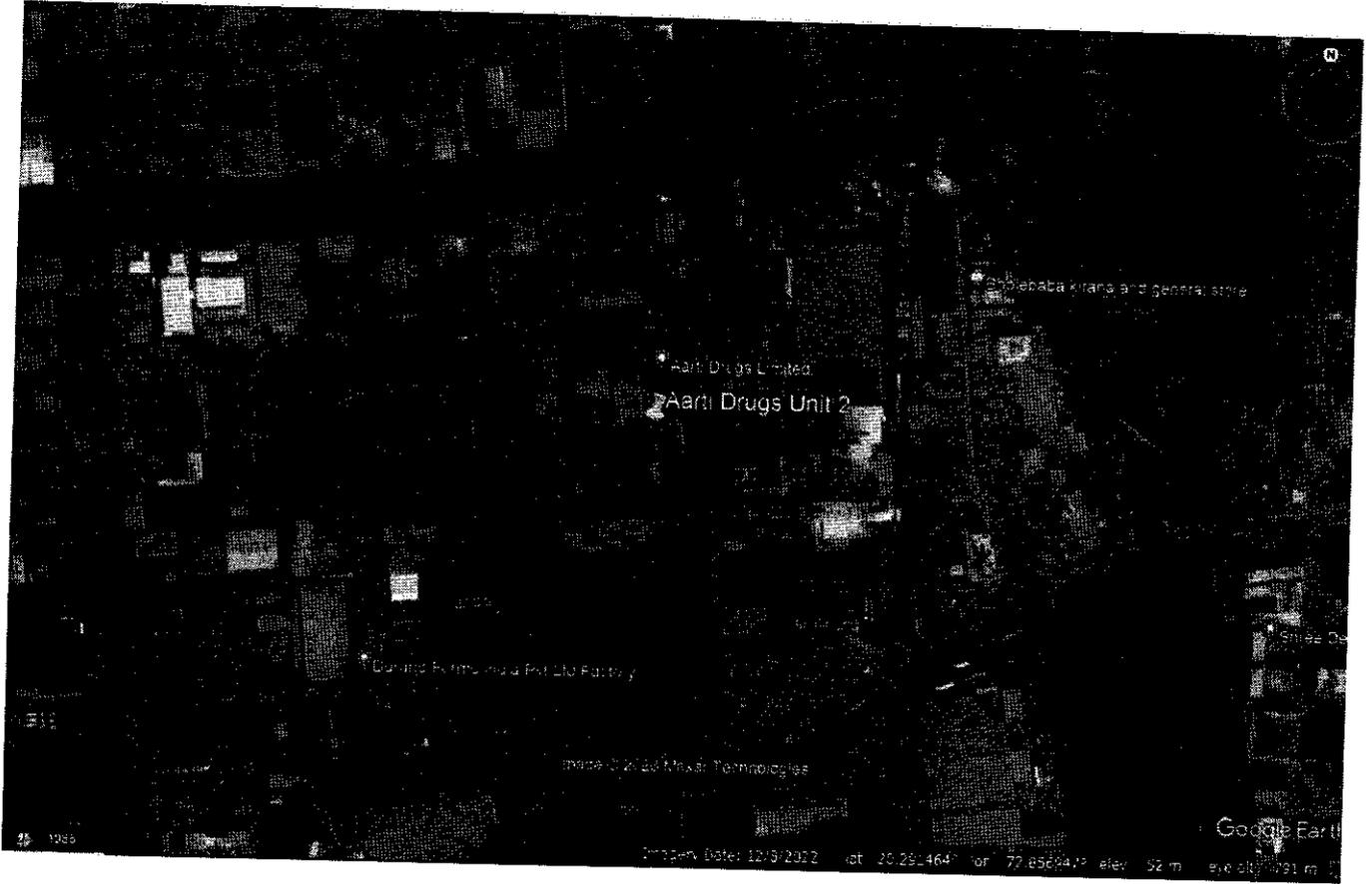


**Valsad District**



**Umbergaon Taluka**

21/✓



The locations of the boreholes were selected in the Aarti Drugs Ltd.- Unit II. The collected samples were brought to the laboratory and geological and environmental testing were carried out.



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## 2. METHODOLOGY

A complete geotechnical investigation work was undertaken to obtain the required subsurface information to study the nature and behavior of soil, under the application of loads of the proposed structure. Such information was obtained through the following steps:

By making boreholes and collecting disturbed and undisturbed soil samples. Performing required in situ tests (SPT Test).

Conducting laboratory tests to classify it and to determine the engineering properties of soil.

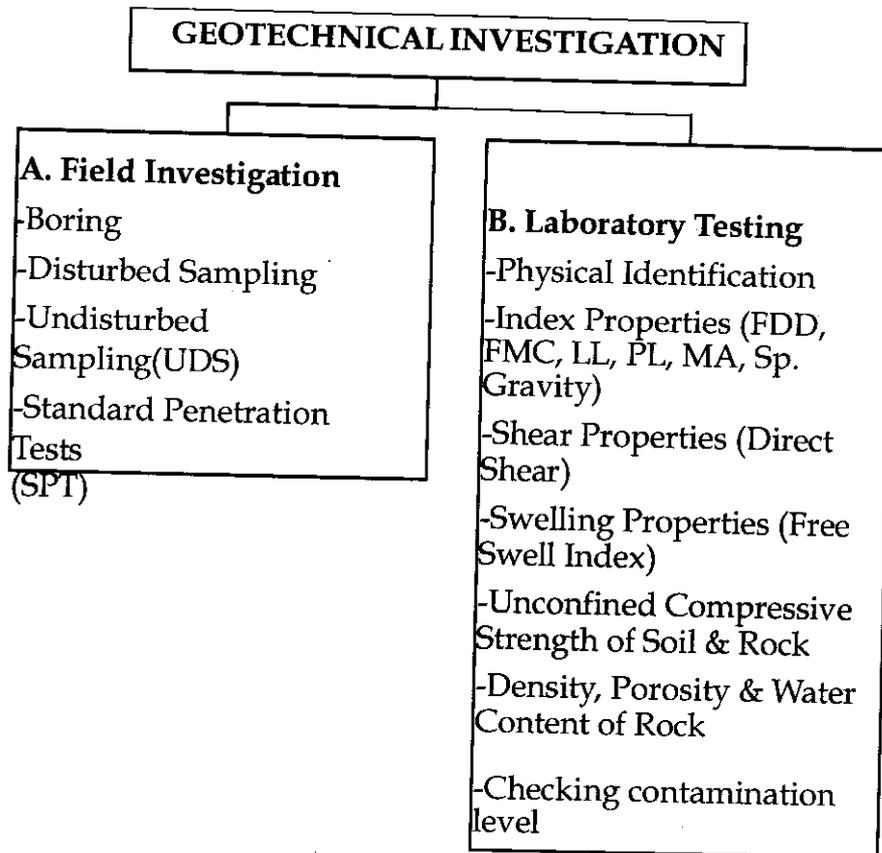
Based on the soil properties, conclusions are made regarding the precautions and protective measures to be taken, if found necessary.

This report has been prepared after a careful study of the field testing and laboratory test results on the scope of work. The analysis and report have been prepared as per our best experience, knowledge, and information provided by the Client. The report shall not be produced, in full or any part of it, for any legal matter without the permission of the laboratory.



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- 2.1 **OBJECTIVE:** -The objective of the geotechnical investigation was to explore the subsoil profile up to a predetermined depth. The same has been achieved by performing various necessary field and laboratory testing and determining the index properties of subsoil.
- 2.2 **SCOPE OF WORK:** - The detailed scope of work was as per the instruction of the Engineer in charge. However, the overall scope included in the current project has been illustrated in the following figure.



**Figure 1: Overall Scope of Work of Project**



- 2.3 **SITE CONDITION:** Site conditions were normal as far as climatic conditions are concerned.
- 2.4 **LOCATION:** - The Site is located at PLOT NO. 211, 213, GIDC, Sarigam..
- 2.5 **GROUND WATER TABLE:** - Groundwater observation details are shown in the table below, encountered during the soil exploration work carried out in the month of January-2022.

Borehole No.	Depth of Investigation	Water Table
BH-07	8	Observed at 3.1 m below EGL
BH-08	8	Observed at 3.8 m below EGL
BH-09	8	Observed at 3.5 m below EGL

- 2.6 **SUB SOIL PROFILE:** - Detail stratification is described in the bore log.
- 2.7 **FIELD INVESTIGATION:** -
- 2.8 **BORE HOLES:** -Three boreholes were conducted by Rotary Calyx Drilling of 8.0 m below EGL.

Boring was carried out in accordance with IS: 1892 and the undisturbed soil samples were collected in the thin-walled tube as per IS: 2132 - 1986 and were sealed packed and brought to our laboratory for further investigation.

- 2.9 **SAMPLING:** - During the advancement of the boring Disturbed and Undisturbed samples are collected at every 1.5 m interval or at the change of strata whichever occurs earlier. Along with the samplings, field Standard Penetration Tests are conducted to correlate the strata denseness & stiffness. Detailed procedures are explained in Annexure-I.

**TABLE 1: DEPOSITIONAL STATE OF SUBSOIL**

Sr. No	SPT N-Value	State of consolidation for	Consistency of Cohesive soils
1	< 10	Loose to Very Loose	Soft
2	10 to 30	Medium Dense	Stiff
3	30 to 50	Dense	Very Stiff
4	> 50	Very Dense	Hard



**2.10 LABORATORY TESTS:** -Following laboratory tests were carried out to determine the physical and engineering properties of undisturbed and disturbed soil samples. Detailed procedures are explained in Annexure-I.

- |  |                              |
|--|------------------------------|
| (A) Field Dry Density & Field Moisture Content | IS 2720 Part-2-1973 RA-2020  |
| (B) Atterberg's Limits                         | IS 2720 Part-5-1985 RA-2020  |
| (C) Particle size distribution                 | IS 2720 Part-4-1985 RA-2020  |
| (D) Specific Gravity                           | IS 2720 Part-3-1980 RA-2016  |
| (E) Shear Parameter                            | IS 2720 Part-13-1986 RA-2016 |
| (F) Free Swell Index                           | IS 2720 Part-40-1977 RA-2016 |
| (G) Density, Porosity and Water Absorption     | IS 13030-1991 RA-2021        |
| (H) Unconfined Compressive Strength            | IS 9143-1979 RA-2021         |



**GENERAL NOTE: -**

1. The report presented is representative of the bore locations and does not represent an entire area of construction as a whole.
2. **If in the course of excavation, if subsoil strata differ from the bore log strata the same shall be reported for necessary steps.**
3. The comments given in this report and the opinion expressed are based on the ground conditions encountered during the site work and based on the results of tests made in the field and the laboratory. There may, however, be special conditions prevailing at the site which have not been disclosed by the investigation and which have not been taken into account in the report. Any variation in stratification in any of the foundation locations shall be studied thoroughly before executing the foundation work.



### ANNEXURE I: TEST PROCEDURES

#### A. SAMPLING:

- a. **Disturbed soil samples (IS: 1892:1979, Reaffirmed: - 2016):** - Disturbed samples were collected during the boring and also from the split spoon sampler. The samples recovered were logged, labeled, placed in polythene bags, and sent to the laboratory for testing. The samples were collected at every 1.50 m depth.
- b. **Undisturbed soil samples (IS: 1892:1979, Reaffirmed: - 2016):** - Undisturbed soil samples were collected in 75 mm diameter Shelby tubes at every 1.50 m depth at the site location. The sampler used for the sampling had a smooth surface and appropriate area ratio and cutting-edge angle thereby minimizing the disturbance of the soil during sampling. The samples were sealed with wax, labeled, and transported to our laboratory for testing. Sampler was coupled together with a sampler head to form a sampling assembly. The sampler head provides a non-flexible connection between the sampling tube and the drill rods. Vent holes are provided in the sampler head to allow the escape of water from the top of sampler tube during penetration. Coating of oil is applied on both sides to obtain the undisturbed samples in the best possible manner. The sampler was then lowered inside the borehole on a string of drill rods and was driven to a pre-determined level. On completion of driving the sampler was first rotated within the borehole to shear the soil sample at the bottom and then pulled out. The disturbed material in the upper end of the tube, if any, is completely removed before applying wax for sealing. The soil at the lower end of the tube is trimmed to about 10 to 15 mm. After trimming, both ends are sealed with wax applied in such a way that will prevent the soil from giving up from its sample. The polythene bags cover both ends. The identification mark was then made on each sample.
- c. **Standard Penetration Tests (IS: 2131-1981, Reaffirmed:-2016):** - SPT is conducted in accordance with IS: 2131-1981, RA-2016 in bores holes at every change of strata or at an interval of 1.50 m depth in uniform strata. The test gives N-value for the blow counts of the last 30 cm of penetration of the split spoon sampler with 65 kg. Hammer falling freely from



75cm height. The rods to which the sampler is attached for driving are straight, tightly coupled, and straight in alignment. Thereafter the split spoon sampler is further driven by 30 cm. The number of blows required to drive each 15cm penetration is recorded. The first 15 cm penetration is termed as a seating value. The last 30cm penetration is termed an 'N' Value. Respective tables and bore logs in the report show the detail of the N value.

