REPORT OF JOINT COMMITTEE
IN COMPLIANCE OF ORDER OF HON'BLE NGT,
PRINCIPAL BENCH NEW DELHI
IN THE MATTER OF OA NO. 05 OF 2022

(Brackish Water Research Centre V/s. Gujarat State Pollution Control Board & Ors.)

TITLED "GUJARAT: ATLEAST 06 DEAD, 20 SICK AFTER GAS LEAK AT INDUSTRIAL AREA IN SURAT"

(As per order of Hon'ble National Green Tribunal, Principal Bench, New Delhi Dated 18.01.2022)

UNDER THE CHAIRMANSHIP OF JUSTICE B.C. PATEL, FORMER CHIEF JUSTICE, DELHI HIGH COURT AND FORMER JUDGE OF THE GUJARAT HIGH COURT

Prepared By

FOR SUBMISSION TO

HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI

APRIL 2022

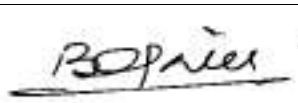
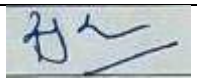
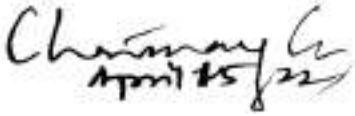
CONTENTS

ANNEXURES	
Annexure – 1	Google image & Photographs of the incident Site
Annexure – 2	The FIR filed by Sachin Police Station
Annexure – 3	The Closure order made against 1) Sahjanand Colour Yarn, 2) Real Chem and 3) Jai Bajrang Industries (formerly-Sejal Colour Chem).
Annexure – 3A	Vadodara Inspection report
Annexure – 3B	Bharuch Inspection report
Annexure – 4	The FIR filed against Chemie Organic Company
Annexure – 5	The FIR filed against tanker No. MH-04-HY-6377 and tanker No. GJ-06-ZZ-6221
Annexure – 6	The FIR registered against tanker No. GJ-06-BT-6431 and tanker No. GJ-06-BT-6421
Annexure – 7	The copy of the bank statement of Hikal Ltd account
Annexure – 8	The concluding report of FSL
Annexure – 9	Copy of the reports i.e., final cause of death
Annexure – 10	The manufacturing process of Fenamidone.
Annexure – 11	The consent renewed on 10/11/2021 of M/s. Hikal Ltd
Annexure – 12	The consent renewal application of M/s. Hikal Ltd
Annexure – 13	The pollution load report of Institute of Chemical Technology on January 17, 2018
Annexure – 13-A	Table of different name of chemical
Annexure – 14	Hikal Ltd Application for the Amendment
Annexure – 15	Hazardous waste stream
Annexure – 16	Hazardous waste (Existing &Proposed)
Annexure – 17	Copy of minutes of 3rd meeting of Technical Committee was held for the year 2018-19 on 30/06/2018
Annexure – 18	The copy of the permits of Tanker No. GJ-06-BT-6421 and the tanker No GJ-06-BT-6431.
Annexure – 19	The copy of the permits of Tank Lorry Reg. No. GJ-12-BY-1891.
Annexure – 20	The copy of the affidavit submitted by MPCB
Annexure – 20-A	A Communication (e-mail on dated:10/01/2022) to MS MPCB.

Annexure – 21	Internal Correspondence e-mail
Annexure – 22	Invoice collectively
Annexure – 23	NaHS cannot be used in Cement Industry
Annexure – 24	Calculation Sheet
Annexure – 25	CETP GECL Bill
Annexure – 26	Compensation granted to deceased
Annexure – 27	Total tankers involved
Annexure – 28	Closure order of M/s. Chemie Organics
Annexure – 29	Closure order of M/s. Raina Industries
Annexure – 30	Inspection report of M/s. Hikal Ltd. By MPCB
Annexure – 31	EC of M/s. Hikal Ltd granted by MoEF&CC in 2007

REPORT OF COMMITTEE IN COMPLAINCE OF ORDER OF HON'BLE NGT, PRINCIPAL BENCH, NEW DELHI IN THE MATTER OF OA NO. 05 OF 2022 (BRACKISH WATER RESEARCH CENTER VERSUS GUJARAT STATE POLLUTION CONTROL BOARD & ORS) TITLED "GUJARAT: AT LEAST 06 DEAD, 20 SICK AFTER GAS LEAK AT INDUSTRIAL AREA IN SURAT"

(As per order of Hon'ble National Green Tribunal, Principal Bench, New Delhi Dated 18.01.2022)

NAME OF COMMITTEE MEMBERS	Institute	Signature
Hon'ble Justice Shri B.C. Patel	Former Chief Justice, Delhi High Court and former Judge of the Gujarat High Court, Ahmedabad	
Shri Aayush Oak, IAS	Collector & District Magistrate, Surat	
Dr. Manoj Patadiya	Director, Gujarat State Disaster Management Authority, Gandhinagar	
Smt. Rupal Solanki	DCP, Crime Branch, Surat City	
Shri Amit Dharva	Technical Advisor, IC Office, Gandhinagar	
Dr. Yogesh Kumar	Scientist C, Integrated Regional Office, MoEF&CC, Gujarat	
Shri Amit Thakkar	Scientist D, Central Pollution Control Board, Regional Directorate, Vadodara, Gujarat	
Shri Chinmay Ghoroi	IIT Gandhinagar, Palaj, Gandhinagar, Gujarat	
Dr Jignasa Oza	I/c. Regional Officer, Regional Office, Gujarat Pollution Control Board, Surat	

REPORT OF COMMITTEE IN COMPLIANCE OF ORDER OF HON'BLE NGT, PRINCIPAL BENCH, NEW DELHI IN THE MATTER OF OA NO. 05 of 2022 TITLED "GUJARAT: AT LEAST 06 DEAD, 20 SICK AFTER GAS LEAK AT INDUSTRIAL AREA IN SURAT.

I. PREAMBLE

Hon'ble The National Green Tribunal, Principal Bench, at New Delhi (hereinafter referred as "the Tribunal") vide Original Application No. 05/2022(WZ) took the cognizance of an incident reported in the daily, the Indian Express, dated 07/01/2022 wherein at least 06 persons died and 20 fell sick after the gas leak at industrial area in Surat, and after hearing an order was made on 18/01/2022.

Hon'ble NGT issued the following directions as per order 18.01.2022

II. CONSTITUTION OF NINE MEMBER COMMITTEE

Relevant para 16 are reproduced as –
Accordingly, we constitute a nine-member joint Committee as follows:

(i) Justice B.C. Patel, former Chief Justice, Delhi High Court and former Judge of the Gujarat High Court presently stationed at Ahmedabad - Chairman,
(ii) Representative of MoEF&CC – Member,
(iii) Representative of CPCB – Member,
(iv) Secretary, Industries, Gujarat – Member
(v) Gujarat State PCB – Member
(vi) State Disaster Management Committee – Member
(vii) SSP, Surat – Member
(viii) Head of the Chemical Engineering Department of the IIT Gandhinagar – Member,
(ix) District Magistrate, Surat

III. DIRECTIONS FOR THE COMMITTEE

Relevant para 17 is reproduced as:
"The Committee may ascertain the sequence of events; causes of failure and persons and authorities responsible therefor; extent of damage to life, human and non-human; and environment – including, water, soil, air; steps to be taken for compensation of victims and restitution of the environment, and the cost involved; remedial measures to prevent recurrence; any other incidental or allied issues found relevant, including particularly already acidic effluents flowing in the drain in question."

The Committee (or some of the members) may undertake visit to the site, conduct proceedings, if necessary online, interact with such stakeholders as may be necessary and place its report on the website of the State PCB within two months.

i. The sequence of events;
ii. Causes of failure and persons and authorities responsible therefor;
iii. Extent of damage to life, human and non-human; public health; and environment – including, water, soil, air;
iv. Steps to be taken for compensation of victims and restitution of the damaged property and environment, and the cost involved;
v. Remedial measures to prevent recurrence;
vi. Any other incidental or allied issues found relevant, including particularly already acidic effluents flowing in the drain in question.

- The Committee will be at liberty to take assistance of such experts, individuals and institutions as may be considered necessary.
- GPCB & CPCB will be the nodal agency for coordination.

IV. DIRECTIONS TO THE CHIEF SECRETARY, GUJARAT

Relevant para 17, is reproduced as-

The Chief Secretary, Gujarat may review the status and compliance of Hazardous Waste Management Rules, 2016 and take steps for bridging the gap in coordination with the concerned authorities. If any further direction is found necessary, he may place the matter before the Bench.

V. APPROACH

The committee adopted following approach in compliance of the order of the Hon'ble NGT:

- In compliance of the order, a joint committee comprising following members along with Hon'ble Justice B.C.Patel and other officials from Gujarat Pollution Control Board (hereinafter referred as "GPCB") carried out series of meetings(through VC & Physical) on 08.02.2022, 16.02.2022, 26.02.2022, 12.03.2022, 17.03.2022 wherein representatives of MPCB were also invited. Following officers from MPCB attended meeting physically on 17.03.2022 and supplied information
  - Mr. P K Mirashe, Asst. Sec (Ret.), Technical,
  - Shri Nandkumar Gurav, Regional Head, and
  - Mr. Dhananjay Patil, Regional Officer Taloja.
- The committee carried out site inspection where the incidence took place on 04.04.2022. During the site inspection along with the committee members following officials were also present and discussed the steps to be taken by Surat Administration with reference to the incidence.
  - Shri Sharad Singhal, IPS, Additional Commissioner of Police, Surat
  - Shri Aayush Oak, IAS, Collector & District Magistrate, Surat (Member)
  - Shri. A. V. Shah, Member Secretary, Gujarat Pollution Control Board
- Report preparation based on the above.

VI. NATURAL DRAIN WHERE FATAL ACCIDENT TOOK PLACE

a) Telephonic massage received from Shri J. K. Pandya (A. C. P. - F Division) regarding causality occurred at GIDC Sachin due to fumes / gas released from area where tanker No. GJ 06 ZZ 6221 parked on bridge over the natural drain passing nearby M/s. Vishwaprem Dyeing and Printing Mills Pvt. Ltd., Plot no. 06, Road no. 03, GIDC Sachin, Surat.

b) Looking to the seriousness of the incident, checking of the tanker was carried out with the help of expert person of the nearby industry using special personal protective equipment (PPEs) by team of GPCB and police. It was noticed that tanker was almost found empty. However, very little quantity of liquid waste remaining at bottom level of tanker was collected as sample from tanker no. GJ 06 ZZ 6221 for analysis purpose. pH and appearance of the collected sample - pH: around 10 on pH strip and appearance: Brown in colour.

GPCB Lab code	pH	COD	NH_3- N	SO_4^{-2}	S^{-2}	CN
233	=14	3,00,672	13,832	13,453	87,95 6	165.1

c) Other seven waste water samples from upstream and downstream were also collected from the flowing natural drain at the place of incidence at that time

VII. IMMEDIATE ACTION TAKEN

- Requested GIDC to make a barrier to avoid flowing and mixing contaminated Nalah waste water further.
- Bund wall created to avoid contamination.
- Requested Globe CETP to lift and treat all the contaminated waste water scientifically. As per GPCB request, Globe CETP has lifted @14 tankers and treated into MEE (Multiple Effective Evaporator). Every day sample had been collected and analyzed from Nalah by Globe CETP till the contamination minimized.
- Surprise night monitoring was carried out by joint team of Police and GPCB

VIII. SUMMARY OF THE REPORT

- Hon'ble the National Green Tribunal, Principal Bench, at New Delhi (hereinafter referred as "the Tribunal") vide Original Application No. 05/2022(WZ) took the cognizance of an incident reported in the daily, the Indian Express, dated 07/01/2022 wherein at least 06 persons died and 20 fell sick after the gas leak at industrial area in Surat, and after hearing an order was made on 18/01/2022.
- From the report received from the MPCB it is clear that Hikal Ltd, supplied 5 tankers on different dates of the sodium hydro sulphide. The last tanker sent on 31st December, 2021, was detained by Sangam Enviro private limited and thereafter as detailed in the report, the Sangam transferred the chemical from the tanker number GJ-06-BT-6421 in a tanker number GJ-06-ZZ 6221. The part played by the persons in transferring the said hazardous waste is discussed in detail in the report. It will be noted that even police seized some video footage indicating the entry and departure of the tankers and entry of the persons on the vehicle
- In all on different 5 dates and through different vehicles/takers, sodium, hydro, sulphide was supplied to Sangam Enviro private limited. The invoice and other details are mentioning Annexure 22. The same is as under.

S.No	**Bill to/Consignee/ Invoice date**	**Order No and date.**	**Customer PO No.**	**LR Date/Transporter. Vehicle No.**	**Quantity (KG) Amount**
1	Sangam/ Sangam 12-Nov-21	1066 10-Nov21	As per mail from Abhay Sir 08-11-201	11-Nov-21 Nilkanth Logistic GJ-12-BY-1891	29030 @ Rs. 0-01 Rs.342.55
2	Sangam/ Sangam 22-Nov-21	1066 10-Nov-21	Same as above	21-Nov-21 Shree Maruti Impex India GJ-06-BT-6431	29270 @ Rs. 0.01 Rs.345.39

3	Sangam/ Sangam 23-Nov-21	1066 10-Nov-21	Same as above	21-Nov-2021 Shree Maruti Impex India. GJ-06-BT-6421	29050 @ Rs. 0.01 Rs.342.79
4	Sangam/ Sangam 17-DEC-21	1066 10-Nov-21	Same as above	17-Dec-21 Shree Kailash Transport MH-04-HY-6377	25910 @ Rs. 0.01 Rs. 305.74
5	Sangam/ Sangam 01-Jan-22	1066 10-Nov-21	Same as above	31-Dec-2021 Shree Maruti Impex India GJ-06-BT-6421	28290 @ Rs. 0.01 Rs.333.82

- The question is whether Hikal Ltd, supplied sodium hydrosulphide to a bona fide purchaser/end user ? Sangam private Limited, having no consent to engage itself in any manufacturing activities, attracting the provisions contained in the environmental laws, could not be the genuine user. This aspect was known to the company.
- Not only Hikal Ltd, supplied the chemical to the Sangam Enviro private limited, but one Chemi organic chemical also supplied to the Sangam Enviro private limited. The same is discussed in detail in the report as to how the same was disposed of illegally.
- It was the duty of the consignor/generator to follow the provisions contained in the Hazardous Rules 2016. Even under the guise of the byproduct, the Sodium Hydro Sulphide was required to be disposed of in accordance with the manner indicated by the Technical Committee. This aspect is discussed in detail. Hikal Ltd in its submission for change in product mix indicated that the hazardous waste, namely sodium hydrosulphide shall be disposed of by incineration or other legal method. However, the MPCB while issuing the consent appears to have overlooked the decision of the technical committee, indicating the mode of disposal in case of sale. The report of the Technical Committee is also discussed in detail.
- It is interesting to note that the communication between the high officials of Hikal Ltd itself indicates that they wanted to dispose of the material, namely sodium hydrosulphide collected at the earliest, and

the cost indicated by the company engaged in incineration at the rate of Rs. 71,000/- per ton was found very heavy. Therefore, a suggestion was made to contact Sangam Enviro Private limited. If the company was required to incinerate the generation of sodium hydrosulphide, it was required to pay more than Rs.1,50,00,000 (One crore Fifty lakhs only). This aspect is discussed in detail. It is very clear that to save the high cost, the Sodium Hydro Sulphide was given for disposal in violation of the provisions contained in the environmental laws.

- The MPCB was of the view that this was the by-product. However, it is interesting to note that ***the managing director of Hikal Ltd, Mr. Sameer Hiremath addressed the communication to the Member Secretary, MPCB, Mumbai through email on 10/01/2022, the copy of which forwarded by MPCB to the GPCB is annexed with the report Mark ANNEXURE 20-A,*** inter alia, conveying that sodium hydrosulphide was diluted solution 16%-18% and is ***a by-product*** generated at Taloja factory. To make products usable to the **Cement,** Craft Industry, Paper Manufacturing, Leather & **Textile** and Dye Industry, ***the dilute NaHS solution generated as a by-product needs to be processed and concentrated to 36%+.*** Hikal Ltd, sold the NaHS dilute solution of 16%-18% to Sangam for further process to make it usable as a product in ***the Cement and Textile industry***. Hikal Ltd, paid made a show of sale to Sangam to further process the by-product to make it saleable to the Cement and Textile industry. This is as per the agreement signed between both the parties and alleged affidavit signed by Sangam. Hikal Ltd, sold NaHS diluted solution of 16-18% to Sangam in view of the alleged affidavit (Not sworn testimony as required under the law) by Sangam

stating that NaHS solution would be used as a product in the textile and cement plant.

- Thus, considering the written documents, it is very clear that sodium hydrosulphide was not given to use as such. Therefore, the provisions contained in the hazardous rules are required to be seen. On examination of the provisions, it is also clear that the ***by-product is a material that is not intended to be produced but gets produced in the production process of the intended product and is used as such***. Thus, it is very clear that the by-product is to be used as it is without any process or making any changes in the product. In the instant case, the material generated during the final product is to be processed before its use. If it is required to be processed, then it cannot be said to be a by-product. In view of what is stated above it cannot be said to be a by-product as contended.
- The committee has discussed the provisions contained in the hazardous rules in detail and has reproduced the relevant provisions. Even for the sake of argument it is considered as a by-product, the same was required to be used by the end user as such, without any process.
- Even the guidelines issued by the CPCB, makes it clear that it cannot be used in the cement industry as sodium hydrosulphide is corrosive. The same cannot be used in the textile industry. No material has been placed by the CPCB or the GPC to indicate that the same can be used in the textile industry. In et al. claim made by Hikal Ltd can be said to be a fake without examining other aspects. No actual user/end user has been named. In the so called affidavit it is also stated by Sangam Enviro Pvt Ltd that the by-product is used as raw material in its industry. In fact it has no industry. No authorisation of the end user was annexed with the so called

affidavit and Hikal Ltd did not consign NaHS in the name of the end user.

- The unit, namely, Hikal Ltd did not follow the provisions contained in the hazardous rules for transportation. It did not bother to follow the provisions contained in the Motor Vehicle Rules. There was no submission of a report to the MPCB with regard to the GPS register indicating the movement of the tankers through which the NaHS was supplied. Neither the transporter nor the Sangam Enviro private limited, nor Hikal Ltd bothered about the provisions contained in the law and all were interested in making easy money.

- Effective tracking system is proposed for Hazardous Waste in PAN India level may be initiated by concerned authorities.

- Considering the provisions contained in the hazardous rules, the decision of the Supreme Court and the decision of the Hon'ble Tribunal, the committee has assessed the environmental compensation and recommended to recover from the Hikal Ltd and all other abetters in this incidence, to pay to the next of kin of the deceased and the victims and towards the Environment Damage as detailed below:

❖ M/s Hikal Ltd. Located at Taloja Maharashtra

- Amount of Rs 15,05,00,000/(Fifteen crore five lakhs only) towards Environmental Damage Compensation as detailed in para 123 of the report.
- Amount of Rs. 2,13,14,460/-(Two crore thirteen lakh fourteen thousand four hundred sixty only) towards Compensation to pay to the next of kin of the deceased and the victims as detailed in para 124 of the report.

- Amount of Rs. 2,92,680/-(Two lakh ninety thousand six hundred eighty only) towards wastewater lifted and treatment cost as detailed in para 125 of the report.
- Amount of Rs. 24,00,000/-(Twenty-four lakh only) towards State of Gujarat which was paid as immediate relief to next of kin of the deceased as detailed in para 126 of the report.

❖ M/s Sahajanand Colour Yarn, M/s Real Chem and M/s Jai Bajrang Industry all located at GIDC Sachin Gujarat for each of them an Amount of Rs. 25,00,000/-(Twenty-five lakh only) to pay to interim EDC (the turnover figure not available hence the GPCB must consider 5% of turnover and recover the remaining amount) as detailed in para 21 of the report.

❖ M/s Sangam Enviro located at Bharuch/Vadodara an amount of Rs. 2,50,00,000/- (two crores fifty lakhs only) for 5 trips from M/s Hikal as detailed in para 128 of the report.

❖ The transporters involved in the incidence of 8 trips for disposal of 05 tankers of Hikal, the transporters have to pay total amount of Rs. 8,00,000/- (Eight lakh only) (considering Rs.100000/- per trip) as detailed in para 129 of the report.

❖ Shri Govind Bhai Shiyal who is responsible for disposing 2 tankers waste the amount is Rs. 5,00,000/-(Five lakhs only) (considering Rs. 2,50,000/- per tanker) as detailed in para 131 of the report.

- In addition to above, M/s Chemi organic, located at Jhaghadia, Gujarat an interim EDC of Rs.50,00,000/-(Fifty lakhs only) has been ordered by GPCB considering involvement in such illegal movements as detailed in the closure order of GPCB Annexure 28.

REPORT COMPRISING FINDINGS, OBSERVATION AND RECOMMENDATIONS

1. Hon'ble The National Green Tribunal, Principal Bench, at New Delhi (hereinafter referred as "the Tribunal") vide Original Application No. 05/2022(WZ) took the cognizance of an incident reported in the daily, the Indian Express, dated 07/01/2022 wherein at least 06 persons died and 20 fell sick after the gas leak at industrial area in Surat, and after hearing an order was made on 18/01/2022.

