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BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL
WESTERN ZONAL BENCH, PUNE

AT-WESTERN ZONE BENCH, PUNE

LA. NO. _____ OF 2023 IN THE ORIGINAL APPLICATION NO. 58 OF 2022 WESTERN
ZONE

M/s. Sudarshan Chemical Industries Limited

... Applicant

IN THE MATTER OF:

Aryavart Foundation

... Applicant

Versus

M/s RIA CETP Co-Op Society Ltd & Ors.

... Respondents

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INDUSTRIES LIMITED (RESPONDENT NO. 5) TO COMBINED REPLY DATED
12th FEBRUARY 2024 FILED BY RESPONDENT NO. 1**

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Sudarshan Chemical Industries Limited


Authorised Signatory
Applicant




Advocate for the Applicant

**BEFORE THE NATIONAL GREEN TRIBUNAL
WESTERN ZONAL BENCH, PUNE
ORIGINAL APPLICATION NO. 58 OF 2022**

IN THE MATTER OF:

Aryavart Foundation

...**Company**

Versus

M/s RIA CETP Co-Op Society Ltd & Ors.

... **Respondents**

**SUR-REJOINDER ON BEHALF OF RESPONDENT NO. 5 TO COMBINED REPLY
DATED 12th FEBRUARY 2024 FILED BY RESPONDENT NO. 1**

I, Shri Adwait Joshi, Age 33, Deputy Manager – Legal and Secretarial of Respondent No.5 (hereinafter referred to as the “**Company**”), and having my office at 7th Floor, Eleven West Panchshil, Survey No. 25, Near PAN Card Club Road, Baner, Pune, Maharashtra 411069. I am authorised to submit on behalf of the Company as follows:

1. I have read the Combined Reply dated 12th February 2024 filed by Respondent No.1 (“**Reply**”).
2. The following allegations and averments are made against Respondent No. 5 in the Reply:
 - A. Respondent No.1 never refused to grant additional capacity in the CETP to Respondent No.5;
 - B. Respondent No. 5 has taken a reference that circular issued by MOEF bars 17 highly polluting industries to be a member of CETP. However, Respondent No. 5 was a member from 2005 to 2016 and hence this plea is a contradiction;
 - C. Respondent No.5 is necessary to be made party in the present proceedings as Respondent No.2 modified the BOD limit from earlier 100 ppm to 30 ppm for creek discharge as per NIO guidelines. The JVS results of Respondent No.5 from Respondent No. 2 are required to be examined;



- D. Respondent No.2 while amending the consent of Respondent No. 5 in 2021 forfeited the bank guarantee of Rs. 2 Lakhs for non-compliance of JVS results. This clearly shows that there has been non-compliance by Respondent No. 5. The Joint Committee Report states that the sample reports of Respondent No.5 have showed the results of COD 380 ppm which is exceeding consented norms;
- E. Respondent No.5 is required to discharge at NIO designated point through MIDC pipeline, which is 14.4 Km at Gophan while the current MIDC line extends only upto 9.2 Km at Arey Khurd which clearly demonstrates that, it is the violation of the conditions of the permission granted by Respondent No. 2;
- F. Respondent No.2 in their consent dated 22nd December 2021 granted permission to Respondent No.5 for discharge of 14.4 MLD while the other industries have been discharging more than 12.5 MLD. The designated capacity of the pipeline carrying the effluents is for 25 MLD as per Respondent No.4. Therefore, the total effluent quantity exceeds the limits. This results into frequent breakage of the pipeline;
- G. Respondent No.5 has not been given any limit of TDS by Respondent No.2. The regular analysis of the effluent of Respondent No.5 shows TDS value to the extent of maximum 6300 ppm and minimum 3400 ppm. Respondent No.1 has failed to understand how the result could meet 2100 ppm;
- H. Respondent No. 5's TDS and COD values are more than the prescribed threshold;
- I. Respondent No.5 has not connected its on-line monitoring system for treated effluent to the server of Respondent No. 1;
- J. Respondent No. 5 did not pay the contribution to CETP and resigned. On failure of Respondent No. 5 to pay bills, Respondent No. 1 has ended up paying GST amount;
- K. Samples are taken by Respondent No. 2 at the CETP outlet which is the confluence of the discharge of Respondent No. 5 and Respondent No. 1. Compensation to be bifurcated between the parties.



3. Respondent No. 5 would deal with the abovementioned allegations or averments in detail:

A. RESPONDENT NO.1 NEVER REFUSED TO GRANT ADDITIONAL CAPACITY IN THE CETP TO RESPONDENT NO.5.

Response:

- (i) Respondent No. 1 has relied upon Annexure R1 to contend that Respondent No.5's request for accommodating additional 7.5MLD was accepted vide letter 12th August 2014 (page 1429 of R2 combined Reply).
- (ii) Thereafter, Respondent No. 5 vide letter dated 15th September 2015 requested Respondent No. 1 to grant additional booking capacity of 5MLD. Hereto annexed as **Exhibit 1** is a copy of the letter dated 15th September 2015.
- (iii) Respondent No. 1 vide letter dated 16th February 2016 informed that Respondent No. 5's final water consumption capacity is 7650 m³ per day (page 1005 of Respondent No. 5's Reply).
- (iv) Respondent No. 1 refused to grant additional booking capacity of 5 MLD by citing the reason that:
- a) total CETP capacity is 22.5MLD
 - b) Respondent No. 5 is entitled to only 7650 m³ per day and
 - c) there would be no further capacity enhancement of the CETP capacity.
- (v) Thus, it is false to contend that Respondent No. 1 did not refuse to grant additional capacity to Respondent No. 5.

B. RESPONDENT NO. 5 HAS TAKEN A PLEA THAT CIRCULAR ISSUED BY MOEF BARS 17 HIGHLY POLLUTING INDUSTRIES TO BE A MEMBER OF CETP. HOWEVER, RESPONDENT NO. 5 WAS A MEMBER FROM 2005 TO 2016 AND HENCE THIS PLEA IS A CONTRADICTION.

Response:

- (i) In April 2015, working group comprising of members from the Central Pollution Control Board, State Pollution Control Board representing the states of Andhra



Pradesh, Punjab, Tamilnadu, West Bengal, Madhya Pradesh and Maharashtra was constituted to revisit the criteria of categorization of industries. The working group developed criteria of categorization of industrial sectors based on the concept of pollution index.

- (ii) Based on the revised criteria, the Final Report on Revised Categorization of Industrial Sectors under Red/Orange/Green and White was evolved. 'Dyes and Dye- Intermediates' was placed in the final list of red category. Respondent No. 5 falls in red category of industry.
- (iii) By way of modified directions dated 7th March 2016, all state pollution control boards were directed to adopt the revised category with immediate effect. Hereto annexed as **Exhibit 2** is a copy of the modified directions dated 7th March 2016 issued by central pollution control board.
- (iv) Given the above background, coupled with the fact that Respondent No. 1 had denied accommodating additional capacity in the year 2016, Respondent No. 5 had no choice but to make alternative arrangements for treatment and discharge of its effluents. Accordingly, Respondent No. 5 had commenced the process of applying for direct discharge permission, keeping in mind that substantial time would be consumed in laying out infrastructure and internal procedures.
- (v) As on 2016, the consent to operate directed the Respondent No. 5 to discharge the effluents into the CETP. Subsequently, Respondent No. 5 received no objection for direct discharge of the treated effluents at the outlet of the CETP from Respondent No. 2 and Respondent No. 4.
- (vi) Respondent No. 5 has been discharging its effluents as per the consent to operate issued by Respondent No.2. In light of the aforesaid, Respondent No. 5 has not taken any contradiction plea as alleged or at all.

C. RESPONDENT NO.5 IS NECESSARY TO BE MADE PARTY AS RESPONDENT NO.2 MODIFIED THE BOD LIMIT FROM EARLIER 100 PPM TO 30 PPM FOR CREEK DISCHARGE AS PER NIO GUIDELINES. THE JVS RESULTS OF RESPONDENT NO.5 FROM RESPONDENT NO. 2 ARE REQUIRED TO BE EXAMINED.

Response:

- (i) In 2017, the BOD limit was fixed as 100mg/l under the Consent to Operate issued to Respondent No. 5. However, in 2019, under the Consent to Operate, when Respondent No. 5 was directed to discharge the treated effluent into the outlet of CETP through dedicated effluent disposal pipeline, the BOD was reduced to 30mg/l. This amendment from 100mg/l to 30mg/l was necessary because effluents were directed to be disposed of at the outlet of the CETP/Creek.
- (ii) Respondent No. 1 has no locus to seek examination of the JVS results of Respondent No. 5. Respondent No. 1 is clearly operating out of vengeance and has miserably failed to make out any prima facie case against Respondent No.5. Merely because BOD level was reduced from 100mg/l to 30mg/l to comply with environment standards, that is no ground to seek any relief against the interest of Respondent No. 5.
- (iii) In any case, Joint Committee Report of October 2022 shows that BOD level is 30.05mg at the outlet of CETP as per OCEMS (page 16 of the Report).

D. RESPONDENT NO.2 WHILE AMENDING THE CONSENT OF RESPONDENT NO. 5 IN 2021 FORFEITED THE BANK GUARANTEE OF RS. 2 LAKHS FOR NON-COMPLIANCE OF JVS RESULTS. THIS CLEARLY SHOWS THAT THERE HAS BEEN NON-COMPLIANCE BY RESPONDENT NO.5. THE JOINT COMMITTEE REPORT SHOWS THAT THE SAMPLE REPORTS OF RESPONDENT NO.5 HAVE SHOWED THE RESULTS OF COD 380 PPM WHICH IS EXCEEDING CONSENTED NORMS.

Response:

- (i) The Consent to Operate dated 22nd December 2021 sets out the reason for forfeiture of bank guarantees. The bank guarantees of Rs.2lacs was forfeited due to exceeding limits for the samples collected between July 2018 to September 2019. It is pertinent to note that in 2018-2019, the plant was undergoing upgradation and commissioning related works including addition of a bio reactor, anaerobic digester and other necessary infrastructure development. It was

because of such circumstances and operational challenges that the limits temporarily exceeded.

- (ii) By way of the forfeiture of the bank guarantee, Respondent No. 5 has already paid the compensation towards the pollution caused due to exceeding limits. Respondent No. 5 makes best endeavours to protect the environment by strictly following the consent conditions.
- (iii) With respect to the COD result of 380 ppm which appears to have been collected between March 2022 to August 2022, it is submitted that the reading is based on a grab sampled taken. The readings pertain to a particular sample taken. Results vary from time to time and this is a onetime reading. As per the OCEMS, COD for the period March 2022- August 2022 shows within limits (page 1078 of Respondent No. 5's Reply). The Joint Committee Report of October 2022 mentions that manual sampling and OCEMS are not matching and there is a need to calibrate and maintain OCEMS (page 16 of the Report).

E. RESPONDENT NO.5 IS REQUIRED TO DISCHARGE AT NIO DESIGNATED POINT THROUGH MIDC PIPELINE, WHICH IS 14.4 KM AT GOPHAN WHILE THE CURRENT MIDC LINE EXTENDS ONLY UPTO 9.2 KM AT AREY KHURD WHICH CLEARLY DEMONSTRATES THAT, IT IS THE VIOLATION OF THE CONDITIONS OF THE PERMISSION GRANTED BY RESPONDENT NO. 2.

Response:

- (i) As per Respondent No. 5's consent to operate, the effluents have to be discharged at the CETP outlet sump through the dedicated pipeline provided by Respondent No. 4 (page 991 of Respondent No. 5's reply).
- (ii) Respondent No. 5 has been discharging the effluents through the dedicated pipeline provided by Respondent No. 4. Respondent No. 5 does not have any role in deciding the length of the pipeline and therefore, the allegation of so called 'violations' cannot be sustained against Respondent No.5.



- (iii) The effluents are discharged into estuarine portion of the river Kundalika through closed pipeline provided by Respondent No. 4 which is about 14.3 km at Gofan Village (page 15 of the Joint Committee Report).
- (iv) The contents of Annexure R-10 is denied for want of authenticity (page 1472 of Respondent No. 5 combined Reply). It appears to be a home grown internal unauthenticated chart.

F. RESPONDENT NO.2 IN THEIR CONSENT DATED 22ND DECEMBER 2021 GRANTED PERMISSION TO RESPONDENT NO.5 FOR DISCHARGE OF 14.4 MLD WHILE THE OTHER INDUSTRIES HAVE BEEN DISCHARGING MORE THAN 12.5 MLD. THE DESIGNATED CAPACITY OF THE PIPELINE CARRYING THE EFFLUENTS IS FOR 25 MLD AS PER RESPONDENT NO.4. THEREFORE THE TOTAL EFFLUENT QUANTITY EXCEEDS THE LIMITS. THIS RESULTS INTO FREQUENT BREAKAGE OF THE PIPELINE.

Response:

- (i) As per the Joint Committee Report of October 2022, the average flow of the members of CETP is 9.36 MLD and Respondent No. 5's flow is 6.04 MLD. Therefore, the total flow is approximately 15.22 MLD (page 11 of the Joint Committee Report of October 2022). Respondent No. 1 has admitted that the CETP inlet effluent load is about 8-12 MLD against the sanctioned capacity of 22.5 MLD (page 760 of Respondent No. 1's Reply).
- (ii) Respondent No. 5's flow of 6.04 MLD is well within the permitted limit of 14.4MLD.
- (iii) The average flow of 15.22MLD is lesser than the carrying capacity of the pipeline which is 25MLD.
- Therefore, the allegation that due to excessive flow, the pipeline breaks frequently is false.

G. RESPONDENT NO.5 HAS NOT BEEN GIVEN ANY LIMIT OF TDS BY RESPONDENT NO.2. THE REGULAR ANALYSIS OF THE EFFLUENT OF RESPONDENT NO.5 SHOWS TDS VALUE TO THE EXTENT OF MAXIMUM 6300 PPM AND MINIMUM 3400 PPM. RESPONDENT NO.1 HAS FAILED TO UNDERSTAND HOW THE RESULT COULD MEET 2100 PPM.

Response:

- (i) The TDS restriction of 2100 ppm is not applicable to Respondent No. 5. It is only applicable to Respondent No. 1 (page 1477 of Respondent No.1's combined reply).
- (ii) The TDS restriction is not found in the consent to operate issued in favour of Respondent No. 5 because Respondent No. 5 is discharging the effluents into the creek/saline zone via the CETP outlet sump.
- (iii) Respondent No. 5 denies the analysis and the readings carried out by Respondent No. 1 as alleged.

H. RESPONDENT NO. 5'S TDS AND COD VALUES ARE MORE THAN THE PRESCRIBED THRESHOLD.

Response:

- (i) With respect to TDS, Respondent No. 5 repeats and reiterates the contents of the above paragraph.
- (ii) Respondent No. 5 vehemently denies the contents of Annexure 12.
- (iii) Respondent No. 1 appears to have illegally procured samples of Respondent No. 5. The samples if at all taken, were taken in absence of Respondent No. 5. Respondent No. 1 has no authority to collect any samples of Respondent No. 5.
- (iv) The readings are not correct and manipulated.
- (v) The samples seem to have been tested in the CETP lab. There is a high chance of manipulation.



- (vi) Respondent No. 5 craves leave to refer to and rely upon third party lab reports to show that the values were within parameters during the period August to October 2023, as and when required.

I. RESPONDENT NO.5 HAS NOT CONNECTED ITS ON-LINE MONITORING SYSTEM FOR TREATED EFFLUENT TO THE SERVER OF RESPONDENT NO. 1.

Response:

- (i) As per the consent to operate dated 22nd December 2021, Respondent No. 5 was directed to ensure that the OCEMS (online continuous effluent monitoring system) is connected at the ETP outlet and disposal unit of CETP outlet sump to Respondent No 2's server (page 1050 of Respondent No. 5's reply).
- (ii) Accordingly, Respondent No.5 has connected its OCEMS to Respondent No. 2's server.
- (iii) There is no requirement for Respondent No. 5 to connect its OCEMS to Respondent No. 1's server.

J. RESPONDENT NO. 5 DID NOT PAY THE CONTRIBUTION TO CETP AND RESIGNED. ON FAILURE OF RESPONDENT NO. 5 TO PAY BILLS, RESPONDENT NO. 1 HAS ENDED UP PAYING GST AMOUNT.