**B. LABORATORY TEST PROCEDURES:**

a. **Field Dry Density & Field Moisture Content (IS 2720 (P-2) 1973, Reaffirmed:-2020):** Field dry density and Field moisture content were carried out in accordance with IS 2720 (P-2) 1973, Reaffirmed:-2020. The field density is found by the following equation. The value of F.D.D. & F.M.C. is shown in the summary table.

$$\text{Field Density (bulk)} = \frac{\text{Weight of soil mass}}{\text{Volume of the soil mass}}$$

And Field Dry Density = Bulk Density/ (1 + w), Where w is field moisture content.

b. **Atterberg's Limit (IS 2720 (P-5) 1985, Reaffirmed:-2020):** Liquid limit and Plastic limits are carried out for the determination of different characteristics of the soil. The test was performed in accordance with IS 2720 (P-5) 1985, Reaffirmed:-2020 by using a cone penetrometer. The liquid limit and plastic limit of soils both depend upon the amount and type of clay in a soil and form the basis for the soil classification system for cohesive soils based on the Plasticity index. The liquid limit of the soil corresponds to the moisture content of a paste which would give 20mm penetration of the cone is determined by using the following formula.

$$WL = \frac{W_x}{(0.65 + 0.0175 \cdot X)}$$

Where, X = Penetration of cone in the sample

W<sub>x</sub> = Moisture Content of the soil sample at the respective penetration



For Plastic Limit, a soil sample weighing at least 20 gm of the soil sample passing 425 microns IS sieve is thoroughly mixed with water such that it can be easily molded with fingers. A ball is formed with about 8 to 10 gm of this soil and is rolled between the fingers and the glass plate with just sufficient pressure to roll the mass into a thread of uniform diameter of 3mm throughout its length. The soil is kneaded to a uniform mass and rolled again. The process is continued until the thread crumbles. The pieces of crumbled soil thread are collected for moisture content determination and reported as the plastic limit. Values of LL, PL & PI are shown in summary.

- c. **Particle Size Distribution (IS: 2720 (P-4) 1985, Reaffirmed:-2020):** -The sieve analysis is carried out in accordance with IS: 2720 P-4-1985, Reaffirmed:-2020. The results are shown in the summary.
- d. **Specific Gravity (IS: 2720 (P-3) (Sec-1) 1980, Reaffirmed:-2016):** - In order to determine the specific gravity of soil particles these tests were conducted on selected samples in 50 ml volumetric density bottle using the procedure described in IS: 2720 (P-3) (Sec-1)-1980, Reaffirmed:-2016. The value of Specific Gravity is shown in the summary.
- e. **Direct Shear Test - UU Test (IS: 2720 (P-13) 1986, Reaffirmed:-2016):** Direct shear test is carried out using the shear box with the specimens (60 mm x 60 mm). Specimen with plain grid plate at the bottom of the specimen and plain grid plate at the top of the specimen is fitted into position in the shear box housing and assembly placed on the load frame. The serrations of the grid plates are kept at the right angle to the direction of the shear. The loading pad is placed on the top grid plate. The required normal stress is applied and the rate of longitudinal displacement / shear stress application is so adjusted that no drainage can occur in the sample during the test (1.25 mm/min). The upper part of the shear box is raised such that a gap of about 1mm is left between the two parts of the box. The test is conducted by applying horizontal shear load to failure or to 20 percent longitudinal displacement whichever occurs first. The test is repeated on identical specimens. The shear parameters were obtained from the shear stress Vs normal stress plot. Direct Shear Test is conducted on remolded samples at FDD & FMC.



f. **Differential Free Swell test (IS: 2720 (P-40) 1977, Reaffirmed:-2016):** -In order to determine the swelling characteristics of the soil, a differential free swell test is carried out. An oven-dried soil sample, 10 gm passing through 425 microns is poured into two 100 ml graduated cylinders. One cylinder was filled with distilled water and in kerosene up to 100 ml mark. After the removal of entrapped air, the sample was allowed sufficient time to attain an equilibrium state of volume. The final

volume of soil in each cylinder was recorded.  $S_p$  = Free swell

$$S_p = \frac{\text{Soil volume in water} - \text{Soil volume in kerosene}}{\text{Soil volume in kerosene}}$$



**g. Density of Rock (IS: 13030 - 1991, Reaffirmed:-2021):**

1. A representative sample comprises at least 10 Lumps of regular or irregular geometry, each having either a mass of at least 50 g or a minimum dimension of at least 10 times the maximum grain size, whichever is the greater, is selected. The sample is washed in water to remove dust.
2. The sample is saturated by water immersion in a vacuum of less than 0.8 kPa for a period of at least  
01 hour, with periodic agitation to remove trapped air.
3. Determine the temperature,  $t$ , of the water in the immersion bath to the nearest degree centigrade.
4. Determine the mass,  $M_1$ , of the basket sub-merged in the immersion bath.
5. Transfer the sample underwater to the basket in the immersion bath. Determine the saturated-submerged mass,  $M_2$ , of the basket plus sample to an accuracy of 0.01 percent of the sample mass.
6. Determine the mass,  $M_3$ , of a clean, dry sample container and lid.
7. Remove the sample from the immersion bath and surface dry the sample with a moist cloth, care was taken to remove only surface water and to ensure that no rock fragments are lost. Transfer the sample to the sample container and replace the lid. Determine the mass,  $M_4$ , of the saturated surface dry sample plus container.
8. Remove the lid and place the container with contents and lid in the oven and dry at  $105 \pm 3^\circ$  C. The sample is deemed to be dry when the difference between successive determinations of mass of the cooled sample at an interval of 4 hours does not exceed 0.1 percent of the original mass of the sample.
9. Replace the lid, remove the container from the oven, and place the whole ion in the dedicator to cool for  
30 minutes.
10. Determine the dried mass,  $M_5$ , of the container with the oven-dry sample.

**h. Unconfined Compressive Strength (IS: 9143 - 1979 Reaffirmed:-2021): The Uniaxial**



Unconfined Compressive Strength test is primarily as index test for strength classification of Rock material. The test is conducted as:

The specimen shall be right circular cylinder fulfilling the following criteria:

1. The length-to-diameter ratio of the cylindrical specimen shall preferably be 2 to 3. If the ratio is less than 2, the usual correction shall be applied.
2. The diameter of the specimen shall be more than 10 times the largest mineral grain size in rock, preferably 45 mm, and in no case shall be less than 30 mm.
3. Specimen ends shall be flat to within 0.05 mm.
4. The ends shall be parallel to each other within  $0.002D$  where  $D$  is the specimen diameter.
5. The ends shall be perpendicular to the axis of the specimen within 0.001 radians or 0.05 mm in 45 mm diameter specimen.
6. The cylindrical surface shall be smooth.
7. The unconfined compressive strength of the specimen shall be calculated by dividing the maximum load carried by the specimen during the test, by the original cross-section area.



**9.0 SITE PHOTOGRAPHS :-**



**BH-07**



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Model: 2205200  
Elevation: 2205200  
Accuracy: 100 m  
Time: 03-01-2023 22:11  
Date: uapi bh8

**BH-08**



Latitude: 20.292258  
Longitude: 72.882675  
Elevation: 62.97442 m  
Accuracy: 14.5 m  
Time: 05/01/2023 14:42  
Note: BH-09

BH-09



**ANNEXURE II: FIELD BORE LOG SHEET**

<b>Bore Hole No. :</b>	BH-7	<b>Date Started:</b>	1/28/2023
<b>Client:</b>	M/S. Aarti Drugs Ltd.	<b>Date Completed:</b>	1/28/2023
<b>Site Location:</b>	At PLOT NO.211, 213, ROAD NO.2, GIDC, SARIGAM	<b>Diameter of Boring,mm:</b>	100.0
<b>Type of Boring:</b>	Rotary Calyx Drilling	<b>Depth of Boring, m:</b>	8.0
<b>Co-Ordinates:</b>	Lat:- 20.292111 Long:- 72.852811	<b>Level of Existing Ground, m</b>	—

Depth below G.L. in m	Thickness, m	Description of Strata	Legend	W.T	Sampling			Field SPT Value 'N'				SPT Curve			
					Type	Lab. No.	Depth m	A	B	C	N-Value B+C		N' Value		
<b>Existing Ground Level</b>															
0.0	0.4	Filled up Material			D	131-324-100	0.00	—	—	—	—	—			
0.5	3.1	Brownish Clay of Intermediate Plasticity	CI		D	131-324-101	1.50								
1.0					S		1.80	3	6	8	14	—			
1.5					U	131-324-102	3.00	—	—	—	—	—			
2.0	4.5	Weathered Rock	WR		Observed at 3.1 m below EGL										
2.5					C	131-324-103	4.50	—	—	—	—	—		10.00	—
3.0					C	131-324-104	6.00	—	—	—	—	—		12.67	—
3.5					C	131-324-105	7.50	—	—	—	—	—		16.33	—
4.0					C	131-324-106	8.00	—	—	—	—	—		28.00	10.50
4.5												CR %		RQD %	

**Borehole Terminated**

<b>Abbreviations:</b>							
D-Disturbed	U-Undisturbed	S-SPT	SPT-Standard Penetration Test	CR - Core Recovery			
WT : Water Table	N'-Corrected N Value (Applicable for Non-Plastic Sand)	C- Core	RQD - Rock Quality Designation				



**ANNEXURE II: FIELD BORE LOG SHEET**

<b>Bore Hole No. :</b>	BH-8	<b>Date Started:</b>	1/29/2023
<b>Client:</b>	M/S. Aarti Drugs Ltd.	<b>Date Completed:</b>	1/29/2023
<b>Site Location:</b>	At PLOT NO.211, 213, ROAD NO.2, GIDC, SARIGAM	<b>Diameter of Boring,mm:</b>	100.0
<b>Type of Boring:</b>	Rotary Calyx Drilling	<b>Depth of Boring, m:</b>	8.0
<b>Co-Ordinates:</b>	Lat:- 20.291873 Long:- 72.852193	<b>Level of Existing Ground, m</b>	-

Depth below G.L. in m	Thickness, m	Description of Strata	Legend	W.T	Sampling			Field SPT Value 'N'				SPT Curve	
					Type	Lab. No.	Depth m	A	B	C	N-Value B+C		N' Value
Existing Ground Level													
0.0	0.3	Filled up Material			D	131-324-200	0.00	-	-	-	-	-	
0.5		Brownish Clay of Intermediate Plasticity	CI		D	131-324-201	1.50						
1.0				S			1.80	5	8	11	19	-	
1.5				U	131-324-202	3.00	-	-	-	-	-	-	
2.0	3.7	Weathered Rock	WR	Observed at 3.8 m below EGL									
2.5				C	131-324-203	4.50	-	-	-	-	-	12.00	
3.0				C	131-324-204	6.00	-	-	-	-	-	14.33	-
3.5				C	131-324-205	7.50	-	-	-	-	-	18.66	-
4.0	4.0				C	131-324-206	8.00	-	-	-	-	24.23	10.20
4.5													
5.0													
5.5													
6.0													
6.5													
7.0													
7.5													
8.0													