2. From the order it appears that casualties have occurred due to release of toxic gas resulting from illegal discharge of hazardous waste/chemical from a tanker (GJ 06 ZZ 6221) into natural drain parked Nr. Vishwa Prem D & P Mills, P 6. Rd-3, GIDC-Sachin. The photographs of the place where the incident took place and where the tanker was parked showing the hosepipe etc., are annexed herewith Mark Annexure-1. The sampling of left-over

hazardous chemical in the tanker and wastewater samples from the natural drain at various locations namely upstream of the accident locations, accident location and downstream locations in two rounds on 06.01.2022. The GPCB Central Laboratory carried out analysis of the samples and also requested CPCB RD vide email dated 07.01.2022 for help and support in analysing 15 nos. of wastewater & hazardous chemical samples collected from the accident site. On 08.01.2022, GPCB sent part of the sample to CPCB Regional Directorate Vadodara for analysis. Accordingly, CPCB RD also carried out analysis of the samples collected by GPCB.

3. The sample collected from the tanker was highly basic with sulphide and cyanide content in the tanker sample. Similarly Chemical Oxygen Demand, Ammoniacal nitrogen and phenolic compounds in samples collected from natural drain would not interfere with analytical results due to highly acidic in nature.

4. Natural drain was carrying highly acidic wastewater. The pH of wastewater flowing in the natural drain downstream of the accident site, at the accident site and in downstream of accident site was acidic and pH ranged from 1.62 to 2.61. Apart from pH, other analysed parameters namely COD, NH3-N, phenolic compounds, sulphides and cyanides were also observed in high concentration. The concentration of analysed parameters even exceeds the general discharge standards notified under The Environment (Protection) Act, 1986 for effluents in upstream and downstream of a site.

5. The liquid hazardous material collected from the tanker on 06/01/2022 at 10:30 Hrs was highly basic. The pH was nearly 14. The analysis results of tanker sample is tabulated below:-

GPCB Lab code	pH	COD	NH_3- N	SO_4^{-2}	S^{-2}	CN
233	=14	3,00,672	13,832	13,453	87,95 6	165.1

Note: Except pH, all other results expressed in mg/L. *All the Samples received in 1.0 lit carboy except sample code 233 in a glass bottle and without any preservations including ice.

6. The analysis results reveal that the sample of the tanker was highly basic and toxic in nature. Concentrations of sulphides, ammonical nitrogen and cyanides were very high.
7. As the tanker liquid waste was highly basic and natural drain wastewater was highly acidic, during such mixing, generation of some abrupt toxic gases due to acid base reactions is envisaged. The content of the tanker was found to have high sulphide and high cyanide concentration. It is the nature of sulphide and cyanide that it liberates sulphide gases such as H2S and cyanogenic gases such as HCN in acidic medium. Hence the accident may have been caused by abrupt formation of such poisonous gases due to acid base reaction. It is worth mentioning that HCN gas do not cause significant pungent smell and H2S gas is highly pungent in odour. Hence people inhaling such mixed gases in an industrial area may not be able to alert themselves. Apart from these gases, some short-lived toxic volatile compounds may also have generated due to illegal discharge which may have further escalated the lethal impact.

8. The Hon'ble Tribunal observed earlier incident of such measure and death of 2 persons while disposing of hazardous waste on 09/02/2019 include a Creek of Surat and incident that took place in industry, known as M/S Yasashvi Rasayan, M/s UPL etc and the committees have been constituted for calculation of environmental damage and compensation.
9. The Hon'ble Tribunal constituted a nine-member joint committee of the following persons.
    I. Justice B.C. Patel, former Chief Justice, Delhi High Court and former Judge of the Gujarat High Court presently stationed at Ahmedabad - Chairman,
    II. Representative of MoEF & CC – Member, (Dr. Yogesh Kumar, Dy. Director Scientist C was nominated)
    III. Representative of CPCB – (Mr. Amit Thakkar, Scientist D, was nominated)
    IV. Member, Secretary, Industries, Gujarat –
    V. Member Gujarat State PCB – Member
    VI. State Disaster Management Committee – Member
    VII. SSP, Surat – Member (Investigation was under Mr. Rahul Patel DCP, hence he represented the Police)
    VIII. Head of the Chemical Engineering Department of the IIT Gandhinagar – Member, (Dr. Chinmay Ghoroi, was nominated)
    IX. District Magistrate, Surat. (Y.B. Zala, Addi. Collector was nominated)
10. Representatives of MPCB were also invited. (1) Mr. P K Mirashe, Asst. Sec, Technical, (2) Shri Nandkumar Gurav, Regional Head, and (3) Mr. Dhananjay Patil, Regional Officer attended the meetings and supplied information.

11. Members of the committee held meetings on different dates for taking appropriate steps in the matter.

*****

ILLEGAL DISCHARGE OF CHEMICAL IN NATURAL DRAIN AND F. I. R.

12. Just near the Vishwa Prem Dyeing Printing Mill, GIDC Road No.3 Sachin (hereinafter referred as "the Vishwa Prem") incident took place from where, a tanker number GJ-06-ZZ-6221, was seized by the police on 06/01/2022. The original owner of the said tanker is Gurvinder Singh Kesar Singh Begal as reported by the Police. It is also reported that the said tanker has been transferred under a sale deed to one Jignesh Bhai Tiwari, however, there is no change of the name of the owner in the records of the Regional Transport office. Under the Motor Vehicle Act and the rules made there under, the owner as per the records maintained under the aforesaid Act and Rules continues to be the owner of the vehicle and is liable for any act or omission. As per the report submitted by the Crime Branch of the Police, that ***Jignesh Tiwari entrusted the said tanker for the management of the business to one Vishal Kumar Yadav***, who has been arrested by the police.
13. The other tanker number GJ-06-BT-6421 is owned by ***Virendrabhai Bhagubhai Patel***, a resident of village Ranoli, District, Vadodara.
14. As per the report submitted by the police, the said tanker number GJ-06-BT-6421 was sent to ***M/S Hikal Ltd, Taloja for carrying the chemical.*** On return that tanker was lying for two days on Palsana Road and thereafter, for one day it was parked near Krishna Hotel at Kim (village) Cross Roads. Hikal Ltd.
15. On 05/01/2022 at the place near Decent Hotel, Ankleshwar, after about 2 PM, the chemical contained in tanker number GJ-

06-BT-6421 was transferred to the tanker number GJ-06-ZZ-6221. For the transfer of the chemical from one tanker to the other tanker one *Mukesh Bhai Patil. a resident of village Ranoli, District, Vadodara acted as an agent*.

16. A report has been submitted by the investigating agency conveying that an offence has been registered on 06/01/2022 at 7 AM for the incident occurred on the same date at 04:00 a.m. just near the Vishwa Prem Mill GIDC Road No.3 Sachin against the driver of the tanker whose name was not known at the relevant time. It indicates the name and addresses of 6 persons who died and 23 persons were required to be treated in the hospital or were adversely affected. Some were unconscious and were removed to the hospital immediately.

17. As per the First Information Report No.11210002220107/2022 (hereinafter referred as "the FIR") recorded by the police, for the offences punishable U/Ss 304, 336, 337, 338, 284, 277, 278,120B of the Indian Penal Code and U/s 15 of the Environment (Protection) Act, 1986, the incident occurred at about 04:00 A M. on 06/01/2022, near the Vishwa Prem, situated on GIDC Road No. 3, Sachin, Surat. During the investigation it was revealed that the accused prepared false documents (Bilty) and were found using false GST number, and therefore, the offences punishable u/s 465, 467, 468 and 471 of the IPC were added as per the report submitted by the crime branch. Copy of the said FIR is annexed herewith Mark Annexure-2.

18. The informant, DJ Prajapati, PSI was in charge of the PCR vehicle No. 46 with other staff. At about 04: 12 AM wireless message was received about the fire having taken place at the Vishwa Prem Mill premises. On receipt of the information, they reached the scene of occurrence at 04:17 AM. It was noticed that outside

the mill premises, some persons were found grappling on account of asphyxiation. The PSI immediately conveyed to the police control room that no incident of fire has taken place in the premises of the Vishwa Prem, but on account of poisonous chemical 20/25 labourers are grasping and immediately asked to send an ambulance. The persons engaged in combing during night hours were immediately called and with their help the police transferred the persons to the hospital who were victims of the poisonous chemical. Some persons who were not much affected and were able to communicate were questioned. It was conveyed by them that outside the Mill premises a tanker was parked from which poisonous chemical was flowing as a result of which the incident took place. The PSI went near the tanker and noticed that the registration number of the said tanker was GJ-06-ZZ-6221. The driver of the tanker was not found. The tanker was cordoned. Thereafter, the said PSI went to the New Civil Hospital where the persons were transferred for treatment and on enquiry it was learnt that 6 labourers died while 23 labourers were under treatment, some were conscious while some were not. From them the names of the deceased persons as well as the persons admitted for treatment were obtained which are recorded in the FIR.

19. The FIR further indicates that the driver and owner of the tanker, carrying the chemical in the tanker, which was hazardous and exceeding the limits of different contents of chemicals, disposed of the chemical from the tanker in the natural stream illegally. Such illegal act of disposal of poisonous chemical would cause harm to the human beings, other living creatures, plants, micro-organism, property or the environment.

20. After the offence was registered, the investigation was entrusted to the Inspector of Police, GIDC police station, Surat. Thereafter the investigation was transferred to the crime branch of the police. It appears that during the investigation, the statement of the owner of the tanker number GJ-06-ZZ-6221, namely Gurvinder Singh Kesar Singh Begal, aged 34, residing at house No. 23, Perth Duplex, canal Road, Abhilash cross roads, Vadodara was recorded. The statements of some of the persons who were the victims were recorded. By the time those who were admitted in the hospital were discharged from the hospital.

*****

THREE UNITS NEAR THE PLACE

DISCHARGING TRADE EFFLUENT/ ACIDIC CHEMICAL ILLEGALLY.

CLOSURE & ORDER TO PAY INTERIM DAMAGES TO ENVIRONMENT

21. The information was called from the GPCB with regard to the analysis report of the samples of industrial effluent flowing in the natural drain. The three units were noticed committing the breach of the provisions. (1) Sahjanand Colour Yarn, plot No. 5532, Road No. 55, GIDC Sachin, Surat, 395007. An officer of GPCB visited the unit on 06/01/2022 in exercise of his powers under section 23 of the Water (Prevention and Control of Pollution) Act ,1974 (hereinafter referred as "the Water Act"). During the visit, it was observed that ETP of the units were not in operation. Generated industrial wastewater from the manufacturing process was being discharged through an unauthorised outlet into the open surface drain of GIDC estate, Sachin. As per Consent and Authorisation, the unit was obliged to dispose of waste water into underground drain of M/S Sachin Infra Environmental Ltd, CETP. This unit was found discharging untreated industrial waste water outside the premises in an unauthorised manner, leading to open surface drain of GIDC Estate, Sachin in violation of conditions No. 3.7 and 3.8 of the Consent and Authorisation. In view of serious violations observed, the unit was ordered to deposit Rs.25 lakhs as interim Environment Damage, Compensation. The direction u/s 33 (A) of the Water Act was issued and the unit was prohibited from

manufacturing activity and was called upon to close the operation of industrial plant. The unit was further prohibited from manufacturing activities through Captive Power Plant and D. G. sets. The concerned authorities supplying the electricity and water were directed to stop the supply of electricity, except single phase, and water with immediate effect. The unit was also warned that non-compliance would attract the provisions contained in section 41 (2) of the Water Act, which provides punishment with imprisonment for a term of not less than one year and 6 months and may extend to 6 years and with fine. (2) Real Chem, plot No. 7104, Road No. 71, GI DC Sachin, Surat, was visited by an officer of GPCB on 06/01/2022 in exercise of the powers under section 23 of the Water Act. During the visit, the unit was found discharging untreated acidic wastewater outside premises through an unauthorised outlet, leading to open surface drain of GIDC estate (passes behind the unit). As per the Consent and Authorisation (condition No. 3 and 4), the unit was required to dispose of wastewater at the common spray dryer facility of M/S Mahavir Eco-Projects Private Limited, through designated tanker. In violation of the aforesaid provisions, the unit was found discharging acidic wastewater outside premises in an unauthorised manner, leading to open surface drain of GIDC estate Sachin. The analysis indicates that certain chemicals were higher than the prescribed norms under the law. The unit therefore was called upon to deposit the sum of Rs.25 lakhs as Interim Environment Damage Compensation. The official exercised the powers under section 33 (A) of the Water Act, and prohibited the unit from manufacturing activities and directed to close the operation of the unit. It was further directed that no manufacturing activities shall be carried out through Captive

Power Plant and/or DG set. The concerned authorities supplying the electricity and water were directed to stop the supply of electricity (except single phase) and water with immediate effect. (3) Jai Bajrang Industries (formerly-Seal Colour Chem) plot number C/1-B, GI DC Sachin, Surat, was visited by officers of the GPCB on 06/01/2022. It was observed that the steam being condensate from distillate plant was discharged outside the premises through an unauthorised outlet, leading to open surface drain of GIDC estate which passes near by the unit. According to the Consent and Authorisation, the unit undertook not to generate any industrial wastewater. However, the unit was found discharging untreated acidic wastewater outside the premises in an unauthorised manner as aforesaid. The analysis of the sample collected from untreated wastewater does not meet with the norms prescribed by the GPCB. The unit was therefore, called upon to deposit the sum of Rs.25 lakhs as Interim Environment Damage Compensation. The official exercised the powers under section 33 (A) of the Water Act, and prohibited the unit from manufacturing activities and directed to close the operation of the unit. It was further directed that no manufacturing activities shall be carried out through Captive Power Plant and/or DG set. The concerned authorities supplying the electricity and water were directed to stop the supply of electricity (except single phase) and water with immediate effect. All the units were conveyed about the penal provision as indicated above in case of Sahaj Anand Colour Yarn. The Closure orders made against the three units aforesaid are annexed herewith and Mark Annexure-3 Collectively.

22. Thus, it is very clear that the aforesaid units were discharging acidic waste water or untreated industrial effluent in the open

drain (natural stream) through an outlet which was not permissible. These units thus, committed violations of the Laws relating of Environment.

*****

23. An inspection report submitted by the MPCB reveals that Sangam has an office at Vadodara. From the invoices that were collected during the investigation it was noticed that the minutes were issued in the name of Sangam Enviro Private Limited at its Bharuch office. In view of this, it was decided to make a proper inquiry to find out the truth. On 08/01/2022. The officials of the GPCB visited the address indicated. To the surprise of the officers, it was found that the property wherein it was claimed that the office of Sangam is situated, one Mahavirsinh J Solanki was found residing there is a tenant. The report is in detail and therefore the report is annexed here with Mark Annexure-3A. Officers of the GPCB also visited the site as indicated in the invoice. The premises, namely 424, Shilpi Square, Dahej bypass road, Bharuch were visited. It was a small office premises and was found locked for a long time. The enquiries made with the owner, who submitted the copy of an agreement with Sangam Enviro Private Ltd. This Firm also submitted its return to the office of the CGST. The report submitted by the Regional Officer, Bharuch is annexed here with Mark Annexure-3B.

*****

HIKAL LTD SUPPLIED TO SANGAM

ON DIFFERENT DATES.

24. The crime branch during the investigation found that Hikal Company Ltd, Taloja, Mumbai (hereinafter referred as **"Hikal Ltd"** on different dates and through different tanker numbers supplied Sodium Hydro Sulfide, the hazardous waste under the provisions and particularly Clause (17) of rule (3) of ***the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016*** (hereinafter referred as **'the Hazardous Rules"**) to M/S Sangam Enviro Pvt Ltd, (Hereinafter referred as **"Sangam"**) The details are as in the next para.

25. (1) On12/11/2021 tanker No. GJ-12-BY-1891, to supply to Gopinath Dye Chem, at Ahmedabad (2) on 22/11/2021 tanker No. GJ-06-BT-6431, to supply to Shri Petrochemical, Rajkot. (3) on 23/11/2021 tanker No. GJ-06-BT-6421, to supply to Shri Petrochemical, Rajkot (4) on17/12/2021 tanker No.MH-04-HY-6377, to supply to Sangam Enviro Bharuch, and (5) on 01/01/2022 in tankerNo.GJ-06-BT-6421 to supply to Sangam Enviro Bharuch.

26. According to the report submitted by the crime branch, chemicals were brought through different tankers on different dates and were disposed of illegally.

*****

ILLEGAL DISPOSAL OF CHEMICAL

AT AMLA KHADI.

27. The Director of Sangam, approached ***Chemie Organic Company, Jhagadia,*** for supplying the chemical to OCL India Ltd, Odisha and got the chemical on 22/12/2021 in tanker No. GJ-06-TT-8555 however, during the investigation, it was revealed that the chemical was disposed of illegally in Amla Khadi, Ankleshwar. Furthermore, as per details received from the GST department by the GPCB some industries of Ankleshwar region were found engaged with Sangam Enviro Pvt. Ltd. Regarding illegal discharge of Hazardous waste/chemical through tanker No: GJ-06-TT-8555 into Amlakhadi, near Ankleshwar instead of being sent to M/s. OCL INDIA LTD. (Dalmia Cement Bharat Ltd.), Odisha from the unit. Copy of FIR is annexed herewith and Mark Annexure-4 Units were visited by Officers of the Regional office for verification and one of the industries Chemie Organic Industries was noticed committing violations.

*****

TANKER AT VATVA

28. During the investigation, the police found that Hikal Ltd, dispatched the chemical in tanker number GJ-12-BY-1891 to Sangam. The said chemical was transferred in the tanker number GJ-06-VV-8829 belonged to Jai Raj @ Jigar Dili Bhai Soni, parked on Vatva Ring Road, was seized by PSI Zali. The said tanker No. GJ-06-VV-8829 filled with chemical was seized.

*****

ILLEGAL DISPOSAL OF CHEMICAL (TWO TANKERS) AT SURAT & F.I.R.

28. During the investigation, the police found that the chemical supplied to Sangam and others by Hikal Ltd, on 17/12/2021 through tanker No. MH-04-HY-6377 and on 23/12/2021 through tanker No. GJ-06-ZZ-6221 was illegally discharged from the tankers in a Khadi, just at some distance from Tirupati Balaji Society, opposite Zavalla Bridge, GIDC Sachin, Surat, for which FIR has been registered, as CR. No. 112 1000 2220 285 at GIDC Police Station, for the offences punishable under sections 284, 34, 120B and u/s 15 of the Environment (Protection) Act, 1986 which is being investigated by inspector of police, Mr R S Suvero of SOG branch of Surat City Police. The Copy of the said FIR is annexed herewith Mark Annexure-5.

*****

ILLEGAL DISPOSAL OF CHEMICAL

TWICE AT RAJKOT.

29. The Hikal Ltd, supplied two tankers (on 22/11/21 tanker No. GJ-06-BT-6431 and on 23/11/21 tanker No. GJ-06-BT-6421) of Sodium Hydro Sulfide to Sangam. Sangam disposed of the chemical ***Through Govind Bhai of Rajkot*** illegally for which the Commissioner of Police, Surat has forwarded the report through GPCB Rajkot. The FIR registered in this case is annexed herewith Mark Annexure-6.
30. During the investigation, the police was apprehending that the Managing Director of Hikal Ltd, Samir Jai Hiremath, aged 48, residing at 292, 29th floor, Jupiter Apartment, 41, Cuff Parade, Coolabah, Mumbai, Maharashtra, is likely to leave India, a look out circular has been published.

*****

ACCOUNT OF HIKAL LTD

PAYMENT TO SANGAM

31. CDR details have been obtained and the statement of the bank account of the Hikal Ltd have been obtained by the investigating agency. The statement of bank account showing the amount of Rs.23,33,398:00 credited in the account of Sangam by Hy Hikal Ltd is also obtained and the account has been frozen. The copy of the statement of account is annexed herewith Mark Annexure-7.

*****

STATEMENTS U/S 164 CR. P. C.

AND MEDICAL EVIDENCE

32. The statement of the witnesses was recorded and the 3 witnesses' statements have been recorded before the learned Magistrate under section 164 of Cr. P. C.
33. The investigating agency forwarded the samples to FSL, Surat and the report indicates the presence of sulphide ion and NaCl, i.e., sodium chloride was also found. The copy of the concluding report of FSL is annexed herewith Mark Annexure-8.
34. The autopsy reports indicate the final cause of death as "gaseous compound poisoning containing sulphide ion and its complications sustained on the body. Findings are consistent with history". The copies of the reports dated 31/01/2022 showing final cause of death are annexed herewith Mark Annexure-9 collectively.
35. The medical officer who treated the affected persons has certified the alleged history of unknown gas inhalation.

*****

RELEVANT PROVISIONS

36. The provisions contained in the Clause (e) of Section 2 of the Environment Protection Act, 1986 states that "hazardous substance" means any substance or preparation which, by reason of its chemical or physico-chemical properties or handling, is liable to cause harm to human beings, other living creatures, plants, micro-organism, property or the environment; while clause (d) states "handling", in relation to any substance, means the manufacture, processing, treatment, package, storage, transportation, use, collection, destruction, conversion, offering for sale, transfer or the like of such substance; While Section 8 in Chapter III states that. Persons handling hazardous substances to comply with procedural safeguards. —"No person shall handle or cause to be handled any hazardous substance except in accordance with such procedure and after complying with such safeguards as may be prescribed." Section 25 gives an authority to make rules. Sub clause (b) of sub section 2 of section 25 reads as the procedure in accordance with and the safeguards in compliance with which hazardous substances shall be handled or cause to be handled under section 8;
37. In exercise of the powers conferred by **sections 6, 8 and 25 of the Environment Protection Act, 1986** the Central Government made the **Hazardous Rules.**
38. Sub clause 17 of Rule 2, defines **hazardous wastes**. It reads, "hazardous waste" means any waste which ***by reason of characteristics such as physical, chemical, biological, reactive, toxic, flammable, explosive or corrosive, causes danger or is likely to cause danger to health or environment, whether alone or in contact with other wastes or substances***, **and shall include** -

(i) waste specified under column (3) of Schedule I;

(ii) waste having equal to or more than the concentration limits specified for the constituents in class A and class B of Schedule II or any of the characteristics as specified in class C of Schedule II; and

(iii) wastes specified in Part A of Schedule III in respect of import or export of such wastes or the wastes not specified in Part A but exhibit hazardous characteristics specified in Part C of Schedule III;

*****

THE MANUFACTURING PROCESSES

OF FENAMIDONE & SO CALLED BY PRODUCT SODIUM HYDRO SULFIDE (NaHS).