Response:

- (i) Respondent No. 4 vide letter dated 17th January 2022 directed Respondent No. 5 to make payment of Rs.1.42 crores and 1.75 crores. Hereto annexed as **Exhibit 3** is a copy of the letter dated 17th January 2022.
- (ii) Respondent No. 5 made payment of Rs. 1.42 crores and Rs. 1.75 crores under protest on 10th February 2022.

- (iii) Since Respondent No.5 resigned as a member of the Respondent No. 1 and was treating its own effluents, Respondent No. 5 continued to pay only towards pumping and water consumption (at the rate of Rs 1.50 per m³ prevailing upto 30th September 2017).
- (iv) As per actual calculations, Respondent No. 5 is only liable to pay an amount of Rs. 1.17 per m³ towards pumping charges from the collection tank to the MIDC disposal tank. However, Respondent No.5 has been paying pumping charges for its treated effluent from the collection tank to the MIDC disposal tank at the rate of Rs. 1.50 per m³ which is higher than the actual proportionate pumping cost.
- (v) Respondent No. 5 has paid GST on the amounts paid by it and accordingly utilized GST credit. Respondent No. 1 is aware that Respondent No. 5 is making the above payment under protest.
- (vi) Annexure R-15 does not reflect payment of entire GST amount (which is disputed) paid by Respondent No. 1. The contents of R-15 are denied.

K. SAMPLES ARE TAKEN BY RESPONDENT NO. 2 AT THE CETP OUTLET WHICH IS THE CONFLUENCE OF THE DISCHARGE OF RESPONDENT NO. 5 AND RESPONDENT NO. 1. COMPENSATION TO BE BIFURCATED BETWEEN THE PARTIES.

Response:

- (i) From the Report of July 2023 filed by the Joint Committee, it is clear that samples were taken from the inlet and outlet of CETP (page 863 of the Additional Report) for the purposes of levying compensation.
- (ii) The treated effluents of Respondent No. 5 are routed into the final outlet sump through the collection tank. The readings of the collection tank are well within the prescribed limits (page 13 of October 2022 Report).
- (iii) Respondent No. 1 is well aware that Respondent No. 5 has its own separate discharge outlet and by-passes the CETP directly in the disposal pipeline. In addition thereto, Respondent No. 5 is not a member of Respondent No. 1

(page 763 and 774 of Respondent No. 1's reply). Infact, Respondent No. 1 has admitted that the treated effluents of Respondent No. 5 were used for dilution and improved treatability of effluent at the CETP (page 775 of Respondent No. 1's reply). Despite this, Respondent No.1 is now attempting to mislead this Hon'ble Tribunal, which should not be entertained.

(iv) The Joint Committee in its Report of July 2023 has clearly stated that “...it is observed that CETP was found not complying with the discharge standards expect for few instances (27 out of total 274 sampling). It is worth to mention here that prior to April 2017, also, CETP was not conforming with the discharge standards, as informed by MPCB” (page 871 of the July 2023 Report).

(v) In absence of any case made out and no reliefs being claimed in the Original Application against Respondent No. 5, it is most respectfully submitted that Respondent No.5 ought not to be called upon to pay compensation.

4. In light of the aforesaid, Respondent No. 5 has no role to play in the operation or maintenance of CETP. It is respectfully submitted that the Company has not contributed in polluting the environment in any manner whatsoever.

Solemnly affirmed at Pune)
On this 26 day of August 2024)

Sudarshan Chemical Industries Limited



Authorised Signatory

DEPONENT

VERIFICATION

I, Shri Adwait Joshi, Age 33, Deputy Manager – Legal and Secretarial of Sudharshan Chemical Industries Limited, the Respondent No. 5 abovenamed, do hereby solemnly declare that what is stated in paragraphs 1 to 4 of the above Affidavit is true and correct, being based on my knowledge and based on information received by me and is believed to be true.

Sudarshan Chemical Industries Limited



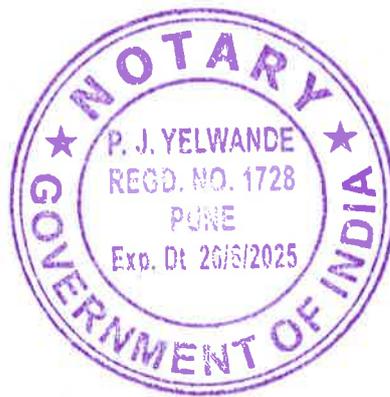
Authorised Signatory

DEPONENTS



Place: Pune

Date: 20 August, 2024



**Noted and Registered
at Serial Number
Date**

1812

20. 8. 2024

20 AUG 2024



Exhibit 1



SUDARSHAN

Sudarshan Chemical Industries Limited
46, MIDC Estate, Dhatav, Roha,
Dist. Raigad 402116, India
Tel.: +91 2194 263 531 Fax: +91 2194 263 602

15th September, 2015

To
THE SECRETARY
RIA-CETP CO.SOC.LTD
DHATAV, ROHA

Subject:- Effluent acceptance letter

Sir,

We have booked capacity of water consumption per day that was regularly upgraded to 7650 m³ per day is as under

Sr no	Booked capacity	Reference date	Cumulative capacity
1	3636 m ³ per day	Before 2009	
2	2364 m ³ per day	1 st June, 2009	6000 m ³ per day
3	1500 m ³ per day	27 th June, 2010	6150 m ³ per day
4	1500 m ³ per day	20 th April, 2011	7650 m ³ per day

We intend to book additional water capacity by 5000 m³/day. We request you to accommodate the corresponding effluent of our CETP and give us a letter to this effect.

Also request you to give us Total capacity booked figure so that earlier correspondences will become void.

Thanking you

For, **Sudarshan Chemicals Industries Ltd.**

N. V. Kamat
Authorized Signatory

RIA-CETP CO-OP. SOCIETY LTD.
C/o. : R.I.R.C., Plot No. 6,
MIDC, Dhatav-Roha,
Dist. Raigad. 402116.

*Received on 16/9
Jeyalax*

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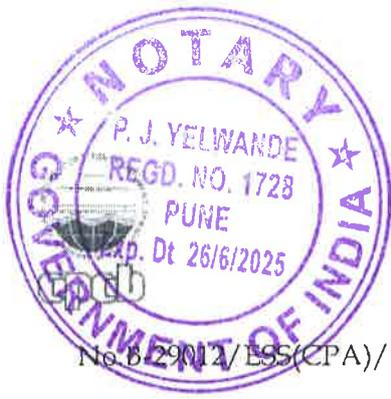


Exhibit 2

केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
(पर्यावरण एवं वन मंत्रालय, भारत सरकार)
MINISTRY OF ENVIRONMENT & FORESTS, GOVT. OF INDIA

No. B 29012/ESS(CPA)/2015-16/

March 07, 2016

To

The Chairman
All the State Pollution Control Boards / Pollution Control Committees
(List Attached)

SUB: MODIFIED DIRECTIONS UNDER SECTION 18(1)(b) OF THE WATER (PREVENTION & CONTROL OF POLLUTION) ACT, 1974 and THE AIR (PREVENTION & CONTROL OF POLLUTION) ACT, 1981 REGARDING HARMONIZATION OF CLASSIFICATION OF INDUSTRIAL SECTORS UNDER RED / ORANGE / GREEN / WHITE CATEGORIES.

WHEREAS, under section 16 (2)(b) of the Water (Prevention and Control of Pollution) Act, 1974 and under Section 16 (2)(c) of the Air (Prevention & Control of Pollution) Act, 1981, one of the functions of the Central Pollution Control Board (CPCB), constituted under the Water (Prevention and Control of Pollution) Act, 1974, is to coordinate activities of the State Pollution Control Boards (SPCBs) and Pollution Control Committees (PCCs); and

WHEREAS, under section 16 (2)(c) of the Water (Prevention and Control of Pollution) Act, 1974 and under Section 16 (2)(d) of the Air (Prevention & Control of Pollution) Act, 1981, one of the functions of the CPCB is to provide technical assistance and guidance to SPCBs and PCCs; and

WHEREAS, it was brought to the notice of CPCB, that different SPCBs /PCCs were following different criteria for classification of industrial sectors under Red/Orange/ Green category and that classification was being used by the SPCBs/PCCs for grant of consents to industries and for Inventorization / surveillance of industries.

WHEREAS, the issue regarding classification of industries was deliberated upon in the 56th Conference of Chairmen & Member Secretaries of CPCB & SPCBs/PCCs held on August 31, 2010 and a working group comprising of representatives from SPCBs & CPCB was constituted to prepare a consolidated list of industrial sectors falling under Red/Orange/Green category to bring uniformity in classification of industrial sectors across the country;

परिवेश भवन, पूर्वी अर्जुन नगर, दिल्ली-110032

'Parivesh Bhawan', East Arjun Nagar, Delhi - 110032

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ई-मेल e-mail: cpcb@nic.in, 1/5 Website: www.cpcb.nic.in

WHEREAS, the report prepared by the Working Group was discussed in the 57th Conference of Chairmen & Member Secretaries of CPCB & SPCBs/PCCs held in Delhi on September 15, 2011, wherein some modifications were proposed;

WHEREAS, the final report of the working group was prepared, incorporating the suggestions/observations made in the 57th Conference of Chairmen and Member Secretaries of CPCB & SPCBs/PCCs and in exercise of the powers delegated to the Chairman, CPCB under Section 18(1)(b) of the Water Act, 1974, following directions were issued for compliance to all SPCBs/PCCs to maintain uniformity in categorization of industries as red, orange and green as per list finalized by CPCB, which identified 85 types of industrial sectors as 'Red', 73 industrial sectors as 'Orange' and 86 sectors as 'Green':

a). To maintain uniformity in categorization of industries under Red/ Orange/Green category, the SPCBs /PCCs shall adopt the list as finalized by CPCB based on the recommendations of that Working Group for grant of Consent, inventorization of industries under Red, Orange and Green categories and other related activities.

(b). The SPCBs/PCCs shall revise the list of Red, Orange and Green categories of industries operating in their jurisdiction based on the criteria specified in the final report of that Working Group and submit the same to CPCB within 90 days in hard copy as well as soft copy;

WHEREAS, later-on, it was observed that the process of categorization thus far was primarily based on the size of the industries and consumption of resources and pollution due to discharge of emissions and effluents and its likely impact on health was not considered as primary criteria;

WHEREAS, there have been proposals from the SPCBs / PCCs and industrial associations for categorization of the industrial sectors in a more pragmatic manner. The issue was discussed during the national level conference of the Environment Ministers of the States, held in New Delhi during April 06-07, 2015 and also during the Conference of the Chairmen and Member Secretaries of CPCB and SPCBs/PCCs held in New Delhi on April 08, 2015. Accordingly, a 'Working Group' comprising of the Members from Central Pollution Control Board and State Pollution Control Boards representing the States of Andhra Pradesh, Punjab, Tamilnadu, West Bengal, Madhya Pradesh and Maharashtra, was constituted to revisit the criteria of categorization of industries and suggest rationale based on pollution potential for categorization of industrial sectors and adopting it for implementation of pollution control plan;

WHEREAS, the Working Group has developed the criteria of categorization of industrial sectors based on the concept of Pollution Index which is a function of the emissions (air pollutants), effluents (water pollutants), hazardous wastes generated and consumption of resources. For this purpose the references are taken from the the Water (Prevention and Control



of Pollution) Cess (Amendment) Act, 2003, Standards so far prescribed for various pollutants under Environment (Protection) Act, 1986 and Doon Valley Notification, 1989 issued by MoEFCC. The Pollution Index (PI) of any industrial sector is a number from 0 to 100 and the increasing value of PI denotes the increasing degree of pollution load from the industrial sector;

WHEREAS, based on the series of consultations with SPCBs, different Government / Non-government Institutions including industries and MoEFCC, the following criteria on 'Range of Pollution Index' for the purpose of categorization of industrial sectors has been finalized:

- o Industrial Sectors having Pollution Index score of 60 and above - Red category
- o Industrial Sectors having Pollution Index score of 41 to 59 -Orange category
- o Industrial Sectors having Pollution Index score of 21 to 40 -Green category
- o Industrial Sectors having Pollution Index score incl. & upto 20 -White category

WHEREAS, based on the revised criteria, the 'Final Report on Revised Categorization of Industrial Sectors under Red/Orange/Green/White' has been evolved. The 'Categorization' is based on the relative pollution potential of the industrial sectors and grouping of the industrial sectors based on the use of raw materials, manufacturing process adopted and pollutants likely to be generated;

WHEREAS, based on relative Pollution Index, the number of industries in various categories are as under :

- i. The Red category of industrial sectors: 60
- ii. The Orange category of industrial sectors: 83
- iii. The Green category of industrial sectors: 63 and
- iv. The Newly introduced White category: 36

WHEREAS, there shall be no necessity of obtaining the Consent to Operate'' for White category of industries and an intimation to concerned SPCB / PCC shall suffice;

WHEREAS, the purpose of categorization is to ensure that the industry is established in a manner consistent with the environmental objectives and to prompt industrial sectors to adopt cleaner technologies, ultimately resulting in generation of no or minimum pollutants.

WHEREAS the new categorization system shall also facilitate in self-assessment by industries;

Now, therefore, in exercise of the powers delegated to the Chairman, CPCB under Section 18(1)(b) of the Water (Prevention & Control of Pollution) Act, 1974 and Section 18(1)(b) of the Air (Prevention & Control of Pollution), Act, 1981 the earlier Directions issued in June 2012 in the context of categorisation of industries as Red, Orange & Green are withdrawn with immediate effect and following 'Directions' are hereby issued for compliance by all SPCBs and PCCs :



1. That the SPCBs and PCCs shall adopt the Revised Criteria of categorization of industrial sectors as detailed in table nos. F1, F2, F3 and F4 and Revised Lists of Red, Orange, Green and White categories of industrial sectors, presented at table no. G2, G3, G4 and G5 respectively, in the 'Final Report' as attached herewith immediately.
2. That all pending applications for consideration of 'Consent to Establish' and 'Consent to Operate' and future such applications shall be processed as per revised criteria.
3. That the SPCBs and PCCs will provide the list of industries identified in each category existing in the State which have been considered for grant of consents. SPCBs/PCCs will forward the list of such industries before 31.05.2016 and the same will be uploaded on the websites of respective SPCB/PCC.
4. That the 'Revised Lists of Red, Orange, Green and White category of industrial sectors' shall be used by the SPCBs and PCCs for Consent Management and inventorization of industries under Red, Orange, Green and White categories. Siting of industries shall be only in conforming areas. SPCBs / PCCs shall evolve sector specific plans for control of pollution and industrial surveillance for verifying compliance.
5. That the SPCBs and PCCs shall revise /prepare the inventory of Red, Orange, Green and White categories of industries operating in their jurisdiction based on the revised criteria specified in the Final Report and submit the same to CPCB within 90 days i.e., before 30.05.2016 in hard copy as well as soft copy.
6. That the listed category of industries or those identified later-on under different categories shall not be linked to sanction of loan /finance or bank proceedings.
7. That any further addition of any new or left-over industrial sector and their categorization which is not listed in the revised list of Red, Orange, Green and White industrial sectors, shall be done at the level of concerned SPCB /PCC following revised criteria & guidelines as detailed in the attached document and no concurrence of CPCB shall normally be required. It is further clarified that while categorizing the industries, fractional numbers shall be rounded off to nearest integer.

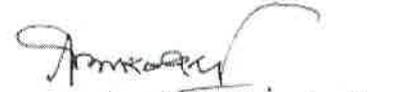
The SPCBs/PCCs shall acknowledge the receipt of directions and submit the 'Action Taken Report' in compliance with these directions to CPCB before 15.04.2016.