Borehole Terminated

**Abbreviations:**

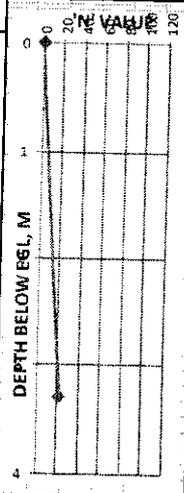
D-Disturbed	U-Undisturbed	S-SPT	SPT-Standard Penetration Test	CR - Core Recovery
WT : Water Table	N'-Corrected N Value (Applicable for Non-Plastic Sand)	C- Core	RQD - Rock Quality Designation	



**ANNEXURE II: FIELD BORE LOG SHEET**

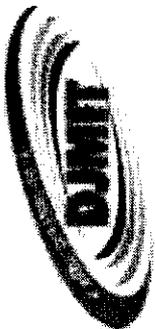
<b>Bore Hole No. :</b>	BH-9	<b>Date Started:</b>	1/30/2023
<b>Client:</b>	M/S. Aarti Drugs Ltd.	<b>Date Completed:</b>	1/30/2023
<b>Site Location:</b>	At PLOT NO.211, 213, ROAD NO.2, GIDC, SARIGAM	<b>Diameter of Boring,mm:</b>	100.0
<b>Type of Boring:</b>	Rotary Calyx Drilling	<b>Depth of Boring, m:</b>	8.0
<b>Co-Ordinates:</b>	Lat:- 20.292475 Long:- 72.852678	<b>Level of Existing Ground, m</b>	--

Depth below G.L. in m	Thickness, m	Description of Strata	Legend	W.T	Sampling			Field SPT Value 'N'				SPT Curve		
					Type	Lab. No.	Depth m	A	B	C	N-Value B+C		N' Value	
Existing Ground Level														
0.0														
0.5	1.0	Filled up Material			D	131-324-300	0.00	--	--	--	--			
1.0														
1.5		Brownish Clay of Intermediate Plasticity	C2	Not Observed	U	131-324-301	1.50	--	--	--	--			
2.0														
2.5	3.0													
3.0					D	131-324-302	3.00							
3.5					S		3.30	6	9	13	22	--		
4.0														
4.5	1.0	Highly Weathered Disintegrated Rock			D	131-324-303	4.50	--	--	--	--	--		
5.0														
5.5		Weathered Rock	C3	Not Observed										
6.0														
6.5	3.0							C	131-324-304	6.00	--	--	--	--
7.0														
7.5					C	131-324-305	7.50	--	--	--	--	--	19.50	--
8.0					C	131-324-306	8.00	--	--	--	--	--	28.43	22.60



**Borehole Terminated**

<b>Abbreviations:</b>			
D-Disturbed	U-Undisturbed	S-SPT	SPT-Standard Penetration Test
WT : Water Table	N'-Corrected N Value (Applicable for Non-Plastic Sand)	C- Core	CR - Core Recovery
			RQD - Rock Quality Designation



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**ANNEXU ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

TC - 7474 23 0 0000323

BH ID.	Lab. No.	Depth below EGL in m	Soil & Rock				Water Content in %	Grain Size Distribution			Atterberg's limit			IS Classification	Specific Gravity, G	Free Swell Index %	Porosity, %	UCS, Kg/cm <sup>2</sup>
			Density gm/cc	% G	M & C%	% S		LL, %	PL, %	PI, %	% 5	37	58					
BH-7 (At GIDC, Sarigam)	131-324-100	0.0	--	--	Filled up Material			--	--	--	--	--	--	--	--	--	--	--
	131-324-101	1.5	--	--	5	37	58	46.7	24.7	22.0	CI	2.594	45.5	--	--	--	--	
	131-324-102	3.0	--	--	13	31	56	42.5	21.9	20.6	CI	2.600	40	--	--	--	--	
	131-324-103	4.5	2.388	2.87	Weathered Rock						WR	--	--	13.1	--	--		
	131-324-104	6.0	2.398	2.81	Weathered Rock						WR	--	--	12.6	--	--		
	131-324-105	7.5	2.404	2.72	Weathered Rock						WR	--	--	12.1	--	--		
131-324-106	8.0	2.410	2.65	Weathered Rock						WR	--	--	11.6	--	220			

**Abbreviations**

- G-Gravel, S-Sand, M-Silt, C-Clay
- DST-Direct Shear Test
- UCS-Unconfined Compressive Strength
- LL - Liquid Limit
- c - Cohesion
- PL - Plastic Limit
- PI - Plasticity Index
- Angle of internal friction

JOB NO.:GES/DHD-230131-324/23/SR-01

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**ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

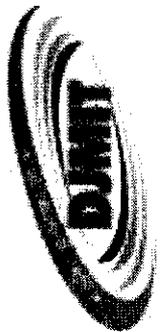
ULR No. TC - 7474 23 0 0000323

BH ID.	Lab. No.	Depth below EGL in m	Density gm/cc	Water Content in %	Grain Size Distribution			Atterberg's limit			IS Classification	Specific Gravity, G	Free Swell Index %	Porosity, %	UCS, Kg/cm <sup>2</sup>
					% G	% S	M & C%	LL, %	PL, %	PI, %					
BH-8 (At GDC, Sarigam)	131-324-200	0.0	--	--	Filled up Material										
	131-324-201	1.5	--	--	7	39	54	47.2	24.1	23.1	CI	2.597	40	--	--
	131-324-202	3.0	--	--	12	30	58	48.1	23.2	24.9	CI	2.604	30	--	--
	131-324-203	4.5	2.390	2.90	Weathered Rock										
	131-324-204	6.0	2.396	2.85	Weathered Rock										
	131-324-205	7.5	2.412	2.78	Weathered Rock										
	Abbreviations G-Gravel, S-Sand, M-Silt, C-Clay	8.0	2.418	2.71	I.L. - Liquid Limit			P.L. - Plastic Limit			WR	--	--	11.7	205

c - Cohesion  
 - Angle of internal friction

DST-Direct Shear Test  
 UCS-Unconfined Compressive Strength

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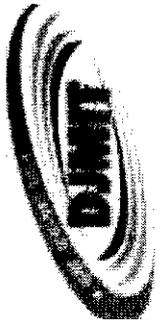
**ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

ULR No. TC - 7474 23 0 0000323

BH ID.	Mechanical Discipline	Soil & Rock																	
		Lab. No.	Depth below EGL in m	Density gm/cc	Water Content in %	Grain Size Distribution			Atterberg's limit			IS Classification	Specific Gravity, G	Free Swell Index %	Porosity, %	UCS, Kg/cm <sup>2</sup>			
					% G	% S	M & C%	LL, %	PL, %	PI, %									
BH-9 (At GIDC, Sarigam)		131-324-300	0.0	--	--	Filled up Material										--	--	--	--
		131-324-301	1.5	--	--	0	45	55	46.5	25.2	21.3	CI	2.584	40	--	--	--	--	
		131-324-302	3.0	--	--	9	39	52	45.1	24.9	20.2	CI	2.589	45.5	--	--	--	--	
		131-324-303	4.5	--	--	Highly Weathered Disintegrated Rock										2.662	--	--	--
		131-324-304	6.0	2.402	2.81	Weathered Rock										--	--	12.3	--
		131-324-305	7.5	2.409	2.72	Weathered Rock										--	--	11.9	--
	Abbreviations G-Gravel, S-Sand, M-Silt, C-Clay			8.0	2.415	2.65	LL - Liquid Limit	Weathered Rock			PL - Plastic Limit	WR	PI - Plasticity Index	--	--	11.5	--	180	

c - Cohesion  
 - Angle of internal friction  
 DST-Direct Shear Test  
 UCS-Unconfined Compressive Strength

JOB NO.:GES/DHD-230131-324/23/SR-01



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**ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

BH ID:	Lab. No.	Depth below EGL in m	FDD gm/cc	FMC/NMC in %	Porosity %	Specific Gravity, G
BH-7 (At GIDC, Sarigam)	131-324-101	1.5	--	--	0.46	--
	131-324-102	3.0	1.625	12.00	0.43	--
	131-324-103	4.5	--	--	--	2.745
	131-324-104	6.0	--	--	--	2.750
	131-324-105	7.5	--	--	--	2.756
	131-324-106	8.0	--	--	--	2.761

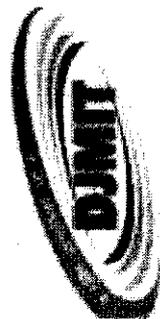
Abbreviations

FDD-Field Dry Density

FMC-Field Moisture Content

NMC-Natural Moisture Content

JOB NO.:GES/DHD-230131-324/23/SR-01



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**ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

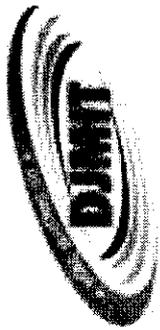
BH ID.	Lab. No.	Depth below EGL in m	FDD gm/cc	FMC/NMC in %	Porosity %	Specific Gravity, G
BH-8 (At GIDC, Sarigam)	131-324-201	1.5	--	--	0.45	--
	131-324-202	3.0	1.600	13.00	0.40	--
	131-324-203	4.5	--	--	--	2.752
	131-324-204	6.0	--	--	--	2.759
	131-324-205	7.5	--	--	--	2.763
	131-324-206	8.0	--	--	--	2.769

**Abbreviations**

FDD-Field Dry Density

FMC-Field Moisture Content

NMC-Natural Moisture Content



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**ANNEXURE III: SUMMARY OF LABORATORY TEST RESULTS**

BH ID.	Lab. No.	Depth below EGL in m	FDD gm/cc	FMC/NMC in %	Porosity %	Specific Gravity, G
BH-9 (At GIDC, Sarigam)	131-324-301	1.5	1.635	12.50	0.50	--
	131-324-302	3.0	--	--	0.43	--
	131-324-303	4.5	--	--	0.31	--
	131-324-304	6.0	--	--	--	2.752
	131-324-305	7.5	--	--	--	2.764
	131-324-306	8.0	--	--	--	2.768