39. What is the manufacturing process of Fenamidone? The team of the officers of the MPCB visited the unit Hikal Ltd, manufacturing pesticides and generating Sodium Hydro Sulphide (NaHS) and inquired in detail about the manufacturing process and forwarded all the details to the GPCB. The process is explained in the report, the copy of which is annexed herewith Mark Annexure-10. The **FIRST** stage is a preparation of Thiazolidinonethione. There is reaction and Methyl (S)-2 phenyl glycinate (S-MPGM) in Mono-chlorobenzene (MCB) is reacted with Carbon- di- sulphide (CS_2) (reagent and solvent). In the **SECOND** stage namely Preparation of Hydrazinothiodydantolne, Thiazolidinonethione (THITHI) is further reacted with phenyl hydrazine in presence of catalyst i.e., tributylamine, acetic acid and sulfur.H_2S is liberated in this reaction. Gaseous H2S is further scrubbed in two stages generating ***Sodium Hydro Sulphide (NaHS).*** This by-product was transported to Gujarat State by M/s. Sangam Enviro Pvt. Ltd, Village Dashrath, District: Vadodara, Gujarat State. In the THIRD stage FENAMIDONE is obtained. Hydrazinothiodydantolne HUTU further methylated with Dimethyl sulphate in Mono- Chloro benzene (MCB). The reaction mixture is neutralized with aqueous Sodium Hydroxide, washed with water, and concentrated to crystallise Fenamidone solid is separated by filtration, washed with MCN and dried under vacuum.
40. SCHEDULE I [See rule 3 (1) (17) (i)] provides the list of processes generating hazardous wastes. *Any process indicated in the*

Schedule would generate waste which in view of the rules must be considered as hazardous waste. When the processes for obtaining the pesticide or insecticide is undertaken then, the waste as indicated in the third column of the list is hazardous waste. In view of process of pesticides, the waste generated would cause harm to human beings, other living creatures, plants, micro-organism, property or the environment

41. So far as the ***State of Gujarat*** is concerned, during the process of manufacturing of pesticides, if sodium hydrosulphide is obtained, the same is to be considered as a hazardous waste in view of the Hazardous Waste Rules and particularly Schedule I [rule 3 (1) (17) (i)] which indicates the list of process generating hazardous wastes.

S.No.	*Process*	Hazardous Waste
29	*Products, and formulation of pesticides including stock-piles*,	*29.1Process wastes or residues* 29.2 Sludge containing residual pesticides, 29.3 Date-expired and off-specification pesticides, *29.4 Spent solvents,* *29.5 Spent catalyst,* *29.6 Spent Acids*
35	***Purification and treatment of exhaust air/gases and waste water from the processes in this schedule*** and common effluent treatment plant (CETP)	35.1 Exhaust Air or Gas cleaning residue, 35.2 Spent ion exchange resin containing toxic metals, 35.3 Chemical sludge from wastewater treatment, 35.4 oil and grease skimming, 35.5 Chromium sludge from cooling water

36	Purification process for organic compounds/solvents	36.1 Any process of distillation residue 36.2Spent carbon or filter medium.

42. Therefore, the moment the chemical Sodium Hydro Sulphide obtained during the manufacturing process of Fenamidone, is a hazardous waste the same would be considered as a hazardous waste and the provisions relating to the Hazardous Rules will apply. When the chemical is reacted with other chemicals indicated in the process and Gaseous H_2S is further scrubbed in 2 stages, generating a product, sodium Hydro sulphide is not a by-product, but a hazardous waste.

43. Thus, in view of what is stated hereinabove, the materials that are produced during the process indicated above, Sodium Hydro sulphide, which is generated on account of processing and obtaining Fenamidone, the utilisation is permissible in accordance with the rules. The procedure laid down in the rule 9 (1) states that "(1) The utilisation of hazardous and other wastes as a resource or after pre-processing either for co-processing or for any other use, including within the premises of the generator (if it is not part of process), shall be carried out only after obtaining authorisation from the State Pollution Control Board in respect of waste on the basis of standard operating procedures or guidelines provided by the Central Pollution Control Board. Thus, the generated hazardous waste for the purpose of utilisation requires permission of the Board as contemplated.

44. Waste oil is defined in sub clause 39 of rule 3. “Waste oil” means any oil which includes spills of crude oil, emulsions, tank bottom sludge and slop oil generated from petroleum refineries, installations or ships and can be used as fuel in furnaces for energy recovery, if it meets the specifications laid down in Part-B of Schedule V either as such or after reprocessing.

45. ***The waste, which is not covered by sub clause (17) of Rule 3 is a waste as per sub clause (38) of rule 3.*** It reads as under:

> “waste” means materials that are not products or by-products, for which the generator has no further use for the purposes of production, transformation or consumption. Explanation. - for the purposes of this clause,
>
> (i) waste includes the materials that may be generated during, the extraction of raw materials, the processing of raw materials into intermediates and final products, the consumption of final products, and through other human activities and excludes residuals recycled or reused at the place of generation; and
>
> (ii) by-product means a material that is not intended to be produced but **gets produced in the production process of intended product and *is used as such;***

46. While manufacturing any intended product, through a process, not attracting any process generating hazardous waste, as indicated against the process being undertaken in schedule I or covered under the definition of hazardous waste generates the waste, would be considered as a waste. However, during the process undertaken for a final product, the material gets produced in the production process **and is used as such,** then may

be considered as a by-product in view of the nature of the product. Therefore, hazardous waste which is clearly defined as stated above in sub clause (17) of rule 3, would remain as a hazardous waste and can be utilised provided the procedure under the rules is followed.

*****

MAHARASHTRA POLLUTION CONTROL BOARD AND CONSENT TO HIKAL LTD.

47. Maharashtra Pollution Control Board (hereinafter referred as the MPCB) on 13/03/2019, issued a letter of consent, which was renewed even thereafter, on 10/11/2021 the copy of which is annexed Mark Annexure-11. As per the consent, apart from other products, *Fenamidone* was the product permitted to manufacture, 100MTA. So far as by-products are concerned, consent was granted to manufacture recovered ammonia 900 MTA, *Sodium Hydro Sulphide, 150 MTA, Spent HCL (Approx. 30%) 1462 MTA, and Spent H_2SO_4 (98%), 904 MTA.* So far as hazardous waste is concerned, in paragraph 7 of the consent, it has been pointed out that in all 10 types of wastes were meant for treatment and disposal out of which the reference is required to be made for *Spent Solvent, Potassium Bromide and Spent Caustic.*

48. It may be noted at this juncture for the sake of argument, that the Sodium Hydro Sulphide is not a hazardous waste and the consent was granted to consider it as a by-product. However, in the consent, percentage/strength of sodium Hydro sulphide is not indicated as it is indicated for other chemicals, such as Spent HCL (Approx. 30%) and Spent H_2SO_4 (98%). The generator is claiming the strength of the Sodium Hydro Sulphide between 16 to 18%. The consent specifically refers to the strength of other by products, however for Sodium hydro sulphide why the strength is not mentioned?

49. It is necessary to refer to the consent granted earlier and the efforts made to get the benefit of Product Mix. On 17th November, 2015. The MPCB granted consent to manufacture a maximum

quantity 300 MTA of Fenamidone and other products. So far as hazardous waste is concerned, in paragraph No. 7 of the consent at item No. 13, what is indicated is HTP-213 waste residue is under category No. 29.1 of Schedule I with the permissible quantity of 25 MTA. What would be constituents of the residue is not indicated. Question is in the same process, whether sodium hydrosulphide was generated as a hazardous waste or not?

50. The Ministry of Environment and Forest, vide letter dated 28th August, 2007 considered the application of the Hikal Ltd for expansion of pesticide unit at Taloja. As far as Fenamidone is concerned, there was no question of an increase in the quantity of manufacturing and that remained at 300 MTA. ***In the letter there is not a whisper about sodium hydrosulphide.***

51. It appears that the Institute of Chemical Technology submitted its report on analysis of possible pollution load with respect to the proposed change product. The expert stated that the proposed addition of new products may not result in any additional impact on the pollution load (West water and air emissions) from the plant as compared to the existing plant with the consented limits. For the 1st time while promoting the format for providing information on change to Product Mix, it was suggested that Fenamidone or MPDC-DME be produced 155 MTA, instead of permission to manufacture Fenamidone 300 MTA. There was suggestion of by-products and intermediates. Recovered ammonia with 1250 MTA was the existing capacity, but that proposed one was Recovered Ammonia/Sodium Hydro Sulfide/ Sodium Bromide/ Aluminium Chloride Solution to the extent of 1800 MTA, without indicating the allowable quantity to manufacture of each product. Similarly for other items, without specifying the quantity permissible to manufacture product wise,

total quantity allowable to manufacture is indicated. In paragraph No. 3, the production method is indicated for Fenamidone. However, there is nothing to indicate what would be the nature and quantity of hazardous waste or the by-product.

52. In paragraph 9 of the report at item No. 13 HTP-213, namely Fenamidone, waste residue falling in category 29.1 is indicated. The generation of this hazardous waste would remain the same, namely 25 MTA. When consent was granted to manufacture 300 MTA, the hazardous waste indicated was 25 MTA, and when the quantity is reduced to 155 MTA, generation of hazardous waste is shown as 25 MTA. In the said list item No. 12 refers to chemical residue/Residue Pesticides at serial No. 29.1of the schedule I and the quantity of the hazardous Waste generated remains the same as before, i.e., 243.5 MTA. After proposed change in reduction of Fenamidone from 300 MTA to 155 MTA chemical residue/Residue Pesticides remains the same.

53. In paragraph No. 2. The expert has indicated 15 different raw materials with the quantity required, while manufacturing 300 MTA, and the reduced quantity of consumption for manufacture of 155 MTA is also indicated. Considering the reduction in consumption of raw material and the manufacturing of the final product, how would the quantity of hazardous waste remain the same? Why product wise generation of hazardous waste is not indicated?

54. There is consent renewal application, Mark Annexure-12 however, the same is undated. In paragraph 13 of the application, the product Fenamidone is sought to manufacture 300 MTA. Under product names and quantity, Recovered Ammonia 1250 MTA is shown. Sodium/Potassium Methyl/Sulphate Solution (100%) are allowed to manufacture totalling to 458 MTA without

each product's quantity. Other products are indicated either individually or jointly and wherever more than one product is shown, the quantity of each product consented to manufacture is not shown. What is important is that even at this stage Sodium Hydro Sulfide is not shown. So far as the hazardous waste generation is concerned, 5.1 used/spent oil and 20.2 spent solvent, in the column of treatment as well as disposal are shown by sale. 29.1 process wastes/residue, the quantity indicated is 257.112 MTA, and in the column of the treatment and disposal is shown by incineration. 29.2 chemical sludge containing residue pesticides, the quantity of which is shown as 95.385 MTA to be disposed of by way of incineration. Similarly, Filters and Filter material which have organic liquid, the generation shown is 3.155 MTA and the disposal is shown by way of incineration.

55. There is an environmental statement where under the head of by-product information Recovered Ammonia 1197.260 MTA shown as actual quantity against consented quantity 1250 MTA. Against the hazardous waste 29.2 chemical sludge containing residue pesticide 101.62 MTA, shown in financial year. 16-17. There is reference to used/spent oil 6MTA and no other hazardous wastes are indicated. In the form V and environmental audit report for the financial year ending on 31st March, 2017 against the consent quantity 300 MTA of Fenamidone, the actual quantity is shown as 139.9 MTA. In the column of hazardous wastes spent solvent (20.2) shows generation of 185.68 MTA. The process waste/residue (29.1) shown to have generated 237.598 MTA. Chemical sludge containing residue pesticide shown to have generated 57 MTA. There is nothing to indicate that Sodium Hydro Sulfide was generated. Even in the name of by-products there is no reference to the same.

56. Institute of Chemical Technology on January 17, 2018 submitted analysis of possible pollution load with respect to proposed change in product mix in the same category for the chemical intermediates manufacturing unit of M/S Hikal Ltd, Taloja. The said report is annexed herewith Mark Annexure-13. The chart of existing material balance and proposed material balance (product mix change) is given. 5 existing products and 9 proposed products are given with a view to show that there will not be any impact on the environment. In the summary of Material Balance (Existing & Proposed), against existing production of Fenamidone of 300 MTA generation of 587 MTA of hazardous waste is shown, while in proposed product mix, change Fenamidone or MPDC-DME, hazardous waste generation would be 303 MTA. However, total generation of hazardous waste for the 5 products indicated is 4143 MTA, while for product mix chart, it would be 4119 MTA. Very marginal decrease in consumption of water and wastewater is shown. In the chart of HTP-213 (Fenamidone) Material Balance, 3 stages are shown. In the 2nd stage of HYTY preparation total input of different chemicals would be 12744 KG against which the output shown is HYTY Organic Mass 11491 KG and ***NaHS 1253 KG***. In the proposed material balance (product mix change) in all, there will be 9 products, ***but there is nothing to show that Sodium Hydro Sulfide will be a product or the by-product in product mix change method***.

57. On February 5, 2018 Hikal Ltd, addressed for proposed change in product mix in the same category with no increase in pollution load with no change in machinery and plant layout. It is specifically stated that the proposed change in product mix is in the same category. In all 8 products are indicated. The existing products are shown with proposed quantities to be

manufactured, but in less quantity which is indicated. One item is not to be manufactured while 4 items are proposed to be manufactured with its quantity. In the table of proposed change in Product Mix at No.2 HTP-218 Fenamidone or MPDC-DME with chemical name, its CAS No. and product category Fungicides while at No. 6 MPDC-DME with chemical name different than shown at No 2 having different CAS No. and product category Intermediate for Herbicides, are mentioned. (MPDC-DME two different chemical names and two different product categories. *Has MPDC-DME has two different name and two different product categories, which can be explained by the author of the letter? Sheet indicating the names of chemicals in the products is Annexed herewith Mark Annexure-13A*

58. For the 1st time it has come out with the list of by-products and intermediates in place of existing by-products of Recovered Ammonia 1250 MTA. ***It proposed to manufacture Recovered Ammonia/Sodium Hydro Sulfide/Sodium Bromide/Potassium Bromide/ Aluminium Chloride Solution in all 1800 MTA. However, what will be the quantity of each product is not mentioned. It also indicated that for manufacturing 155 MTA of Fenamidone, there would be generation Hazardous Waste of 303 MTA.*** The manufacturing process indicated and the process of manufacturing observed by the officers of MPCB, if compared one would find the difference. There is nothing to show that during the process Sodium Hydro Sulfide would be generated as a by-product but will be hazardous waste. Hazardous wastes are also indicated. Apart from the hazardous waste which are of 5 types indicated in the table were for disposal to authorised reprocess or/dealer. However, for process waste residues, waste category No. 29.1, one of which is chemical residue/residue

pesticides 243.5 MTA. Process wastes or residues category No. 29.1 ***in particular HTP-213 waste residue generated is shown 25 MTA and even after change in product mix would remain the same i.e., 25, MTA.*** Sludge containing residue of pesticide category No. 29.2 even after change in product mix would remain the same i.e., 30 MTA. For the hazardous waste referred above except for sale/processing disposal mode was incineration.

59. On 08/05/2018, Hikal Ltd, submitted an application for revised proposal for change in product mix, and with reference to the Technical Committee dated 21st April, 2018. Thereafter, again on 20th May 2018, Hikal Ltd addressed the communication to the MPCB. Thereafter, on 9th June, 2018 (267 P) submitted the documents as per the recommendations of Technical Committee during its 2nd meeting, dated May 19, 2018. A chart was submitted with regard to hazardous waste data for existing and proposed hazardous waste. The product in question being Fenamidone, hazardous waste generated in the process of manufacturing Fenamidone and the hazardous waste not for sale, is pointed out here. CS_2 in the category of hazardous waste at serial No. 29.1 of the list, the proposed hazardous waste 30.97MTA as against 92.92 MTA was shown to be incinerated for the purpose of disposal. In the same category, namely 29.1 the hazardous waste CS_2 +Acetone against existing hazardous waste generated 275.40 MTA, 91.80 MTA will be generated, and will be disposed of by incineration. Hazardous waste covered by category ***No. 29.1, namely, NaHS generated as hazardous waste of 283.87 MTA, as against that proposed hazardous waste would be 94.62 MTA to be incinerated for disposal.*** In the same category MCB residue, 178.85 MTA was generated while in the proposed product mix, the generation of 59.62 MTA to be incinerated for

disposal. The copy of the sheet with letter dated 09/06/2018 is annexed here with Mark Annexure-15. Again, another table for hazardous waste in the category at serial No. 29.4 namely spent acetone against existing 468 MTA, the proposal was that it will be 156 MTA and shall be disposed of by incineration. ***Yet in another table hazardous waste category 29.1, namely chemical residue/residue pesticides with constituents of NaHS generated during HYTY preparation as per existing plan, the waste generated is 243.56 MTA and in the proposed change that will be 81.19 MTA of NaHS which will be incinerated***. The said table titled as Hazardous wastes generation and its disposal (existing and proposed) is annexed herewith Mark Annexure-16. The same category wastes residue with constituent MCB during the preparation which was generating 25 MTA during the production as per existing plan, however, in the proposed system. It would be only 8.38 MTA which will be incinerated. In the same category, process residue with constituent NaHS as per existing system 40.79 MTA is generated, but in the proposed system, it will be 13.60 MTA, which will be incinerated. In the same category. There will be MCB residue having MCB constituent, the present system generates 153.89 MTA while in the proposed system. It will be only 51.30 MTA, which will have to be incinerated. In the same category Recovered MCB having constituent of MCB, is generated 40.22 MTA while in the proposed system, it will generate 13.41 MTA but which will have to be incinerated.

60. It appears that in the 3rd meeting of Technical Committee was held for the year 2018-19 on 30/06/2018, the copy of which is annexed herewith and Marked Annexure-17 submission by MPCB. It was also pointed out that earlier presentation made by Hikal Ltd, was considered in the 2nd meeting and it was noted

that *Hazardous Waste generation after product mix will be for 4124.08 MTA (IT SHOULD BE 4186.28) as against existing-4187.65 MTA*. Thus, whatever hazardous waste was generated is reduced very little. On further consideration of the material placed before the committee, it was held that following would be by-products and how the same shall be disposed of or sold: -

a. *Recovered Ammonia-900 MTA,*
b. ***Sodium Hydro Sulphide/Potassium bromide-458 MTA (existing consented quantity -458 MTA)***
c. Potassium Chloride/Aluminium Chloride Solution-382 MTA (Existing consented quantity-382 MTA)
d. Spent HCL (Approx. 30%) 1462 MTA (Existing consented quantity-1462 MTA)
e. Spent H2SO4 (98%) 904 MTA (Existing consented quantity-904 MTA,
f. ***Spent Caustic-520 MTA*** (Existing consented quantity 520 MTA,
g. Recovered Solvents (Mono Chloro Acetone/ Toluene/Methanol/IPA/DMF/Mono Chloro Benzene/ Benzene) 500 MTA (Existing consented quantity-500 MTA),
h. Total by-product quantity will be 5126 MTA (Existing consented quantity-5476MTA,
i. ***PP shall follow provisions of Hazardous and Other Waste (M& TM) Rules, 2016 for selling of by-product.***

61. *The Ministry of Environment, Forest and Climate Change issued a notification on 23rd November, 2016.There's an office memorandum, dated 10th July, 2017 for constitution of export Technical Committee****. The said notification is for the process for obtaining "No Increase in Pollution Load".*** *Even for the sake of*

argument, the said notification is considered to be applicable, there is a serious violation of this notification. It is specifically stated that based on the deliberations and scrutiny, the Technical Committee will make its recommendations. It further states that based on the recommendations of the Technical Committee, The State Pollution Control Board shall take the decision with respect to the application received from the project proponent for change in the consent to operate for the purpose of change in the product mix.

62. *As pointed out above, the project proponent itself submitted that NaHS, the hazardous waste is to be incinerated and the Technical Committee specifically recommended that in case of sale of any by-product indicated, the same shall be dealt with in accordance with the provisions contained in the Hazardous Rules. In view of this there is no escape that in the hazardous waste NaHS is one of the components and the same is to be incinerated. In case of sale, the hazardous Rules shall apply. There is flagrant violation of the provisions indicated hereinabove.*

63. Reading the consent dated 13/03/2019 and 10/11/2021, it is very clear that though the committee indicated all the products referred from (a) to (g) aforesaid as by-products, however, in the consent, all these by-products are not shown as by-products. *It was consented to manufacture Sodium Hydro Sulphide/ Potassium bromide-458 MTA, as by-products. The quantity of these two by-products is 458 MTA. However, what would be the permissible production of each product is not indicated in the report of the Technical Committee and in the consent.* Sodium Hydro Sulphide is put in the category of by-product with permissible capacity to manufacture 150 MTA. While *Potassium bromide is put in the category of hazardous waste.* Even *Spent*

Caustic is shown as a by-product, but is in the list of hazardous waste in the consent order.