(Arun Kumar Mehta)
Chairman
7/3/16

Copy to:

1. The Chief Secretary of all the States and UTs
2. The Secretary ,
Ministry of Micro, Small and Medium Entrepreneurs
Udyog Bhawan, Rafi Marg, New Delhi - 110 011
3. The Secretary ,
Ministry of Heavy Industries
Udyog Bhawan, Rafi Marg, New Delhi - 110 011
4. The Secretary,
Ministry of New and Renewable Energy
Block-14, CGO Complex,
Lodhi Road, New Delhi-110 003,
5. The Advisor(CP Division)
Ministry of Environment ,Forests and Climate Change
Indira Paryavaran Bhawan
Jor Bagh Road, New Delhi - 110 003
6. All Zonal Offices of CPCB




(A. B. Akolkar) 5.3.16
Member Secretary

Final Document
on
Revised
Classification
of
Industrial Sectors
Under

Red, Orange, Green and White Categories
(February 29, 2016)



Central Pollution Control Board
Delhi

Executive Summary

Categorization of Industrial Sectors under Red, Orange, Green and White Category

The Ministry of Environment, Forest and Climate Change (MoEFCC) had brought out notifications in 1989, with the purpose of prohibition/ restriction of operations of certain industries to protect ecologically sensitive Doon Valley. The notification introduced the concept of categorization of industries as " Red", "Orange "and "Green" with the purpose of facilitating decisions related to location of these industries. Subsequently, the application of this concept was extended in other parts of the country not only for the purpose of location of industries, but also for the purpose of Consent management and formulation of norms related to surveillance / inspection of industries.

The concept of categorization of industries continued to evolve and as different State Pollution Control Boards interpreted it differently, a need arose to bring about necessary uniformity in its application across the country. In order to harmonize the 'Criteria of categorization', Directions were issued by CPCB under Section 18(1)(b) of the Water (Prevention & Control of Pollution) , Act, 1974 to all SPCBs/PCCs to maintain uniformity in categorization of industries as red, green and orange as per list finalized by CPCB, which identified 85 types of industrial sectors as 'Red', 73 industrial sectors as 'Orange' and 86 sectors as 'Green'.

The process of categorization thus far was primarily based on the size of the industries and consumption of resources. The pollution due to discharge of emissions & effluents and its likely impact on health was not considered as primary criteria. There was demand from the SPCBs / PCCs and industrial associations for categorization of the industrial sectors in a more transparent manner. Accordingly, the issue was discussed thoroughly during the national level conference of the Environment Ministers of the States, held in New Delhi during April 06-07, 2015 and a 'Working Group' comprising of the members from CPCB, APPCB, TNPCC, WBPCB, PPCB, MPCCB and Maharashtra PCB is constituted to revisit the criteria of categorization of industries and recommend measures for making the system transparent and rational.

The Working Group has developed the criteria of categorization of industrial sectors based on the Pollution Index which is a function of the emissions (air pollutants), effluents (water pollutants), hazardous wastes generated and consumption of resources. For this purpose the references are taken from the the Water (Prevention and Control of Pollution) Cess (Amendment) Act, 2003, Standards so far prescribed for various pollutants under Environment (Protection) Act , 1986 and Doon Valley Notification, 1989 issued by MoEFCC. The Pollution Index PI of any industrial sector is a number from 0 to 100 and the increasing value of PI denotes the increasing degree of pollution load from the industrial sector. Based on the series of brain storming sessions among CPCB, SPCBs and MoEFCC , the following criteria on 'Range of Pollution Index 'for the purpose of categorization of industrial sectors is finalized.



- Industrial Sectors having Pollution Index score of 60 and above - Red category
- Industrial Sectors having Pollution Index score of 41 to 59 -Orange category
- Industrial Sectors having Pollution Index score of 21 to 40 -Green category
- Industrial Sectors having Pollution Index score incl.&upto 20 -White category

The newly introduced White category of industries pertains to those industrial sectors which are practically non-polluting such as Biscuit trays etc. from rolled PVC sheet (using automatic vacuum forming machines), Cotton and woolen hosiers making (Dry process only without any dyeing/washing operation), Electric lamp (bulb) and CFL manufacturing by assembling only, Scientific and mathematical instrument manufacturing, Solar power generation through photovoltaic cell, wind power and mini hydel power (less than 25 MW).

The salient features of the 'Re-categorization' Exercise are as follows :

- Due importance has been given to relative pollution potential of the industrial sectors based on scientific criteria . Further, wherever possible, splitting of the industrial sectors is also considered based on the use of raw materials, manufacturing process adopted and in-turn pollutants expected to be generated.
- The Red category of industrial sectors would be 60.
- The Orange category of industrial sectors would be 83.
- The Green category of industrial sectors would be 63.
- Newly introduced White category contains 36 industrial sectors which are practically non-polluting.
- There shall be no necessity of obtaining the Consent to Operate" for White category of industries. An intimation to concerned SPCB / PCC shall suffice.
- No Red category of industries shall normally be permitted in the ecologically fragile area / protected area.

The purpose of categorization is to ensure that the industry is established in a manner which is consistent with the environmental objectives. The new criteria will prompt industrial sectors willing to adopt cleaner technologies, ultimately resulting in generation of fewer pollutants. Another feature of the new categorization system lies in facilitating self-assessment by industries as the subjectivity of earlier assessment has been eliminated. This 'Re-categorization' is a part of the efforts, policies and objective of present government to create a clean & transparent working environment in the country and promote the Ease of Doing Business.

Other similar efforts include installation of Continuous Online Emissions/ Effluent Monitoring Systems in the polluting industries, Revisiting of the CEPI (Comprehensive Environment Pollution Index) concept for assessment of polluted industrial clusters, Revision of existing industrial Emission/Effluent discharge standards, initiation of special drive on pollution control activities in Ganga River basin and many more in coming future.

Revised Criteria of Categorization of Industries

“Securing industrial pollution control in accordance with the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 by linking with categorization of industries, consent management and vigilance - ‘In context of Red, Orange, Green and White categories of industries”

A: Genesis of Categorization:

- The Ministry of Environment, Forest and Climate Change (MoEFCC) had brought out notifications, which inter-alia refers to Prohibition/ Restriction on operation of industries to protect ecologically sensitive areas or areas of specific importance. This has for the first time brought the concept of categorization of industries to “Red”, “Orange” and “Green” and restrict their operation in certain areas of importance. Therefore, it is at-once interpreted that Red, Orange and Green categorization is linked with location specific needs.
- The notification of MoEF was first brought on 2nd February, 1989 in case of “Restriction on location of industries, mining operations and other developmental activities in Doon Valley in “Uttarakhand” and thereafter another notification on 24th February 1999 regarding restriction on the setting up of industries in Dahanu Taluka in Maharashtra. The categorization had been made mainly on the basis of size of the industries, man power and consumption of resources.
- However, in other parts of the country, there have been variations in context to the classification of industries under Red, Orange and Green categories. SPCBs / PCCs were following their own criteria in different States thereby creating confusion.
- In order to harmonize the ‘Criteria of categorization’, a ‘Working Group’ was formed as per resolution passed during the 57th Conference of the Chairmen & Member Secretaries of CPCB and SPCBs. Based on the recommendations of the Working Group, Directions dated 4/6/2012 under Section 18(1)(b) of the Water



(Prevention & Control of Pollution), Act, 1974 were issued to all SPCBs/PCCs with the effects to maintain uniformity in categorization of industries as red, green and orange as per list finalized by the Working Group. This indicative list included 85 types of industrial sectors as 'Red', 73 industrial sectors as 'Orange' and 86 sectors as 'Green'. However, these identified categories have not been assigned with scores as per existing criteria/ or any new criteria

B: Categorization criteria used by SPCBs/PCCs:

SPCBs and PCCs use the criteria of Red, Orange and Green categories for consent management and vigilance purposes for carrying out inspections to verify compliance to the stipulated standards. However the above categorization do not emphasize on sector-specific plan for control of pollution in accordance with priority based on pollution index.

C: Gap in the process:

1. The categorization has been made mainly on the basis of size of the industries and consumption of resources. The pollution due to discharge of emissions & effluents and its impact on health was not considered as primary criteria.
2. Categorization was on random basis, no scoring system was adopted.

D: Resolutions made during National Level Conferences

The issue was discussed thoroughly during the following national level conferences held in New Delhi:

- Conference of the Environment Ministers of Central Government and State Governments during April 06-07, 2015
- 59th Conference of Chairmen & Member Secretaries of Pollution Control Boards / Pollution Control Committees held on April 08, 2015

Accordingly following resolutions were made during the Conferences:

1. A 'Working Group' comprising of the members from CPCB, APPCB, TNPCB, WBPCB, PPCB, MPPCB and Maharashtra PCB is constituted.
2. This WG shall revisit the categorization of industries that is based on pollution index criteria & environmental issues such as generation of emission, effluent and hazardous wastes.
3. The categorization will be done on the basis of composite score (0-100 marks) of Pollution Index given in accordance with the following weightage.

Air Pollution Score based on parameters namely PM, CO, NOx, SOx, HMs, Benzene, Ammonia and other toxic parameters relevant to the industry.	40 Marks
Water Pollution Score based on parameters namely pH, TSS, NH ₃ -N, BOD, Phenol and other toxic pollutants relevant to the industry.	40 Marks
Hazardous wastes (land fillable, incinerable, recyclable) as generated by the industry.	20 Marks
<p>Note :</p> <ul style="list-style-type: none"> • Parameters to be decided on the basis of the nature of the wastes generating from the industrial sector. • Industries having only either water pollution or air pollution, the score will be normalized wrt 100. 	

4. Based on the score of the Pollution Index, following categorization be made :
 - Type of industries, if scores 60 and above be categorized as Red
 - Type of industries, if scores from 30 to 59 be categorized as Orange
 - Type of industries, if scores from 15 to 29 be categorized as Green
 - Type of industries, if less than 15 be categorized as White or non-polluting industry.
5. SPCBs/PCCs may issue consent to the industries
 - Red category of industries for 5 years.
 - Orange category of industries for 10 years.
 - Green category of industries for 15 years.
 - No necessity of consent for non-polluting industries.
6. No red categories of industries will be permitted to establish in eco-sensitive areas and protected areas.

E: Follow-up Actions made on the Resolutions :-

- Accordingly, a Committee comprising the Chairmen of CPCB, APPCB, TNPCB, MPPCB, MPCB, PPCB, WBPCB and MS, CPCB was constituted vide CPCB OM dated

23.04.2015 to review & classify industrial sectors into different categories based on criteria of respective pollution potential.

- The categorization is made on the basis of following:
 - Quality of emissions (air pollutants) generated
 - Quality of effluents (water pollutants) generated
 - Types of hazardous wastes generated
 - Consumption of resources

- Reference is taken from the following :
 - The Water (Prevention and Control of Pollution) Cess Act, 1977
 - Standards so far prescribed for various pollutants under the Environment (Protection) Act , 1986
 - Doon Valley Notification, 1989 issued by MoEF.

F : Scoring Methodology :

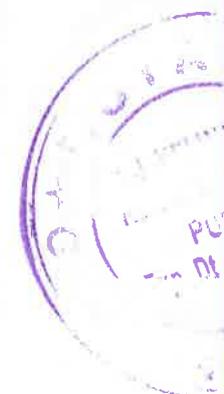
The details on the scoring methodology in respect of the aforesaid 3 components is presented in the following tables F-1 to F-4 .

Table F-1 : Water Pollution Scoring Methodology

Sl. No.	Activity / Types of Discharges	Score
Part A : Score W1 : Score based on types of expected criteria water-pollutants present in industrial processes waste waters. Maximum of the following seven categories is to be taken.		
W11	Waste-water which is polluted and the pollutants are - <ul style="list-style-type: none"> • not easily biodegradable (very high strength waste waters having BOD > 5000 mg/l); or • toxic; or • both toxic and not easily biodegradable. (Presence of criteria water pollutants having prescribed standard limits up-to 10 mg/l or having BOD > 5000 mg/l). For details appendix 1 may be referred)	30
W12	Non-toxic high strength polluted waste-water having BOD in the range of 1000-5000 mg/l and the pollutants are biodegradable. (Presence of criteria water pollutants having prescribed standard limits from 11 mg/l to 250 mg/l and having BOD strength in the range of 1000-5000 mg/l) . For details appendix 1 may be referred)	25
W13	Non toxic- polluted waste-water having BOD below 1000 mg/l and the pollutants are easily biodegradable. (Presence of criteria water pollutants having prescribed standard limits from 11mg/l to 250 mg/l and having BOD strength below 1000 mg/l) . For details appendix 1 may be referred)	20
W14	Waste-water generated from the chemical processes and which is polluted due to presence of high TDS (total dissolved solids) of inorganic nature. (Presence of criteria water pollutants having prescribed standard limits more than 250 mg/l. For details appendix 1 may be referred)	15
W15	Waste-water generated from the physical unit operations / processes and which is polluted due to presence of TDS (total dissolved solids) of inorganic nature and of natural origin like fresh-water RO rejects, boiler blow-downs, brine solution rejects etc. (Presence of criteria water pollutants having prescribed standard limits more than 250 mg/l. For details appendix 1 may be referred)	12
W16	Non-toxic polluted waste-water from those units which are: <ul style="list-style-type: none"> • Having the overall waste-water generation less than 10 KLD and • The pollutants are easily bio-degradable having BOD below 200 mg/l which can be easily treated in a single stage ASP (activated 	12



	sludge process) based Effluent Treatment Plant. Note : This is a special category and is applicable to only those units having over-all liquid waste generation less than 10 KLD with low strength organic load.	
W17	Waste-water from cooling towers and cooling-re-circulation processes	10
Part B : Score W2 : Score based on huge discharges of any kind (Penalty Clause)		
W2	Industry having overall liquid waste generation of 100 KLD or more including industrial & domestic waste-water.	10
Overall Water Pollution Score $W = W1+W2$		



Appendix 1

- **Water Pollutants covered under Group W11:**

- ✓ Free available Chlorine , Total residual chlorine, Fluoride (as F), Sulphide (as S), Free Ammonical Nitrogen, Dissolved phosphates (as P), Free ammonia (as NH₃), Nitrate Nitrogen, Mercury (As Hg), Selenium (as Se), Hexa-valent chromium (as Cr + 6), Lead (as Pb), Tin , Vanadium (as V), Cadmium (as Cd), Manganese (as Mn), Total chromium (as Cr), Copper (as Cu), Iron (as Fe), Nickel (as Ni), Zinc (as Zn), Benzene, Arsenic (as As), Benzo-a-pyrene, Cyanide (as CN), Phenolic compounds (as C₆H₅OH) , Adsorbable Organic Halogens (AOX), Boron and /or
- ✓ BOD strength of waste water > 5000 mg/l

- **Water Pollutants covered under Group W12:**

- ✓ Sodium Absorption Ratio (SAR) , Biochemical oxygen demand (3 days at 27°C), Total Kjeldahl nitrogen (TKN), Ammonical nitrogen (as N), Suspended solids, Total nitrogen (as N), Chemical oxygen demand, Oils & grease and
- ✓ BOD strength of waste water is in the range of 1000-5000 mg/l

- **Water Pollutants covered under Group W13:**

- ✓ Sodium Absorption Ratio (SAR), Biochemical oxygen demand (3 days at 27°C), Total Kjeldahl nitrogen (TKN), Ammonical nitrogen (as N), Suspended solids, Total nitrogen (as N), Chemical oxygen demand and
- ✓ BOD strength of waste water is below 1000 mg/l

- **Water Pollutants covered under Group W14 and W15:**

Chlorides as Cl, Colour , Total dissolved solids (TDS - Inorganic)

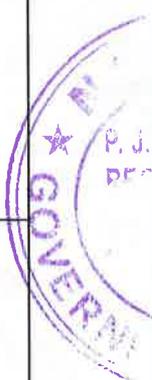
- **Water Pollutants covered under Group W16**

- ✓ BOD strength of waste water is below 200 mg/l and overall discharge is less than 10 KLD.