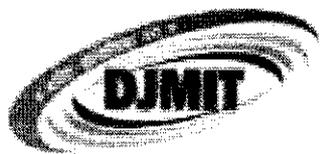
**Abbreviations**

**FDD**-Field Dry Density

**FMC**-Field Moisture Content

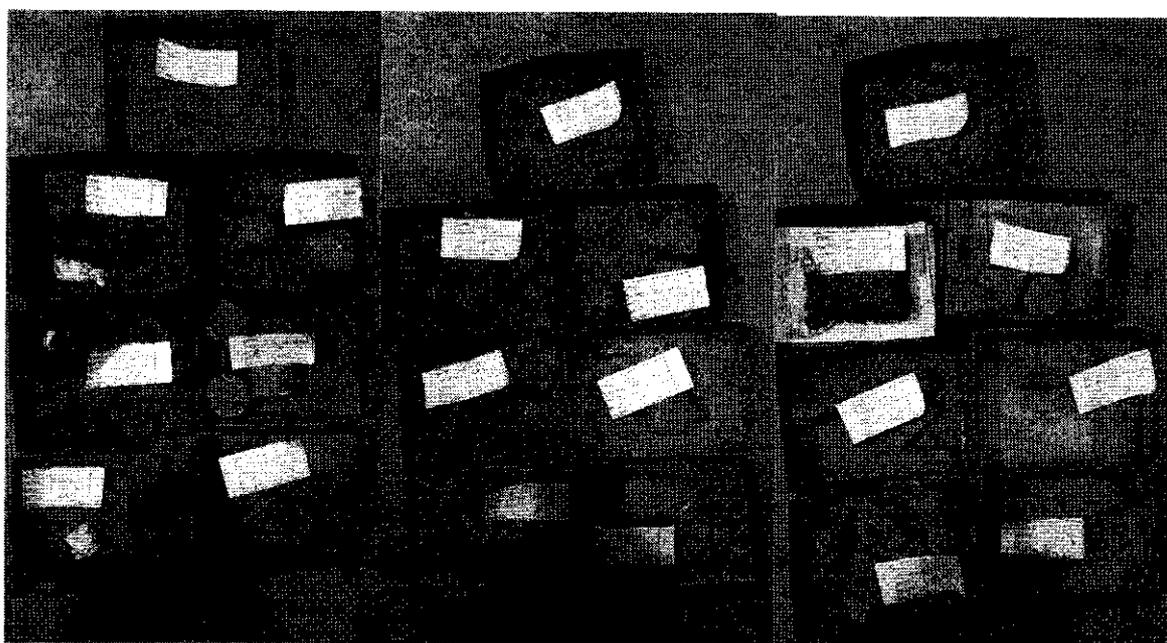
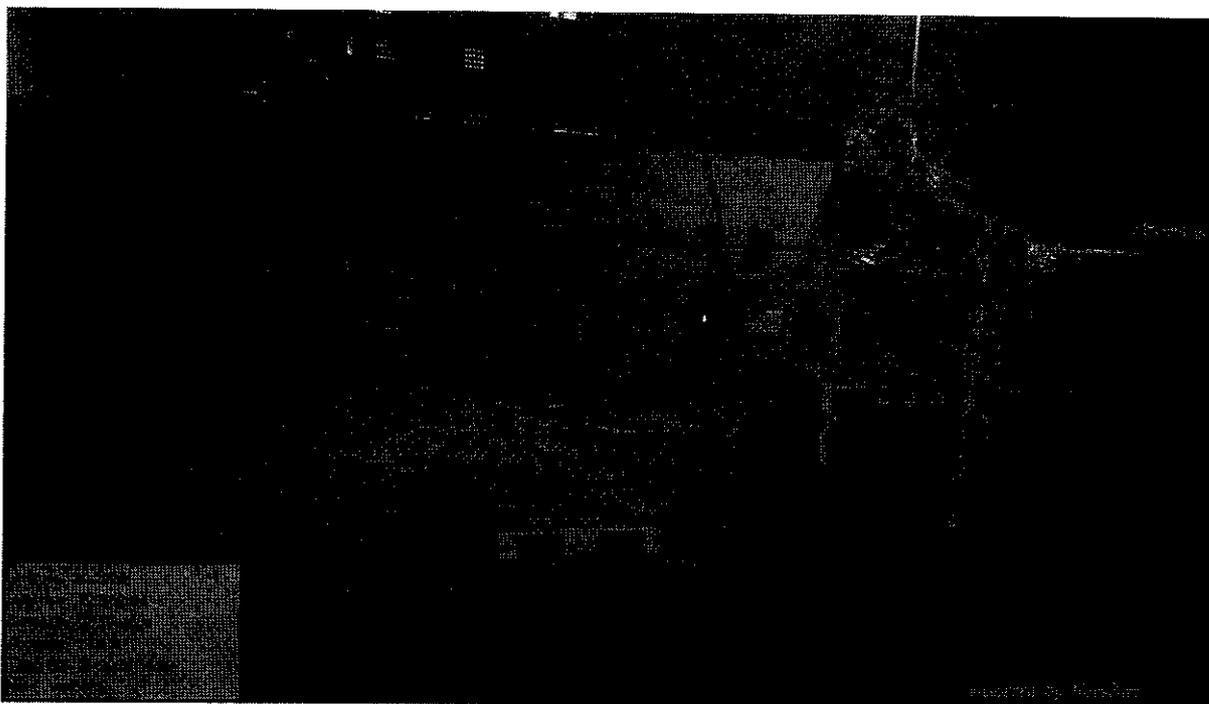
**NMC**-Natural Moisture Content

**JOB NO.:**GES/DHD-230131-324/23/SR-01



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The site visit and sampling were arranged on 28/01/2023 and a thorough investigation was carried out. The soil samples were collected from the surface layer and subsurface layer and along with the geological analysis environmental parameters were tested in the DJMIT laboratory and CHARUSAT university laboratory. For testing of the heavy metal contamination levels, the samples were sent to CHARUSAT, Changa.



BH 7

BH 8

BH 9

The results of the analysis are as follows:



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**TABLE I-TEST REPORT FOR SOIL SAMPLES**

Report No. : DJMIT/ETRL/AUD/2023030102	M/s. Aarti Drugs Ltd. Unit-2, Plot No. 211,213 GIDC, Sarigam, Valsad.		
Issue Date : 01/03/2023			
Customer Ref. : Work order			
Description of Sample : Soil Sample As per Below Table			
Sample ID : DJMIT/ETRL/LAB/2023020901-03	Sampling Date : 08/02/2023		
Packing : seal	Sample Received Date : 09/02/2023		
Quantity/ No. of Samples : 250 gm	Date of Starting of Test : 13/02/2023		
	Date of Completion : 01/03/2023		

**RESULT TABLE**

No.	TEST PARAMETER	RESULT			UNIT	Screening Levels*	Response Levels*
		BH7-(0.0 m)	BH-8(0.0 M)	BH-9 (0.0 m)			
1	pH	7.7	8.1	8.1	---		
2	Moisture Content	0.046	0.06	0.13	%		
3	Total Solid	99.9	99.9	99.8	%		
4	Volatile Solid	4.58	3.51	3.24	%		
5	Fixed Solid	5.41	96.4	96.7	%		
6	Conductivity	982	642	937	µm/Cm		
7	Total Hardness	9	7	5.8	gm/Kg		
8	Calcium Hardness	7.8	1.92	5.2	gm/Kg		
9	Sodium	0.35	0.30	0.25	gm/Kg		
10	Potassium	0.25	0.22	0.29	gm/Kg		
11	Sulphates	0.58	0.53	0.818	gm/Kg		
12	Arsenic	8.15	2.5	5.65	mg/Kg	12	50
13	Chromium	17	8.65	7.1	mg/Kg	87	-
14	Copper	76.5	71.35	57	mg/Kg	91	190
15	Lead	ND	ND	ND	mg/Kg	600	530
16	Mercury	ND	ND	ND	mg/Kg	50	36
17	Nickel	98.9	83.1	70.25	mg/Kg	50	100
18	Cadmium	ND	ND	ND	mg/Kg	22	13
19	Selenium	ND	ND	ND	mg/Kg	2.9	-
20	Boron	20.25	6.7	ND	mg/Kg	-	-
21	Zinc	159.6	104.7	76.65	mg/Kg	360	720

\*(<https://cpcb.nic.in/technical-guidelines-6/>)



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**TABLE II-TEST REPORT FOR SOIL SAMPLES**

Report No. : DJMIT/ETRL/AUD/2023030102	M/s. Aarti Drugs Ltd. Unit-2,		
Issue Date : 01/03/2023	Plot No. 211,213 GIDC,		
Customer Ref. : Work order	Sarigam, Valsad.		
Description of Sample : Soil Sample As per Below Table			
Sample ID : DJMIT/ETRL/LAB/2023020904-06	Sampling Date : 08/02/2023		
Packing : seal	Sample Received Date : 09/02/2023		
Quantity/ No. of Samples : 250 gm	Date of Starting of Test : 13/02/2023		
	Date of Completion : 01/03/2023		

**RESULT TABLE**

No.	TEST PARAMETER	RESULT			UNIT	Screening Levels*	Response Levels*
		BH7-(1.5 m)	BH-8(1.5 M)	BH-9 (1.5 m)			
1	pH	8.3	8.5	8.1	---		
2	Moisture Content	0.006	0.6	0.11	%		
3	Total Solid	99.9	99.9	99.8	%		
4	Volatile Solid	6.73	7.65	8.37	%		
5	Fixed Solid	93.2	92.3	91.6	%		
6	Conductivity	966	862	834	µm/Cm		
7	Total Hardness	8	7.8	9	gm/Kg		
8	Calcium Hardness	7.5	7.0	7.8	gm/Kg		
9	Sodium	0.63	0.56	0.43	gm/Kg		
10	Potassium	0.10	1.60	1.20	gm/Kg		
11	Sulphates	0.73	0.71	0.85	gm/Kg		
12	Arsenic	8.65	14.95	13.3	mg/Kg	12	50
13	Chromium	27.25	18.15	23.85	mg/Kg	87	-
14	Copper	36.35	51.5	36.05	mg/Kg	91	190
15	Lead	22.6	6.8	8.5	mg/Kg	600	530
16	Mercury	ND	ND	ND	mg/Kg	50	36
17	Nickel	159.95	138.65	126.35	mg/Kg	50	100
18	Cadmium	ND	ND	ND	mg/Kg	22	13
19	Selenium	ND	ND	ND	mg/Kg	2.9	-
20	Boron	15.85	12.8	6.35	mg/Kg	-	-
21	Zinc	95.85	111.65	80.3	mg/Kg	360	720

\*(<https://cpcb.nic.in/technical-guidelines-6/>)



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**TABLE III-TEST REPORT FOR SOIL SAMPLES**

Report No. : DJMIT/ETRL/AUD/2023030102	<b>M/s. Aarti Drugs Ltd. Unit-2,</b>		
Issue Date : 01/03/2023	<b>Plot No. 211,213 GIDC,</b>		
Customer Ref. : Work order	<b>Sarigam, Valsad.</b>		
Description of Sample : Soil Sample As per Below Table	Sampling Date : 08/02/2023	Sample Received Date : 09/02/2023	Date of Starting of Test : 13/02/2023
Sample ID : DJMIT/ETRL/LAB/2023020907-08	Date of Completion : 01/03/2023		
Packing : seal			
Quantity/ No. of Samples : 250 gm			

**RESULT TABLE**

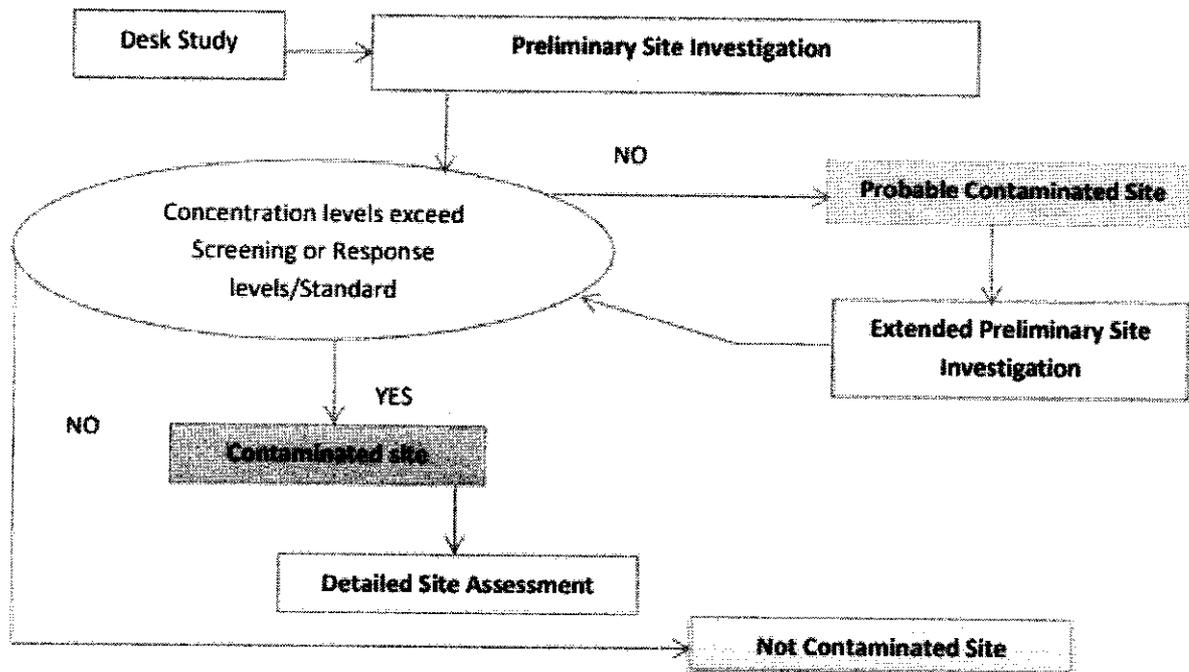
No.	TEST PARAMETER	RESULT			UNIT	Screening Levels*	Response Levels*
		BH-7(3.0 m)	BH-8(3.0 M)	BH-9 (3.0 m)			
1	pH	8.3	8.0	8.7	---		
2	Moisture Content	2.8	1.24	0.15	%		
3	Total Solid	99.7	99.8	99.9	%		
4	Volatile Solid	8.76	6.84	0.56	%		
5	Fixed Solid	91.2	93.1	99.4	%		
6	Conductivity	867	762	482	µm/Cm		
7	Total Hardness	5.8	9	5.8	gm/Kg		
8	Calcium Hardness	5.0	5.4	4.4	gm/Kg		
9	Sodium	0.78	0.56	0.40	gm/Kg		
10	Potassium	3.80	0.60	2.20	gm/Kg		
11	Sulphates	0.69	0.74	1.14	gm/Kg		
12	Arsenic	6	19.9	1.00	mg/Kg	12	50
13	Chromium	23.1	19.1	23.15	mg/Kg	87	-
14	Copper	31.35	31.9	40.30	mg/Kg	91	190
15	Lead	10.25	5.4	12.45	mg/Kg	600	530
16	Mercury	ND	ND	ND	mg/Kg	50	36
17	Nickel	141.55	121	151.35	mg/Kg	50	100
18	Cadmium	ND	ND	ND	mg/Kg	22	13
19	Selenium	ND	ND	ND	mg/Kg	2.9	-
20	Boron	13.3	9.9	10.30	mg/Kg	-	-
21	Zinc	97.45	96.9	77.40	mg/Kg	360	720