64. When the technical committee referred hereinabove specifically indicated that **PP shall follow provisions of Hazardous and Other Waste (M& TM) Rules, 2016 for selling of by-product, the same has not been followed While disposing of the Sodium Hydro Sulphide while selling it.**

65. The provisions contained in rule (6) is also relevant to refer at this stage. It conveys that Every occupier of the facility who is **engaged** in handling, **generation,** collection, storage, packaging, **transportation,** use, treatment, processing, recycling, recovery, pre-processing, co-processing, utilisation, **offering for sale, transfer** or disposal of the hazardous and other wastes shall be required to make an application in Form 1 to the State Pollution Control Board and **obtain an authorisation from the State Pollution Control Board.** Such application for authorisation shall be accompanied with a copy of each of the following documents, referred to in the provision.

66. The provision contained in sub rule (1) of rule (8) for storage of hazardous and other wastes states that "The occupiers of facilities may store the hazardous and other wastes for a period ***not exceeding ninety days and shall maintain a record of sale, transfer, storage, recycling, recovery, pre-processing, co-processing and utilisation of such wastes*** and make these records available for inspection:

67. Sub-rule (1) of rule (9) for Utilisation of hazardous and other wastes states that **"*The utilisation of hazardous and other wastes as a resource*** or **after pre-processing either for co-processing or for any other use***, including within the premises* of the generator (if it is not part of process), shall be carried out *only*

after obtaining authorisation from the State Pollution Control Board in respect of waste on the basis of standard operating procedures or guidelines provided by the Central Pollution Control Board."

68. In view of the above it is clear that after following the procedure hazardous wastes can be stored, utilised and sold disposed of. However, storage, utilisation, sale and transportation etc, must be according to strict law.

*****

TRANSPORTATION OF HAZARDOUS AND OTHER WASTE.

69. Rule 18 in Chapter V for transportation of hazardous and other wastes reads as under: -

> (1) The transport of the hazardous and other waste shall be in accordance with the provisions of these rules and the rules made by the Central Government under the Motor Vehicles Act, 1988 and the guidelines issued by the Central Pollution Control Board from time to time in this regard.
>
> (2) The occupier shall provide the transporter with the relevant information in Form 9, regarding the hazardous nature of the wastes and measures to be taken in case of an emergency and shall label the hazardous and other wastes containers as per Form 8.
>
> (3) In case of transportation of hazardous and other waste for final disposal to a facility existing in a State other than the State where the waste is generated, the sender shall obtain ***'No Objection Certificate' from the State Pollution Control Board of both the States.***
>
> (4) In case of transportation of hazardous and other waste for ***recycling or utilisation including co-processing, the sender shall intimate both the State Pollution Control Boards before handing over the waste to the transporter.***
>
> (5) In case of transit of hazardous and other waste for recycling, utilisation including co-processing or

disposal through a State other than the States of origin and destination, ***the sender shall give prior intimation to the concerned State Pollution Control Board of the States of transit before handing over the wastes to the transporter.***

(6) In case of transportation of hazardous and other waste, the ***responsibility of safe transport shall be either of the sender or the receiver whosoever arranges the transport and has the necessary authorisation for transport from the concerned State Pollution Control Board.*** This responsibility should be clearly indicated in the manifest.

(7) The authorisation for transport shall be obtained either by the sender or the receiver on whose behalf the transport is being arranged.

*****

THE MOTOR VEHICLE RULES

70. At this juncture it would be relevant to refer the provisions contained in the Motor Vehicle Rules: Rule 91 in chapter V provides the definitions and the relevant definitions are reproduced.

> *(b) "consignor", in relation to dangerous or hazardous goods intended for transportation by a goods carriage, means the owner of such dangerous or hazardous goods;*
>
> *(c) "dangerous or hazardous goods", means the goods of dangerous or hazardous nature to human life specified in Tables I, II, and III to rule 137;*

71. **TABLE II** gives Indicative criteria wherein at (C)Flammable chemicals are indicated and at (v)Flammable liquids are indicated. In the hazardous goods a list is given in table III wherein the names of hazardous goods against which in short form (E) —Explosive, (F)— Flammable, (O)—Oxidising, (R)—Reactive, (C) —Corrosive, (Ra)—Radioactive, (T)—Toxic, and (G)—Gas, is/are indicated.
72. So far as Sodium Hydro sulphide is concerned in table III at sr.no. 1921 it is shown as **corrosive** and at sr.no. 1953, Sodium Hydro sulphide is also shown as **flammable**.
73. Thus, under the Motor Vehicle Rules, the chemical Sodium Hydro Sulphide is included in table III as hazardous goods and the transportation must be strictly according to rules.
74. Rule 129 refers to the transportation of goods of dangerous or hazardous nature to human life. According to this provision, the owner of a goods carriage transporting any dangerous or hazardous goods shall, in addition to complying with the provisions of any law for the time being in force in relation to any category of dangerous or hazardous goods, comply with the

following conditions indicated therein. Mandatory requirement of displaying distinct mark of the class label with the size as indicated in the rule. Every goods carriage carrying any dangerous or hazardous goods must be equipped with safety equipment for preventing fire, explosion or escape of hazardous or dangerous goods. ***Every goods carriage carrying goods of dangerous or hazardous nature to human life, shall be fitted with tachograph (an instrument to record the lapse of running time of the motor vehicle; time speed maintained, acceleration, deceleration, etc.)*** *conforming to the specifications of the Bureau of Indian Standards.]* (ISI indicates that it is an "Equipment intended for installation in road vehicles to show and record automatically or semi-automatically details of the movement of those vehicles and of the certain working periods of their drivers;" AIS-059 Automotive Vehicles –Recording Equipment in Road Vehicles (Tachograph)

75. Spark arrester as per rule 129A, 130. display of class labels to be displayed on a vehicle, as indicated and every goods carriage carrying any dangerous or hazardous goods shall display the class label on the places shown in the Table in rule 134

76. Responsibility of the consignor for safe transport of dangerous or hazardous goods. Is indicated in rule 131.— (1) It shall be the *responsibility of the consignor intending to transport any dangerous or hazardous goods listed in Table III.* Apart from various duties it is relevant to note That the transporter or the owner of the goods carriage must have adequate information about the dangerous or hazardous goods being transported and that the driver of the goods carriage must be trained in handling the dangers posed during transport of such goods. The consignor has to supply to the owner of the goods carriage, full and

adequate information about the dangerous or hazardous goods being transported as to enable such owner and its driver to comply with the requirements of rules 129 to 137 (both inclusive) of these rules; and must be made aware of the risks created by such goods to health or safety of any person. It is the duty of the consignor to ensure that the information is accurate and sufficient for the purpose of complying with the provisions of rules 129 to 137 (both inclusive) of these rules.

77. Responsibility of the transporter or owner of goods carriage are indicated in rule 132. Apart from other duties, the owner of a goods carriage, before undertaking the transportation of dangerous or hazardous goods in his goods carriage, satisfies himself that the information given by the consignor is full and accurate in all respects and correspond to the classification of such goods specified in rule 137. ***The owner of a goods carriage has to ensure that the driver of such carriage is given all the relevant information in writing as given in*** **Annexure V** of these rules in relation to the dangerous or hazardous goods entrusted to him for transport and must satisfy himself that the driver has sufficient understanding of the nature of such goods and the nature of the risks involved in the transport of such goods and is capable of taking appropriate action in case of an emergency.

78. The important aspect is that as per sub-clause (4) ***The owner of the goods carriage*** carrying dangerous or hazardous goods, and ***the consignor of such goods shall lay down the route for each trip which the driver shall be bound to take unless directed or permitted otherwise by the Police Authorities. They shall also fix a time table for each trip to the destination and back with reference to the route so laid down.***

79. Responsibility of the driver is indicated in rule 133. **The driver has to ensure that the information given to him in writing under sub-rule (3) of rule 132 which lays down the route and timing is kept in the driver's cabin and is available at all time while the dangerous or hazardous goods to which it relates, are being transported.**

80. Under the provisions contained in ***the Gujarat Motor Vehicle Rules, 1988*** a carrier is required to have "National Permit" to move out of the State. Rule 70(7)(x) is the relevant provision for the national permit. In clause 12, the prescribed form, wherein the permit specifies the nature of goods to be carried as a goods carriage. For the vehicle No. GJ-06-ZZ-6221 owned by Shri Begal, as per RTO records it is clear that for the said vehicle, the ***RTO granted permit to carry PETROLEUM PRODUCTS in the vehicle.*** No permit is there to show that the permission was granted to carry the goods, namely any chemical or other hazardous chemical. Only **Petroleum Product** could have been transported. Thus, a tall claim that vehicles were being checked about the permissibility to carry the chemicals is a false claim. Tanker No. GJ-06-BT-6421 and the tanker No GJ-06-BT-6431 were permitted to carry PETROLEUM PRODUCTS only. In these tankers other than Petroleum Products could not have been carried and transported. The copy of the permits for vehicle aforesaid collectively are annexed herewith Mark Annexure-18 For the Vehicle No. GJ-12-BY-1891, the Transport Department issued a permit valid from 10-Aug-2021 to 09-Aug-2022, however, in the column for NATURE OF GOODS TO BE CARRIED is BLANK. The Ministry of Commerce & Industry, Petroleum & Explosive Safety Organisation, having an office at Vadodara after considering the application, licensed to transport petroleum products by land by Tank Lorry Reg. No. GJ-

12-BY-1891. This vehicle was not allowed to transport other than petroleum product of class A/B. The copy of the said permit is Annexed herewith and Mark Annexure-19.

81. For the sake of argument, the carrier was allowed to collect the waste as a **waste collector** as per newly added clause (40) of rule (3) of the Hazardous Rules vide Notification dated 01/06/2019, ***even then there must be record with Hikal Ltd, as to indicate that on behalf of the actual user or the operator of the disposal facility, hazardous waste given for transportation.*** The said clause reads as "Waste collector" means a person who collects hazardous and other wastes ***on behalf of actual user or operator of disposal facility from the occupier;"*** thus, when a person is collecting hazardous waste from the occupier, the generator/occupier can part with such waste only if the waste collector has authorisation as provided under rule 6. In the instant case as the hazardous waste to be disposed of at a cheaper price none has bothered to follow the provisions contained in the Act, rules or even guidelines.

*****

CONSENT AND CONDITION

82. Apart from these rules referred above, the MPCB issued a consent with certain conditions to be observed.

83. Condition No. 13 states that the industry, the by-product ***generator, should ensure that all the vehicles used to transport by-products to the vendor industry to be fitted with web-based GPS system to record the origin to destination position and shall self-monitor the compliance and submit monthly report to the Board.***

84. Condition No. 14 states that the **industry shall obtain (an) affidavit from vendors stating that the by-product purchased from PP (by-product generator) is used as raw material in their respective industries.**

85. There is noncompliance with the rules contained in the Hazardous Rules and MV Rules. The MPCB has pointed out that the record of movement of tankers to be recorded in web-GPS systems has not been produced except for 2 trips. Not only that, but if Hikal Ltd was really monitoring the web-GPS record it would have known that the tankers had been diverted to other place than instructed in writing along with the route and had not reached the destination. It was the duty of Hikal Ltd to monitor through GPS and to make immediate enquiries in the matter, if the tankers are diverted. In case diverted or having not reached in time, Hikal Ltd, ought to have immediately lodged the report with the police and the MPCB. Absence of this clearly indicates that the chemical, a hazardous waste, was given for disposal otherwise than in accordance with the rules.

86. It is also required to be noted that the condition was imposed by the MPCB to the effect of obtaining an affidavit from the

purchaser of the hazardous waste or for the sake of argument the by-product, to be used as a raw material in its industry. Surprisingly, no affidavit as required under the law is obtained from the so-called purchaser and on a piece of paper, there is a writing and the signature, but there is nothing to show that the contents were affirmed by the authorised person on oath before the competent authority administering the oath. It is also pointed out by the team of the MPCB that in the said document, it is also stated that this material received is used as a raw material in their industry. *As a matter-of-fact the consignee, Sangam has neither consent nor a factory. The Hikal Ltd did not inquire into the matter and in view of the material which is discussed hereafter it can be said that the material was given for the purpose of disposal, not in accordance with law.*

87. In the report, the MPCB has pointed out that the said firm has submitted an affidavit (so-called affidavit) stating that they are receiving sodium hydro sulphide (Lower Grade-by-product) from M/S Hikal Ltd through their authorised transporter. It is also pointed out in the report that M/S Sangam was engaged since last the two months only. The copy of the affidavit submitted by Sangam, to Hikal Ltd is annexed here with Mark Annexure-20. (Submitted by MPCB)

88. The Hikal Ltd could have acted only in accordance with the Hazardous Rules and MV Rules.

89. In the Motor Vehicle Rules, the material, namely sodium hydrosulphide is in the category of hazardous goods. Therefore, the transportation must be strictly in accordance with the aforesaid rules. There is nothing to show that tachograph as required under rule was fitted in the tanker which was carrying hazardous goods. There is nothing to show that the Hikal Ltd, the

consignor, laid down the route for the trip. If the route would have been laid down the driver was bound to follow the route indicated. Time was also required to be fixed for the trip. This was required to be followed with a view to see that the vehicle carrying the hazardous goods does not leave the route which is fixed and it reaches in time fixed earlier. While sitting in the office, Hikal Ltd could have watched the movement of the tanker on GPS, but that has not been done. A man of ordinary prudence is expected to check all these things. However, there is nothing to indicate the compliance of these rules. Had the rules been followed, the situation could have been avoided.

90. The officers of MPCB visited the aforesaid unit on 08/01/2022. The report is in detail. An enquiry was made about illegal disposal of sodium Hydro sulphide, at Sachin GIDC, Surat, Gujarat. In response, it was conveyed by the responsible officer of the Company that during the manufacturing process of the chemical indicated in the report, sodium Hydro sulphide (NaHS) was supplied to the companies named in the report. According to the said report in FY 19-20, there was total production of 157.8 MT of sodium hydro sulphide. The same was supplied through M/S Apollo Chemicals, Dahisar, Mumbai to M/S Raina Industries, GIDC estate, Ankleshwar, which is engaged in manufacturing of Sodium Sulphide, 150 TPM.

91. In FY 21-22. There was a production of 19.66 MT which was sold to M/S Eureka Chemicals, MIDC, Taloja, Raigad. It also produced 141.55 MT of sodium Hydro sulphide, which was *supplied to M/S Sangam Enviro Private Limited, village Dasharath, District Vadodara, Gujarat.* However, the invoices are showing Bharuch address.

*****

HIKAL LTD RESPONSE SHOWS NOT

A BY-PRODUCT & ILLEGAL DISPOSAL

92. ***The managing director of Hikal Ltd, Mr Sameer Hiremath addressed the communication to the Member Secretary, MPCB, Mumbai through email on 10/01/2022, the copy of which forwarded by MPCB to the GPCB is annexed herewith Mark Annexure-20A,*** inter alia, conveying that NaHS diluted solution 16%-18% is ***a by-product*** generated at Taloja factory. To make products usable to the **Cement,** Craft Industry, Paper Manufacturing, Leather & **Textile** and Dye Industry, ***the dilute NaHS solution generated as a by-product needs to be processed and concentrated to 36%+.*** Hikal Ltd, sold the NaHS dilute solution of 16%-18% to Sangam for further process to make it usable as a product in ***the Cement and Textile industry***. Hikal Ltd, paid processing and transportation fees to Sangam to further process the by-product and make it saleable to the Cement and Textile industry. This is as per the agreement signed between both the parties and alleged affidavit signed by Sangam. Hikal Ltd, sold NaHS diluted solution of 16-18% to Sangam in view of the alleged affidavit by Sangam stating that NaHS solution would be used as a product in the textile and cement plant against proper authorisation.

93. It is also stated that Sangam is a MSME registered enterprise for collection, treatment, processing and sale of by-products. It was further stated that Hikal has abided by all the conditions of the consent issued by MPCB for the sale of NaHS solution. It is required to be referred that the Ministry of MICRO, SMALL AND MEDIUM ENTERPRISES a notification on 01/06/2020 under the

provisions contained in the Micro, Small and Medium Enterprises Development Act, 2006 notified the criteria for classification of micro, small and medium enterprises as per the amount of investment in Plant and Machinery or Equipment. From the certificate issued it appears that Sangam Enviro Pvt. Ltd, having office at Village Dasharath, District Vadodara was registered with the authorities for Micro Services, though in the sheet manufacturing or collection and treatment of hazardous waste etc have been indicated. The managing Director and other highly paid officers of the company engaged in manufacturing pesticides are supposed to be aware that even other waste is required to be disposed of in accordance with law.

94. When Hikal Ltd submitted to consider certain products as by-products, the technical committee was not satisfied in 1st and 2nd meeting, however, in the 3rd meeting, with regard to by-products, ***the Technical Committee mandated that the provisions of the Hazardous Rules will have to be followed***, meaning thereby the said rules will apply. Under rule 6 of Hazardous Rules, there is a provision of ***authorisation for managing hazardous and other wastes which includes generation, transportation, processing, and even offering for sale etc.*** Reading the provisions contained in rule 8, it is also clear that the occupier of the facilities (subrule, 21 of rule 3) in case of sale, is required to maintain record. As indicated the hazardous wastes can be stored, utilised and sold in accordance with the provisions.

95. One will have to refer to the meaning of the ***Actual user*** and ***authorisation*** as given in sub clauses (2) and (3) of rule (3). ***"actual user" means an occupier who procures and processes hazardous and other waste for reuse, recycling, recovery, pre-***

processing, utilisation including co-processing; and ***"authorisation" means permission for generation, handling, collection, reception, treatment, transport, storage, reuse, recycling, recovery, pre-processing, utilisation including co-processing and disposal of hazardous wastes granted under sub-rule (2) of rule 6;*** There is nothing to show that the Sangam was the actual user as defined and there is nothing to show that any unit in need of NaHS authorised Sangam to collect the hazardous waste and transport the same to its unit for the purpose required. All the persons were and are aware about the Environmental Laws including the law relating to hazardous wastes.

96. In absence of any consent to manufacture sodium hydrosulphide 16%-18% and all the by-products indicated would attract the provisions contained in the Hazardous Rules, in view of the decision taken by the Technical Committee. **It is admitted by the managing director that the sodium hydrosulphide was required to be processed to make it saleable to the textile and cement industry.** *He is not aware about the industry to be supplied with NaHS given to Sangam. The only presumption can be drawn is that it was given for disposal not in accordance with the law and not for any process to make it saleable to cement or textile industry.* Explanation to MPCB and internal correspondence make it clear that NaHS was disposed of contrary to the provisions of law and the explanation that the same was given for processing to make it saleable without the name of the vendor cannot be considered at all. If it is a by-product, the same by product is to be used without any further process. On examination of the provisions, it is very clear that the ***by-product is a material that is not intended to be produced but gets produced in the production process of the intended product <u>and is used as such</u>***. Thus, it is very clear

that the by-product is to be used as it is without any process or making any changes in the product. In the instant case, the material generated during the final product is to be processed before its use. If it is required to be processed, then it cannot be said to be a by-product. In view of what is stated above it cannot be said to be a by-product as contended.

*****

HIGH COST OF INCINERATION EVALUATE WITH SANGAM FOR DISPOSAL.

97. It is interesting to refer to the communication between the Assistant General manager (hereinafter referred as AGM), Machindranath Gorhe and Abhay Dandekar. (In all invoices there is a reference to "As per mail from Mr. Abhay Sir dt 08.11.201". (Should be 2021) On 01/10/2021 AGM addressed a communication to Mr. Abhay that 6 tankers are lying inside the factory, which is very serious for the safety of the plant as well as any visit of MPCB officials. It was conveyed that immediate action is required to remove all tankers from the site. ***Need to consider and evaluate the disposal option for the time being till another end-user option is available. Otherwise on urgent basis, disposal was requested, which may cost more than Rs.50 per KG***. AGM conveyed that the sample has been sent to MWML for analysis and incineration cost proposal details. It was also communicated that recovered ammonia is not going directly to the end user. ***Requested for proper affidavit from the agency with a request to expedite the actions***. On 27th October, 2021. The AGM conveyed to Mr Abhay inter alia that the situation is very serious. Around 6-7 thankers of ammonia and NaHS in any ease is very dangerous with respect to plant safety. Main road is blocked. ***As per last communication, for incineration of NaHS will cost Rs. 71, 000/-per MT***. ***It was suggested to discuss and evaluate with M/S Sangam for disposal.*** Explanation to MPCB and internal correspondence make it clear that NaHS was disposed of and the explanation was given that the same was given for processing to make it saleable. Without knowing the name of the vendors i.e.,

the end user, NaHS given to Sangam, who had no consent to process to make it saleable, indicates guilty mind and disposal of the hazardous waste illegally. The copies of internal correspondence are annexed herewith Mark Annexure -21

98. Thus, it is very clear that for incineration, the cost would be Rs. 71,000 per MT. The cost of disposal was anticipated to be nearly Rs.50/- per KG. From this it appears that to get rid of the material, it was suggested to contact Sangam for disposal and a show was made as if Sangam was the purchaser of the so-called by-product. The computerised copies of invoices are obtained by the police. Hikal Ltd, having admitted in the communication as well as before the officers of MPCB about the transportation, the same requires no much discussion. However, looking at the dates of loading, name of the person who communicated and the name of the consignee and many other things are revealing that the transactions are fraud. The invoices are annexed herewith Mark Annexure-22 collectively.