Table F-2 : Air Pollution Score

Sl. No.	Air Pollutants Group	'Range of Prescribed Standard' of criteria pollutants	Marks
Part 1 : Score A1 = Score based on types of expected criteria Air Pollutants present in the emissions , Maximum of the following seven categories is to be taken. For details appendix 2 may be referred.			
1	Group A1A	Presence of criteria air pollutants having prescribed standard limits up- to 2 mg/Nm ³	30
2	Group A1B	Presence of criteria air pollutants having prescribed standard from 3 to 10 mg/Nm ³	25
3	Group A1C	Presence of criteria air pollutants having prescribed standard from 11 to 50 mg/Nm ³	20
4	Group A1D	Presence of criteria air pollutants having prescribed standard from 51 to 250 mg/Nm ³	15
5	Group A1E	Presence of criteria air pollutants having prescribed standard from 251 mg/Nm ³ & above.	10
6	Group A1F	<ul style="list-style-type: none"> • Generation of fugitive emissions of Particulate Matters which are: <ul style="list-style-type: none"> ○ Not generated as a result of combustion of any kind of fossil-fuel. ○ Generated due to handling / processing of materials without involving the use of any kind of chemicals. ○ Which can be easily contained /controlled with simple conventional methods 	10
7	Group A1G	<ul style="list-style-type: none"> • Generation of Odours which are : <ul style="list-style-type: none"> ○ Generated due to application of binding gums / cements /adhesives /enamels ○ Which can be easily contained /controlled with simple conventional methods 	10
Part 2 : Score A2 = Score based on consumption of fuels and technologies required for air pollution control :			
6	Group A2F1	<ul style="list-style-type: none"> • All such industries in which the daily consumption of coal/fuel is more than 24 MT/day and the particular (Particulate/gaseous/process) emissions from which can be controlled only with high level equipments / technology like ESPs, Bag House Filters, High Efficiency chemical wet scrubbers etc. 	10
7	Group A2F2	<ul style="list-style-type: none"> • All such industries in which the daily consumption of coal/fuel is from 12 MT/day to 24 MT/day and the particular (Particulate/gaseous/process) emissions from which can be controlled with suitable proven technology. 	5
Overall Air Pollution Score -A = A1 + A2			



- **Air pollutants covered under Group A1A:**
Cd+Th, Dioxins & Furans, Mercury, Asbestos
- **Air Pollutants covered under Group A1B:**
HF, Nickel+ Vanadium, HBr, Manganese, Lead, H₂S, P₂O₅ as H₃PO₄
- **Air Pollutants covered under Group A1C:**
Chlorine, Pesticide compounds, CH₃Cl, TOC, Total Fluoride, Hydrocarbons, NH₃, HCL vapour & Mist, H₂SO₄ Mist, SO₂
- **Air Pollutants covered under Group A1D:**
CO, PM, CO, NO_x
- **Air Pollutants covered under Group A1E:**
NO_x with liquid-fuel, SO₂ with liquid-fuel



Table F-3: Hazardous Waste Generation Score

Sl.No.	Types of Hazardous Waste Generated as per Schedule 1 / Schedule 2 of Hazardous Waste (Management, Handling & Trans-boundary Movement) Rules , 2008 . Maximum of the following four categories is to be taken	Score
HW1	<ul style="list-style-type: none">• Land disposable HW which require special care & treatment for stabilization before disposal.	20
HW2	<ul style="list-style-type: none">• Incinerable HW	15
HW3	<ul style="list-style-type: none">• Land disposable HW which doesn't require treatment & stabilization before disposal.• High volume low effect wastes such as fly-ash, phspho-gypsum, red-mud, slags from pyro-metallurgical operations, mine tailings and ore beneficiation rejects)	10
HW4	<ul style="list-style-type: none">• Recyclable HW, which are easily recyclable with proven technologies.	10



Table F-4 : Calculation Sheet
Industrial Sector -

1. Water Pollution Score (W)			
Scores	Waste Water Category	Value	
Score on W1			
Score on W2			
Water Pollution Score = W1+W2			
2. Air Pollution Score (A)			
Scores	Air Pollutant Category	Value	
Score on A1			
Score on A2	-	-	
Air Pollution Score = A1+A2			
3. Hazardous Waste Score (HW)			
Score	HW Category	Value	
HW			
Grand Total = W + A + HW			

Note :

1. Any of the industrial sector having only either air pollution (A) or water pollution (W) , the score will be normalized to 100 as per the following formula -

$$\text{Normalized Score} = \{100 \times W \text{ (or A)}\} / 40$$

2. Any of the industrial sector having air pollution (A) and water pollution (W) both but no hazardous waste generation (H) , the joint score of air & water pollution will be normalized to 100 as per the following formula -

$$\text{Normalized Score} = \{100 \times (W+A)\} / 80$$

3. Any of the industrial sector having air pollution (A) & hazardous waste generation (H) but no water pollution (W), the joint score of air pollution & hazardous waste generation will be normalized to 100 as per the following formula -

$$\text{Normalized Score} = \{100 \times (A+H)\} / 60$$

4. Any of the industrial sector having water pollution (W) and hazardous waste generation (H) but no air pollution (A), the joint score of water pollution & hazardous waste generation will be normalized to 100 as per the following formula -

$$\text{Normalized Score} = \{100 \times (W+H)\} / 60$$

G : Developments :

- i. The existing Red (85 sectors) , Orange (73 sectors) and Green (86 sectors) i.e a total of 244 industrial sectors have been assessed as per the proposed formula by the Working Group. For this purpose, concerned Engineers / Scientists from the Member SPCBs were also involved & consulted during May 28-29, 2015.
- ii. After careful examination and consideration of the suggestions of concerned stake-holders the "Draft Document on Revised Concept of Categorization of Industrial Sectors " was prepared by the Committee and circulated to all the SPCBs, PCCs and concerned Ministries for their information & comments. The ' Draft Document ' was uploaded on the website of CPCB also for information & comments of one & all.
- iii. The matter was discussed during the 170th Board Meeting also and issues raised by the Board Members pertaining to some of the industrial sectors were clarified.
- iv. Responses were received from various concerned Ministries, SPCBs, Industrial Associations including individuals.
- v. Based on the above, final meeting was convened by the Secretary , MoEFCC with CPCB and senior officers of MoEFCC on January 06, 2016 to resolve the issues appropriately and finalize the 'Re-categorization'. Accordingly , following modifications in the 'Range of Pollution Index 'for the purpose of categorization of industrial sectors were suggested :
 - Industrial Sectors having Pollution Index score of 60 and above - Red category
 - Industrial Sectors having Pollution Index score of 41 to 59 -Orange category
 - Industrial Sectors having Pollution Index score of 21 to 40 -Green category
 - Industrial Sectors having Pollution Index score incl.& upto 20 -White category
- vi. Based on the final criteria as described in v above , the final categorization is as follows :

Category of Industrial Sector	Existing Categorization	Proposed (New) categorization
Red	85	60
Orange	73	83
Green	86	63
White	---	36
Total	244	242

- vii. In the proposed categorization, some of the industrial sectors have been either deleted due to duplication or merged with similar type of sectors on account of same

characteristics of pollution generation. In a similar way, some of the industrial sectors are split into more sectors on account of variation in the raw materials / manufacturing process. As a result final totals of the existing and proposed categorization are different.

- viii. The industrial sector which doesn't fall under any of the above four categories (Red, Orange, Green and White) , decision with regard to its categorization will be taken at the level of concerned SPCB/PCC by a committee headed by the Member Secretary , SPCB/PCC and comprising of two senior cadre Engineers / Scientists of the SPCB / PCC in accordance with the scoring-criteria specified in this document
- ix. The summary is presented in the following Table G-1 and final lists of Red, Orange, Green and White categories of industries are presented in Tables G-2, G-3, G-4 and G-5 respectively, which are self explanatory.



Table G-1: Final Summary Table Red , Orange, Green and White Categories of Industries (16-01-16)

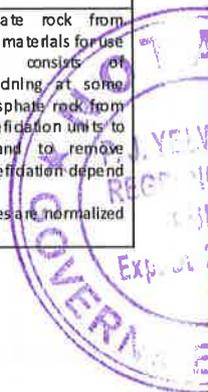
SI No.	Original Categorization	Initial Nos.	Addition by Splitting into further classes	Deletion/ Shifting to foot-note due to vague term /Merger/ other reasons	Re-categorization to Red	Re-categorization to Orange	Re-categorization to Green	Re-categorization to White	Check
									(1+2) = (3 to 7)
1	Red	85	11	7	60	26	3	Nil	96=96
2	Orange	73	2	3	Nil	51	19	2	75=75
3	Green	86	Nil	3+2=5	Nil	6	41	34	86=86
Final Categorization		244	13	15	60 (Red)	83 (Orange)	63 (Green)	36 (White)	257 =257 (Total categories including in foot-note)



Table G-2 : Final List of Red Category of Industrial Sectors

Sl No.	Orgnl Sl.No	Industry Sector	W1	W2	W	A1	A2	A	H	W+A+H	Revised Category	REMARKS
1.	38	Isolated storage of hazardous chemicals (as per schedule of manufacturing, storage of hazardous chemicals rules ,1989 as amended)									R-R	As per provisions of Rules, to be kept under Red category especially for safety purposes.
2.	4	Automobile Manufacturing (integrated facilities)	30	-	30	20	-	20	10	60	R-R	i. Such types of plants are having either one or combinations of polluting activities viz. washing, metal surface finishing operations, pickling, plating, electro-plating , phosphating, painting , heat treatment etc. ii. Some of such plants may outsource some /all of the polluting activities. In such cases, after thorough inspection of such units by concerned SPCB, re-categorization of the industry shall be made accordingly.
3.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Spent cleared metal catalyst containing copper,, Spent cleared metal catalyst containing zinc,	30	-	30	20	-	20	10	60	R-R	All the three types of pollutants are expected.
	44	Manufacturing of lubricating oils ,grease and petroleum based products	20	-	20	20	-	20	20	60	R-R	Generates all sorts of pollution.
	66 E	DG Set of capacity > 5 MVA	-	-	-	20	5	25	-	62.5	R-R	i. Mainly air polluting. ii. DG sets consume the diesel @ 0.21 litres/hr/KVA at full load. iii. Average running is taken @ 12 hrs / day although many of the DG sets run for more than this period.
6.	31	Industrial carbon including electrodes and graphite blocks, activated carbon, carbon black	10	-	-	20	5	25	10	62.5	R-R	Mainly air polluting. Air pollution score is normalized to 100.

7.	39	Lead acid battery manufacturing(excluding assembling and charging of lead-acid battery in micro scale)	10	-	10	25	-	25	10	62.5	R-R	<ul style="list-style-type: none"> i. Mainly air polluting. Air pollution scores are normalized to 100. ii. Lead Acid Battery manufacturing consists of various stages which broadly involve (after producing or receiving lead oxide): Paste Mixing , Grid Casting , Grid Pasting & Curing , Hydro-setting, parting & enveloping , Stacking, grouping & inter-cell welding , Formation. iii. Exposure of workmen to lead during all or any of the processes outlined above exceeds the prescribed standards if appropriate equipment in this respect is not installed at any Battery Manufacturing Unit. iv. All of the above processes, some more than others, involve release of lead particles or fumes into the environment. Pollution from the above processes can be grouped into two possible types, viz: (a) Lead Oxide becomes airborne and there is Particulate Pollution (b) Fumes are generated and there is Gaseous Pollution
8.	62	Phosphate rock processing plant	30	-	30	20	-	20	-	62.5	R-R	<ul style="list-style-type: none"> i. The separation of phosphate rock from impurities and non-phosphate materials for use in fertilizer manufacture consists of beneficiation, drying or calcining at some operations, and grinding. Phosphate rock from the mines is first sent to beneficiation units to separate sand and clay and to remove impurities. Steps used in beneficiation depend on the type of rock. ii. The water & air pollution scores are normalized to 100.



9.	66	Power generation plant [except Wind and Solar renewable power plants of all capacities and Mini Hydel power plant of capacity <25MW]	10	-	10	15	10	25		62.5	R-R	1. Mainly air polluting. It uses a mixture of biomass (agro based) and coal (< 10 %) as a fuel. Almost, round the year operation. 2. In case of DG sets of 5 MVA & more and emissions of SO2 will take place due to use of liquid fuel. Air pollution score will be =20 + 10 = 30, Normalized score will be 75. 3. In case of 'Waste to Energy Plants', water will be used for cooling and air score will be - 30+10 = 40.
10.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Spent catalyst containing nickel, cadmium, Zinc, copper, arsenic, vanadium and cobalt,	30	-	30	25	-	25	10	65	R-R	All the three types of pollutants are expected.
11.	67	Processes involving chlorinated hydrocarbons	30	-	30	20	-	20	15	65	R-R	Chlorinated hydrocarbons are used in the manufacture of insecticides, pesticides and organo chloro pesticides. Effluents & emissions are toxic in nature.
12.	74	Sugar (excluding Khandasari)	20	10	30	15	10	25	10	65	R-R	I. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. II. Sugar mills generate all sorts of pollution problems.
13.	22	Fibre glass production and processing (excluding moulding)	-	-	-	20	-	20	20	67	R-R	I. The use of styrene in most methods of fiberglass production causes hazardous air pollution that is harmful to breathe at excessive levels. II. It is mainly air polluting & HW generating industry. The air pollution & HW scores are normalized to 100. III. In case of lead containing glass, the score of A1 will be 25 and final normalized score will be 75 and shall be categorized as Red.
	23	Fire crackers manufacturing and bulk storage facilities	-	-	-	20	-	20	20	67	R-R	i. This is the normalized score based on air pollution & HW generation. ii. Various hazardous chemicals are used in the manufacturing process. iii. These chemicals are namely Potassium Nitrate, Potassium per-chlorate, Barium Nitrate, Aluminium compounds, Copper Chloride etc.

													iv. These chemicals are highly hazardous and cause serious diseases among the workers. especially ability of blood to carry oxygen leading to headaches, methemoglobinemia and kidney problems, skin problems, thyroid metal fume etc.
15.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Dismantlers Recycling Plants -- Components of waste electrical and electronic assemblies comprising accumulators and other batteries Included on Ilist A, mercury-switches, activated glass cullets from cathode-ray tubes and other activated glass and PCB-capacitors, or any other component contaminated with Schedule 2 constituents (e.g. cadmium, mercury, lead, polychlorinated biphenyl) to an extent that they exhibit hazard characteristics indicated in part C of this Schedule.	-	-	-	30	0	30	10	67	R-R	Mainly air polluting and hazardous waste generating. Air & HW pollution scores are jointly normalized to 100.	
16.	47	Milk processes and dairy products(integrated project)	20	10	30	20	5	25	-	68.75	R-R	i. Water as well as air polluting due to use of boilers. II. Water & air pollution scores are normalized to 100.	
17.	63	Phosphorous and its compounds	30	-	30	25	-	25	-	68.75	R-R	Water pollution & air pollution containing compounds of phosphorous are expected	
18.	61	Pulp & Paper (waste paper based without bleaching process to manufacture Kraft paper)	20	10	30	15	10	25	0	68.75	R-R	Mainly water & air polluting . Water & air pollution scores are normalized to 100.	
19.	13	Coke making , liquefaction, coal tar distillation or fuel gas making	30	-	30	20	-	20	20	70	R-R	It is a kind of petrochemical industry.	