\*(<https://cpcb.nic.in/technical-guidelines-6/>)



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The samples not mentioned in the above tables were either boulders or rock. As depicted in Table I, II and Table III the soil is in good natural condition. The pH levels are also almost neutral. It was still found imperative to check for heavy metals and the digestion of samples was carried out as per part 3500 of the American Public Health Association handbook/Handbook of Methods in Environmental Studies-S. K. Maiti Vol 2. The samples were tested at the ANALUBE lab of the Pramukh Swami Centre of Excellence for Renewable Energy (PCERE) Charotar University of Science & Technology (Charusat), Changa. The results of the same are as produced in Tables I, II, and III. All the parameters of the soil are well below the threshold limits/screening levels guidelines as prescribed by CPCB except Nickel. The summary of the results and their comparison with the Soil Quality \* Guidelines for the Protection of Environmental and Human Health in Volume II-2.1-b Screening and Response levels of a Guidance document for assessment and remediation of contaminated sites in India available on the CPCB website (<https://cpcb.nic.in/technical-guidelines-6/>) is given in table I, II and III. To determine whether the soil is contaminated or not following flow chart is to be followed:



So, the results of the analysis had been compared with screening and response levels given in the CPCB guideline document. Screening levels produced in Tables I, II and III are generic concentrations of hazardous substances in soil and sediments, groundwater, and surface water at or below which potential risks to human health or the environment are not likely to occur and where no further investigation and assessment is needed. These Screening levels are distinguished for industrial land use.



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Thus, it can be seen that the contaminant levels are well below the threshold limits for screening and response so no threat to human health or the environment can exist at the present concentrations of heavy metals and other contaminants except for Nickel. As Nickel concentration exceeded screening level, the samples were tested by M/s. Pollucon Laboratories Private Limited, Surat by Soluble Threshold Limit Concentration (STLC) and Waste Extraction Test (WET) Procedure given in Appendix II of section 66261 of Title 22 of California Code regulation (CCR) as mentioned in Hazardous Waste Management Rules 2016. The results of these tests are produced overleaf.



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**TEST REPORT**

QF/7.8/01

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213 , GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : PLPL/23/03/17/0032 Issue Date : 23/03/2023 Customer's Ref. : Letter
---	---

Description of Sample	: Self Sample	Quantity/No. of Samples	: 50 gm/01
Sampling By	: Sample Sent By Party	Protocol (purpose)	: QC
Sample Receipt Date	: 17/03/2023	Lab ID	: PLPL/23/03/17/0032
Packing/ Seal	: Sealed	Test Parameters	: As Per Table
Date of Starting of Test	: 17/03/2023	Date of Completion	: 23/03/2023
Identification of Sample*	: Aarti Drugs Unit-2, BH-7 0.0		

**RESULT TABLE**

Sr. No.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	0.34	SCP/INS/WW/14

\* : INSR (per) by customer.

**H. T. Shah**  
 Lab Manager

**Dr. Arun Daga**  
 Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

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 No. 12 of Government of Gujarat (Professional Act) 1988      • ISO 17025 (Lab)



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**TEST REPORT**

QF/7.8/01

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213, GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : PLPL/23/03/17/0033 Issue Date : 23/03/2023 Customer's Ref. : Letter
--	---

Description of Sample : <b>Soil Sample</b>	Quantity/No. of Samples : <b>50 gm/01</b>
Sampling By : <b>Sample Sent By Party</b>	Protocol (purpose) : <b>QC</b>
Sample Receipt Date : <b>17/03/2023</b>	Lab ID : <b>PLPL/23/03/17/0033</b>
Packing/ Seal : <b>Sealed</b>	Test Parameters : <b>As Per Table</b>
Date of Starting of Test : <b>17/03/2023</b>	Date of Completion : <b>23/03/2023</b>
Identification of Sample : <b>Aarti Drugs Unit-2, BH-7 1.5</b>	

**RESULT TABLE**

SRL NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	< 0.1	50P/INS/HW/14

\* : Detail given by customer.

  
**H. T. Shah**  
 Lab Manager

  
**Dr. Arunajpal**  
 Lab Manager(Q)

Note: This report is subject to terms &amp; conditions mentioned overleaf.

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**TEST REPORT**

QF/7.0/31

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> <b>PLOT NO. 211 &amp; 213 , GIDC, SARIGAM, DIST : VALSAD-</b> <b>SARIGAM, TAL : UMBERGAON</b>	Test Report No. : <b>PLPL/23/03/17/0034</b> Issue Date : <b>23/03/2023</b> Customer's Ref. : <b>Letter</b>
---	--

Description of Sample : <b>Soil Sample</b>	Quantity/No. of Samples : <b>50 gm/01</b>
Sampling By : <b>Sample Sent By Party</b>	Protocol (purpose) : <b>QC</b>
Sample Receipt Date : <b>17/03/2023</b>	Lab ID : <b>PLPL/23/03/17/0034</b>
Packing/ Seal : <b>Sealed</b>	Test Parameters : <b>As Per Table</b>
Date of Starting of Test : <b>17/03/2023</b>	Date of Completion : <b>23/03/2023</b>
Identification of Sample* : <b>Aarti Drugs Unit-2, BH-7 3.0</b>	

**RESULT TABLE**

SR. NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	< 0.1	SOP/INS/HW/14

\* : Detail given by customer.

**H. T. Shah**  
 Lab Manager

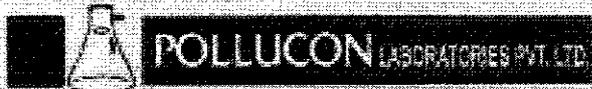
**Dr. Arun Bajpai**  
 Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

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 ■ IAF/22 approved    
 ■ ISO 14001    
 ■ ISO 45001    
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**TEST REPORT**

Q5/7.8/01

Page: 1 of 1

Customer's Name and Address:

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213 , GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : PLPL/23/03/17/0029 Issue Date : 23/03/2023 Customer's Ref. : Letter
---	---

Description of Sample	: Soil Sample	Quantity/No. of Samples	: 50 gm/01
Sampling By	: Sample Sent By Party	Protocol (purpose)	: QC
Sample Receipt Date	: 17/03/2023	Lab ID	: PLPL/23/03/17/0029
Packing/ Seal	: Sealed	Test Parameters	: As Per Table
Date of Starting of Test	: 17/03/2023	Date of Completion	: 23/03/2023
Identification of Sample	: Aarti Drugs Unit-2, BH-8 0.0		

**RESULT TABLE**

SRL NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	< 0.1	SDRYMS/HW/14

\* : Detail given by customer.

H. T. Shah  
Lab Manager

Dr. Arun K. Patel  
Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

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 ■ AICTE approved  
 ■ ISO 15189  
 ■ ISO 9001  
 ■ ISO 14001



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**TEST REPORT**

QF/7.6/01

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213 , GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : PLPL/23/03/17/0030 Issue Date : 23/03/2023 Customer's Ref. : Letter
---	---

Description of Sample : <b>Soil Sample</b>	Quantity/No. of Samples : <b>50 gm/01</b>
Sampling By : <b>Sample Sent By Party</b>	Protocol (purpose) : <b>QC</b>
Sample Receipt Date : <b>17/03/2023</b>	Lab ID : <b>PLPL/23/03/17/0030</b>
Packing/ Seal : <b>Sealed</b>	Test Parameters : <b>As Per Table</b>
Date of Starting of Test : <b>17/03/2023</b>	Date of Completion : <b>23/03/2023</b>
Identification of Sample <sup>2</sup> : <b>Aarti Drugs Unit-2, BH-B 1.5</b>	

**RESULT TABLE**

S.R. NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	0.38	SOP/D&S/HW/14

\* 1: Detail given by customer.

  
**H. T. Shah**  
 Lab Manager

  
**Dr. Arunpal**  
 Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

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 ■ ISO 9001:2015    
 ■ ISO 14001:2015    
 ■ ISO 45001:2018    
 ■ ISO 14001:2015    
 ■ ISO 14001:2015



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**TEST REPORT**

QF7.8/01

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213 , GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : PLPL/23/03/17/0031 Issue Date : 23/03/2023 Customer's Ref. : Letter
---	---

Description of Sample	: Soil Sample	Quantity/No. of Samples	: 50 gm/01
Sampling By	: Sample Sent By Party	Protocol (purpose)	: QC
Sample Receipt Date	: 17/03/2023	Lab ID	: PLPL/23/03/17/0031
Packing/ Seal	: Sealed	Test Parameters	: As Per Table
Date of Starting of Test	: 17/03/2023	Date of Completion	: 23/03/2023
Identification of Sample <sup>a</sup>	: Aarti Drugs Unit-2, BH-8 3.0		

**RESULT TABLE**

SR. NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	< 0.1	SOP/INS/HW/14

<sup>a</sup> : Data given by customer.

  
**H. T. Shah**  
 Lab Manager

  
**Dr. Arun K. Patel**  
 Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

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 Sec. 12 of Environmental Protection Act 1986      • ISO 45001:2018 certified      • ISO 27001:2017 certified



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**TEST REPORT**

QF/17.8/31

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213 , GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : <b>PLPL/23/03/17/0036</b> Issue Date : <b>23/03/2023</b> Customer's Ref. : <b>Letter</b>
---	--

Description of Sample : <b>Soil Sample</b>	Quantity/No. of Samples : <b>50 gm/01</b>
Sampling By : <b>Sample Sent By Party</b>	Protocol (purpose) : <b>QC</b>
Sample Receipt Date : <b>17/03/2023</b>	Lab ID : <b>PLPL/23/03/17/0036</b>
Packing/ Seal : <b>Scaled</b>	Test Parameters : <b>As Per Table</b>
Date of Starting of Test : <b>17/03/2023</b>	Date of Completion : <b>23/03/2023</b>
Identification of Sample* : <b>Aarti Drugs Unib-2, BH-9 L5</b>	

**RESULT TABLE**

SRL NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	0.19	SOP/INS/HW/14

\* - Sealed given by customer.

*[Signature]*

**H. T. Shah**  
Lab Manager

*[Signature]*  
**Dr. Arun Bapat**  
Lab Manager(Q)

Note: This report is subject to terms & conditions mentioned overleaf.