S. No	Bill to /Consignee/ Invoice date	Order No and date.	Customer PO No.	LR Date/ Transporter. Vehicle No.	Quantity KG Amount
1	Sangam/ Sangam 12-Nov-21	1066 10-Nov-21	As per mail from Abhay Sir 08-11-2021	11-Nov-21 Nilkanth Logistic GJ-12-BY-1891	29030 @ Rs. 0-01 Rs.342.55
2	Sangam/ Sangam 22-Nov-21	1066 10-Nov-21	Same as above	21-Nov-21 Shree Maruti Impex India	29270 @ Rs. 0-01

				GJ-06-BT-6431	Rs.345.39
3	Sangam/ Sangam 23-Nov-21	1066 10-Nov-21	Same as above	21-Nov-2021 Shree Maruti Impex India. GJ-06-BT-6424	29050 @ Rs. 0-01 Rs.342.79
4	Sangam/ Sangam 17-DEC-21	1066 10-Nov-21	Same as above	17-Dec-21 Shree Kailash Transport MH-04-HY-6377	25910 @ Rs. 0-01 Rs. 305-74
5	Sangam/ Sangam 01-Jan-22	1066 10-Nov-21	Same as above	31-Dec-2021 Shree Maruti Impex India GJ-06-BT-6421	28290 @ Rs. 0-01 Rs.333.82

141550 kgs=141.550MT cost of incineration @Rs.71,000/- Per MT. would be Rs.1,00,50,050/- this cost has been saved by the Hikal Ltd.

99. In the invoices aforesaid only one order No.1066 dated 10/11/2021 is recorded. However, in all the invoices, the name of the contact person is referred to and though the phone is written, but his phone number is not there in the invoice. ***If the order is placed for all the transactions on 10/11/2021, how and why it is specifically recorded that "As per mail from Abhay Sir Dt.08-11-2021*** (in all in the figure of years last figure 1 is missing). At Sr No. 2 and 3, though the Sodium Hydro Sulphide was loaded on

21/11/2021, invoices are not prepared on the same date, one is prepared on the same date and the other on the next day. The invoice is for sale of goods and the name of the consignee as well as the party billed are the same party. It appears that the transactions are sham, bogus and are nothing but fraud. In absence of authorisation for collection for the end user, the Hikal Ltd, could not have parted with hazardous waste. Hikal Ltd is asking to believe that the one party ordered 141.550 MT of Sodium Hydro Sulphide on 10/11/2021 for which Mr Abhay Dandekar intimated on 08/11/2021.

100. In view of invoices, it is very clear that the consignee, Sangam Enviro Private Limited, was not the user of NaHS as a raw material in its industry. This was known to the managing director of Hikal Ltd. A man of common prudence, and particularly in this case engaged since long in the manufacturing of pesticides is deemed to be aware that the consent is required not only for manufacturing but also for any type of operation or process or any treatment. If that be so, one would have enquired whether Sangam has a consent or not. Without making any verification the hazardous waste has been supplied. What could be the reason for supplying hazardous waste to a person who has no consent from the competent authority? If the final destination of the consignment was that of cement and textile industry, the invoice would have been prepared in the name of the Company authorising for collecting Sodium Hydro Sulphide.

*****

CANNOT BE USED IN

CEMENT PRODUCTION.

101. The claim is made by Hikal Ltd, that NaHS is utilised in the cement factory. The Central Pollution Control Board issued guidelines in February, 2010. It did not recommend corrosives to be used in the cement industry. Regular permission was granted for co-processing in the Cement Industries to 4 hazardous wastes, namely, (1) Paint Sludge from automobile sector, (2) Petroleum Refining Sludge, (3) TDI tar waste and (4) ETP sludge from M/S BASF India Ltd. Again, in July, 2017 CPCB issued further guidelines, the copy of which is annexed, Mark Annexure-23 In paragraph 7.1 pointed out that amongst various items, Corrosives need not be considered for pre-and co-processing. It is known that NaHS is corrosive and therefore it is not to be used in the Cement Industry. CPCB has not issued any guidelines for the use of NaHS in the Textile Industry. Thus, it is clear that the so-called by-product has been illegally disposed of.

*****

POLLUTER PAYS.

102. Industrialization and popping up of factories emitting pollutants, were and are worldwide concern. In Stockholm, at the United Nations Conference on the Human Environment, decisions were taken in June 1972 to take appropriate steps for preservation of the natural resources of the earth, including the preservation of the quality of air and water by controlling pollution. The Water (Prevention and Control of Pollution) Act, 1974, was enacted by the Parliament to prevent and control water pollution and to maintain and restore wholesomeness of water. In view of the decision taken at Stockholm, the Parliament enacted the Air (Prevention and Control of Pollution) Act, 1981. The Environment (Protection) Act, 1986, was enacted pursuant to the decisions taken in June, 1972 at the United Nations Conference on the Human Environment, held in Stockholm. All over the world, people are facing problems arising out of different types of pollution caused by the industries, that includes deaths of innocent persons and rise in certain health hazards, some leading to death.

103. It is the duty of the authorities to see that the laws made by the Parliament are strictly enforced, and all involved in manufacturing or processing or co-processing activities, including that generating hazardous waste are kept under strict and continuous surveillance so that there is no adverse effect on the environment. In view of the availability of CCTV cameras especially at all entry and exit points of industrial estate, industrial clusters and, chemical industries located outside such estate there will be no difficulty to monitor the movements and activities as recorded footage of CCTVs are generally available for about 15

days and which may even be extended. This will benefit the law-abiding industries and the Pollution Control Boards where the units are committing breach of any of the provisions relating to the environment. The laws have made the hands of the Pollution Control Officers very strong to take any measure deemed necessary or expedient for the purpose of protection and improvement in the quality of the environment and also for preventing, controlling and reducing environmental pollution. (Section 3 of the Environment Protection Act, 1986).

104. This case is dealing with an act in violation of the environmental laws causing deaths of six innocent persons and injury to as many as 23 persons. An act or omission to deal with the hazardous liquid chemical (having NaHS or Sodium Hydro Sulfide) was intentional, the person has deliberately acted passively without bothering about the provisions of law and the duty cast on him to act in particular manner only. Again, the illegal disposal is not of a small quantity. The persons dealing were not only educated, but qualified in the manufacturing of pesticides. Looking at the bulk quantity of varieties of pesticides and being aware about the dangers of the chemicals and mode of disposing, have illegally disposed of such hazardous liquid the NaHS on different dates to avoid the payment of more than Rs. One crore for incineration. Had it been the case of mere disposal to the genuine end user, matter could have been dealt with differently. But in the instant case, in view of the danger that was apprehended of causing damage to the plant and machinery and the cost of incineration was high, as indicated earlier, to save the money, illegally disposed of the hazardous liquid the NaHS. It was not a small quantity but the five load tankers, which comes to 141.550 MT in all as per the invoice issued by the generator (M/s Hikal Ltd. Taloja, Maharashtra), the

consignor (M/s Sangam Enviro, Bharuch/Vadodara, Gujarat). As discussed earlier, from 11th November, 2021 to 31st December, 2021 (both including) by five tankers NaHS was disposed of in flagrant violation of the Hazardous Rules. In the instant case the hazardous waste which was shown to be incinerated before the Technical Committee, claimed to have obtained as a By-product (Required to be used as such, without any further treatment) and has been claimed subsequently to have been given for processing before the end use. All these aspects have been discussed in earlier paras. The carrier had no authorisation from the end user of the NaHS generated by the generator. Even the generator had no authorisation for disposal of such hazardous liquid through a third party. It was the duty of the generator to take steps for safe disposal as per rule 4. The generator was under duty to send or sell to an authorised actual user of hazardous waste generated in its establishment or to dispose of in an authorised disposal facility. The generator of hazardous waste was duty bound to transport to an authorised actual user or to an authorised disposal facility in accordance with the provisions of these rules. Even for transporting the hazardous waste, the generator was required to adhere to the procedure laid down in rule 18 and the provisions of the Motor Vehicle Rules so as to see that the hazardous liquid the NaHS reaches the authorised user.

105. In flagrant violation, the hazardous chemical NaHS is illegally disposed of and to make it a show that it is a sale, invoices were issued and the consignee was the Sangam Enviro who had no facility of any treatment or processing etc. moreover is not a textile or cement industry. M/s Sangam Enviro has no consent from GPCB, and surprisingly that was not known to the generator. Even the transporter could not have taken the delivery without the

authorisation and was required to follow the rules as discussed. The consignee has illegally disposed of all the tankers in the state of Gujarat except 01 which was caught by the police.

106. In the trip when the carrier disposed of the such hazardous liquid NaHS in the open drain in Sachin GIDC. Due to some reactions with the existing acidic condition in the Sachin GIDC Drain which resulted in generation of poisonous gase/s which took the life of 6 innocent persons and caused injury to many as said earlier. In view of this, the police investigated and found active involvement of the Hikal Ltd, and its officers and the carrier and others. In detail it has been pointed out as to how and at what places hazardous liquid the NaHS was disposed of. Thus, this is a deliberate and engineered act in conspiracy to save huge money. Even before the officers of the MPCB the generator has agreed to have dispatched the tankers as discussed earlier.

107. Therefore, in a case like this how the amount of compensation and environmental damages should be assessed?

108. The easiest mode to calculate in a matter like this where it is clear from the correspondence of the officers amongst themselves that the sum of Rs.71,000/- per MT will be the cost of the incineration it is easy to calculate what amount has been saved by the generator. 141.550 MT (total disposal through Sangam) X Rs. 71,000 will come to Rs,1,00,50,050/- (Rs. One Crore fifty thousand fifty only). The generator, Hikal Ltd has saved this amount of Rs.100,50,050/- This amount is illegally retained by it which it was not entitled to retain.

109. Hon'ble National Green Tribunal on the question of compensation/ damages/ assessment pointed out various aspects in ORIGINAL APPLICATION NO. 64/2016 (WZ) decided on January 24, 2022 and that is required to be kept in mind.

110. Considering the Schedule II of the NGT Act,2010 and as pointed out by the hon'ble Tribunal in Paras 434 and 435 items (g) and (h) relates to ***expenses and cost incurred by the State in providing relief to the affected persons;*** and loss caused in connection with activity causing damage. The damage to environment covers a very wide variety of nature as is evident from definition of environment under section 2 (c) which is inclusive and says; 'environment includes water, air, and land and the interrelationship, which exists among and between water, air and land and human beings, other living creatures, plants, micro-organism and property'.

111. In paragraph 442 the Hon'ble Tribunal pointed out that ***"Determination/computation/assessment of environmental compensation must, not only conform the requirement of restoration/remediation but should also take care of damage caused to the environment, to the community, if any, and should also be preventive, deterrent and to some extent, must have an element of "being punitive".*** The idea is ***not only for restoration/remediation or to mitigate damage/loss to the environment, but also to discourage people/proponents from indulging in the activities or carrying out their affairs in such a manner so as to cause damage/loss to the environment.*** In paragraph 472 it has been pointed out that" ***We also find that some crucial relevant aspects requiring application of 'Polluters Pay', have not been considered in the above suggestions. CPCB has failed to consider that the purpose of determination/ computation/ assessment of environmental compensation and levy thereof, involve various factors like (i) cost of damage to environment, (ii) cost needed for restoration/remediation of damage caused to environment, (iii) element of deterrent/provincial, (iv) liability arising for violation of statutory***

mandatory law relating to environment namely requirement of consent, EC and NOC etc. It is not the mere cost of an item or subject but computation of something which has arisen by an act of PPs due to violation of environmental law causing damage to the environment. The loss and its remedy involve a complex of components."

112. In paragraph 473 it is pointed out that" ***Nature is precious.*** The elements of nature like air, water, light and soil in a materialistic manner may not be priced appropriately and adequately. Most of the time, whenever price is determined, it may be extremely low or highly exorbitant, meaning thereby disproportionate. Still, since some of the assets of nature are marketable, on that basis price may be determined but ***when such elements are damaged or degraded, restoration thereof, in effect is priceless***. Many times, it may be almost impracticable and improbable to recover and remediate the damaged environment to its position as it was. Moreover, its cost might be very high. It also cannot be doubted that once there is pollution or damage to the environment, it would adversely affect not only the environment but also inhabitants and all biological organisms. Damage is there, only degree may differ whether to the environment or to the inhabitants and other organisms…."

113. When a polluter is noticed to have acted systematically or in an organised manner the amount determined in fixed quotients and in rupees etc, is very lenient. ***In the instant case on account of throwing the hazardous waste through a flexible hose pipe, a cloud of poisonous gas generated and the wind moved that strong poisonous cloud towards the nearby factory which affected a number of persons. Six died and 23 sustained injuries and were hospitalised for a couple of days and even after***

discharge from the hospital all injured could not join the duty. The hazardous waste which was liquid, Sodium Hydro Sulphide entering the natural drain on account of other effluent reacted and that generated poisonous gas and, in the drain, caused damage to the water of the drain, soil, and other than human lives in the water and caused pollution. In different tankers on different dates and different places the hazardous waste was discharged, which aspect has been discussed earlier must be kept in mind.

114. 114. In paragraph 474 it is pointed out that "Unfortunately, the above guidelines laid down by CPCB have not considered all these aspects and it appears that the same have been prepared in a very casual and formal manner."

115. *115.* In paragraphs 476, 477 and 478 it is pointed out that: - ***"476. Statutory Regulators have also failed to consider that environmental compensation is not a kind of fee which may result in profiteering to violators and after adjusting a nominal amount of environmental compensation, a violator may find it profitable to continue with such violations. The objective of environmental compensation is that not only the loss and damage already caused, is made to recover and restore but also in future, the said violator may not repeat the kind of violation already committed and others also have a fear of not doing the same else similar liability may be enforced upon them. Unless the amount of compensation is more than maximum permissible profit arising from violation, the purpose of environmental compensation would always stand defeated.***

477. Loss caused to surroundings of the environment, may also include flora-fauna and human beings. It is in this backdrop that in various matters when the issues were

considered by Courts and Tribunal and found necessary to impose environmental compensation upon Proponent/Violator of environmental laws, they have followed different mechanisms……."

478. CPCB Guidelines have taken care of industries and municipal bodies. Its application in all cases irrespective of other relevant consideration may prove to be disastrous. Individuals, charitable, social or religious bodies, public sector and government establishments etc., may, in given circumstances justify a different approach……." "Compensation regime must be a deterrent to violators and incentivize eco-friendly proponents. No one should get profited by violating environmental laws and the community should also not suffer for violation of environmental norms by defaulting proponents."

116. *116*. How the compensation has been awarded has been pointed out in different paragraphs.

> ***"486. In some cases, compensation has been awarded by the Tribunal on a lump sum basis without referring to any methodology. For example: (i) in Ajay Kumar Negi vs Union of India, OA No. 183/2013, Rs. 5 cr. was imposed. (ii) In Naim Shariff vs M/s Das Offshore Application no. 15(THC) of 2016, Rs.25 cr. was imposed (iii) Hazira Macchimar Samiti vs. Union of India, Rs 25 cr. was imposed".***

117. *In* paragraph 494 it has been pointed out that "Moreover, in a case where pollution is continuous, violations of environmental laws and norms are consistent and ***Industries for their own benefit are carrying on their commercial activities without showing any***

legal, social and ethical obligations, responsibilities and duties toward society, i.e., preservation, protection and maintenance of purity of environment, they cannot be allowed to raise any technical plea to take advantage of their own wrong or own practical problems for the reason that the factum of causing pollution by violating environmental norms is sufficient to attract Principle of Polluters Pay and since violation is for commercial interest of industries, they must be required to pay in terms of their volume of business which has been suggested by Supreme Court also as we have already discussed above."

118. When the industry is found disposing of the hazardous waste illegally and systematically to earn wrongful gain, how the compensation is to be arrived at? For the complete year the industry has disposed of the hazardous waste illegally. About the earlier years the Committee has no figures. However, as pointed out by the Tribunal in paragraph 496" Here, Respondents Proponents have been crossing limits/standards and releasing polluted effluents just for their commercial interests and thereby compromising ecological sustenance and health of society. Determination of compensation, this must correlate the level of industrial/commercial activities of such Pollutants i.e., volume of business.

119. In the instant case, as reported by MPCB in all on 6 occasions, sodium Hydro sulphide was disposed of through tankers and the total quantity of hazardous waste through 5 tankers comes to 141.551MT with the help of only one carrier who had no tanker of his own but hired the tankers which were meant for transportation of Petroleum Products. The 1st incident relates to the State of Maharashtra. However, on 5 occasions. Sodium hydrosulphide was disposed of in the State of Gujarat through different tankers on

different dates. (Except one case the chemical was disposed of by an order of the Court)

120. On examination for determination of environmental compensation to be recovered for violation of Hazardous and other Waste (Management and Transboundary Movement) rules 2016, the guidelines have been issued by the CPCB. On page No. 9, the quantity of hazardous or other waste is impressed upon to take into consideration. It reads" Environmental compensation may, therefore, be directly correlated with the quantity of hazardous or other waste under reference." In such cases, it is suggested that the Environmental compensation as indicated in the Enforcement framework for effective implementation of Hazardous and other waste rules -2016 issued by CPCB, July-2019, the same is required to be calculated as (EC= Q x ERF x R). In the note, it is stated that the authorised quantity of per annum generation of waste to be considered. What is indicated in the consent is a by-product, namely sodium hydrosulphide permitted to manufacture 150 MTA. As per the technical committee's decision, if it is to be disposed of by sale, the Hazardous Rules will apply. Therefore, it will be considered as hazardous waste. Even according to the generator, the said chemical was given for processing to a party having no consent from the concerned Pollution Control Board or not operating any unit to process the said waste. Again, to whom that was to be disposed of is not known to the generator. The end use was not known. Thus, in clear violation of the provisions it was disposed of and therefore quantity 150MTA, will have to be taken into consideration. Considering the method of calculation, the amount comes to Rs. 67, 50, 000.00 (***Q = 150 x ERF= 1.5 x R=30,000=67,50,000)***. As indicated, the total cost for incineration for 150 MT would be **Rs.1,06,50,000.00.** (It is a case of the

generator that Rs. 71,000 Per MT is a cost in correspondence). Considering the amount required to be spent for incineration is much more than the amount to be considered as damages/compensation as per the CPCB guidelines. This cannot be accepted. There is illegal disposal in absence of authorisation and contrary to the provisions contained in the Hazardous Rules and MVA Rules. The industry would be willing to give this amount without any hesitation.

121. Case II refers to the category" *if authorisation has not been taken at any point of time for all or any given category of hazardous or other waste being generated/utilised"* authorisation has been given to generate a by-product and has not been utilised, but has been disposed of, contrary to the technical committee's opinion/report. Even if this formula is considered, namely ***EC (in rupees) =T x S x C x ECF x Y.*** (Type of Facility x Scale of operation x Environmental Compensation Factor x Category x Number of Operation of the facility) Here considering this formula 1 x 1.5 x 45,0000 x1 x 1= 67,50,000.00, which is obviously much less than the amount required to be spent for incineration. The manner in which the act is committed, cost, benefit in terms of money, nature of damage etc are not considered appropriately.

122. Therefore, as pointed out by the Hon'ble Tribunal, formulas have been prepared in a very casual and formal manner. It is also pointed out that***" In Deepak Nitrite (supra) Supreme Court said that in a given case the percentage of the turnover itself may be a proper measure because the method to be adopted in awarding damages on the basis of 'polluter to pay' principle has got to be practical, simple and easy in application. In Goel Ganga Developers (supra) Supreme Court allowed 10% of project cost as compensation.***

123. Considering all the aspects, percentage of the total turnover of Hikal Ltd, would be an appropriate method in awarding damages. The total turnover of Hikal Ltd is Rs.17204 million. However, this figure cannot be taken into consideration for calculating the compensation as the figure given is of all the units of Hikal Ltd. So far as the unit at Taloja is concerned, its turnover is Rs.3010 million as communicated by the MPCB and therefore, this figure will have to be taken into consideration for calculating the amount of compensation. If the 5% of the turnover of Taloja unit of Hikal Ltd, is taken into consideration the compensation of Rs.15.05 crore must be awarded. The Committee recommends that the aforesaid amount of Rs. 15.05 (fifteen crore and five lakhs) Crore be recovered from Hikal Ltd.

124. The persons who unfortunately became the victims and expired and the others those who were required to be treated in the hospital for a number of days (indicated against the name of the victim) and were not able to join the duties for a number of days as indicated in the list. The Committee has calculated the damages and recommends to be recovered from the Hikal Ltd, to pay to the next of kin of the deceased and the victims, the compensation of Rs. 2,13,14,460.00(two crores thirteen lakhs fourteen thousand four hundred sixty) as detailed in the statement Mark Annexure-24.

125. The sum of Rs.2,92,680/- (Two lakhs Ninety-two thousand six hundred eighty) as billed by Globe Enviro Care Ltd. CETP, Surat, dated 17/01/2022 be paid to GPCB towards the cost of lifting of contamination Liquid waste about 73,170 litres to CETP through tankers. The copy of the said bill is annexed herewith and Mark Annexure-25. The said waste has been treated in their CETP. This

exercise was on account of illegal discharge and that cost in opinion of the Committee should be recovered from Hikal Ltd.