20.	41	Manufacturing of explosives, detonators, fuses including management and handling activities	30	-	30	20	-	20	20	70	R-R	<p>I. Explosives manufacture and use contribute some measure of hazardous waste to the environment.</p> <p>II. Nitroglycerin produces several toxic byproducts such as acids, caustics, and oils contaminated with heavy metals. These must be disposed of properly by neutralization or stabilization and transported to a hazardous waste landfill.</p> <p>III. The use of explosives creates large amounts of dust and particulate from the explosion, and, in some cases, releases asbestos, lead, and other hazardous materials into the atmosphere.</p>
21.	45	Manufacturing of paints varnishes, pigments and intermediate (excluding blending/mixing)	30	-	30	25	-	25	15	70	R-R	<p>I. The process may cause considerable emissions of volatile organic compounds (VOC). VOC contribute to the creation of ozone in the lower layers of the atmosphere (photochemical air pollution) and can present danger to health.</p> <p>II. Dust and odour may also be a problem.</p> <p>III. Washing of vessels will contribute waste-waters.</p> <p>IV. Large quantity of HWs are also produced.</p>
22.	56	Organic Chemicals manufacturing	30	-	30	20	-	50	20	70	R-R	Such types of Industrial sectors generate all sorts of pollution.
23.	1	Airports and Commercial Air Strips	20	10	30	-	-	-	10	75	R-R	<p>I. The Airports are generating mainly the waste-waters.</p> <p>II. This is the water pollution normalized score for airports having discharge more than 100 KLD.</p> <p>III. The airports / strips having discharge less than 100 KLD will have score of 50 and hence orange category.</p> <p>IV. If the score is normalized wrt water + HW both, then all the airports will come under Orange category (score - 58.33).</p>
24.	3	Asbestos and asbestos based industries	-	-	-	30	-	30	10	75	R-R	<p>I. This is mainly air polluting industry.</p> <p>II. Final score is based on air pollution score only.</p> <p>III. Asbestos is carcinogenic and banned in many countries.</p>
25.	5	Basic chemicals and electro chemicals and its derivatives including manufacturing of acid	30	-	30	-	-	-	10	75	R-R	<p>I. Standards prescribed for Inorganic Chemicals are adopted.</p> <p>II. It is mainly water polluting industry having effluents which are toxic and not easily biodegradable.</p>



													<ul style="list-style-type: none"> iii. Water pollution score normalized to 100 is undertaken. iv. The earlier Red category industrial sector namely "Hydrocyanic acid and its derivatives" is also merged under this industrial sector.
26.	7	Cement	-	-	-	20	10	30	-	75	R-R	This is mainly air polluting industry & hence normalized air pollution score.	
27.	9	Chlorates, per-chlorates & peroxides	30	-	30	-	-	-	-	75	R-R	<ul style="list-style-type: none"> i. It is mainly water polluting industry having effluents which are toxic and not easily biodegradable. ii. Water pollution score normalized to 100 is undertaken. 	
28.	10	Chlorine, fluorine, bromine, iodine and their compounds	30	-	30	-	-	-	-	75	R-R	<ul style="list-style-type: none"> i. It is mainly water polluting industry having effluents which are toxic and not easily biodegradable. ii. Water pollution score normalized to 100 is undertaken. 	
29.	16	Dyes and Dye- Intermediates	30	-	30	20	5	25	20	75	R-R	<ul style="list-style-type: none"> i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Such types of industrial sectors generate all sorts of pollution. 	
30.	26	Health-care Establishment (as defined in BMW Rules)	20	10	30	-	-	-	-	75	R-R	<ul style="list-style-type: none"> i. Mainly water polluting. ii. The water pollution score is normalized to 100 & valid for Hospitals having total waste-water generation > 100 KLD. iii. The hospitals with Indnerator will be categorized as Red irrespective of the quantity of the waste-water generation. iv. The hospitals having total waste-water generation less than 100 KLD and without Indnerator, the normalized water pollution score will be 50 and will be categorized as Orange category. 	
31.	29	Hotels having overall waste-water generation @ 100 KLD and more.	20	10	30	15	-	15	-	75	R-R	<ul style="list-style-type: none"> i. Mainly water polluting. Small boiler may be installed. ii. The water pollution score is normalized to 100 & valid for Hotels having waste-water generation > 100 KLD. iii. The hotels having more than 20 rooms and waste-water generation less than 100 KLD and having a coal / oil fired boiler, the pollution score will be 35/40 & are categorized as Orange. iv. The hotels having more than 20 rooms and waste-water generation less than 10 KLD and 	

												having no-boiler & no hazardous waste generation, the pollution score will be 20 & are categorized as Green.
32.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule Iv of HW(M, H& TBM) rules, 2008 - Items namely - Lead add battery plates and other lead scrap/ashes/residues not covered under Batteries (Management and Handling) Rules, 2001. [* Battery scrap, namely: Lead battery plates covered by ISRI, Code word "Ralls" Battery lugs covered by ISRI, Code word "Rakes". Scrap drained/dry while intact, lead batteries covered by ISRI, Code word "rains".	30	-	30	25	--	25	20	75	R-R	All the three types of pollutants are generated.
33.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule Iv of HW(M, H& TBM) rules, 2008 - Items namely - Integrated Recycling Plants -- Components of waste electrical and electronic assemblies comprising accumulators and other batteries Included on list A, mercury-switches, activated glass cullets from cathode-ray tubes and other activated glass and PCB-capadtors, or any other component contaminated with Schedule 2 constituents (e.g. cadmium, mercury, lead, polychlorinated biphenyl) to an extent that they exhibit hazard characteristics indicated in part C of this Schedule.	30	-	30	25	-	25	20	75	R-R	All the three types of pollutants are expected.
34.	43	Manufacturing of glue and gelatin	30	10	40	20	-	20	-	75	R-R	Highly water polluting & obnoxious air polluting.
	49	Mining and ore beneficiation	30	10	40	15	5	20	-	75	R-R	Both air and water polluting. Score is normalized with air & water pollution.

36.	52	Nuclear power plant	10	-	10	30	-	30	15	75	R-R	<p>i. Mainly air polluting due to indnerator. Others - cooling water.</p> <p>ii. Air pollution score is normalized to 100.</p>
37.	58	Pesticides (technical) (excluding formulation)	30	-	30	25	-	25	20	75	R-R	<p>i. This Industrial sector is the one among the '17 categories of Highly Polluting Industries'.</p> <p>ii. Such types of Industrial sectors generate all sorts of pollution.</p>
38.	64	Photographic film and its chemicals	30	-	30	-	-	-	-	75	R-R	<p>i. Silver salts and other chemicals are used in preparation. Slight quantity of effluents is generated.</p> <p>ii. Water pollution scores are normalized to 100.</p>
39.	68	Railway locomotive work shop/Integrated road transport workshop/Authorized service centers	20	10	30	-	-	-	10	75	R-R	<p>i. Mainly water polluting industry. Water is used in the washing of locomotives, road transport vehicles during servicing.</p> <p>ii. This score is valid for those Centers having discharge more than 100 KLD.</p> <p>iii. Service Centers having waste-water generation < 100 KLD, the normalized score will be $= (100 \times 20) / 40 = 50$.</p>
40.	84	Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and colouring	30	10	40	15	-	15	20	75	R-R	In this sector all sorts of pollution are generated.
41.	8	Chlor Alkali	30	10	40	20	10	30	10	80	R-R	<p>i. This Industrial sector is the one among the '17 categories of Highly Polluting Industries'.</p> <p>ii. Chlor-alkali units are having different section like NaOH, Cl₂, SBP etc which are having toxic effluents. Additionally, fuel consumption is also on higher-side.</p>
42.	70	Ship Breaking Industries	30	-	30	30	-	30	20	80	R-R	<p>i. The ship-breaking industry creates numerous hazards for the coastal and marine environment.</p> <p>ii. Ship-breaking releases a large number of dangerous pollutants, including toxic waste, oil, poly-chlorinated biphenyls, and heavy metals, into the waters and sea bed.</p> <p>iii. While most of the oil is removed before a ship is scrapped, sand used to mop up the remaining oil is thrown into the sea. High concentrations of oil and grease are then found in the coastal waters, choking marine life.</p>

													iv. Solid waste strewn on the shore, 45 tonnes on any given day according to a study by the Central Pollution Control Board, also finds its way into the sea. v. Adding to the stress on coastal waters, the organic load from the thousands of workers living in cramped conditions with little or no sanitary facilities results in unacceptably high levels of BOD.
43.	53	Oil and gas extraction including CBM (offshore & on-shore extraction through drilling wells)	30	-	30	-	-	-	20	83	R-R		i. Mainly water polluting & hazardous waste generating. ii. The water pollution & HW generation scores are normalized to 100.
44.	36	Industry or process involving metal surface treatment or process such as pickling/ electroplating/paint stripping/ heat treatment using cyanide bath/ phosphating or finishing and anodizing / enamellings/ galvanizing	30	-	30	-	-	-	20	83	R-R		Mainly water polluting & toxic hazardous waste generating industry. Scores are normalized to 100.
45.	80	Tanneries	30	-	30	-	-	-	20	83	R-R		Mainly water polluting & hazardous waste generating industry. Scores are normalized to 100.
46.	65	Ports and harbour, jetties and dredging operations	30	10	40	15	10	25	20	85	R-R		This category contain all sorts of pollution.
47.	77	Synthetic fibers including rayon ,tyre cord, polyester filament yarn	30	10	40	25	10	35	10	85	R-R		This sector generates all sorts of pollution problems.
48.	81	Thermal Power Plants	30	10	40	20	10	30	15	85	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. TPP generate all sorts of pollution problems.
49.	71	Slaughter house (as per notification S.O.270(E)dated 26.03.2001)and meat processing industries, bone mill, processing of animal horn, hoofs and other body parts	25	10	35	-	-	-	-	87.5	R-R		Mainly water polluting and obnoxious odour generating industry. The water pollution score is normalized to 100
50.	2	Aluminium Smelter	30	10	40	20	10	30	20	90	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. This sector is generating all sorts of pollution i.e. air, water and HW.
51.	12	Copper Smelter	30	10	40	20	10	30	20	90	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Integrated Copper Smelters contain all sorts of

													pollution.
52.	20	Fertilizer (basic) (excluding formulation)	30	10	40	20	10	30	20	90	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Generates all sorts of pollution.
53.	37	Iron & Steel (involving processing from ore/ integrated steel plants) and or Sponge Iron units	30	10	40	20	10	30	20	90	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Such types of industrial sectors generate all sorts of pollution.
54.	61	Pulp & Paper (waste paper based units with bleaching process to manufacture writing & printing paper)	25	10	35	25	10	35	20	90	R-R		Waste paper based Pulp & Paper mills with bleaching process generate all sorts of pollution.
55.	85	Zinc Smelter	30	10	40	20	10	30	20	90	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Integrated Zinc smelter generates all sorts of pollution problems.
56.	55	Oil Refinery (mineral Oil or Petro Refineries)	30	10	40	25	10	35	20	95	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Such types of industrial sectors generate all sorts of pollution.
57.	59	Petrochemicals Manufacturing (including processing of Emulsions of oil and water)	30	10	40	25	10	35	20	95	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Such types of industrial sectors generate all sorts of pollution. iii. The earlier red category industrial sector namely "Processing of Emulsions of Oil & Water " is merged with this industrial sector.
58.	60	Pharmaceuticals	30	10	40	30	5	35	20	95	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Such types of industrial sectors generate all sorts of pollution.
59.	61	Pulp & Paper (Large-Agro + wood) , Small Pulp & Paper (agro based-wheat straw/rice husk)	30	10	40	25	10	35	20	95	R-R		i. This industrial sector is the one among the '17 categories of Highly Polluting Industries'. ii. Large /Small Agro based Pulp & Paper mills contribute all sorts of pollution problems.
60.	15	Distillery (molasses / grain / yeast based)	30	10	40	-	-	-	-	100	R-R		Mainly water polluting industry. Final score is the normalized water pollution score.



Note :

i. Under the column Revised Category, the full forms of the abbreviations are as follows :

- a. R-R means original category was Red and revised category is also Red
- b. R-O means original category was Red and revised category is Orange
- c. O-O means original category was Orange and revised category is also Orange
- d. O-G means original category was Orange and revised category is Green
- e. O-W means original category was Orange and revised category is White
- f. G-O means original category was Green and revised category is Orange
- g. G-G means original category was Green and revised category is also Green
- h. G-W means original category was Green and revised category is White

ii. There are specific remarks in respect of some of the industrial sectors. These sectors are either merged with other relevant sectors or deleted due to duplication. The overall details are as follows :

Sl No.	Original Sl No.	Industry Sector	Original Category	Remarks
1	14	Common treatment and disposal facilities(CETP, TSDF, E-waste recycling, CBMWTF, effluent conveyance project, incinerator, solvent/acid recovery plant, MSW sanitary land fill site)	R	i. All such facilities are classified as Red but special category projects as these are parts of pollution control facilities. ii. In case of CETP, the categorization will depend upon the category of member Industries being served.
2	18	Processing of Emulsions of Oil & Water		It is a part of Petrochemical Industries. Transferred and merged with the Industrial sector namely 'Petrochemicals' at Sl. No. 54.
3	27	Heavy engineering including ship building (with investment on Plant & Machineries more than Rs 10 crores)	R	Most of the pollution generating processes / operations under this category are similar to the industry category namely "Automobile Manufacturing (integrated facilities)" at Sl. No. 1 and may be referred accordingly.
4	30	Hydrocyanic acid and its derivatives	R	Have been merged with the red category industrial sector namely "Basic chemicals and electro chemicals and its derivatives including manufacturing of acid" at Sl. No. 24
5	32	Industrial estates/ parks / complexes/ areas/export processing zones/ SEZs/ Biotech parks/ leather complex	R	The classification will depend upon the category(ies) of the industries operating / proposed to be permitted in the area. In this context, guidelines prescribed in EIA Notification, 2006 shall be followed.
6	33	Industrial inorganic gases namely- a) Chemical gas- Acetylene, hydrogen, chlorine, fluorine, ammonia, sulphur dioxide, ethylene, hydrogen-sulphide, phosphine b) Hydrocarbon gases- Methane, ethane, propane	R	These gases are generally secondary products and produced alongwith other main products. To be classified as per the main parent plant.
7	69	Reprocessing of used oils & waste oils	R	i. The industry generates mainly the air pollution and oil bearing hazardous wastes. The normalized (air pollution & HW generation score is 58.33. ii. To be deleted as already covered under HW Recyclers / Re-processors (Used oils / Waste Oils) under Orange Category



Table G-3 : Final List of Orange Category of Industrial Sectors

Final Sl. No.	Orgnl S.No	Industry Sector	W1	W2	W	A1	A2	A	H	W+A+H	Revised category	Remarks
1.	20	Dismantling of rolling stocks (wagons/ coaches)	--	--	--	15	--	15	10	41.67	O-O	Emissions of dust and generation of waste oils take place during dismantling. Air pollution & HW generation scores (15+10=25) are normalized to 100.
2.	5	Bakery and confectionery units with production capacity > 1 TPD. (With ovens / furnaces)	20	--	20	15	--	15	--	43.75	O-O	
3.	10	Chanachur and laddoo from puffed and beaten rice(murl and shira) using husk fired oven	20	--	20	15	--	15	--	43.75	O-O	Normal water and air polluting.
4.	23	Coated electrode manufacturing	15	0	15	20	0	20	0	43.75	G-O	Preparation of core wire / rod, preparation of dry mix, preparation of wet mix, application of coating by extrusion, baking of coated electrodes
5.	24	Compact disc computer floppy and cassette manufacturing / Reel manufacturing	15	0	15	20	0	20	0	43.75	G-O	Generates waste-water and process emissions.
6.	24	Flakes from rejected PET bottle	20	-	20	15	-	15	-	43.75	R-O	Normal water & air pollutions are generated.
7.	30	Food and food processing including fruits and vegetable processing	20	--	20	15	--	15	--	43.75	O-O	Normal water and air polluting.
8.	40	Jute processing without dyeing	20	--	20	15	--	15	--	43.75	O-O	CPCB has notified standards for this category. Both air and water pollutions are generated.
9.	56	Manufacturing of silica gel	15	0	15	20	0	20	0	43.75	G-O	Waste-waters containing TDS and emissions of H ₂ SO ₄ are generated.



10.	45	Manufacturing of tooth powder, toothpaste, talcum powder and other cosmetic items	20	--	20	15	--	15	--	43.75	O-O	Both air and water pollution are generated.
11.	55	Printing or etching of glass sheet using hydrofluoric acid	15	--	15	20	--	20	--	43.75	O-O	Both air and water pollution are generated.
12.	65	Silk screen printing, sari printing by wooden blocks	20	--	20	15	--	15	--	43.75	O-O	Wash-water and PM emissions from boilers .
13.	76	Synthetic detergents and soaps(excluding formulation)	20	-	20	15	-	15	-	43.75	R-O	i. This is the score for units having generation of waste-waters less than 100 KLD. ii. The units having waste-water generation more than 100 KLD will become mainly water polluting and accordingly normalized water pollution score will be 75 and be categorized as Red.
14.	71	Thermometer manufacturing	15	--	15	20	--	20	--	43.75	O-O	Process - making glass bulb, forming reservoir in the glass tube for fluid, inserting fluid, scale marking. Use of fuel to heat the glass tubes and hydrofluoric acid to seal the scalling. Small quantities of spent acids are generated.
15.	14	Cotton spinning and weaving (medium and large scale)	--	--	--	15	--	37.5	10	47.5	O-O	Mainly air polluting industry. Sources of air pollution (PM) are the fine particles of cotton from spinning process. Air pollution score is normalized to 100.
16.	1	Almirah, Grill Manufacturing (Dry Mechanical Process)	--	--	--	20	--	20	--	50	O-O	Air pollution due to spray painting (emissions of VOCs). Units without painting operations shall be categorized as White.