• Recognized by ISO/IEC 17025:2005 New Delhi, India  
 Gov. of Gujarat, Ahmedabad, GIDC, Valsad  
 • ISO 9001:2015  
 • ISO 14001:2015  
 • ISO 45001:2018



**Dr. Jivraj Mehta Institute of Technology**  
 (An Institute approved by AICTE, New Delhi & Affiliated to  
 Gujarat Technological University, Ahmedabad)  
 Managed by: Charuttar Education & Navrachana Trust

**TEST REPORT**

CF17.6/01

Page: 1 of 1

Customer's Name and Address :

<b>AARTI DRUGS LTD.</b> PLOT NO. 211 & 213, GIDC, SARIGAM, DIST : VALSAD- SARIGAM, TAL : UMBERGAON	Test Report No. : <b>PLPL/23/03/17/0037</b> Issue Date : <b>23/03/2023</b> Customer's Ref. : <b>Letter</b>
--	--

Description of Sample	: Soil Sample	Quantity/No. of Samples	: 50 gm/01
Sampling By	: Sample Sent By Party	Protocol (purpose)	: QC
Sample Receipt Date	: 17/03/2023	Lab ID	: PLPL/23/03/17/0037
Packing/ Seal	: Sealed	Test Parameters	: As Per Table
Date of Starting of Test	: 17/03/2023	Date of Completion	: 23/03/2023
Identification of Sample <sup>a</sup>	: Aarti Drugs Unit-2, BH-9 3.0		

**RESULT TABLE**

SRL NO.	PARAMETERS	UNIT	RESULT	TEST METHOD
1	Nickel	mg/L	0.40	SOP/DAS/HW/14

<sup>a</sup> : Detail given by customer.

  
**H. T. Shah**  
 Lab Manager

  
**Dr. Arun K. Patel**  
 Lab Manager (Q)

Note: This report is subject to terms & conditions mentioned overleaf.

■ Registered by MOEF, New Delhi Under  
 Sec. 12 of Environmental Protection Act, 1986

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As per Schedule II - "List of waste constituents with concentration limits" class A given on page 20-21 of Hazardous waste management rules 2016 the permissible concentration limits are as follows:

**SCHEDULE II**  
 [See rule 3 (1) (17) (ii)]

**List of waste constituents with concentration limits**

**Class A:** Based on leachable concentration limits [Toxicity Characteristic Leachir Procedure (TCLP) or Soluble Threshold Limit Concentration (STLC)]

Class	Constituents	Concentration in mg/l
(1)	(2)	(3)
A1	Arsenic	5.0
A2	Barium	100.0
A3	Cadmium	1.0
A65	Cobalt	80.0
A66	Copper	25.0
A67	Molybdenum	350
A68	Nickel	20.0
A69	Thallium	7.0
A70	Vanadium	24.0

Our results are very well below this limit and hence present concentrations are nonhazardous.

### 3. CONCLUSION

Considering the facts mentioned in this report, it can be stated that the soil in the premises is maintained in its natural state and contamination in the soil is not severe and the threat to human health or the environment is ruled out. Constructive remedial measures like the development of green belts/areas are always welcome to step. Due care must be taken not to violate any norms as directed by authorities.

Thanking you,



Dr. Devang Arvindbhai Shah,

Chief Scientist & Associate Professor,  
Environmental Testing and Research Laboratory,  
Dr. Jivraj Mehta Institute of Technology,  
Mogar, Anand-388340.

**GUJARAT POLLUTION CONTROL BOARD**

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



BY RPAD

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

WHEREAS, you M/s. Aarti Drugs Ltd having an industrial plant located at Plot No. 211, 213, Road No. 2, GIDC Sarigam, Tal: Umbergaon, Dist: Valsad 396 155 for manufacturing of Metformin Hydrochloride.

ANDWHEREAS, the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A) under the provisions of the Environmental Acts/Rules by its Consent Order No. AWH- 108687 dated 03/11/2020 valid up to 19/07/2025 for production of above said products with certain conditions mentioned therein.

ANDWHEREAS, during the inspection of your industrial plant on 23/03/2023 under section 23 of The Water Act-1974 by authorized officer of the Board, following was observed:

1. Unit has been inspected with reference to complain received to this office, during inspection flexible pipe has been observed in ETP & Sock Pit near storm water drain their one end open in GIDC storm water drain outside the premises through hole, it observed freshly sealed condition.
2. pH of the wet mud in GIDC open storm water drain is observed alkaline on pH strip.
3. GIDC open drain is observed wet from hole to Gate No 2 of the unit and onwards wastewater is observed accumulated and one wastewater sample of the same is collected for analysis purpose.
4. Analysis report of water sample form water drain of the unit near boundary wall shows; Colour-550 pt.co.sc., Total Dissolved Solid-6886 mg/l, Suspended Solid-293 mg/l, Ammonical Nitrogen-627 mg/l, Chlorides-4019 mg/l, Chemical oxygen demand-3977 mg/l and BOD-1160 mg/l, which is exceeding the Norms.

UNDER THESE CIRCUMSTANCES, Gujarat Pollution Control Board proposes to issue Notice of Directions under 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 Power supply of your industrial plant?

YOU ARE HEREBY directed to replay within 15 days on receipt of this notice failing which directions as proposed above will be deemed to be passed without further reference to you.

For and on behalf  
Gujarat Pollution Control Board

(R. B. Trivedi)

Environment Engineer

Outward No: 740109, 25/03/2023

NO: GPCB/ CCA-SRG-453(3)/ID 43373/

Date:

ISSUED TO:

M/s. Aarti Drugs Ltd

Plot No. 211, 213, Road No. 2,

GIDC Sarigam,

Tal: Umbergaon, Dist: Valsad 396 155

Outward No: 740109, 25/04/2023



# Gujarat Pollution Control Board

PCB Id: 43373

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

## 1 Industry Details Aarti Drugs Ltd.

Outward No: 31398-26/05/2023

Email :  
safety211@aartidrugs.com

Plot No. 211, 213,  
Road no. 2, GIDC Sarigam, ,  
Sarigam - 396155

Telephone :  
8511136142

DIST : Valsad-Sarigam, TAL : Umbergaon , SIDC : Sarigam

Inspection Id : 733940 ( H.O.Reference )

Ro Name : Sarigam

## 2 Type / Scale / Sector / Status : RED / LARGE / Pharmaceuticals / In Operation

## 3 Inspection Dt & Time : 18/04/2023 11:45 / Hazd

Person Contacted : Mr. Sachin Tambe-Unit Head

## 4 Env Audit Detail : Sch : N.A , Not Applicable , Year : 2012 , On Dt : 19/12/2013

Commissioned Dt : 15/02/2014

Production Start Dt : 01/04/2014

Applicability of CRZ Rules : No

## 5 Water Consumption in Kilo Lts Per Day

Ind : 242.000

Dom : 3.000

Borewells: 0

## 6 Waste Water generation / Discharge (klpd) :

Ind : 39.000

Dom : 2.500

Tubewells: 0

## 7 Consumer No.(Electric Meter):

Source of Water Supply: GIDC Water Supply

## 8 Disposal Mode of Industrial / Domestic :

Zero Discharge / Soak Pit

## 9 Discharge Pt / Final Receiving Body (Ultimate):

Treated effluent will be evaporated in Evaporator / Zero liquid Discharge unit

## 10 Status of water consent Under the Water Act,1974:

H-121429-19/07/2025 Last Inward:225162-24/06/2022[GRT]

## 11 Effluent Treatment plant (ETP) : Units, if provided and status :

ETP Details : P-Equalization Tank,P-Flash Mixer,P-Oil-Grease Trap,P-Pri Settling Tank,S-Sludge Dry Beds

## 12 Whether Industry is a member of CETP ?

No

## 13 Boilers=1 , DG Sets=1 , Flue Gas =2, Process =0 , ETP Cap = 210 , Capacity of All =

APCM Details : Bag Filter,Multi Cyclone

Fuel Used : Agro Waste/Briquettes,Diesel

Stack Attached to : Boiler,D.G. Sets

## 14 TSDF Name :

Recycling Solution Pvt Ltd.(GEPIL)[13376]

## 15 Lab Charges Pending : NIL

Water Cess Charges Pending : Rs. 0.00

## 16 Last Env. Form V : 2022-2023

Water Cess Return : 2017-2018

HW Monthly Return : 2023-04

## 17 Last 3 Legal Action :

Insp Dt	Act	Leg Dt	For	Insp ID	IR-Leg	Type	Out No
23/03/2023	NOT	25/04/2023	33A,,	729849	NOT	SCN	740109
06/12/2022	SCN	27/12/2022	---	695956	SCN	REV	691389
12/08/2022	REV	21/09/2022	TRI,	681931	REV	SCN	683849

Monthly Patrak Data : Last Return : 202304

HAZD Waste Disposal : 252.920 (0 Trucks)

Electricity Units Consumed in month	Water Consumed in month	Effluent Discharged in month
Production - 438032, ETP - 5138, APCM - 4177	Meter Reading - 0, Kilo Litre - 3041	Meter Reading - 0, Kilo Litre - 540



# Gujarat Pollution Control Board

PCB Id: 43373

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

### General Observation

a	-	Is the Industry in Operation ??	Yes	
a	-	R.O File No	43373	
b	-	Industry Operating without CCA	No.	
c	-	Has Production exceeded (last 3 MTHs) than CCA-Qty	No.	
d	-	Any products-NOT in CCA, manufactured-Last 3 MTHs	No.	
e	-	Foul Odour/Fugitive Emission/Bye Pass in Premises ??	No.	
f	-	Industry Name CHANGED in recent times ??	No.	
g	-	Has Regn with CETP or TSDF expired ??	No.	
h	-	Seperate Energy Meter for A.P.C.M ?	No.	
h	-	Provision of any STAND-BY Pump ??	No.	

### GEM

18	-	Where Authorization Under BMW Rules 2016 obtained ? Provide Authorization No. / Date	Yes	
----	---	---	-----	--

### Haz Waste Related

a	-	Haz waste Catg confirmitive with CCA	Yes	
b	-	H.W generation exceeding CCA limits	No.	
c	-	Collection, Storage, Treatmnt, Disposal Facility Adequate ??	Yes	
d	-	Reusing or Recycling of Haz Waste by Industry ?	No	
e	-	LogBook / XGN Manifests / Disposal Records TALLYING ??	Partially	
f	-	Stock of Haz-Waste @ premises/Whether EXCESS ?	As per crux	
g	-	Recycler/ Actual user has valid Authorization under rules 6 or 9 of HOWR-2016?	Yes	
h	-	Installed capacity of the plane based on machinery installed (Capacity of Machine,No. of Batch/Day,Annual Capacity)	----	
i	-	Technical capability and equipment complying with the SOP/Guideline?	Yes	
j	-	Is unit complying the conditions gives in SOP/Guidelines?	Yes	
k	-	Facility is adequate for the applied process	Yes	
l	-	Passbook is maintained?	Yes	
m	-	Details of PLI, if applicable	---	
n	-	Details of safety specs provided by the facility	---	
o	-	Seprate storage area for Haz. Waste for the utilization or generation from the process is provided?	Yes	
p	-	Quantity of Hazardous waste procured as per CCA?	Yes	

### Remarks :

Note: EIA 2006 / SEIAA / E.C / MOEF Applicable : Yes

### Site Observations during Inspection , PCB-ID: ( 43373 )



This unit is inspected with reference to Email received from HO on dated 13/04/2023 regarding detailed inspection with respect to Hazardous waste Management. (Representation received to HO from Mr. Asif R. Khan vide letter dated 07/03/2023). In this regards from April-2022 to March-2023; production details & all category of Haz. waste generation & disposal details are attached herewith in pdf. along with Geological Survey report conclusion. Looking to the details of production and generation of hazardous waste, following are the findings:(1) Process Waste – Total generation of process waste is 1394.59 MT and disposal is 1400.07 MT which is within limits of CC&A during the year. However, it is hereby to mention that if we calculate month wise generation and as per mass balance, then actual generation is more than calculated generation.(2) Spent Carbon/Spent Charcol – Total generation is 857.162 MT and disposal is 874.59 which is within limits of CC&A during the year. However, it is hereby to mention that if we calculate month wise generation and as per mass balance, then actual generation is more than calculated generation. Other hazardous waste details is nil. And stock of hazardous waste is ETP sludge – Nil, Process waste – 13.371 MT, Spent carbon/Charcoal – 16.7 MT, Used oil – 0.25 MT and Discarded containers – 0.8 MT. [680]-25/05/2023

**I recommend : a. Keep on Records + Notings**

W.C Notings:

**Specific Instructions given to Industry at the time of visit , for Pt to Pt Compliance**

**Compliance Observed in this Inspections.**



# Gujarat Pollution Control Board

PCB Id: 43373

( Inspection Report ) - Air,Water,Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