126. The State government granted the relief to the next of kin of the six deceased persons as immediate assistance. The same amount should be recovered from the polluter. The Committee recommends that in view of para 435 of the aforesaid decision of the Hon'ble Tribunal, the total amount of Rs. 24,00,000/- (Twenty-four lakhs only) paid by the State government to the next of kin be recovered from Hikal Ltd. The copy of the letter in this behalf is annexed herewith and Mark Annexure-26 copy of letter dated 24/03/2022 issued by the Collector.

127. In addition, as a source of presence of acidic waste in the natural drain of Sachin GIDC was detected as the same was ***illegally discharged by the three units.*** Three industries have been directed to pay an interim amount of Rs.25 Lakhs each as environmental compensation and order of closure has also been made. These units must be asked to pay the environmental compensation by the GPCB as at present the figures of Annual turnover is not available as the units are closed around 3 months, the Committee is not in a position to fix the figure.

128. Sangam Enviro Pvt Ltd, and its directors are equally liable to pay the environmental compensation in view of their active role in disposal of the hazardous waste which has been discussed in detail. For 5 trips for transporting contrary law and disposing the hazardous waste, the Committee is recommending to recover towards compensation the amount of Rs. 2.5 crore from the said Sangam enviro Pvt Ltd, and its directors.

129. The transporters having ignored the provisions of law which have been discussed in detail and assisted to dispose of the hazardous waste are also liable for their wrongs and the Committee

recommends to recover the sum of Rs.1,00,000/- (One Lakh) per trip undertaken from each vehicle owner. The details of the evidence collected by the investigating agency in the summary form is attached herewith and Mark Annexure-27.

130. Chemie Organic Chemical was found breaching the norm/conditions etc. hence interim environmental damages have been ordered to be paid in the sum of Rs.50 Lakhs. The order of closer is Annexed herewith Mark Annexure-28

131. At Rajkot during the enquiry it was revealed that the Sangam after receiving the chemical from Hikal Ltd, prepared bogus bills in the name of Shri Petrochemicals, Rajkot and send the tankers for disposal of the chemicals to Govind Bhai Shiyal who kept the tankers in his service station and thereafter disposed of the chemical illegally for which Sangam paid the amount of ₹92,000/- (Ninety two thousand) which has been credited in the bank account (Punjab National Bank, Jubilee chalk, Rajkot) of said Govind Bhai. The Rajkot police registered the first information report for the offenses committed at Rajkot by Govind Bhai. (Refer Annexure-6) Govind Bhai Shiyal disposed of the hazardous chemical illegally by taking money. The Committee recommends that the sum of Rs. Five lakhs to be recovered from the said Govind Bhai for causing damage to the environment.

132. In the present case, the MPCB has forwarded the details of selling NaHS to the persons who had no consent or purchase the material and used it in violation of the conditions. i.e., M/S Raina industries GIDC estate, Ankleshwar. In FY 19-20. The unit was found violating the conditions and particularly using NaHS which was a hazardous waste that was supplied by other units as detailed in the closure order which is annexed herewith Mark Annexure-29. The

inspection report of the MPCB Annexed herewith Mark Annexure-30, also reveals that NaHS was supplied to the aforesaid unit.

*****

NUMBER OF CASES SHOWING VIOLATIONS.

133. Looking at the number of cases of illegal disposal of hazardous wastes and dangerous/ chemicals, the damages should be recovered in a manner so that no one would repeat the same.

134. As per the record during the last five years (As on 09/03/2022) 76 incidents of illegal disposal came to the light. 45 industries involved were ordered to be closed down. The vehicle registration of 33 vehicles was cancelled. In 23 cases FIRs were filed. The sum of Rs. 12 crores were recovered towards environmental damages. Very recently one case has come to light in Jamnagar District. These are the figures as the department was able to detect. There must be many others. For example, Hikal Ltd, dispatched 5 tankers and in case of the last tanker the unfortunate incident took place and matters came to the light about disposal of 5 tankers. There may be many others who are not caught. An act or omission committed will be an offence if it is detected and not otherwise. Many more tankers must be throwing hazardous waste like this. It is high time to adopt latest electronic gadgets to catch the wrong doers who are causing the unaccounted damage to the environment

*****

FOR THE REMEDIAL MEASURE

TO PREVENT RECURRENCE.

135. The team visited the site and had occasion to visit the Gujarat State Transport (Regional Office Surat) where it was shown on the screen that all the buses in the region are under the radar in view of their own Ground Position System fitted in every vehicle run under the Regional Office, whether in the region or outside. In the State Control Office, the officer can watch not only the movement of the GSRTC Surat depot vehicles, but in the entire State and its buses outside the State. Where it is parked, whether it has deviated the route, whether it is running in time or not and so many other things could be recorded and watched by the person from the office itself. The District Collector conveyed that the Food Corporation of India has a similar system along with the App to watch the movement of the truck carrying the food grain, which has saved the time and loss of grains on account of theft enroute. We have the App known as 'Flightradar24'. Opening of this app will show the movement of the flights or the helicopters world over and the flights with some required details. Similar App is available for vessels on the sea. We are given to understand that the Gujarat State Pollution Control Board is likely to invite the experts to assist and provide the facilities. The system of GPS though in force has not given good results as the generator, in the instant case did not forward the report to the MPCB. Even a monthly report submitted after the damage caused may not be effective as the same may be received after the damage is caused which may be irreversible like the present one. When any hazardous waste or Hazardous Chemical as per the Motor Vehicle Rules is to be transported the system as

indicated above must be in operation. This will have to be followed as under to get the advantages.

(I)The sender will be in a position to check whether the truck/tanker is moving as per the fixed route and that there is no halt at a place other than the scheduled.

(II)The end user or the receiver will be equally in a position to check whether the truck/tanker is moving as per the fixed route and that there is no halt at a place other than the prefixed.

(III)The officer not only of the PCB but the Police Department as well, of the concerned area/region will be able to record and check the movement of tanker/truck and on noticing the deviation of the route or unauthorised halt may take action immediately.

(IV)The State Pollution Control Board, will be able to check the movement as aforesaid. The other State Control Board can check the movement of truck/tanker as and when the truck/tanker enters the state.

(V)The proposed movement of the truck/tanker must be communicated to the concerned Pollution Control Board and the regional offices through which the truck/tanker will move, in advance and in any case before the chemical is loaded in the truck/tanker with all the details of the tanker (Requisite details under the Motor Vehicle Act and the Rules), name of the driver/s, residential address with license Number, name of the chemical. Route and the stoppage along with the time required for the trip. If the

GPS of the department is fitted with requisite material, there will be no chance practically for the vehicle to go out of the route and shall reach in time fixed.

(VI) If the tanker/truck containing hazardous chemicals deviates from the fixed route, provision of auto generated alert/ messages shall put the officers in action. Special focus for hazardous liquid transported in the tanker/truck is concerned, there must be a provision of auto alarm to all concerned, if such vehicle is found near any water body/lake/river/ drains/canals etc.

136. In addition, provision of auto ignition off of trucks/tankers in case of suspicion may also be provided.

*****

ROLE OF POLLUTION CONTROL BOARDS.

137. It transpires that in view of the opinion expressed by the Technical Committee, MPCB considered hazardous waste, namely NaHS as a by-product. It appears that the conditions imposed by the Technical Committee, with regard to the applicability of the Hazardous Rules, had been overlooked at the time of issuing the consent. Even though the Technical Committee specifically mentioned that for the by-products, the Hazardous Rules shall apply, as pointed out earlier. The MPCB, while granting consent, did not take into consideration the decision of the Technical Committee. Even before the Technical Committee it was represented by the unit that NaHS will be incinerated.

138. What is the role to be played by the CPCB? It appears that the representative of the CPCB is always there in a committee constituted by MPCB as well as GPCB. The committee constituted for the purpose of examination of the said topic in the State of Maharashtra, the technical committee consisting the member from MPCB as well as CPCB accepted the proposal that NaHS is a by-product and is a hazardous waste in case of sale, while in the State of Gujarat it is a hazardous waste. If in one State the by-product is considered as a hazardous waste, in view of the definition and in another State, the same by-product is not considered as a hazardous waste. The CPCB must issue the guidelines consistent with the Hazardous Rules and the guidelines should be such that the same are not violating any provisions of law or the rules made there under.

139. The Guidelines for identification of materials Generated from Industrial Processes as Wastes or By-products made in May 2019 by CPCB, need not be examined in the present case as there is ***no***

Environment Clearance after the Rules having been made and the so-called by-product was not sold to the bonafide end user but was given for disposal in violation of the provisions as indicated. The by-product is required to be used by the end user as generated without any process with the so-called by-product. When the generator is supplying illegal disposal, there is no question of considering the provisions which cannot be applied. From the stage of bulk storage in the Company-Generator, the price of incineration, price for disposal, disposal otherwise then the mode prescribed by law, supply to a transporter and not to the end user and without any authorisation which have been discussed in detail, shows that beyond reasonable doubt the chemical Sodium Hydro Sulphide was given for illegal disposal.

140. The Ministry of Environment and Forest by letter dated 28th August, 2007 issue later for expansion of pesticide unit to Hikal Ltd, at plot number. T-21, Taloja. Permitting to manufacture 1800 MTA as against existing permission of1704 MTA. There is no reference to any by-product. Thus, the unit was entitled to manufacture only the quantity indicated on was not allowed to increase the quantity of the product under any circumstances without any authority.

141. The consent issued on favour of Hikal Ltd, on 17/11/2015 indicates that it was allowed to manufacture in all 5 items totaling to 1905 MTA as against the authorisation granted by the Ministry of Environment and Forest. That also allowed to manufacture by-product. 5476 MTA of by-product was allowed to manufacture. It may be noted that the sodium hydro sulphide was not the product shown as a by-product. Thus, the unit was allowed to manufacture in all 7381 MTA Saleable products.

142. Again, while issuing the consent on 10/11/21 total quantity of manufacturing the product was allowed to 1800 MTA. So far as by-

products are concerned, the unit was allowed to manufacture 4298 MTA. Thus, the unit was allowed to manufacture in all 6098 MTA. When the government of India has granted to manufacture only 1800 MTA of the product, how the unit can manufacture more than that, without the previous permission, obtained from the government of India.

143. General conditions mentioned under head "B" (II) specifically states that "No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment and forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made by the Ministry to assess adequacy of the conditions imposed and to add additional environmental measures required, if any".

144. The further conditions are imposed that the rules and regulations with regard to handling and disposal of hazardous waste in accordance with the rules must be complied with strictly. It was made mandatory to get the authorisation for collection, storage, treatable and disposal of hazardous waste. The copy of permission for expansion of pesticide unit dated 28th August, 2007, issued by the government of India, Ministry of Environment and forests is annexed here with and Mark Annexure-31. There is nothing to indicate that any prior approval as indicated in the authorisation for expansion has been obtained to manufacture the quantity of the product granted earlier. From the project proposal, which was granted specifically states any expansion or modifications or variations or alterations in the project proposal granted, cannot be changed without prior permission of the Ministry of Environment and Forest.

145. Thus, prima facie, it appears that considering the environment clearance and conditions-imposed have been breached and therefore the Committee recommends that the matter requires further consideration in this behalf by MOEF&CC and CPCB.

*****

Annexure-1

Google Image of the incident site

Tanker no. GJ 06 ZZ 6221 parked on bridge over the natural drain passing nearby M/s. Vishwaprem Dying and Printing Mills Pvt. Ltd.

Tanker no. GJ 06 ZZ 6221 parked on bridge over the natural drain passing nearby M/s. Vishwaprem Dying and Printing Mills Pvt. Ltd.

Incidence place where Tanker no. GJ 06 ZZ 6221 parked on bridge over the natural drain

Wastewater having appearance Yellowish Brown (Turbid) is found flowing in natural drain at incidence place

Surrounding situation nearby M/s. Vishwaprem Dying and Printing Mills Pvt. Ltd. and Tanker

Surrounding situation nearby M/s. Vishwaprem Dying and Printing Mills Pvt. Ltd. and Tanker

Wastewater sample collected from the flowing natural drain at incidence place

Liquid waste sample collected from tanker no. GJ 06 ZZ 6221

Annexure-2

પ્રથમ માહિતી અહેવાલ.

ફોજદારી કાર્યરીતિની કલમ-૧૫૪ હેઠળ.

1.જીલ્લો- સુરત પો.મથક- સચીન GIDC વર્ષ-૨૦૨૨ F.I.R.નં.A- ૧૧૨૧૦૦૦૨૨૨૦૧૦૩/૨૦૨૨

તા.૦૬/૦૧/૨૦૨૨

2. (૧) અગ્નિશસ્ત્ર ધારધી અને કલમ- ઈ.પી.કો કલમ-૩૦૪,૩૩૬, ૩૩૭, ૩૩૮, ૨૮૪,૨૩૭, ૨૩૮, ૧૨૦બી.

(૨) અગ્નિશસ્ત્ર ધારધી અને કલમ- Environment Protection Act ની કલમ ૧૫ મુજબ

3. (૧) ગુન્હો બન્યાનો સમયગાળો. દિવસ તારીખ-૦૬/૦૧/૨૦૨૨ કલાક ૦૪/૦૦ વાગે

(૨) પોલીસ મથકે માહિતી મળ્યા તારીખ- ૦૬/૦૧/૨૦૨૨ સમય- ૦૬/૦૦

(૩) સ્ટેશન ડાયરી એન્ટ્રી એન્ટ્રી નંબર- ૮૧૫ / ૨૦૨૨ સમય- ૧૩/૦૮

4. માહિતી નો પ્રકાર લેખિત / મૌખિક.

5. ઘટનાનું સ્થળ. સચીન GIDC રોડ નં-૩ વિશ્વાપ્રેમ મીલની પાસે, પો.સ્ટેથી દક્ષીણે આશરે ૨ કિ.મી. દુર

(૧) પોલીસ મથકથી દિશા અંતર.

(૨) સરનામું. :- સચીન GIDC રોડ નં-૩ વિશ્વાપ્રેમ મીલની પાસે સુરત શહેર

(૩) પોલીસ સ્ટેશનની હદની બહાર હોય તો તે પોલીસ સ્ટેશનનું નામ- જીલ્લો-

6. ફરિયાદી / બાતમીદાર.

(૧) નામ – શ્રી.સ.ત ડી.જે.પ્રજાપતિ પો.સ.ઇ

(૨) પિતા / પતિનું નામ -

(૩) જન્મ તારીખ / વર્ષ –

(૪) રાષ્ટ્રીયતા –

(૫) પાસપોર્ટ નંબર - જારી તારીખ- જારી કર્યા સ્થળ-

(૬) ધંધો – નોકરી

(૭) સરનામું – સચીન GIDC પોલીસ સ્ટેશન સુરત શહેર.

7. ઓળખેલ / શકમંદ / વણઓળખેલ આરોપીની તમામ વિગતો બાબેની માહિતી.

(જરૂર જણાયતો અલાયદો કાગળ જોડો) ફોર્મ નં.૧૮

(૧) ટેન્કર નં- GJ-06-ZZ-6221 નો ચાલક જેના નામઠામની ખબર નથી.

(૨) ટેન્કર નં- GJ-06-ZZ-6221 ના માલીક જેના નામઠામની ખબર નથી.

8. ફરીયાદી / બાતમીદાર તરફથી ગુન્હાની જાણ કરવામાં વિલંબ થવાના કારણો.

9. ચોરાયેલી/ગુન્હામાં સંડોવાયેલ બીજ વસ્તુઓની વિગતો. (જરૂર હોય તો અલાયદા કાગળ ઉપર વિગત દર્શાવવી)

10. ચોરાયેલી / ગુન્હામાં સંડોવાયેલ બીજ વસ્તુની કુલ કિંમત.

11. મૃત્યુ વિષયક તપાસ અહેવાલ / અકસ્માત મોતનો નંબર હોય તો તે.

12. પ્રથમ માહિતી અહેવાલની વિગતો (જરૂર જણાય તો અલાયદો કાગળ જોડો)

તા-૦૬/૦૧/૨૦૨૨

હું ડી.જે.પ્રજાપતિ પોલીસ સબ ઇન્સ્પેક્ટર, સચીન GIDC પોલીસ સ્ટેશન સુરત શહેર.

મારી શ્રી સ.ત.ફરીયાદ હકીકત એવી રીતેની છે કે..,તા.૦૬/૦૧/૨૦૨૨ ના રોજ કલાક ૦૦/૦૦ થી કલાક ૦૫/૦૦ સુધી અમો પી.સી.આર વાહન નં-૪૬ માં ઇન્ચાર્જ તરીકે હતા અને પી.સી.આર માં મારી સાથે અ.હે.કોન્સ રાજેશ કિશનભાઇ તથા ડ્રાઇવર વિરેરે નાઓ હતા, દરમ્યાન કલાક ૦૪/૧૨ વાગ્યાના સુમારે પોલીસ કંટ્રોલ રૂમ તરફ થી વાયરલેશ મેસેજ આવેલ અને જણાવેલ કે, સચીન GIDC રોડ નં-૩ વિશ્વાપ્રેમ મીલમાં આગનો બનાવ બનેલ છે, પોહચો, તેવુ જણાવતા અમો કોલ વાળી જગ્યા સચીન GIDC રોડ નં-૦૩ વિશ્વાપ્રેમ મીલ પાસે કલાક ૦૪/૧૩ વાગે પોહચેલ અને જોયેલ તો વિશ્વાપ્રેમ મીલની બહાર રોડ

Scanned with CamScanner

ઉપર કેટલાક માણસો તડપતા હતા જે જોઇ અમોએ કલાક ૦૪/૨૨ વાગ્યાના સુમારે પોલીસ કંટ્રોલ રૂમને જાણ કરેલ કે વિશાપ્રેમ મીલમાં આગનો બનાવ બનેલ નથી પરંતુ અહી ઝેરી કેમીકલ ના કારણે ૨૦ થી ૨૫ જેટલા મજુરો તડપે છે, તાત્કાલીક ૧૦૮ એમ્બ્યુલન્સ ને મોકલી આપો તેવુ કહી ફોન રાખી દિધેલ. ત્યારબાદ ફોલ્ડીંગ નાકાના રોકાયેલ પો.ઇન્સશ્રી તથા પોલીસ માણસોને સ્થળ ઉપર બોલાવી લીધેલ અને ૧૦૮ એમ્બ્યુલન્સ આવવા લાગતા તેમાં ઝેરી કેમીકલના કારણે તડપી રહેલા તમામને વારા ફરતી ૧૦૮ એમ્બ્યુલન્સમાં તથા પોલીસ વાહનમાં રાખી નવી સિવીલ હોસ્પીટલ ખાતે મોકલી આપેલ અને તે વખતે કેટલાક મજુરો ભાનમાં હોય તેઓને બનાવ બાબતે પુછતા જણાવેલ કે, વિશાપ્રેમ મીલની બહાર એક ટેન્કર ઉભેલ છે તેમાંથી તા.૦૬/૦૧/૨૦૨૨ ના કલાક ૦૪/૦૦ વાગે ઝેરી કેમીકલ નિકળતા તે ઝેરી કેમીકલના કારણે બનાવ બનેલ હોવાનુ જણાવેલ જેથી ટેન્કર પાસે જઇ જોતા તે ટેન્કર ના આગલ પાછળનો રજીસ્ટ્રેશન નંબર-GJ-06-ZZ-6221 નો હોય જેથી તે ટેન્કર પાસે જતા તેનો ડ્રાઇવર મળી આવેલ નહી. જેથી ટેન્કરને સ્ટોર્ન કરવામાં આવેલ અને અમો તાત્કાલીક નવી સિવીલ હોસ્પીટલ ખાતે જતા અને તપાસ કરતા કુલ-૦૬ મજુરો ઝેરી કેમીકલ ના કારણે મરણ ગયેલ હોવાનુ તથા કુલ-૨૩ મજુરો સારવાર હેઠળ છે જેમાં કેટલાક ભાનમાં તથા કેટલાક બેભાનમાં છે. જેઓના નામઠામ બાબતે ખાત્રી કરતા જે નિચે મુજબના છે.