17.	2	Aluminium & copper extraction from scrap using oil fired furnace (dry process only)	--	--	--	20	--	20	10	50	O-O	i. Normalized Air pollution score. ii. Significant air pollution due to melting (emissions of SO ₂ , PM).
18.	3	Automobile servicing, repairing and painting (excluding only fuel dispensing)	20	--	20	20	--	20	10	50	O-O	Normal water & air polluting and recyclable waste oil generating. If the waste water generation is more than 100 KLD, it will become mainly water polluting and Red category unit.
19.	4	Ayurvedic and homeopathic medicine	20	--	20	15	--	15	15	50	O-O	
20.	7	Brickfields (excluding fly ash brick manufacturing using lime process)	--	--	--	20	--	20	--	50	O-O	Significantly air polluting.
21.	8	Building and construction project more than 20,000 sq. m built up area	20	--	20	20	--	20	--	50	O-O	1. In the pre-construction stage, It is mainly air polluting due to generation of dust (PM) emissions. 2. After construction, it is mainly water polluting. If the discharge is more than 100 KLD, It will be having the normalized score of 75 and be categorized as Red.
22.	6	Ceramics and Refractories	-	-	-	20	-	20	-	50	R-O	i. Mainly air polluting Industry. ii. This score is for the units having coal consumption < than 12 MT/day. iii. For the units having coal consumption > 12 MT /day, the normalized air pollution score will be 62.5 and shall be categorized as Red.

23.	11	Coal washeries	15	10	25	15	-	15	-	50	R-O	<p>i. Wet washeries are mainly water polluting industry generating effluents which are having inorganic SS & TDS. Additionally, air pollution due to PM emissions is also generated.</p> <p>ii. Water & air pollution scores are jointly normalized to 100.</p>
24.	16	Dairy and dairy products (small scale)	20	--	20	20	--	20	--	50	O-O	Water and air polluting both.
25.	18	DG set of capacity >1MVA but < 5MVA	--	--	--	20	--	20	--	50	O-O	Mainly air polluting. air pollution score is normalized to 100.
26.	17	Dry coal processing, mineral processing, industries involving ore sintering, pelletising, grinding & pulverization	-	-	-	20	-	20	-	50	R-O	Mainly air polluting industry. Final score is the normalized air pollution score.
27.	19	Fermentation industry including manufacture of yeast, beer, distillation of alcohol (Extra Neutral Alcohol)	20	-	20	-	-	-	-	50	R-O	<p>i. Mainly water polluting industry. This is the normalized water pollution score for units having discharge < 100 KLD.</p> <p>ii. For the units having discharge > 100 KLD, the normalized water pollution score will be 75 and shall be accordingly categorized as Red.</p>
28.	21	Ferrous and Non-ferrous metal extraction involving different furnaces through melting, refining, re-processing, casting and alloy-making	-	-	-	15	5	20	10	50	R-O	<p>i. Mainly air polluting.</p> <p>ii. This score is applicable to secondary production of ferrous & non-ferrous metals (excluding lead) up-to 1 MT/hour production.</p>



													<p>iii. For lead, the normalized air pollution score will be = $(100 \times 25) / 40 = 62.5$ and is categorized as Red.</p> <p>iv. For Induction Furnace clubbed with AOD furnace - separate calculation shall be made based on the capacity of the furnaces. In such industries, the molten metal from induction furnace is transferred to AOD furnace where other metals like manganese and nickel are added to get the metal of desired constituents. The lime and silicon are also added for reduction of the metal oxides to the base metal. the normalized air pollution score will be = $(100 \times 25) / 40 = 62.5$ and is categorized as Red.</p>
29.	26	Fertilizer (granulation / formulation / blending only)	--	--	--	20	--	20	--	50	O-O	Air polluting.	
30.	27	Fish feed, poultry feed and cattle feed	--	--	--	20	--	20	--	50	O-O	Obnoxious odour, H ₂ S etc. AP score is normalized to 100	
31.	28	Fish processing and packing (excluding chilling of fishes)	20	--	20	--	--	--	--	50	O-O	Mainly water polluting. WP score is normalized to 100.	



32.	31	Forging of ferrous and non-ferrous metals (using oil and gas fired furnaces)	--	--	--	20	--	20	--	50	O-O	Heating furnace. Mainly air polluting.
33.	32	Formulation/pelletization of camphor tablets, naphthalene balls from camphor/ naphthalene powders.	--	--	--	20	--	20	--	50	O-O	Mainly air polluting. Emissions of Benzene, HC are expected.
34.	33	Glass ceramics, earthen potteries and tile manufacturing using oil and gas fired kilns, coating on glasses using cerium fluorides and magnesium fluoride etc.	--	--	--	20	--	20	--	50	O-O	Mainly air polluting. Emissions of SO2 are expected.
35.	35	Gravure printing, digital printing on flex, vinyl	20	--	20	20	--	20	10	50	O-O	Waste waters , emissions of VOCs
36.	36	Heat treatment using oil fired furnace (without cyaniding)	--	--	--	20	--	20	--	50	O-O	Mainly air polluting and noise generating. AP Score is normalized to 100.
37.	28	Hot mix plants	-	-	-	20	-	20	-	50	R-O	Mainly air polluting. Air pollution scores are normalized to 100.
38.	37	Hotels (< 3 star) or hotels having > 20 rooms and less than 100 rooms.	20	--	20	20	--	20	--	50	O-O	Mainly water polluting. WP score is normalized to 100.
39.	38	Ice cream	20	--	20	20	--	20	--	50	O-O	Wash-water and boilers / oven for pasteurization.
40.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Paint and Ink Sludge/residues	-	-	-	20	0	20	0	50	R-O	Mainly air polluting. Air pollution score is normalized to 100
41.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Brass Dross ,, Copper Dross,, Copper Oxide Mill Scale,, Copper Reverts, Cake & Residues,, Waste Copper and copper alloys in	10	-	10	20	-	20	10	50	R-O	Mainly air polluting.



		dispersible form,, Slags from copper processing for further processing or refining ,, Insulated Copper Wire,, Scrap/copper with PVC sheathing including ISRI-code material namely "Druid" ,, Jelly filled Copper cables ,, Zinc Dross-Hot dip Galvanizers SLAB,, Zinc Dross-Bottom Dross,, Zinc ash/Skimming arising from galvanizing and die casting operations,, Zinc ash/Skimming/other zinc bearing wastes arising from smelting and refining,, Zinc ash and residues including zinc alloy residues in dispersible from,,										
42.	35	Industry or processes involving foundry operations	-	-	-	20	-	20	-	50	R-O	I. This score is valid for the foundries having capacity < 5 MT/hr as such units require the coal/coke @ < 500 kg/hr. II. The units having capacity of 5 MT/hr and more, the coal/coke consumption will be more than 500 kg/hr and the normalized score will be 62.5 and classified accordingly as Red.
43.	40	Lime manufacturing (using lime kiln)	-	-	-	20	-	20	-	50	R-O	Mainly air polluting
44.	41	Liquid floor cleaner, black phenyl, liquid soap, glycerol mono-stearate manufacturing	20	--	20	20	--	20	--	50	O-O	Both air and water pollution are generated.



45.	42	Manufacturing of glass	10	-	-	20	-	20	-	50	R-O	i. Mainly air polluting (melting at 1500°C and refining). ii. In case of lead glass, the score of A1 will be 25 and accordingly the normalized scores will be 62.5 i.e. Red.
46.	43	Manufacturing of iodized salt from crude/raw salt	12	--	12	20	--	20	--	50	O-O	Boiling in Evaporators (multiple effect evaporators), centrifuging, iodization with KIO3 mixing. Mainly air polluting. Air pollution score is normalized to 100.
47.	42	Manufacturing of mirror from sheet glass	--	--	--	20	--	20	--	50	O-O	Evaporator & furnace for heating the metal to be applied as reflector on mirror. Mainly air polluting.
48.	44	Manufacturing of mosquito repellent coil	--	--	--	20	--	20	--	50	O-O	Mainly air polluting. Toxic fumes are expected.
49.	46	Manufacturing of Starch/Sago	25	-	25	15	-	15	-	50	R-O	i. Water and air polluting industry. Boiler is used for steam generation. ii. Water & air pollution scores are normalized to 100.
50.	46	Mechanized laundry using oil fired boiler	20	--	20	20	--	20	--	50	O-O	Both air and water pollution are generated.
51.	47	Modular wooden furniture from particle board, MDF & saw timber etc, Ceiling tiles/ partition board from saw dust, wood chips etc., and other agricultural waste using synthetic adhesive resin, wooden box making (With boiler)	--	--	--	20	--	20	--	50	O-O	1. Mainly air polluting. Boiler as well as VOCs from use of adhesives. 2. Without boiler, it will be a Green category industry.
52.	50	New highway construction project	-	-	-	20	-	20	-	50	R-O	Mainly air polluting project.



53.	51	Non-alcoholic beverages(soft drink) & bottling of alcohol/non alcoholic products	20	--	20	15	5	20	--	50	R-O	i. Both air and water polluting. Score is normalized with air & water pollution. This score is valid for industries having waste-water generation < 100 KLD. ii. For the units having waste-water generation > 100 KLD the , normalized score would be 62.5 and categorized as Red.
54.	49	Paint blending and mixing (Ball mill)	20	--	20	20	--	20	10	50	O-O	Both air and water pollution are generated.
55.	62	Paints and varnishes (mixing and blending)	20	0	0	20	0	20	0	50	G-O	Waste-waters as well as fumes of VOCs due to solvents, pigments, varnishes.
56.	51	Ply-board manufacturing(Including Veneer and laminate) with oil fired boiler/ thermic fluid heater(without resin plant)	0	--	0	20	--	20	--	50	O-O	Mainly air polluting because of use of boiler. AP score is normalized to 100
57.	52	Potable alcohol (IMFL) by blending, bottling of alcohol products	20	--	20	--	--	--	--	50	O-O	Mainly water polluting. WP score is normalized to 100.
58.	54	Printing ink manufacturing	20	--	20	20	--	20	--	50	O-O	1. Pigments, binders and solvents are used. 2. Boiler is also used. 3. Emissions of VOCs take place.
59.	70	Printing press	20	0	20	20	0	20	0	50	G-O	Colored waste-waters containing dyes and VOC emissions are generated.
60.	59	Reprocessing of waste plastic Including PVC	20	--	20	20	--	20	--	50	O-O	Large quantities of wash-water and fugitive emissions are generated.
61.	61	Rolling mill (oil or coal fired) and cold rolling mill	10	--	10	20	--	20	--	50	O-O	Mainly air polluting. Air pollution score is normalized to 100. Others - cooling water and recyclable waste oils etc. are generated.
62.	67	Spray painting, paint baking, paint shipping	--	--	--	20	--	20	10	50	O-O	Mainly air polluting. Emissions of VOCs and HC are generated.

63.	72	Steel and steel products using various furnaces like blast furnace /open hearth furnace/induction furnace/arc furnace/submerged arc furnace /basic oxygen furnace /hot rolling reheated furnace	10	-	10	20	-	20	10	50	R-O	i. Mainly air polluting. In the emissions, oxides of manganese, nickel etc. are also present. ii. Air pollution score is normalized to 100.
64.	73	Stone crushers	-	-	-	20	-	20	-	50	R-O	Mainly air polluting. Air pollution score is normalized to 100.
65.	75	Surgical and medical products including prophylactics and latex	20	-	20	20	-	20	-	50	R-O	Both air as well as water polluting. Air and water pollution scores are normalized to 100.
66.	85	Teflon based products	0	0	0	20	0	20	0	50	G-O	Due to spraying applications, emissions (HC) are generated
67.	70	Thermocol manufacturing (with boiler)	--	--	--	20	--	20	--	50	O-O	Polystyrene is heated. Mainly air polluting with boiler.
68.	82	Tobacco products including cigarettes and tobacco/opium processes	20	-	20	20	-	20	-	50	R-O	Such Industries generate both air as well as water pollution. These scores are normalized to 100.
69.	72	Transformer repairing/ manufacturing (dry process only)	--	--	--	20	--	20	10	50	O-O	Mainly air polluting because of ovens, shot-blasting etc.
70.	73	Tyres and tubes vulcanization/ hot retreating	10	--	10	20	--	20	--	50	O-O	Mainly air polluting. Emissions of PM, VOCs and obnoxious odour are generated.
71.	83	Vegetable oil manufacturing including solvent extraction and refinery /hydrogenated oils	20	-	20	15	5	20	10	50	R-O	i. All sorts of pollution are generated. ii. This score is valid for plants having waste-water generation < 100 KLD. iii. If the waste-water generation is more than 100 KLD, the unit shall be classified as Red.
72.	74	Wire drawing and wire netting	20	--	20	--	--	--	--	50	O-O	Mainly water polluting. WP scores normalized to 100.

73.	21	Dry cell battery (excluding manufacturing of electrodes) and assembling & charging of add lead battery on micro scale	30	--	30	15	--	15	10	55	O-O	Water and air polluting both.
74.	50	Pharmaceutical formulation and for R & D purpose (For sustained release/ extended release of drugs only and not for commercial purpose)	20	--	20	20	--	20	15	55	O-O	i. All sorts of pollution are generated. ii. R&D activities are to be shifted to Red category.
75.	78	Synthetic resins	20	-	20	20	-	20	15	55	R-O	All sorts of pollution are generated.
76.	79	Synthetic rubber excluding molding	20	-	20	20	-	20	15	55	R-O	i. Most synthetic rubber is created from two materials, styrene and butadiene. Both are currently obtained from petroleum. ii. Process is similar to a part of Petrochemical plants.
77.	9	Cashew nut processing	25	--	25	20	--	20	--	56	O-O	Normal water and air polluting.
78.	12	Coffee seed processing	25	--	25	20	--	20	--	56	O-O	Normal water & air polluting industry.
79.	57	Parboiled Rice Mills	25	-	25	20	-	20	-	56	R-O	i. Rice Mills are generating both air and water pollution. Waste-waters are having high strength in respect of BOD. ii. This is the normalized air & water pollution score for units having waste-water generation < 100 KLD and fuel consumption less than 12 MTD. iii. For units having waste-water generation > 100 KLD or fuel consumption > 12 MTD or both, the unit shall be classified as Red.



80.	29	Foam manufacturing	--	--	--	20	--	20	15	58	O-O	<p>i. Raw material is polyurethane, latex etc.</p> <p>ii. Emissions of VOCs and HAPs, CH₃Cl₂ and similar compounds as blowing agents.</p> <p>iii. Outdated raw materials and spoiled slots are discarded as HW.</p>
81.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Used Oil - As per specifications prescribed from time to time.	10	0	10	20	0	20	15	58.33	R-O	Mainly air polluting and hazardous waste generating industry. Air pollution & HW scores are normalized to 100
82.	34	Industries engaged in recycling / reprocessing/ recovery/reuse of Hazardous Waste under schedule iv of HW(M, H& TBM) rules, 2008 - Items namely - Waste Oil ---As per specifications prescribed from time to time.	-	-	-	20	0	20	15	58.33	R-O	Mainly air polluting and hazardous waste generating industry. Air pollution & HW scores are normalized to 100.
83.	56	Producer gas plant using conventional up drift coal gasification (linked to rolling mills glass and ceramic industry referatories for dedicated fuel supply)	--	--	--	20	--	20	15	58.33	O-O	Mainly air polluting & tar (HW) generating. SO ₂ , CO, NO _x are generated. Tar is the by-product and utilized by other industries in co-processing.

Note :

- i. Under the column Revised Category, the full forms of the abbreviations are as follows :
 - a. R-R means original category was Red and revised category is also Red
 - b. R-O means original category was Red and revised category is Orange
 - c. O-O means original category was Orange and revised category is also Orange
 - d. O-G means original category was Orange and revised category is Green
 - e. O-W means original category was Orange and revised category is White
 - f. G-O means original category was Green and revised category is Orange
 - g. G-G means original category was Green and revised category is also Green
 - h. G-W means original category was Green and revised category is White



ii. There are specific remarks in respect of some of the industrial sectors. These sectors are either merged with other relevant sectors or deleted due to duplication / vague category. The overall details are as follows:

Sl No	Original Sl No.	Industry Sector	Original Category	Remarks
1	24	Excavation of sand from the river bed (excluding manual excavation)	O	Since such types of activities cause ecological disturbances, the instructions issued by the government from time to time be followed. To be categorized by MoEF&CC.
2	39	Infrastructure Development Project	O	Vast variety of such projects come under such category. This is to be decided by the concerned SPCB in line of EIA Notification, 2006.
3	53	Power press	O	Very vague term hence deleted. Such types of general engineering units have already been covered.