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Instructions in Previous Visits and Reply	Insp Det	Instruction Status
૩ આપના એકમને તા.૦૬/૧૨/૨૦૨૨ નાં રોજ આપવામાં સુચનાના મુદ્દા નંબર ૧,૨,૩,૪ નું compliance આજ દિન સુધી કરવામાં આવેલ નથી જેનું સત્વરે compliance કરવું.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	729849(23/03/23)	Still Pending
૧.આપના એકમની મુલાકાત અત્રેની કચેરીને મળેલ ફરિયાદ અન્વયે કરવામાં આવેલ , મુલાકાત સમયે ETP તથા soakpitમાં flexible pipe નાંખેલો જોવા મળેલ જેની પાસેની વરસાદી પાણીના નિકાલ storm water drain કે જે એકમ premises બહાર ખૂલે છે. તે દીવાલમાં તાજેતરનું કોન્ક્રીટ નું સીલ કરવામાં આવેલ જોવા મળેલ.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	729849(23/03/23)	Still Pending
૨ મુલાકાત સમયે ઉપરોક્ત વરસાદી પાણીના નિકાલની storm water drainમાં રહેલ ગંદા પાણીનો નમૂનો પૃથ્થકારણ અર્થે એકત્રિત કરવામાં આવેલ છે.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	729849(23/03/23)	Still Pending
૧) આપના એકમના Premises માં અલગ-અલગ જગ્યાએથી મોનીટરીંગ કરી (Reputed institute જેવા કે NEERI, NPC,HT, Schedule-1 Auditor, etc, દ્વારા) તે બાબતનો Geological Survey report અત્રેની કચેરી ખાતે સત્વરે રજૂ કરવો. કે જે બાબતની સુચના અગાઉ તા.૧૨/૦૮/૨૦૨૨ ના રોજ પણ આપવામાં આવેલ.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	695956(06/12/22)	Still Pending
૨) મુલાકાત સમયે O&G removing tank માંથી Solvent ની દુર્ગન્ધ (VOC) અનુભવાયેલ જે દુર કરવા યોગ્ય પગલા ભરવા.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	695956(06/12/22)	Still Pending
૩) મુલાકાત સમયે Sludge drying ની પરિસ્થિતિ જોતા, Sludge drying bed ના સ્થાને Sludge decanter લગાવવા સુચન છે.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	695956(06/12/22)	Still Pending
૪) Psychometric Evaporator માંથી ઉકવતી Steam સીધી વાતાવરણમાં જતી જોવા મળેલ જેના સ્થાને આધનિક system (MEE/MVR) લગાવવા સુચન છે.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	695956(06/12/22)	Still Pending
૫) મુલાકાત સમયે Carbon Waste નો આશરે 35-40MT Storage તેમજ ખુલ્લી જગ્યામાં સંગ્રહિત જોવા મળેલ જેને TSDF ખાતે સત્વરે મોકલવું.; Respected Sir, We have submitted reply of the same to GPCB RO. Copy of the same uploaded in Extra Document. Thank you. (12/04/2023)	695956(06/12/22)	Still Pending
૧. અત્રેની કચેરીને મિડીયા દ્વારા મળેલ માહિતી મુજબ આપના એકમ પ્રિમાઈસીસમાં ભૂતકાળમાં વેસ્ટ દાંતવામાં આવેલ હોવાનું જણાવેલ જે બાબતે આપના દ્વારા expert Institution/Organizationસ નિયુક્ત કરી એકમ પ્રિમાઈસીસમાં અલગ-અલગ જગ્યાએ તેમજ અલગ-અલગ ઊંડાઈથી માંટીના સેમ્પલ એકત્રીત કરી તેના પરીણામ તેમજ અહેવાલ અત્રેની કચેરીએ સત્વરે રજૂ કરવો.	681931(12/08/22)	Still Pending



# Gujarat Pollution Control Board

PCB Id: 43373

( Inspection Report ) - Air, Water, Hazardous

(Under Section 23 of The Water Act 1974, Under Section 24 of The Air Act 1981 and Under Section 10 of EP Act 1986)

## Annexure Details - Air, Stack, Hazardous Waste & Samples PCB-ID: (43373)

### A Sample Details

### B Process Stacks

### C Flue gases Stacks

Sr	Stack attached to	Mts	Remark	SMF	APCM	Fuel	Consp-Unit	Insp Remk
1	D.G. Sets	11	D. G. Set (500 KVA) Stand by	NO	N.A	Diesel	40 Lits/Hr.	
2	Boiler	30	2 nos - 6 TPH each (one standby unit)	YES	FIL,MUL	Agro Waste/Briquettes	1.9 MT/Hour	

### D Details about Hazardous Waste Management :

Sr	Source of Hazardous Waste	Catg	Qty/Year	HW Disposal Management
1	Process Residue and wastes	I -28.1	1421.617-M.T	CIW,COL,STO,TRA
2	Spent carbon	I -28.3	1011.064-M.T	CIW,COL,STO,TRA
3	Used or Spent Oil	I -5.1	0.200-M.T	COL,CYC,RRE,STO,TRA
4	Empty barrels/containers/liners contaminated with hazardous chemicals /wastes	I -33.1	50.000-M.T	COL,DCO,CYC,RRE,STO,TRA
5	Chemical sludge from waste water treatment	I -35.3	481.800-M.T	COL,DSS,STO,TRA

### E Products :

Sr	Product Name	NOC Qty	CCA Qty	Applied Qty	Inspection Remark
1	Metformin Hydrochloride	1200.000	2400.000 - M.T	1200.000	NOC Qty = 1200 MT/M

### F Raw material :

Sr	Raw Material Name	Capacity - Unit / Month
1	activated carbon 240 mb	34.210 - M.T
2	dicyanodiamine ( dcda)	638.300 - M.T
3	dimethyl-amine hydrochloride ( dmahcl)	676.600 - M.T
4	methanol	0.000 - M.T
5	mix xylene	889.000 - M.T

### G Water Consumption & Generation Break up

Sr	Water Code (Qty in klpd - Kilo Ltr per Day)	WC : 245.000	WWG : 41.500	Water Source	Remark
1	Agriculture	20.000	0.000	SIDC	
2	Boiler Feed	42.000	3.000	SIDC	
3	Cooling Water	150.000	15.000	SIDC	
4	D.M Water Plant	12.000	12.000	SIDC	
5	Domestic Purpose	3.000	2.500	SIDC	
6	Mnfg Process	8.000	0.000	SIDC	
7	Wash Water	10.000	9.000	SIDC	

### H Solid Waste

Sr	Solid Waste Name	Qty-Unit	Coll Mode	Disp Mode
1	Fly Ash from Briquettes (5%)	40.000 - M.T	HDP	OTH

**Inspection Team :** Rana Jaimin C - MS. UTTEJANA ANILBHAI CHAUDHARI

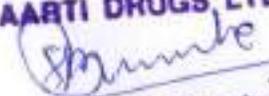
**I hereby affirm, that all the PDF, Data mentioned above, fees paid has been checked & certified.**

**Signature By(Rana Jaimin C )**



Monthly Data GPCB 2022-2023														
Power Consumption (Units)	Permissible Limit	Unit	Apr/22	May/22	Jun/22	Jul/22	Aug/22	Sep/22	Oct/22	Nov/22	Dec/22	Jan/23	Feb/23	Mar/23
<b>Hazardous Waste Generation and Disposal (MT/Year)</b>														
Process waste and Residues (28.1) (Generation)	1421.617 MT/Year	MT	15.390	114.300	126.400	84.368	139.684	128.996	79.502	127.112	137.332	150.073	139.781	151.655
(Disposal)			43.690	120.130	105.640	104.960	138.500	114.830	85.150	123.070	151.070	137.670	149.980	125.380
Spent Carbon / Spent Charcol (28.3) (Generation)	1011.064 MT/Year	MT	10.368	71.800	78.000	53.890	83.876	77.205	46.075	88.742	93.864	89.021	84.937	79.384
(Disposal)			29.640	32.760	99.690	55.440	100.070	67.430	33.790	101.640	102.940	101.370	75.520	73.670
Chemical Sludge from Waste Water Treatment (35.3) (Generation)	481.8 MT/Year	MT	0	0	0	0	0	0	0	0	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Empty Barrels / Containers / Liners contaminated with hazardous chemical / waste (33.1) (Generation)	50 MT/Year	MT	0	0	0	0	0	0	0	0	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Used Oil (5.1) (Generation)	0.2 MT/Year	MT	0	0	0	0	0	0	0	0.05	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Production Data (MT/Month)	1200 MT/Months	MT	162	910	990	634	1002	926	552	1030	1034	1076	996	844

Quantity instock on date 18/04/2023	Opening stock (MT)
ETP sludge	NIL
Residues and waste (28.1) (Generation)	13.371 MT
Spent Charcol / Carbon (28.2) (Generation)	16.7 MT
Used Spent Oil (5.1) (Generation)	0.25 MT
Discarded Containers/Barrels/Liners (33.3) (Generation)	0.8 MT

**AARTI DRUGS LTD**  
 Plot No. : 211/213, Road No.: 2  
 G.I D.C. SARIGAM - 396 155  
 Dist. Valsad, Gujarat  
 For, **AARTI DRUGS LTD.**  
  
 Authorised Signatory



**Aarti Drugs Limited**

Manufacturers of : Bulk Drugs & Chemicals

269

G.I.D.C. Sarigam, Tal. Umbergaon,  
Dist : Valsad, Gujarat, India -396155. 95  
Tel : (0260) 2780269 /+91- 99980 10751  
Email : hr211@aartidrugs.com  
Website : www.aartidrugs.com  
CIN NO.: L37060MH1984PLC055433

Date: 07/04/2023

GPCB ID- 43373

To,  
The Regional Officer (Sarigam Region)  
Gujarat Pollution control Board  
Sarigam

Sub: Compliance of remaining point of visit instruction & show cause notice (SCN)

Ref: Compliance of remaining following point of instruction visit dated 06/12/2022 & show cause notice number 691389 dated 27/12/2022

1. Unit shall carry out monitoring for Geological survey at different locations within premises of your site from reputed institute, like NEERI, NPC, IIT, Schedule-I Auditor etc. and submit Geological Survey report to GPCB Office
  - Our Geological survey at different locations within premises of our unit were carried out by Schedule one (1) auditor and reputed institute namely Dr. Jivraj Mehta Institute of Technology, Moger Annand Gujarat and here with we are submitting Geological Survey report of same.

Thanking You

For Aarti Drugs Ltd.

Authorized Signatory



Enclosed:

1. copy of Geological Survey report
2. Copy of already submitted Reply of visit instructions and scn Points.

C.C. to

The Unit Head – Sarigam Region GPCB Gandhinagar

INWARD  
No. 15523  
Date 10/04/2023  
G. P. C. BOARD, SARIGAM

10/04/23

Corporate Office : Mahendra Industrial Estate, Ground Floor, Plot No. 109-D, Road No. 29, Sion (East), Mumbai - 400 022. (India)  
Tel.: 022-2407 2249 / 2401 9025 (30 Lines) Fax: 022-2407 3462 / 2407 0144  
Email: admin@aartidrugs.com Website: www.aartidrugs.com

Regd. Office : Plot No. N-198, MIDC, Tarapur, Tal & Dist. Palghar (MH) - 401 506.

# GEOLOGICAL SURVEY REPORT

of

**M/s. AARTI DRUGS LTD. (UNIT 2)**

Plot No. 211, 213, GIDC, Sarigam

Ta. Umbergaon, Dist. Valsad-396155

Prepared By



Dr. Jivraj Mehta Institute of Technology,  
**Environmental Testing & Research Laboratory,**  
National Highway No. 8, Near Sankara Eye Hospital, Mogar,  
Anand, Gujarat - 388340.



**Dr. Jivraj Mehta Institute of Technology**  
(An Institute approved by AICTE, New Delhi & Affiliated to  
Gujarat Technological University, Ahmedabad)  
Managed by: Charuttar Education & Navrachana Trust

### 3. CONCLUSION

Considering the facts mentioned in this report, it can be stated that the soil in the premises is maintained in its natural state and contamination in the soil is not severe and the threat to human health or the environment is ruled out. Constructive remedial measures like the development of green belts/areas are always welcome to step. Due care must be taken not to violate any norms as directed by authorities.