મરણજનારના નામો

(૧) કિરણબેન ઉર્ફે કલી W/O સુલતાના ડામડ ઉ.વ-આશરે ૨૨, રહેવાસી-સચીન GIDC રોડ નં-૩ વિશાપ્રેમ મીલ સુરત, મુળગામ તાલાબપાડા થાના દેહાંડી, જીલ્લો જાંબુઆ મધ્યપ્રદેશ

(૨) સુલતાના નંદલાલ ડામડ રહેવાસી-સચીન GIDC રોડ નં-૩, વિશાપ્રેમ મીલ સુરત મુળગામ તાલાબપાડા થાના દેહાંડી, જીલ્લો જાંબુઆ મધ્યપ્રદેશ

(૩) વિમલ શ્યામનંદન પાસવાન ઉ.વ-૪૮, રહેવાસી સચીન GIDC રોડ નં-૩, વિશાપ્રેમ મીલ સુરત. મુળગામ ઇસીપુર તા.જમોઇ જીલ્લો પટના (બીહાર)

(૪) સુરેશભાઇ પપ્પુભાઇ વાકલા ઉ.વ-૨૨, રહેવાસી- સચીન GIDC રોડ નં-૩, વિશાપ્રેમ મીલ સુરત મુળગામ માકનપુર, તા.જી જાંબુઆ (મધ્યપ્રદેશ)

(૫) અંબાદત્ત બાજપાય ઉ.વ- આશરે ૪૫ થી ૫૦, રહેવાસી સચીન GIDC રોડ નં-૩, વિશાપ્રેમ મીલ સુરત

(૬) બિમલ કુલચંદ કોળી ઉ.વ-૨૩ રહેવાસી-ઇન્દરનગર, રજજુ કી ચાલ, સચીન GIDC સુરત મુળગામ ધુવરા થાના મંજનપુર જીલ્લો કોસંબી, ઇલાબાદ ઉત્તરપ્રદેશ

સારવારમાં દાખલ દર્દી ના નામો

(૧) રવી કુબેર સરોજ ઉ.વ-આશરે ૧૯

(૨) મહાવીર શ્રીરામ પ્રજાપતિ ઉ.વ આશરે ૪૦

(૩) અવધેશ રામદયાલ પ્રજાપતિ ઉ.વ-૩૦ ધંધો ઇલેકટ્રીશીયન રહેવાસી- રૂમ-૧૦૮, સુમન સ્મૃતી, ભેસ્તાન સુરત

(૪) વિજેન્દ્રસીંગ રામદેહન સીંગ ઉ.વ-૨૪ રહેવાસી મકાન નં-૨૫૦૧ રાધેકિન સોસાયટી, સચીન હાઉસીંગ સચીન

(૫) મનોજ રામમાશીષ સિકરમી ઉ.વ આશરે ૩૪

(૬) પુનિત રામવૃક્ષ સીંગ ઉ.વ-૩૦ રહેવાસી- મકાન નંબર-૨૬ શીવાંજલી પાર્ક, પ્રિયંકા સોસાયટીની પાછળ, ભેસ્તાન જીવાવ રોડ, પાંડેસરા સુરત

(૭) રાધેશ્યામ મુખદેવ રાય ઉ.વ-૪૦ ધંધો મજુરી રહેવાસી રામેશ્વર કોલોની, સચીન GIDC સુરત

(૮) દુખી શ્યામ અરખીતા બહેરા

(૯) ગરીબન મયુર દાસ ઉ.વ-આશરે ૪૫

(૧૦) ઉમેશકુમાર દશરથ પ્રસાદ ઉ.વ-૩૨ ધંધો સિકયુરીટી ગાર્ડ, રહેવાસી-બરફ ફેક્ટરી શીવસાંઇ સોસાયટી, સચીન GIDC સુરત

(૧૧) અશોક રાજકિશોર તિવારી ઉ.વ-૩૪ જેઓ સચીન GIDC રોડ નં-૩ વિશાપ્રેમ મીલ સુરત ખાતે કંપનીની બહાર લારી ચલાવે છે.

Scanned with CamScanner

(૧૨) શ્યામ ભગવતીલાલ શર્મા ઉ.વ-૩૦ રહે શ્રીનાથનગર, મનોજભાઇની ચાલ, બાલાજી ટાઉનશીપની સામે,

(૧૩) સંદીપ જયરામ રાજપુત

(૧૪) રાવેન્દ્ર ભાલુ યાદવ

(૧૫) સતેન્દ્ર લાલબીહારી ચૌધરી ઉ.વ-આશરે ૩૦

(૧૬) રાજનાથ છોટેલાલ યાદવ

(૧૭) રાજુ કુબેર સરોજ

(૧૮) સુનિલ રામનરેશ પટેલ ઉ.વ-૨૦

(૧૯) છોટેલાલ રણજીત સરોજ

(૨૦) જીતુ ઉર્ફે રાજકુમાર ગોરાચંદ સીંગ

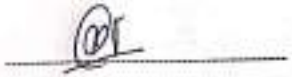
(૨૧) રતીરામ મનીષ મિશ્રા ઉ.વ-૪૩

(૨૨) એક અજાણ્યો ઇસમ ઉ.વ-આશરે ૩૪

(૨૩) એક અજાણ્યો ઇસમ

આમ, ઉપરોક્ત તારીખ અને સમય તથા જગ્યાએ ટેન્કર નં.GJ-06-ZZ-6221 ના ચાલકે તથા ટેન્કરના માલીક ગ્રસ ટેન્કરમાં રહેલ ઝેરી કેમીકલ પ્રવાહીની કુદરતી ખાડી (natural stream) માં અનઅધિકૃત રીતે નિકાલ કરવામા આવતા અથવા અન્ય કોઇ રીતે સપાટીના અને ભૂગર્ભ જળસોતોને, સંપર્કમા આવતા માનવ જીવન, જળચર જીવ સૃષ્ટીને સમગ્રતયા પર્યાવરણને અત્યંત હાનિકારક, જોખમકારક નીવડે તે રીતે ઝેરી કેમીકલ વધુ માત્રા ધરાવતા પ્રવાહીનો ગેરકાયદેસર રીતે ખાડીમાં નિકાલ કરવાની પ્રવૃતીમાં ઝેરી કેમીકલ નિકળતા જે ઝેરી કેમીકલના કારણે નજીકમાં આવેલ વિશ્વપ્રેમ મીલના કારીગરો કુલ-૨૯ ને અસર થતા જેમાંથી કુલ-૦૬ કારીગરોનુ મોત થયેલ હોય અને ખાડીના સારવાર હેઠળ હોય, જેથી સદર ગુનામા સંડોવાયેલા ટેન્કરના ચાલક, ટેન્કર નં.GJ-06-ZZ-6221 ના માલિક, વગેરે વિરૂધ્ધમાં તથા તપાસમાં નિકળી આવે તેઓ વિરૂધ્ધમાં ઇ.પી.કો કલમ-૩૦૪,૩૩૬, ૩૩૭, ૩૩૮,૨૮૪,૨૩૩,૨૩૮,૧૨૦બી, તથા Environment Protection Act ની કલમ ૧૫ મુજબ કાયદેસરની તપાસ થવા મારી ફરીયાદ છે, મારા સાહેદો ફરીયાદમાં જણાવેલ તથા તપાસમાં નિકળી આવે તઓ વિગેરે છે.

એટલી મારી ફરીયાદ હકીકત ખરી છે.



વધુમાં,

(મહેન્દ્રસિંહ ઉદેસિંહસિંહ)
પોલીસ સ્ટેશન અમલદાર
એ.એસ.આઇ,
સચીન GIDC પો.સ્ટે
સુરત શહેર.

Scanned with CamScanner

Annexure-3

GPCB

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcbgov.in

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

WHEREAS you are having an industrial plant at Plot No: 5532, Road No: 55, Sachin-395007, Tal: Chorasi, Dist: Surat..

AND WHEREAS the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC & A) under the provisions of the Environmental Acts/Rules by its Consent Order No. AWH-110757 which was valid up to 31/10/2025.

AND WHEREAS your industry was visited on 06/01/2022 under Section (23) of The Water (Prevention and Control of Pollution) Act-1974 by authorized officers of the Board, during said visit it was observed that;

1. Distance of this unit from the location where the tanker No. - GJ 06 ZZ 6221 had carried out illegal discharge of liquid waste (near Vishwaprem Dying & Printing Mill) is about 800 Meter on the upstream side).
2. During visit it is observed that provided ETP units are not in operation. Generated industrial waste water from the manufacturing processes is being discharged through unauthorized outlet, in to open surface drain of GIDC estate – Sachin, which ultimately meet to Unn Khadi.
3. Sample of untreated waste waterbeing discharged outside premises through unauthorized outlet leading to open surface drain of GIDC estate – Sachin is collected.Physical characteristic of sample collected during visit are as : pH @ 4 on pH strip, Temperature - 38 Deg. cencand Colour -Greenish.
4. As per Consent & Authorization obtained (Condition No- 3.7 &3.8) unit has to dispose waste water in to underground drain of M/S Sachin Infra Environmental Ltd (SIEL), CETP.
5. However, unit is found discharging untreated industrial waste water outside premises in unauthorized manner, leading to open surface drain of GIDC Estate – Sachin, hence violation of Condition No. 3.7 & 3.8 of obtained Consent & Authorization.

AND WHEREAS Pay **Rs. 25 lakhs** as Interim Environment Damage Compensation by RTGS/NEFT immediately in following A/C:

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

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

1) rb-gpcb-sur@gujarat.gov.in

Outward No: 62[illegible]/01/2022

ID-67510

Clean Gujarat Green Gujarat
ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

2) rub-gpcb-acc5@gujarat.gov.in
3) rub-gpcb-surat@gujarat.gov.in

UNDER THE CIRCUMSTANCES, I, Smt S. V. Bhargava, Unit Head, Surat of the Gujarat Pollution Control Board is directed to issue the direction under Section 33(A) of The Water (Prevention and Control of Pollution) Act-1974 as under:

1) To prohibit you from the above said manufacturing activity.
2) To close the operation of your industrial plant on the above mentioned premises.
3) To prohibit any kind of manufacturing activities through Captive Power Plant and/or D. G. Sets
4) To direct the concerned authority to stop supply of electricity (except single phase) and water with **immediate effect**.

If the above directions are not complied, you are liable for prosecution under Section 41(2) of The Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This order is issued after approval of competent authority.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S. V. Bhargava)
Unit Head, Surat

Date:

NO: GPCB/CCA-SRT-2288/ID-67510/

To: -
M/s. Sahjanand Colour Yarn
Plot No: 5532, Road No: 55,
Sachin-395007,
Tal: Chorasi, Dist: Surat.

COPY TO:

1. Managing Director,
   Dakshin Gujarat Vij Co. Ltd.
   Nana Varachha Road,
   Kadodara,Surat-395 006,
   Dist.:Surat..... With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Sahjanand Colour Yarn,Plot No: 5532, Road No: 55, Sachin-395007, Tal: Chorasi, Dist: Surat and intimate to us accordingly.
2. The Executive Engineer, (O&M)
   Surat Rural Division,
   DGVCL,Surat-R Dn.
   Nana Varachha Road,
   Nr. Gajjar Petrol Pump,
   Dist: Surat ..... With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Sahjanand Colour Yarn,Plot No: 5532, Road No: 55, Sachin-395007, Tal: Chorasi, Dist: Surat. and intimate to us accordingly.

Outward No: 621467, 2000 / 2022

GPCB

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

3. The Manager,
GIDC, Sachin,
Surat.....You are requested to disconnect the Water supply and drainage connection with **immediate effect** to industrial plant M/s. Sahjanand Colour Yarn,Plot No: 5532, Road No: 55, Sachin-395007, Tal: Chorasi, Dist: Surat. and intimate to us accordingly.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S. V. Bhargava)
Unit Head, Surat

Outward No:621467, 20/01/2022

ID-67510

GPCB

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

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

WHEREAS you are having an industrial plant at Plot No: 7104, Road No. 71, Sachin-GIDC, Choryasi-394230, Dist:Surat.

AND WHEREAS the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC & A) under the provisions of the Environmental Acts/Rules by its Consent Order No. AWH-108624 which was valid up to 30/06/2024.

AND WHEREAS your industry was visited on 06/01/2022 under Section (23) of The Water (Prevention and Control of Pollution) Act-1974 by authorized officers of the Board, during said visit it was observed that;

1. Distance of this unit from the location where the Tanker No.- GJ 06 ZZ 6221 had carried out illegal discharged of liquid waste (near Vishwaprem Dyeing & Printing Mills P. Ltd) is @ 800 meters on the upstream side.
2. During visit it is observed that unit is found discharging untreated acidic waste water outside premises through unauthorized outlet, leading to open surface drain of GIDC estate (passes behind the unit), which ultimately meets Uan Khadi.
3. Sample of untreated acidic waste water being discharged outside premises through this unauthorized outlet, leading to open surface drain of GIDCestateSachin is collected. Physical characteristic of sample collected during visit are as: pH- @ 2 on pH strip, Temperature-32 deg. C and Colour- Reddish Pink.
4. As per Consent & Authorization obtained (condition no-3.4), unit has to dispose waste water at common spray dryer facility of M/s. Mahavir Eco Projects Pvt. Ltd. (MEPPL) through designated tanker.
5. However, unit is found discharging untreated acidic waste water outside premises in unauthorized manner, leading to open surface drain of GIDC estate -Sachin, hence violating the condition no-3.4 of Consent & Authorization.
6. Analysis result of the sample collected from untreated w/w from unauthorized outlet of industry shows pH=2.08, TDS=27132 mg/L, SS= 652 mg/l, COD = 38893 mg/l & Acidity as CaCO3 = 9000 mg/l which are higher than the prescribed norms by the Board.

AND WHEREAS Pay Rs. 25 lakhs as Interim Environment Damage Compensation by RTGS/NEFT immediately in following A/C:

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

Outward No: 6214652

ID-36634

Clean Gujarat Green Gujarat
ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

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

1) uh-gpcb-sura@gujarat.gov.in
2) nuh-gpcb-acc5@gujarat.gov.in
3) nuh-gpcb-sura@gujarat.gov.in

UNDER THE CIRCUMSTANCES, I, Smt S. V. Bhargava, Unit Head, Surat of the Gujarat Pollution Control Board is directed to issue the direction under Section 33(A) of The Water (Prevention and Control of Pollution) Act-1974 as under:

1) To prohibit you from the above said manufacturing activity.
2) To close the operation of your industrial plant on the above mentioned premises.
3) To prohibit any kind of manufacturing activities through Captive Power Plant and/or D. G. Sets
4) To direct the concerned authority to stop supply of electricity (except single phase) and water with **immediate effect**.

If the above directions are not complied, you are liable for prosecution under Section 41(2) of The Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This order is issued after approval of competent authority.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S. V. Bhargava)
Unit Head, Surat

Date:-

NO: GPCB/CCA-SRT-3525/ID-56634/

To:
M/s. Real Chem,
Plot No: 7104, Road No. 71,
Sachin-GIDC, Choryasi-394230,
Dist:Surat.

COPY TO:

1. Managing Director,
   Dakshin Gujarat Vij Co. Ltd.
   Nana Varachha Road,
   Kadodara,Surat-395 006,
   Dist.:Surat..... With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Real Chem,Plot No: 7104, Road No. 71, Sachin-GIDC, Choryasi-394230, Dist:Surat. and intimate to us accordingly.

2. The Executive Engineer, (O&M)
   Surat Rural Division,
   DGVCL,Surat-R Dn.
   Nana Varachha Road,
   Nr. Gajjar Petrol Pump,
   Dist: Surat ..... With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Real Chem,Plot No: 7104, Road No. 71, Sachin-GIDC, Choryasi-394230, Dist:Surat and intimate to us accordingly.

Outward No:621465 20/01/2022

GPCB

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

3. The Manager,
GIDC, Sachin,
Surat.....You are requested to disconnect the Water supply and drainage connection with immediate effect to industrial plant M/s. Real Chem,Plot No: 7104, Road No. 71, Sachin-GIDC, Choryasi-394230, Dist:Surat and intimate to us accordingly.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S. V Bhargava)
Unit Head, Surat

Outward No:621465, 20/01/2022

Clean Gujarat Green Gujarat
ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

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

WHEREAS you are having an industrial plant at Plot No: C1-B, Shed No: 7117, GIDC, Sachin-394230, Tal: Choryasi, Dist: Surat

AND WHEREAS the Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC & A) under the provisions of the Environmental Acts/Rules by its Consent Order No. AWH-108624 which was valid up to 30/06/2023.

AND WHEREAS your industry was visited on 06/01/2022 under Section (23) of The Water (Prevention and Control of Pollution) Act-1974 by authorized officers of the Board, during said visit it was observed that;

1. Distance of this unit from the location where the Tanker No.- GJ 06 zz 6221 had carried out illegal discharged of liquid waste (near Vishwaprem Dyeing & Printing Mills Pvt. Ltd) is @ 800 meters on the upstream side.
2. During visit it is observed that steam condensate from distillate plant is being discharged outside premises through unauthorized outlet, leading to open surface drain of GIDC estate (passes behind the unit), which ultimately meets Uno Khadi.
3. Sample of untreated acidic waste water being discharged outside premises through this unauthorized outlet, leading to open surface drain of GIDC estate Sachin is collected. Physical characteristic of sample collected during visit are as: pH- 4 to 6 on pH strip, Temperature- 32 deg. C and Colour- Colourless.
4. As per Consent & Authorization obtained (condition no-3.4), there shall be no industrial waste water generation.
5. However, unit is found discharging untreated acidic waste water outside premises in unauthorized manner, leading to open surface drain of GIDC estate -Sachin, hence violating the condition no-3.4 of Consent & Authorization.
6. Analysis result of the sample collected from untreated w/w from unauthorized outlet of industry shows pH=5.4 mg/L which are higher than the permissible limit.

AND WHEREAS Pay Rs. 25 lakhs as Interim Environment Damage Compensation by RTGS/NEFT immediately in following A/C:

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

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

1) ub-gpcb-sura@gujarat.gov.in

ID-41139

Outward No:621464, 29/01/2022

2) nuh-gpcb-acc5@gujarat.gov.in
3) nuh-gpcb-sura@gujarat.gov.in

UNDER THE CIRCUMSTANCES, I, Smt S. V. Bhargava, Unit Head, Surat of the Gujarat Pollution Control Board is directed to issue the direction under Section 33(A) of The Water (Prevention and Control of Pollution) Act-1974 as under:

1) To prohibit you from the above said manufacturing activity.
2) To close the operation of your industrial plant on the above mentioned premises.
3) To prohibit any kind of manufacturing activities through Captive Power Plant and/or D. G. Sets
4) To direct the concerned authority to stop supply of electricity (except single phase) and water with **immediate effect.**

If the above directions are not complied, you are liable for prosecution under Section 41(2) of The Water (Prevention and Control of Pollution) Act-1974 which provides punishment with imprisonment for a term not less than one year and six months and may extend to six years and with fine.

This order is issued after approval of competent authority.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S. V. Bhargava)
Unit Head, Surat

NO: GPCB/CCA-SRT-1938/ID_41439/
Date:-

To:
M/s. Jay-Bajrang Industries,
Plot No: C1-B, Shed No: 7117,
GIDC, Sachin-394230,
Tal: Choryasi, Dist: Surat

COPY TO:

1. Managing Director.
   Dakshin Gujarat Vij Co. Ltd.
   Nana Varachha Road,
   Kadodara, Surat-395 006,
   Dist.:Surat.................... With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Jay Bajrang Industries, Plot No: C1-B, Shed No: 7117, GIDC, Sachin-394230, Tal: Choryasi, Dist: Surat.and intimate to us accordingly.

2. The Executive Engineer, (O&M)
   Surat Rural Division,
   DGVCL,Surat-R Dn.
   Nana Varachha Road,
   Nr. Gajjar Petrol Pump,
   Dist: Surat ....With a request to disconnect the supply of Electricity(except single phase) with **immediate effect** to industrial plant M/s. Jay Bajrang Industries, Plot No: C1-B, Shed No: 7117, GIDC, Sachin-394230, Tal: Choryasi, Dist: Surat.and intimate to us accordingly.

Outward No:621464/20/01/2022

GPCB

GUJARAT POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

3. The Manager,
GIDC. Sachin,
Surat.....You are requested to disconnect the Water supply and drainage connection with **immediate effect** to industrial plant M/s. Jay Bajrang Industries, Plot No: CI-B, Shed No: 7117, GIDC, Sachin-394230, Tal: Choryasi, Dist: Surat and intimate to us accordingly.

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(Smt S.V. Bhargava)
Unit Head, Surat

Outward No:621464, 20/01/2022

D-4109

Annexure-3A

Gujarat pollution control board
Regional Office- Vadodara
Investigation Report

Subject	To verify registered address (as per Udyam Registration Certificate – MSME) of company M/S Sangam Enviro Pvt. Limited of Vadodara.
Reference	W.r.to incident occurred in Sachin GIDC, Surat on dated 06/01/2022 in which M/S Sangam Enviro Pvt. Limited of Vadodara is involved for transporting NaSH.
Inspection Date and Time	08/01/2022, 11:20 Hrs onward

Observation:

It was revealed that M/S Sangam Enviro Pvt. Limited of Vadodara had purchased NaSH and was being illegally discharged at Sachin GIDC. In view of this, XGN record was verified and found that no such company has been registered with Regional Office - Vadodara. Therefore, Udyam Registration Certificate– MSME of the company was electronically found which is attached herewith. Subsequently, on above mentioned date and time location D-305, Neel Deep Towers, Vill. Dashrath, Dist. Vadodara at which this company is registered is visited. Findings of the same are summarized hereunder:

- Address on which company is registered is a residential flat.
- During visit, it is found that presently at this location Mr. Mahavirsinh J Solanki is staying on rental basis. It is learnt that he is staying here since about last four months as informed.
- Contacted person Mr. Mahavirsinh J Solanki has informed that, they have not made any rent agreement with the owner of this flat. On further inquiry, he informed that he is unaware about the actual owner of the said flat but amongst three brothers namely Mr. Rameshbhai Gupta, Mr. Ashish Gupta and Mr. Mahendrakumar Gupta, one is the owner of said flat. He also informed that he is transferring rent online on three mobile nos. 9106771757, 8000440742 and 9624719736.
- On the electric meter of the flat D-305, name of Mr. Mahendra kumar Gupta is found written.
- During visit, owner of flat no- D-306 has been contacted. He has informed that; he has purchased flat no- D-306 from Mr. Ramesh kumar Shridudhnath Gupta. He further informed that, Mr. Rameshbhai Gupta and Mr. Ashish Gupta are mainly engaged with the business of the tanker transportation. However, he is unaware about the address of the business of Mr. Rameshbhai Gupta and Mr. Ashish Gupta.
- Thus, it is found that location at which company M/S Sangam Enviro Pvt. Ltd. registered is a residential flat and no manufacturing or service activities being carried out.
- NEI is not served during visit.
- Photographs taken during inspection are attached herewith.