Table G-4 : Final List of Green Category of Industrial Sectors

Sl. No.	Orgnl Sl. No.	Industry Sector	W1	W2	W	A1	A2	A	H	W+A+H	Revised Category	Remarks
1.	2	Aluminium utensils from aluminium circles by pressing only (dry mechanical operation)	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from buffing operations.
2.	6	Ayurvedic and homeopathic medicines (without boiler)	10	-	10	-	-	-	-	25	G-G	Small quantities of waste-waters are generated from washing operations.
3.	8	Bakery /confectionery /sweets products (with production capacity <1tpd (with gas or electrical oven)	10	-	10	-	-	-	-	25	G-G	Small quantities of waste-waters are generated from washing operations.
4.	6	Bi-axially oriented PP film along with metalizing operations	10	-	10	-	-	-	-	25	O-G	Mainly extrusion process involving Cooling water recirculation
5.	10	Biomass briquettes (sun drying) without using toxic hazardous wastes	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from pulverization / mixing operations.
6.	13	Blending of melamine resins & different powder, additives by physical mixing	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from pulverization / mixing operations.
7.	15	Brass and bell metal utensils manufacturing from circles(dry mechanical operation without re-rolling facility)	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from buffing operations.
8.	16	Candy	10	-	10	10	-	10	-	25	G-G	Small quantities of waste-water and minor



												PM emissions are generated.
9.	17	Cardboard or corrugated box and paper products (excluding paper or pulp manufacturing and without using boilers)	-	-	-	10	-	10	-	25	G-G	This score is valid with Small gas / electricity operated oven / furnace for making glue.
10.	18	Carpentry & wooden furniture manufacturing (excluding saw mill) with the help of electrical (motorized) machines such as electrical wood planner, steel saw cutting circular blade, etc.	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from cutting operations.
11.	19	Cement products (without using asbestos / boiler / steam curing) like pipe, pillar, jafri, well ring, block/tiles etc.(should be done in closed covered shed to control fugitive emissions)	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions from mixing operations.
12.	20	Ceramic colour manufacturing by mixing & blending only (not using boiler and wastewater recycling process)	-	-	-	10	-	10	-	25	G-G	Minor air pollution due to some fugitive PM emissions.
13.	11	Chilling plant, cold storage and ice making	10	-	10	-	-	-	-	25	O-G	Cooling water recirculation only.
14.	13	Coke briquetting (sun drying)	-	-	-	10	-	10	-	25	O-G	Mainly air polluting industry. Sources of air pollution (PM) are pulverizes and mixers. Air pollution score is normalized to 100.
15.	28	Cotton spinning and weaving (small scale)	-	-	-	10	-	10	-	25	G-G	Minor PM emissions from spinning process.
16.	17	Dal Mills	-	-	-	10	-	10	-	25	O-G	Some fugitive emissions of PM.



17.	29	Decoration of ceramic cups and plates by electric furnace	-	-	-	10	-	10	-	25	G-G	Fumes of enamels. Minor air pollution.
18.	19	Digital printing on PVC clothes	-	-	-	10	-	10	-	25	O-G	Minor emissions / odour generations are expected.
19.	25	Facility of handling, storage and transportation of food grains in bulk	-	-	-	10	-	10	-	25	O-G	Some fugitive emissions of PM during handling of grains.
20.	36	Flour mills (dry process)	-	-	-	10	-	10	-	25	G-G	Fugitive dust emissions.
21.	41	Glass , ceramic, earthen potteries, tile and tile manufacturing using electrical kiln or not involving fossil fuel kiln	-	-	-	10	-	10	-	25	G-G	Minor fugitive emissions only.
22.	34	Glue from starch (physical mixing) with gas / electrically operated oven /boiler.	-	-	-	10	-	10	-	25	O-G	Some fugitive emissions of PM during mixing of raw materials.
23.	42	Gold and silver smithy (purification with acid smelting operation and sulphuric acid polishing operation) (using less or equal to 1 litre of sulphuric acid/ nitric acid per month)	-	-	-	10	-	10	-	25	G-G	Minor fumes from cleaning process.
24.	36	Heat treatment with any of the new technology like ultrasound probe , induction hardening , ionization beam, gas carburizing etc.	10	-	10	10	-	10	-	25	O-G	<ul style="list-style-type: none"> • Cooling waters and minor heat fumes. • Finalization of categorization subject to field verification.
25.	46	Insulation and other coated papers (excluding paper or pipe manufacturing)	-	-	-	10	-	10	-	25	G-G	Minor fumes due to application of poly-urethane
26.	49	Leather foot wear and leather products (excluding tanning and hide processing except cottage scale)	-	-	-	10	-	10	-	25	G-G	Minor fumes due to use of adhesives / gums.



27.	50	Lubricating oil, greases or petroleum based products (only blending at normal temperature)	-	-	-	10	-	10	-	25	G-G	Minor fumes at the time of transfers from one container to other.
28.	54	Manufacturing of pasted veneers using gas fired boiler or thermic fluid heater and by sun drying	-	-	-	10	-	10	-	25	G-G	1. Minor fumes due to application of gums / adhesives / pastes etc. 2. This score is valid only for gas fired boiler. 3. The units having coal fired boilers shall be categorized as Orange.
29.	59	Oil mill Ghani and extraction (no hydrogenation / refining)	10	-	10	-	-	-	-	25	G-G	Small quantities of floor washings & equipments washings are generated.
30.	48	Packing materials manufacturing from non asbestos fibre, vegetable fibre yarn	-	-	-	10	-	10	-	25	O-G	Some fugitive emissions of PM are expected.
31.	65	Phenyl/toilet cleaner formulation and bottling	-	-	-	10	-	10	-	25	G-G	Minor fumes of VOCs in the work zone
32.	67	Polythene and plastic processed products manufacturing (virgin plastic)	10	-	10	10	-	10	-	25	G-G	Cooling water & emissions due to mixing of raw materials.
33.	68	Poultry, Hatchery and Piggery	-	-	-	10	-	10	-	25	G-G	Obnoxious odour containing H ₂ S, CH ₄ etc. and fugitive PM emissions
34.	69	Power looms (without dye and bleaching)	-	-	-	10	-	10	-	25	G-G	Minor emissions of PM.
35.	71	Puffed rice (muri) (using gas or electrical heating system)	-	-	-	10	-	10	-	25	G-G	Minor emissions of PM.
36.	57	Pulverization of bamboo and scrap wood	-	-	-	10	-	10	-	25	O-G	Some fugitive emissions of PM are expected.
37.	72	Ready mix cement concrete	-	-	-	10	-	10	-	25	G-G	PM emissions.
38.	73	Reprocessing of waste cotton	-	-	-	10	-	10	-	25	G-G	PM emissions.
39.	60	Rice mill (Rice hullers only)	-	-	-	10	-	10	-	25	O-G	PM emissions are generated. Mainly air



													polluting. AP score is normalized to 100
40.	62	Rolling mill (gas fired) and cold rolling mill	10	-	10	10	-	10	-	25	O-G	Mainly air polluting. AP score is normalized to 100	
41.	75	Rubber goods industry (with gas operated baby boiler)	-	-	-	10	-	10	-	25	G-G	Some PM emissions and obnoxious odour.	
42.	63	Saw mills	-	-	-	10	-	10	-	25	O-G	Mainly air polluting. PM and noise are generated.	
43.	77	Soap manufacturing (hand made without steam boiling / boiler)	10	-	10	-	-	-	-	25	G-G	Small quantities of waste-water are generated.	
44.	80	Spice grinding (upto-20 HP motor)	-	-	-	10	-	10	-	25	G-G	Small quantities of fugitive emissions of raw materials.	
45.	66	Spice grinding (>20 hp motor)	-	-	-	10	-	10	-	25	O-G	Mainly air polluting. Fugitive emissions of PM.	
46.	81	Steel furniture without spray painting	-	-	-	10	-	10	-	25	G-G	Obnoxious gases from welding as well as noise pollution.	
47.	82	Steeping and processing of grains	10	-	10	-	-	-	-	25	G-G	Washing waters are generated.	
48.	86	Tyres and tube retreating (without boilers)	-	-	-	10	-	10	-	25	G-G	Due to applications of binding gum / adhesives / cement, some obnoxious fumes may generate.	
49.	22	Chilling plant and ice making without using ammonia	12	-	12	-	-	-	-	30	G-G	Cooling water and brine water circuits. Spillages / blow down may take place	
50.	26	CO2 recovery	12	-	12	-	-	-	-	30	G-G	Normal water pollution from scrubbing action	
51.	32	Distilled water (without boiler) with electricity as source of heat	12	-	12	-	-	-	-	30	G-G	TDS as distillation residues	



52.	45	Hotels (up to 20 rooms and without boilers)	12	--	12	--	--	--	--	30	G-G	This score is valid for hotels having overall waste-water generation less than 10 KLD.
53.	53	Manufacturing of optical lenses (using electrical furnace)	12	--	12	--	--	--	--	30	G-G	Small quantities of waste-waters containing TDS, SS are generated.
54.	58	Mineralized water	12	--	12	--	--	--	--	30	G-G	RO Rejects.
55.	68	Tamarind powder manufacturing	12	--	12	15	--	15	--	33.75	O-G	<ul style="list-style-type: none"> Dried tamarind fruits - cleaned and after soaking them in water they are boiled in steam jacketed kettle for about 40-45 minutes. Then pulp is extracted in pulper and dried in drum type drier and on cooling, the final product is packed. Generates small quantities of waste waters and air emissions. Joint score is normalized to 100.
56.	15	Cutting, sizing and polishing of marble stone	15	--	15	--	--	--	--	37.5	O-G	Mainly water polluting . Water pollution score is normalized to 100.
57.	22	Emery powder (fine dust of sand) manufacturing	--	--	--	15	--	15	--	37.5	O-G	Air polluting. PM emissions take place during various stages of grindings of naturally occurring minerals.
58.	25	Flyash export, transport & disposal facilities	-	-	-	15	-	15	-	37.5	R-G	<ul style="list-style-type: none"> This is mainly air polluting activity. This is the normalized score based on air pollution.
59.	48	Mineral stack yard / Railway sidings	15	-	15	15	-	15	-	37.5	R-G	<ul style="list-style-type: none"> Mainly air pollution due to loading, unloading, storage and transportation of the minerals.



													<ul style="list-style-type: none"> Waste-water generation mainly during rains only.
60.	54	Oil and gas transportation pipeline	-	-	-	10	5	15	-	37.5	R-G	<ul style="list-style-type: none"> Contains small gas based power plants up-to 5 MWs. Air pollution score is normalized to 100. In case , If these power plants are bigger / liquid fuel / oil based, scores will be calculated accordingly. 	
61.	64	Seasoning of wood in steam heated chamber	--	--	--	15	--	15	--	37.5	O-G	<ul style="list-style-type: none"> Air pollution due to use boiler for supply of steam. Air pollution score is normalized to 100. 	
62.	84	Synthetic detergent formulation	--	--	--	15	--	15	--	37.5	G-G	<ul style="list-style-type: none"> This score is valid for the industries which are not manufacturing LABSA. It is procured from outside. Small quantities of emissions are generated from mini boiler. Air pollution score is normalized to 100. 	
63.	69	Tea processing (with boiler)	--	--	--	15	--	15	--	37.5	O-G	<ul style="list-style-type: none"> With boiler, it is an orange category industry. Without boiler, it will be green category industry. 	



Note :

- i. Under the column Revised Category, the full forms of the abbreviations are as follows :
- R-R means original category was Red and revised category is also Red
 - R-O means original category was Red and revised category is Orange
 - O-O means original category was Orange and revised category is also Orange
 - O-G means original category was Orange and revised category is Green
 - O-W means original category was Orange and revised category is White
 - G-O means original category was Green and revised category is Orange
 - G-G means original category was Green and revised category is also Green
 - G-W means original category was Green and revised category is White

- ii. There are specific remarks in respect of some of the industrial sectors. These sectors are either merged with other relevant sectors or deleted due to duplication. The overall details are as follows :

Sl No	Original Sl No.	Industry Sector	Original Category	Remarks
1	47	Jobbing and Machining	G	Vague category to be deleted, as such activities have already been covered in other categories.
2	66	Reel manufacturing	G	Already covered in other categories. Hence, deleted
3	1	Assembling of acid lead batteries (up to 10 batteries per day excluding lead plate casting)	G	Already covered in Orange category. Hence, deleted
4	5	Automobile fuel outlets (only dispensing)	G	Minor air pollution due to some fugitive emissions during fuel filling operations. May be exempted from the purview of Consent management.
5	30	Diesel generator sets (15 KVA to 1 MVA)	G	<ul style="list-style-type: none"> Normal operation – 12 hrs a day. Consumption of diesel = 1680 litres for 1 MVA DG set at full load @ 0.21 litres / KVA / hr. Stand-alone DG Sets having total capacity 1 MVA or less and equipped with acoustic enclosures alongwith adequate stack height may be exempted from the purview of Consent management. Higher capacity DG sets have already been covered under Red / Orange categories .



Table G-5: Final List of White Category of Industries

Sl. No.	Orgnl Sl. No.	Industry Sector	W1	W2	W	A1	A2	A	H	W+A+H	Revised Category
1.	3	Assembly of air coolers / conditioners ,repairing and servicing	--	--	--	--	--	--	--	--	G-W
2.	4	Assembly of bicycles ,baby carriages and other small non motorizing vehicles	--	--	--	--	--	--	--	--	G-W
3.	7	Bailing (hydraulic press)of waste papers	--	--	--	--	--	--	--	--	G-W
4.	9	Bio fertilizer and bio-pesticides without using inorganic chemicals	--	--	--	--	--	--	--	--	G-W
5.	11	Biscuits trays etc from rolled PVC sheet (using automatic vacuum forming machines)	--	--	--	--	--	--	--	--	G-W
6.	12	Blending and packing of tea	--	--	--	--	--	--	--	--	G-W
7.	14	Block making of printing without foundry (excluding wooden block making)	--	--	--	--	--	--	--	--	G-W
8.	21	Chalk making from plaster of Paris (only casting without boilers etc. (sun drying / electrical oven)	--	--	--	--	--	--	--	--	G-W
9.	25	Compressed oxygen gas from crude liquid oxygen (without use of any solvents and by maintaining pressure & temperature only for separation of other gases)	--	--	--	--	--	--	--	--	G-W
10.	27	Cotton and woolen hosiers making (Dry process only without any dyeing / washing operation)	--	--	--	--	--	--	--	--	G-W
11.	31	Diesel pump repairing and servicing (complete mechanical dry process)	--	--	--	--	--	--	--	--	G-W
12.	33	Electric lamp (bulb) and CFL manufacturing by assembling only	--	--	--	--	--	--	--	--	G-W

13.	34	Electrical and electronic item assembling (completely dry process)	--	--	--	--	--	--	--	--	G-W
14.	23	Engineering and fabrication units (dry process without any heat treatment / metal surface finishing operations / painting)	--	--	--	--	--	--	--	--	O-W
15.	35	Flavoured betel nuts production/ grinding (completely dry mechanical operations)	--	--	--	--	--	--	--	--	G-W
16.	37	Fly ash bricks/ block manufacturing	--	--	--	--	--	--	--	--	G-W
17.	38	Fountain pen manufacturing by assembling only	--	--	--	--	--	--	--	--	G-W
18.	39	Glass ampules and vials making from glass tubes	--	--	--	--	--	--	--	--	G-W
19.	40	Glass putty and sealant (by mixing with machine only)	--	--	--	--	--	--	--	--	G-W
20.	43	Ground nut decorticating	--	--	--	--	--	--	--	--	G-W
21.	44	Handloom/ carpet weaving (without dyeing and bleaching operation)	--	--	--	--	--	--	--	--	G-W
22.	48	Leather cutting and stitching (more than 10 machine and using motor)	--	--	--	--	--	--	--	--	G-W
23.	51	Manufacturing of coir items from coconut husks	--	--	--	--	--	--	--	--	G-W
24.	52	Manufacturing of metal caps containers etc	--	--	--	--	--	--	--	--	G-W
25.	55	Manufacturing of shoe brush and wire brush	--	--	--	--	--	--	--	--	G-W
26.	57	Medical oxygen	--	--	--	--	--	--	--	--	G-W
27.	60	Organic and inorganic nutrients (by physical mixing)	--	--	--	--	--	--	--	--	G-W
28.	61	Organic manure (manual mixing)	--	--	--	--	--	--	--	--	G-W
29.	63	Packing of powdered milk	--	--	--	--	--	--	--	--	G-W
30.	64	Paper pins and u clips	--	--	--	--	--	--	--	--	G-W
31.	58	Repairing of electric motors and generators (dry mechanical process)	--	--	--	--	--	--	--	--	O-W
32.	74	Rope (plastic and cotton)	--	--	--	--	--	--	--	--	G-W



33.	76	Scientific and mathematical instrument manufacturing	--	--	--	--	--	--	--	--	G-W
34.	78	Solar module non conventional energy apparatus manufacturing unit	--	--	--	--	--	--	--	--	G-W
35.	79	Solar power generation through solar photovoltaic cell, wind power and mini hydel power (less than 25 MW)	--	--	--	--	--	--	--	--	G-W
36.	83	Surgical and medical products assembling only (not involving effluent / emission generating processes)	--	--	--	--	--	--	--	--	G-W

Note : Under the column Revised Category, the full forms of the abbreviations are as follows :

- a. R-R means original category was Red and revised category is also Red
- b. R-O means original category was Red and revised category is Orange
- c. O-O means original category was Orange and revised category is also Orange
- d. O-G means original category was Orange and revised category is Green
- e. O-W means original category was Orange and revised category is White
- f. G-O means original category was Green and revised category is Orange
- g. G-G means original category was Green and revised category is also Green
- h. G-W means original category was Green and revised category is White





केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
(पर्यावरण एवं वन मंत्रालय, भारत सरकार)
(MINISTRY OF ENVIRONMENT & FORESTS, GOVT. OF INDIA)

No. B-29012/ESS/CPA/2015-16

19.08.2015

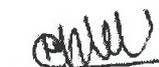
Sub: "Harmonization of Classification of industries under Red / Orange / Green / White Categories".