Thanking you,

Dr. Devang Arvindbhai Shah,



Chief Scientist & Associate Professor,  
Environmental Testing and Research Laboratory,  
Dr. Jivraj Mehta Institute of Technology,  
Mogar, Anand-388340.

**M/s. Aarti Drugs Limited (GPCB ID – 43373)**

Supplementary report in context with the inspection carried out of the unit on dated 18.04.2023 (Inspection ID-733940) & 19.06.2023 (Inspection ID-741224) and as per telephonic discussion with Unit Head.

- The Hazardous Waste generation of process waste/residue is 1394.593 MT/Year and spent carbon/spent charcoal is 857.162 MT/Year as against production 10156 MT/Year, which is within CC&A limit.
- However, considering mass balance in case of the full production as per CC&A, the hazardous waste quantity may be higher than quantity mention in Authorization.

**Inspected By:-**



U.A. Chaudhari  
(AEE)



J. C. Rana  
(AEE)



R. K. Mehta  
(SO)

### Inspection Report

**Name of Industry** : M/s. Aarti Drugs Limited  
**GPCB ID** : 43373  
**Address** : Plot No. 211, 213, Road No. 2, GIDC – Sarigam  
**Date & Time of Inspection** : 19.06.2023 at 12:15 hours  
**Name & Designation of Person Contacted** : Mr. Sachin Tambe – Unit Head

#### Observations:

During inspection unit is found in operation. During inspection provided ETP units followed by evaporator are found in operation. During inspection one flue gas emission sampling is carried out from 6 TPH boiler for analysis purpose.

#### Pointwise compliance of closure direction order dated 30.03.2022

Sr. No.	Points of closure direction	Compliance
1.	Unit has sent this waste (Process waste/Residue) into tanker No. GJ15AV2810 without any document (manifest, etc) which is caught by the Police Department. This clearly indicates that unit may be illegally disposing their generated Hazardous Waste at unknown location.	As per Honourable Umbergaon court order, unit has sent waste (Process waste/Residue) = 19.28 MT to M/s Eco Waste Management through manifest number 1717802, dated 07/05/2022, which was previously caught by Police Department and in custody of Bhilad Police Station, Bhilad.
2.	During inspection, Tanker No. GJ15AV2810 filled with liquid chemical (Process waste) observed under custody of Bhilad Police.	
3.	Tanker owner has shown us the location in M/s. Aarti Drugs Limited (Plot No. 211, 213, Road No. 2, GIDC Sarigam) from where he had filled/load his tanker No. GJ15AV2810.	
4.	The sample collected from this tanker and sample collected from tank of your unit from which tanker was filled within your premises is observed identical from its physical appearance & pH.	
5.	During inspection, it is found that this waste is a process waste/residue generated during manufacturing of Metformin Hydrochloride and as per CC&A (AWH-108687) condition; this waste shall be dispose for coprocessing to cement industry.	
6.	During inspection dated 24/02/2022, Unit has submitted material balance. From the said material balance and production details	

	<p>submitted during inspection and record of disposal of hazardous waste by the unit from XGN, it is concluded that during the period of January -2021 to January -2022 unit has manufactured 9116.462 MT of Metformin Hydrochloride and as per material balance generation of process waste/residue is 619.919 MT and carbon waste is 583.453 MT. However as per XGN records unit has disposed only 202.37 MT of process waste/residue and 169.55 MT of carbon waste through manifest and disposal of remaining 417.549 MT of process waste and 413.88 MT of carbon waste is of question. Hence written instruction is given for clarification to this unit. However, unit has not replied till date in this regard and hence it may be concluded that unit has disposed off 417.549 MT of process waste and 413.88 MT of carbon waste (as per material balance submitted by the unit in unauthorized manner</p>	<p>453(3)/ID 43373/685624 dated 10/10/2022.</p>
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#### Pointwise compliance of revocation order dated 30.04.2022

Sr. No.	Points of revocation order	Compliance
1.	Unit shall dispose hazardous waste as per CCA condition and maintained record for the same	Earlier unit has submitted notarized under taking and ensure that generated hazardous waste will be disposed properly only through online manifest system for disposal of HW through PCB authorized vehicle as per condition of consolidated consent and authorization
2.	Unit shall comply with CCA conditions	Earlier unit has submitted notarized under taking and ensure to comply with CCA conditions

#### Pointwise compliance of revocation order dated 21.09.2022

Sr. No.	Points of revocation order	Compliance
1.	Industry shall comply with CCA conditions	As per below findings

Details of production and all category of hazardous waste generation and disposal during the period of April – 2022 to March – 2023 are attached herewith in pdf along with Geological

survey report conclusion. Looking to the details of production and generation of hazardous waste, following are the findings:

- 1) Process Waste – Total generation of process waste during the period of April – 2022 to March – 2023 is 1394.59 MT and disposal is 1400.07 MT which is within limits of CC&A during the year.
  - a. However, it is hereby to mention that if we calculate month wise generation of process waste as per mass balance, then process waste generated actually is more than calculated generation.
- 2) Spent Carbon/Spent Charcoal – Total generation of spent carbon/spent charcoal during the period of April – 2022 to March – 2023 is 857.162 MT and disposal is 874.59 which is within limits of CC&A during the year.
  - a. However, it is hereby to mention that if we calculate month wise generation of spent carbon/spent charcoal as per mass balance, then spent carbon/spent charcoal generated actually is more than calculated generation.
- 3) Other hazardous waste disposal details is nil.
- 4) Stock of hazardous waste is ETP sludge – 6 MT, Process waste – 15.452 MT, Spent carbon/Charcoal – 7.924 MT, Used oil – 0 MT and Discarded containers – 3.5 MT.

**Inspected By:**



J. C. Rana  
(AEE)



R. K. Mehta  
(SO)

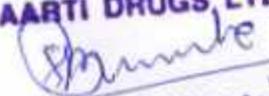


Monthly Data GPCB 2022-2023														
Power Consumption (Units)	Permissible Limit	Unit	Apr/22	May/22	Jun/22	Jul/22	Aug/22	Sep/22	Oct/22	Nov/22	Dec/22	Jan/23	Feb/23	Mar/23
<b>Hazardous Waste Generation and Disposal (MT/Year)</b>														
Process waste and Residues (28.1) (Genration)	1421.617 MT/Year	MT	15.390	114.300	126.400	84.368	139.684	128.996	79.502	127.112	137.332	150.073	139.781	151.655
(Disposal)			43.690	120.130	105.640	104.960	138.500	114.830	85.150	123.070	151.070	137.670	149.980	125.380
Spent Carbon / Spent Charcol (28.3) (Genration)	1011.064 MT/Year	MT	10.368	71.800	78.000	53.890	83.876	77.205	46.075	88.742	93.864	89.021	84.937	79.384
(Disposal)			29.640	32.760	99.690	55.440	100.070	67.430	33.790	101.640	102.940	101.370	75.520	73.670
Chemical Sludge from Waste Water Treatment (35.3) (Genration)	481.8 MT/Year	MT	0	0	0	0	0	0	0	0	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Empty Barrels / Containers / Liners contaminated with hazardous chemical / waste (33.1) (Genration)	50 MT/Year	MT	0	0	0	0	0	0	0	0	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Used Oil (5.1) (Genration)	0.2 MT/Year	MT	0	0	0	0	0	0	0	0.05	0	0	0	0
(Disposal)			0	0	0	0	0	0	0	0	0	0	0	0
Production Data (MT/Month)	1200 MT/Months	MT	162	910	990	634	1002	926	552	1030	1034	1076	996	844

Quantity instock on date 18/04/2023	Opening stock (MT)
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**AARTI DRUGS LTD**  
 Plot No. : 211/213, Road No.: 2  
 G.I.D.C. SARIGAM - 396 155  
 Dist. Valsad, Gujarat

For, **AARTI DRUGS LTD.**

  
 Authorised Signatory

Date: 07/04/2023

GPCB ID- 43373

To,  
The Regional Officer (Sarigam Region)  
Gujarat Pollution control Board  
Sarigam

Sub: Compliance of remaining point of visit instruction & show cause notice (SCN)

Ref: Compliance of remaining following point of instruction visit dated 06/12/2022 & show cause notice number 691389 dated 27/12/2022

1. Unit shall carry out monitoring for Geological survey at different locations within premises of your site from reputed institute, like NEERI, NPC, IIT, Schedule-I Auditor etc. and submit Geological Survey report to GPCB Office
  - Our Geological survey at different locations within premises of our unit were carried out by Schedule one (1) auditor and reputed institute namely Dr. Jivraj Mehta Institute of Technology, Moger Annand Gujarat and here with we are submitting Geological Survey report of same.

Thanking You

For Aarti Drugs Ltd.

Authorized Signatory





Enclosed:

1. copy of Geological Survey report
2. Copy of already submitted Reply of visit instructions and scn Points.

C.C. to

The Unit Head – Sarigam Region GPCB Gandhinagar





# **GEOLOGICAL SURVEY REPORT**

of

**M/s. AARTI DRUGS LTD. (UNIT 2)**

Plot No. 211, 213, GIDC, Sarigam

Ta. Umbergaon, Dist. Valsad-396155

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### 3. CONCLUSION

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Dr. Devang Arvindbhai Shah,



Chief Scientist & Associate Professor,  
Environmental Testing and Research Laboratory,  
Dr. Jivraj Mehta Institute of Technology,  
Mogar, Anand-388340.



## ANALYSIS REPORT FOR AIR

Gujarat Pollution Control Board

TYPE : Stack-Filtrate

281

Vapi

C5/124, GIDC Vapi,

Near Hotel Pritam,

Vapi - 396 195

Tele:(0260) 2432089



TC10419

Accreditation Standards &amp; NABL Certificate Details : TC10419 / -- / Issue: 17/03/2022 / Validity: 16/03/2024

1. Name & : Aarti Drugs Ltd. - 43373
2. Address of the Unit : Plot No. 211, 213, Road no. 2, GIDC Sarigam,  
Sarigam - 396155, Taluka : Umbergaon, District : Valsad-Sarigam, GIDC : Sarigam
3. Nature of Sample : REP-Representative/Grab , (Insp Type : NOT-After Notice of DIR)
4. Sample Collected By : R.K. Maheta, SO
5. Date & Time of Collection & Receipt : 19/06/2023, (1245 to 1315)
6. Date of Start & Completion of Analysis : 20/06/2023 & 03/07/2023
7. Sampling Point : Stack attach to Boiler ~ Common Chimney (2 Nos. of Boiler - 6 TPH each (one standby))
8. Fuel : Briquettes
9. APCM : Multicyclone + Bagfilter
10. Thimble & Weight (gm) : 17/2100
11. Temperature on Collection : 95 & Volume-Absord Media : 50 ml each
12. Volume-Gas Passed : For PM - 406.37 L (N), For SO<sub>2</sub> - 58.43 L (N) and For NO<sub>x</sub> - 1514.93ml
13. Parameters : 3 & Oper Time(Min) : 30

Sr	Parameter	Unit	Test Method	Range of Testing	Result
1	PM-Stack	MG/NM3	IS: 11255 (Part – 1), 1985 (Reaffirmed 1999)	1 – 5000 mg/NM3	48
2	SO <sub>2</sub> -Stack (PPM)	PPM	IS: 11255 (Part – 2), 1985 (Reaffirmed 2009)	5 – 500 mg/NM3	8.43
3	NO <sub>x</sub> -Stack	PPM	IS:11255(Part-7), 2005	5 – 500 mg/NM3	9.14

Laboratory Remarks : Freeze By:279-R.O\_279 Dt.: 03/07/2023

R. N. Patel, SSO

Field Observation : sample is collected as follows: so<sub>2</sub> – is 1125 (part 2):1985 reaffirmed 2019, nox – is 11255 (part 7): 2005 reaffirmed 2017, pm – is 11255 (part 1)1998

**M/s. Aarti Drugs Limited (GPCB ID – 43373)**

Supplementary report in context with the inspection carried out of the unit on dated 18.04.2023 (Inspection ID-733940) & 19.06.2023 (Inspection ID-741224) and as per telephonic discussion with Unit Head.

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