During the Conference of the Environment Ministers of States held in New Delhi during April 06-07, 2015, it was resolved to adopt pollution potential criteria for categorization of Red, Orange & Green categories of industries and that a Committee be constituted with State representatives. Further, in the 59th Conference of Chairmen & Member Secretaries of Pollution Control Boards/PCCs held in New Delhi on April 08, 2015, it was agreed to constitute a Committee to look into categorization system of industries based on their respective pollution potential index.

2. Accordingly, a Committee comprising the Chairmen of CPCB, APPCB, TNPCB, MPPCB, MPCB, PPCB, WBPCB and MS, CPCB was constituted vide CPCB OM dated 23.04.2015 to review & classify industrial sectors into different categories based on criteria of respective pollution potential indices.
3. The existing Red (85 sectors) , Orange (73 sectors) and Green (86 sectors) industrial sectors have been assessed as per the proposed formula by a group of Scientists from CPCB . For this purpose , concerned Engineers / Scientists from the Member SPCBs of the Committee were also involved & consulted during May28-29, 2015.
4. After careful examination and consideration of the suggestions of concerned stake-holders the "Draft Document on Revised Concept of Categorization of Industrial Sectors " is prepared by the Committee .

In this context, the Undersigned is directed to forward a copy of the " Draft Document on Revised Concept of Categorization of Industrial Sectors to all the SPCBs, PCCs and concerned Ministries for their comments. Accordingly, the same is enclosed herewith and all the SPCBs, PCCs and concerned Ministries are, hereby requested to provide their comments by 04.09.2015. The comments may kindly be sent through hard copy as well as soft copy at e-mail: nkgupta.cpcb@nic.in , nkgpcb@hotmail.com .

Encl : As above


[N.K. Gupta]
Incharge - ESS

To:

1. All the State Pollution Control Boards / Pollution Control Committees
2. The Secretary, Ministry of Micro Small and Medium Enterprises, New Delhi
3. The Secretary, Ministry of Heavy Industries & Public Enterprises, New Delhi
4. The Advisor & Incharge , CP Division, MoEFCC, New Delhi
5. CPCB Website

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

'Parivesh Bhawan', East Arjun Nagar, Delhi - 110032

दूरभाष / Tel. : 43102030, फेक्स / Fax : 22305793, 22307078, 22307079, 22301932, 22304948

ई-मेल / e-mail : cpcb@nic.in वेबसाइट / Website : www.cpcb.nic.in



Exhibit 3

MAHARASHTRA INDUSTRIAL DEVELOPMENT CORPORATION

(A GOVT. OF MAHARASHTRA UNDERTAKING)



No.DE Roha/IFMS/ A20684 /of'2021

Office of the Deputy Engineer,
M.I.D.C. Roha Sub division, Dhatav,
Tal. Roha, Dist. Raigad.

Date: 17.01.2022

To,
M/s Sudarshan Chemical Industries
Plot No. 44, 45, 46
MIDC, Roha Indl. Area,
Dhatav, Roha.

Sub :- Roha Industrial Area
Payment of proportionate and balance capital cost contribution.

Dear Sir,

This office has issued the demand letter towards payment of Balance Capital cost contribution of Rs. 1.42 Crores and proportionate capital cost contribution of Rs. 1.75 Crores.

It is requested to make the payment of these charges at the earliest. Kindly note that, the No dues certificate will be issued only after full payment of these charges.

Thanking you,

Yours faithfully,


Deputy Engineer
M.I.D.C. Sub-Dn, Roha.

Copy submitted to the Executive Engineer, M.I.D.C. Division, Alibag for favour of information please.



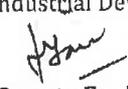
1575



MAHARASHTRA INDUSTRIAL DEVELOPMENT CORPORATION

Roha Sub Division Office, Roha Kolad Road, Tal. Roha, Dist. Raigad 402116
Tel. No. 02194-263825, E-mail: deroha@midcindia.org

DEMAND NOTE

To M/s. Sudarshan Chemical Industries Ltd MIDC Roha Plot No.46 CONSUMER GSTIN :27AABCS4223P1Z3			Invoice No.	DVAL008/ROH303/	
			Date:	14.01.2022	
			Location of Service: Roha Industrial Area		
Sr. No.	Description of Service	SAC No.	QTY	Rate	Amount
1	Balance Capital Cost Contribution	---	---	---	1,42,00,000.00
			Total		1,42,00,000.00
			Add: CGST		
			Add: SGST		
			Grand Total		1,42,00,000.00
Rupees	One Crores Fourty Two Lakhs only				
MIDC GSTIN: 27AAACM3560C1ZV MIDC PAN No. AAACM3560C MIDC TAN No. PNEM07859F E&OE Cheque/DD/PO should be drawn in favour of Executive Engineer MIDC Allbag			For Maharashtra Industrial Development Corporation  Deputy Engineer, MIDC, Sub-Division Roha		





MAHARASHTRA INDUSTRIAL DEVELOPMENT CORPORATION

Roha Sub Division Office, Roha Kolad Road, Tal. Roha, Dist. Raigad 402116
Tel. No. 02194-263825, E-mail: deroha@midcindia.org

DEMAND NOTE

To, M/s. Sudarshan Chemical Industries Ltd MIDC Roha Plot No.46			Invoice No.	DVAL008/ROH303/	
CONSUMER GSTIN :27AABCS4223P1Z3			Date:	14.01.2022	
			Location of Service: Roha Industrial Area		
Sr. No.	Description of Service	SAC No.	QTY	Rate	Amount
1	Proportionate Capital Cost of Up-gradation of CETP Work	---	---	---	1,75,00000.00
			Total		1,75,00000.00
			Add: CGST		-
			Add: SGST		-
			Grand Total		1,75,00000.00
Rupees	One Crores Sevety Five Lakhs only				
MIDC GSTIN: 27AAACM3560C1ZV		For Maharashtra Industrial Development Corporation			
MIDC PAN No. AAACM3560C		 Deputy Engineer, MIDC, Sub-Division Roha			
MIDC TAN No. PNEM07859F					
E&OE					
Cheque/DD/PO should be drawn in favour of Executive Engineer MIDC Alibag					

11th February, 2022

The Executive Engineer,
Maharashtra Industrial Development Corporation,
Alibag,
Dist Raigad

Sudarshan Chemical Industries Limited
46, MIDC Estate, Dhatav, Roha,
Dist. Raigad 402116, India
Tel.: +91 2194 263 531 Fax:+91 2194 263 602

Ref: Committee's report on RIA CETP, Roha related issues with M/s Sudarshan Chemical Industries Limited, MIDC, Roha

Sub: Actions arising out of Committee's Report dated 3rd November, 2021

Dear Sir,

At the outset, we would like to thank your office for taking initiative and forming a Committee for looking into the long pending issues with RIA CETP. We would also like to place on record our sincere appreciation for giving us an opportunity for presenting our case and also giving a detailed report consisting of recommendations of the Committee for resolving the pending issues. We present herewith an update on the following action points arising out of the Committee's report dated 3rd November, 2021

1. In terms of Clause 11.7 of the Report, the Committee has recommended the MIDC to process the necessary approvals and permissions required for the Mega Project of Sudarshan Chemical Industries Limited (Sudarshan).
2. In terms of Clause 11.1 of the Recommendation of the Committee, the Committee has recommended Sudarshan to pay balance capital contribution of Rs.1.42 Crore to MIDC towards expansion of RIA CETP from 10 MLD capacity to 22.5 MLD. The Committee has also made recommendation that Sudarshan should also pay Rs.1.75 Crores towards proportionate Capital Contribution Cost of up-gradation of CETP work being undertaken by MIDC.

Sudarshan has now been advised to pay the capital contribution amounts of Rs.1.42 Crore and Rs. 1.75 Crore vide your letter dated 17th January, 2022 as a pre-condition for issue of No Dues Certificate. The said No Dues Certificate would be necessary for processing of our application for approval of our building plans and other approvals / permissions.

As explained in detail in our written submissions before the Committee, since Sudarshan has resigned from the membership of CETP in 2016 and hence cannot be made liable to pay the capital contribution cost of upgradation of CETP.

However, since payment of capital contribution of Rs.1.42 Crore and Rs.1.75 Crore would be necessary for securing the No Dues Certificate, the Management of Sudarshan is left with no choice but to make the capital contribution of Rs. 1.42 Crore and Rs.1.75 Crore towards upgradation of CETP infrastructure being undertaken by MIDC, under protest, without prejudice to its right of pursuing all possible legal remedies at the appropriate Judicial / Quasi- Judicial Forums.

Sudarshan Chemical Industries Limited
Registered Office and GHO Address
152 Wellesley Road, Pune - 411 001, India
Tel: +91 20 260 58 888 Fax: +91 20 260 58 222
Email: contact@sudarshan.com
www.sudarshan.com

Corporate Identity No: U41159PN1951PLC008409

Recd
Received
15/02/2022
Asst. Deputy Engineer
MIDC Sub - Division Roha



We are, therefore, arranging to make payment of Rs. 1.42 Crore and Rs.1.75 Crore towards upgradation of CETP infrastructure being undertaken by MIDC, under protest, without prejudice to our right of pursuing all possible legal remedies at the appropriate Judicial / Quasi- Judicial Forums for recovering the said contribution with interest and other legal costs. Accordingly, we attach herewith Cheque No. 623715 of HDFC Bank Limited for Rs.1.42 Crore and Cheque No. 623714 of HDFC Bank Limited for Rs.1.75 Crore towards upgradation of CETP infrastructure being undertaken by MIDC, under protest, without prejudice to our right of pursuing all possible legal remedies at the appropriate Judicial / Quasi- Judicial Forums for recovering the said contribution with interest and other legal costs.

We once again would like to request you to process our application for sanction of building plans expeditiously and grant us the sanction for our building plans.

In case you need any further Information / clarification, we shall be glad to provide the same.

Thanking you,

Yours truly

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED


VIVEK GARG

AUTHORISED SIGNATORY

Copy to

1. Chief Executive Officer (CEO)
Maharashtra Industrial Development Corporation
Udyog Sarathi Building
MIDC Head Office,
Andheri (East) Mumbai – 400 093
2. The Chief Engineer
Maharashtra Industrial Development Corporation
Udyog Sarathi Building
MIDC Head Office,
Andheri (East) Mumbai – 400 093
3. The Superintendent Engineer (Kokan)
Maharashtra Industrial Development Corporation
Panvel, Dist. Raigad
4. The Deputy Engineer (Dhatav)
Maharashtra Industrial Development Corporation
Sub division dhatav , Roha,Dist. Raigad



A/C PAYEE ONLY

HDFC BANK LTD. 885, BHANDARKAR ROAD,
OPP - SANE DAIRY, PUNE - 411 004, MAHARASHTRA.
RTGS / NEFT IFSC : HDFC0000007

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जकां ऑर्डर पर

Rupees रुपये ONE CORRE ONLY TWO LACS ONLY अदा करें

₹ 1,42,00,000/-

For Sudarshan Chemical Industries Ltd

A/c No. 00070110000226 C/A
जकां अ.

Payable at par through clearing/transfer at all branches of HDFC BANK LTD

[Handwritten Signature]

Authorised Signatory
Please sign above / जकां पर हस्ताक्षर करें

॥ 6 2 3 7 1 5 ॥ 4 1 1 2 4 0 0 2 1 9 0 0 0 2 2 ॥ 3 0





A/C/PAYEE ONLY

HDFC BANK LTD. 885, BHANDARKAR ROAD,
OFF - SARE DAPT, PUNE - 411 004, MAHARASHTRA
RTGS / NEFT IFSC : HDFC0000067

दिनांक
Date 1 0 0 2 2 0 2 2

Valid for 3 months Only

Pay EXECUTIVE ENGINEER, MIDC DIVISION, ALIBAG By Order
उत्तक आदेश पर

Rupees रुपये ONE crore seventy five lacs only.

₹ 1,75,00,000/-

For Sudarshan Chemical Industries Ltd

A/c No. 00070110000226 C/A

Payable at par through clearing/transfer at all branches of HDFC BANK LTD

[Handwritten Signature]

Authorised Signatory
Please sign above / यहाँ पर हस्ताक्षर करें

⑈ 6 2 3 7 1 4 ⑈ 4 1 2 4 0 0 2 ⑈ 9 0 0 0 2 ⑈ 3 0

SESHASAI(C)/CTS-2010 010716

Exhibit 4

SUDARSHAN



LETTER OF AUTHORITY

In furtherance to the Board Resolution passed at the meeting of the Board of Directors of Sudarshan Chemical Industries Limited (“the Company”) held on 29th October 2018, I hereby authorize **Mr. Adwait Shrikant Joshi, Deputy Manager – Legal and Secretarial**, to sign, execute and file Sur-Rejoinder on behalf of the Company to the Combined Reply dated 12th February, 2024 filed by M/s. RIA CETP Co-Op Society Ltd in OA No. 58 of 2022 before the National Green Tribunal, Pune Bench.

This Letter of Authority shall be in force for a period of 3 (three) months from the date of issuance of this Letter of Authority or as soon as Mr. Adwait Joshi ceases to be in the employment of the Company, whichever is earlier.

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED

ASHISH VIJ
WHOLETEIME DIRECTOR
DIN: 08140194



Date: 19th August, 2024
Place: Pune, Maharashtra, India

Sudarshan Chemical Industries Limited

Registered Office:

Eleven West Panchshil, 7 Floor, Survey No. 25,

Near PAN Card Club Road, Baner, Pune - 411 069, India.

Tel. No.: +91 20 682 81 200

Email: contact@sudarshan.com

www.sudarshan.com

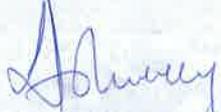
Corporate Identity No: L24119PN1951PLC008409

1582

CERTIFIED EXTRACT OF THE MINUTES OF THE BOARD OF DIRECTORS OF SUDARSHAN CHEMICAL INDUSTRIES LIMITED HELD ON 29TH OCTOBER, 2018 AT PUNE

“RESOLVED THAT in supersession of the resolution passed by the Board of Directors in earlier meetings, authority be and is hereby severally granted to Mr. R. B. Rathi, Managing Director and Mr. Ashish Vij, Executive Director and Vice President (Operations) to delegate powers to employees of the Company or other person/s as deemed necessary in connection with the business of the Company to effectively discharge various obligations whether statutory or otherwise by means of Power of Attorney or Letter of Authority as may be required from time to time.”

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED



ASHISH VIJ
WHOLETIME DIRECTOR
DIN: 08140194



Date: 19th August, 2024
Place: Pune, Maharashtra, India

Sudarshan Chemical Industries Limited

Registered Office:

Eleven West Panchshil, 7 Floor, Survey No. 25,
Near PAN Card Club Road, Baner, Pune - 411 069, India.

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