Photographs taken during Inspection

Flat D-305, Neel Deep Towers, Vill. Dashrath

Electric Meter of Flat D-305, Neel Deep Towers

Neel Deep Towers, Vill. Dashrath

P. S. Chaudhary
AEE

R.R Badgujar
SO

भारत सरकार
Government of India
सूक्ष्म, लघु एवं मध्यम उद्यम मंत्रालय
Ministry of Micro, Small and Medium Enterprises

UDYAM REGISTRATION CERTIFICATE

TYPE OF ENTERPRISE	MICRO	SERVICES
UDYAM REGISTRATION NUMBER	UDYAM-GJ-24-0001525	
NAME OF ENTERPRISE	M/S SANGAM ENVIRO PRIVATE LIMITED	

NAME OF UNITS

SNo.	Units Name
1	SANGAM ENVIRO PRIVATE LIMITED

OFFICAL ADDRESS OF ENTERPRISE

Flat/Door/Block No.	D-305	Name of Premises/ Building	NEEL DEEP TOWERS
Village/Town	AT VILLAGE DAS HARATH	Block	AT VILLAGE DAS HARATH
Road/Street/Lane	AT VILLAGE DAS HARATH	City	VADODARA
State	GUJARAT	District	VADODARA , Pin 391740
Mobile	9033405074	Email:	nileshbehera19@gmail.com

DATE OF INCORPORATION / REGISTRATION OF ENTERPRISE	22/07/2020
DATE OF COMMENCEMENT OF PRODUCTION/BUSINESS	22/07/2020

NATIONAL INDUSTRY CLASSIFICATION CODE(S)

SNo.	Nic 2 Digit	Nic 4 Digit	Nic 5 Digit	Activity
1	37 - Sewerage	3700 - Sewerage	37002 - Collecting and transporting of human or industrial waste water or rain water by means of sewerage networks, collectors, tanks and other means of transport (sewage vehicles etc.)	Manufacturing
2	38 - Waste collection, treatment and disposal activities; materials recovery	3822 - Treatment and disposal of hazardous waste	38221 - Treatment and disposal of toxic live or dead animals and other, contaminated waste, disposal of used goods; incineration of hazardous waste	Manufacturing
3	38 - Waste collection, treatment and disposal activities; materials recovery	3812 - Collection of hazardous waste	38120 - Collection of hazardous waste	Manufacturing
4	39 - Remediation activities and other waste management services	3900 - Remediation activities and other waste management services	39000 - Remediation activities and other waste management services	Manufacturing

DATE OF UDYAM REGISTRATION	09/08/2020

Disclaimer: This is computer generated statement, no signature required.
Printed form www.udyamregistration.gov.in

For any assistance, you may contact:

1. DIC **VADODARA**
2. MSME-DI **AHMEDABAD**

BE A CHAMPION


Visit : www.msme.gov.in ; www.dcmsme.gov.in ; www.champions.gov.in
Follow us @minmsme & @msmechampions
with the
Ministry of
MSME

Annexure-3B

Inspection Dated : 10.03.2022

This firm is inspected w.r.to Mail received from Regional Officer –Surat on dated: 09.03.2022 regarding verification of company named Sangam Enviro, Office No. 424, Shilpi Square, Dahej Bypass Road, Bharuch, Gujarat, 392001.They have received mail from Hon'ble Justice B. C. Patel Sir. The above said address was verified and observations of the same are as follow:

- On the above said address office named Sangam Enviro pvt. Ltd. is found. The gate of the office is found locked. We have inquired to neighbors regarding office, they informed that this office is closed since long.
- After that we have visited Builder's office and found that Mr. Vikrant Joshi has possession of this place i.e. office no. 424, Shilpi Square and he had made rent agreement with Sangam Enviro Pvt. Ltd. copy of the index, rent agreement and electric bill are attached herewith.
- We have telephonically inquired to Assistant commissioner, CGST Bharuch regarding same firm and they have submitted related documents through whatsapp which is attached herewith.
- Photographs of the office are attached herewith.

(N.D. Patel)
DEE

(F.M.Modi)
Regional Officer

Photographs taken during inspection Dated : 10.03.2022

Photographs taken during inspection Dated : 10.03.2022

Annexure-4

(એકિકૃત તપાસ ફોર્મ-I)/I.I.F.-I

FIRST INFORMATION REPORT

પ્રથમ માહિતી અહેવાલ

(Under Section 154 Cr.P.C.)

(ફોજદારી કાર્યસંહિતાની કલમ 154 હેઠળ.)

1 District ભરૂચ (જીલ્લો) Police Station ઝઘડીયા (પોલીસ સ્ટેશન) Year 2022 (વર્ષ) FIR No. (પ્ર.મા.અ.ક્રમાંક) 11199028220440 Date (તારીખ) 05/04/2022

2 (i) Act આઈ પી સી (અધિનિયમ) Sections 277,284,114 (કલમો)

3 (a) Occurrence of offence:
(ક) (ગુન્હો બન્યાનો સમયગાળો)

Day. (દિવસ) શુક્રવાર Date from (તારીખથી) 07/01/2022 Date to (તારીખ સુધી) 05/04/2022

Time Period (સમયગાળો) Time from (કલાકથી) 00:00 Time to (કલાક સુધી) 13:15

(b) Information received at PS:
(ખ) (પોલીસ મથકે માહિતી મળ્યા) Date (તારીખ) 05/04/2022 Time (સમય) 13:15

(c) General Diary Reference: Entry No.
(ગ) (સ્ટેશન ડાયરી સંદર્ભ: એન્ટ્રી નં) Time (સમય)

4 Type of Information: (માહિતીનો પ્રકાર) મૌખિક

5 Place of Occurrence:
(ઘટનાનું સ્થળ)

(a) Direction and distance from P.S.
(ક) (પોલિસ સ્ટેશનથી દિશા અંતર) દક્ષિણ,12.00 (કિ.મી.) Beat No. (બીટ નંબર)

(b) Address (સરનામું) મેસર્સ કેમી ઓર્ગેનિક કેમીકલ્સ ઇ પ્રા.લી. પ્લોટ નં.758 GIDC ઝઘડિયા , ગામ. ઝઘડીયા, તા. ઝઘડિયા, જી. ભરૂચ.

(c) In case, outside the limit of this Police Station, then
(ગ) (પોલીસ સ્ટેશનની હદની બહાર હોય તો તે પોલીસ સ્ટેશનનું નામ)

Name of P.S. (પોલીસ સ્ટેશનનું નામ) District (જીલ્લો)

6 Complainant/Informant:
(ફરિયાદી / બાતમીદાર)

(a) Name (નામ) શૈલેષકુમાર બાબુભાઇ (b) Father's/Husband's Name (ખ) બાબુભાઇ પટેલ

Scanned by CamScanner

(૬) પટેલ (પિતા/પતિનું નામ)

(c) Date/Year of Birth (ગ) (જન્મ તારીખ / વર્ષ) 49 (d) (ઘ) Nationality (રાષ્ટ્રીયતા) ભારતીય

(e) (ડ)

(f) Occupation (ચ) (ધંધો) અન્ય (g) (છ) Address (સરનામું) અંકલેશ્વર ક્લિનર ટેકનોલોજી ડેવલોપમેન્ટ સેન્ટર બિલ્ડીંગ પ્રથમ માળ પ્લોટ નં. 1501 GIDC અંકલેશ્વર , ગામ. અંકલેશ્વર, તા. અંકલેશ્વર. જી. ભરૂચ.

7 Details of known/suspected/unknown accused with full particulars:
(Attach seperate sheet, if necessary)
(ઓળખાયેલ/શકમંદ/વણઓળખાયેલ આરોપીની તમામ વિગતો સાથેની માહિતી)
(જરૂર જણાયતો અલાયદા કાગળ ઉપર વિગત દર્શાવવી)

Accused Name (તહોમતદારનું નામ)	Age (Approx.) (ઉમર) (આશરે)	Address (સરનામું)
(1) અજાણ્યુ		
(2) અજાણ્યું		
(3) અજાણ્યું		

8 Reasons for delay in reporting by the complainant/Informant
(ફરિયાદી/બાતમીદાર તરફથી ગુન્હાની જાણ કરવામાં વિલંબ થવાના કારણો)
NO

9 Particulars of properties stolen(Attach seperate sheet, if necessary)
(ચોરાયેલી/ગુન્હામાં સંડોવાયેલ ચીજ વસ્તુઓની વિગતો) (જરૂર જણાયતો અલાયદા કાગળ ઉપર વિગત દર્શાવવી).

10 Total value of property stolen
(ચોરાયેલી / ગુન્હામા સંડોવાયેલ ચીજ વસ્તુઓની કુલ કિમંત)

11 Inquest Report/U.D. case No. if any
(મુત્યુ વિષયક તપાસ અહેવાલ / અકુદરતી મોતનો નંબર હોય તો તે)

12 First Information contents(Attach seperate sheet, if required)
(પ્રથમ માહિતી અહેવાલની વિગતો)(જરૂર જણાયતો અલાયદો કાગળ જોડવો)
ગુનો એવી રીતે કે આ કામના આરોપીઓએ જોખમી ઝેરી જ્વલનશીલ હેઝાર્ડસ વેસ્ટનો અન-અધિકૃત રીતે નિકાલ કરી એકબીજાની મદદગારી કરી ગુનો કર્યો તે વિગેરે બાબત.

Complaint(ફરિયાદ)

પ્રતિ,
પોલીસ ઇન્સ્પેકટરશ્રી,
પોલીસ ઇન્સ્પેકટરશ્રીની કચેરી,
ઝગડીયા જી.આઈ.ડી.સી. પોલીસ સ્ટેશન ,
ઝગડીયા

Scanned by CamScanner

જી. ભરૂચ

વિષય: મેસર્સ કેમી ઓર્ગેનીક કેમીકલ્સ (ઈ) પ્રા. લિ., પ્લોટ નં. ૩૫૮, જી.આઈ.ડી.સી. ઝગડીયા, જી. ભરૂચ ઉદ્યોગ સામે જોખમી, ઝેરી જવલનશીલ હેઝાર્ડસ વેસ્ટનો અનઅધિકૃત રીતે નિકાલ કરવા અંગે ફરિયાદ દાખલ કરવા બાબતે.

સાહેબશ્રી,

અત્રેની ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડની પ્રાદેશિક કચેરી, અંકલેશ્વર દ્વારા તા. ૦૩/૦૧/૨૦૨૨ના રોજ બોર્ડની વડી કચેરી, ગાંધીનગરના તા. ૦૬/૦૧/૨૦૨૨ના ઈ-મેલ અન્વયે સુરત ખાતે સચીન જી.આઈ.ડી.સી.માં ટેન્કર નં. જીજે-૦૬-ઝેડઝેડ-૬૨૨૧ મારફત ગેરકાયદેસર રીતે વેસ્ટ નિકાલ દરમ્યાન ૬ માણસોના મૃત્યુની ઘટના બનેલ જે અંકલેશ્વર વિસ્તારમાં ટેન્કરની અવર-જવર બાબતે મેસર્સ કેમી ઓર્ગેનીક કેમીકલ્સ (ઈ) પ્રા. લિ., પ્લોટ નં. ૩૫૮, જી.આઈ.ડી.સી. ઝગડીયા, જી. ભરૂચ ખાતે સ્થળ તપાસ કરવામાં આવેલ જે ઉક્ત દર્શાવેલ ઉદ્યોગ ટેન્કર નં. જીજે-૦૬-ઝેડઝેડ-૬૨૨૧ મારફતે જોખમી, ઝેરી, જવલનશીલ હેઝાર્ડસ વેસ્ટનો અનઅધિકૃત રીતે નિકાલ કરવામાં આવેલ હોય તેવું સ્થળ તપાસ દરમ્યાન જણાયેલ છે. સદર મુલાકાત અહેવાલ તારીખ ૦૩/૦૧/૨૦૨૨, ઇન્સપેકશન આઇ ડી – ૬૩૪૪૩૭ ની નકલ આ સાથે સામેલ રાખેલ છે. (બિડાણ-૧)

વધુમાં, પોલીસ કમિશ્નરશ્રી, સુરત શહેરના તા. તા. ૦૩/૦૨/૨૦૨૨ના રોજના પત્ર અન્વયે સદર ઉદ્યોગની પુનઃ તપાસ કરવામાં આવેલ જે દરમ્યાન સદર ઉદ્યોગ દ્વારા ટેન્કર નં. જીજે-૬ટીટી-૮૫૫૫ મારફતે જોખમી, ઝેરી, જવલનશીલ હેઝાર્ડસ વેસ્ટનો અનઅધિકૃત રીતે નિકાલ કરવામાં આવેલ હોય તેવું જણાયેલ છે. સદર મુલાકાત અહેવાલ ૦૩/૦૨/૨૦૨૨, ઇન્સપેકશન આઇ ડી – ૬૩૭૫૮૯ ની નકલ પણ આ સાથે સામેલ રાખેલ છે. (બિડાણ-૨)

વધુમાં ઉમેરવાનું કે, સદર ઉદ્યોગનું તા. ૧૬/૦૩/૨૦૨૨ના રોજ બોર્ડની વડી કચેરી, ગાંધીનગરની સુચના અન્વયે મેસર્સ સંગમ એન્વાયરો પ્રા.લિ. સાથે મેસર્સ કેમી ઓર્ગેનીક ઉદ્યોગોના વચ્ચે થયેલ કામગીરી અન્વયે તપાસ મુલાકાત લીધેલ, જેમાં ઉપરોક્ત મેસર્સ કેમી ઓર્ગેનીક કેમીકલ્સ (ઈ) પ્રા. લિ., દ્વારા હેઝાર્ડસ વેસ્ટના નિકાલ કરવા અંગે પુરતી તકેદારી રાખેલ ન હોઈ, હેઝાર્ડસ વેસ્ટ રૂલ્સ અંતર્ગત હેઝાર્ડસ વેસ્ટ ઓથોરાઈઝેશન મુજબ કામગીરી કરેલ ન હોઈ તેવું સ્પષ્ટ જણાયેલ છે. સદર મુલાકાત અહેવાલ ૧૬/૦૩/૨૦૨૨, ઇન્સપેકશન આઇ ડી – ૬૪૩૩૪૬ ની નકલ પણ આ સાથે સામેલ રાખેલ છે (બિડાણ-૩)

આમ, ઉપરોક્ત હકીકતે જણાવવાનું કે, મેસર્સ કેમી ઓર્ગેનીક કેમીકલ્સ (ઈ) પ્રા. લિ., ઉદ્યોગ દ્વારા જોખમી, ઝેરી, જવલનશીલ હેઝાર્ડસ વેસ્ટનો અનઅધિકૃત રીતે નિકાલ કરવામાં આવેલ હોય તેવું જણાયેલ છે. જે અન્વયે ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડની વડી કચેરી, ગાંધીનગર દ્વારા તા. ૦૧/૦૪/૨૦૨૨ના રોજ રૂ. ૫૦ લાખની એન્વાયરમેન્ટ ડેમેજ કમ્પનસેશન (EDC) સહિત ક્લોઝર ડાયરેકશન આઉટ વર્ડ નંબર :GPCB/ANK/CCA-164(10)/ID-15014/637392 dated 01/04/2022 થી પાઠવવામાં આવેલ છે જેની નકલ આ સાથે બિડાણમાં રાખેલ છે. (બિડાણ-૪)

ઉક્ત હકીકતે ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડની વડી કચેરી, ગાંધીનગરની સુચનાનુસાર હું શૈલેષકુમાર બાબુભાઈ પટેલ, ઉ.વ. ૪૯, વૈજ્ઞાનિક અધિકારી, ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર જણાવું છું કે સદર ઉદ્યોગ, ઉદ્યોગના ભાગીદારો, ટેન્કરના માલિકો, ડ્રાઈવર તથા આ કામગીરીમાં સંકળાયેલા તમામ ઈસમો સામે ઇન્ડિયન પીનલ કોડ (IPC)ની કલમ ૨૭૩, ૨૮૪, ૧૧૪ હેઠળ તાત્કાલિક ફરિયાદ દાખલ કરવા આ સાથે આપશ્રીને વિનંતિ કરવામાં આવે છે.

ઉપરોક્ત વિવિધ તપાસમાં નીચે દર્શાવેલ અધિકારીઓ/કર્મચારીઓ .....

૧) શ્રી આર.પી. રાણા, (મદદનીશ પર્યાવરણ ઈજનેર) ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર મો.નં. ૭૯૯૦૩૪૫૯૩૯

૨) ભૂમિકા એ. ભુવા (મદદનીશ પર્યાવરણ ઈજનેર) ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર મો.નં. ૮૮૬૬૮૨૨૮૦૫

૩) શ્રી આર.બી. મકવાણા, (સિનિયર વૈજ્ઞાનિક મદદનીશ) ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર મો.નં. ૯૯૨૫૦૪૬૯૦૮

૪) શ્રી એન.એમ. શૌલિયા (મદદનીશ પ્રોજેક્ટ ઈજનેર) ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ, પ્રાદેશિક કચેરી, અંકલેશ્વર મો.નં. ૯૦૯૯૦૮૮ ૬૫૩.....તપાસમાં સાહેદો છે.

સ્થળ : ઝઘડિયા
તા.૦૫/૦૪/૨૦૨૨

(શૈલેષકુમાર બાબુભાઈ પટેલ)
વૈજ્ઞાનિક અધિકારી
મો.નં. ૯૮૨૫૫૪૧૮૮૪/૩૯૮૪૦૪૧૪૩૬
ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ,
પ્રાદેશિક કચેરી, અંકલેશ્વર

ઉપર મુજબની લેખિત ફરીયાદ અમોએ આપેલ છે જે ફરીયાદ વાંચી સમજી આ નીચે સહિ કરેલ છે.

Scanned by CamScanner

૩બ૩

(એન.જી.વસાવા)
અ.હે.કો.
પોલ્સ્ટે. અલમદાર
ઝઘડિયા પોલીસ સ્ટેશન

13 **Action Taken : Since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2:**
(લીધેલ પગલાં : ઉપરના અહેવાલની ઉપરની આઇટમ નં.(2) માં જણાવ્યા પ્રમાણેનો ગુન્હો બન્યાનું જણાઇ આવતા)

(1) **Registered the case and took up the investigation or**(કેસની નોંધણી કરી તપાસ હાથ ધરી છે)

(2) **Directed (Name of I.O.) take up the Investigation or**(તપાસ કરનાર અધિકારીનું નામ):- સુકલાલ રતનસીંગ ગાવીત **Rank**(હોદ્દો):- પોલીસ ઇન્સ્પેકટર
No.:- srg010666 to take up the Investigation or(નંબર)

F.I.R. read over to the complainant/informant, admitted to be correctly recorded and a copy given to the complainant/informant, free of cost.
(પ્રથમ માહિતી અહેવાલ ફરિયાદી / બાતમીદારને વાંચી સંભળાવેલ છે અને ફરિયાદીએ લખાવ્યા પ્રમાણેજ નોંધવામાં આવેલ છે. તેવુ ફરિયાદી / બાતમીદારે સ્વીકરેલ છે અને ફરીયાદી / બાતમીદારને તેની નકલ વિના મુલ્યે આપવામાં આવી છે.)

R.O.A.C.
(વાંચી સંભળાવવામાં આવ્યું અને તે બરાબર છે.)

Signature of Officer in charge, Police Station
(પોલીસ મથકનો હવાલો ધરાવતા અધિકારીની સહી.)

14 **Signature/Thumb Impression of the complainant/informant.**
(ફરિયાદી/બાતમીદારની સહી/અંગૂઠાની છાપ)

Name (નામ) નરોત્તમભાઇ જીવણભાઇ વસાવા

Rank (હોદ્દો) હેડ કોન્સ્ટેબલ **GPF No** (જીપીએફ નંબર) 111308

15 **Date and time of dispatch to the court.** 05/04/2022 13:15
(ફરિયાદ કોર્ટમાં રવાના કર્યાની તારીખ અને સમય)

P.S.O.
Jhagadia Police Station
Dist. Bharuch

Scanned by CamScanner

Annexure-5

પ્રથમ માહિતી અહેવાલ

ફોજદારી કાર્યસંહિતાની કલમ ૧૫૪ હેઠળ

1). જીલ્લો-સુરત પો.મથક- સચીન GIDC વર્ષ- ૨૦૨૨ FIR ગુ.ર.ન.૧૧૨૧૦૦૦૨૨૨૦૧૮૫/ ૨૦૨૨ તા. ૧૯/૦૧/૨૦૨૨.

2). (૧) અધિનીયમ કાયદો અને કલમ:- ઇ.પી.કો. કલમ ૨૮૪, ૧૨૦(બી), ૩૪ તથા Environment Protection Act ની કલમ.૧૫ મુજબ

3). (૧) ગુન્હો બન્યાનો સમયગાળો :- તા.૧૭/૧૨/૨૦૨૧ થી આજદિન સુધી

(૨) પોલીસ મથકે માહિતી મળ્યા તારીખ- ૧૯/૦૧/૨૦૨૨ સમય કલાક :૨૦/૫૦ PI DCB

(૩) સ્ટેશન ડાયરી એન્ટ્રી એંટ્રી નંબર- ૪૭ /૨૦૨૨ સમય કલાક: ૨૧. /૨૦ PSO

4). માહિતી નો પ્રકાર લેખિત / મૌખિક. : લેખીત

5). ઘટનાનું સ્થળ.:- સચીન જી.આઇ.ડી.સી. સાતવલ્લા બ્રીજ સામે તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં

(૧) પોલીસ મથકની દિશા અંતર.

(૨) સરનામું- સચીન જી.આઇ.ડી.સી. સાતવલ્લા બ્રીજ સામે તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં સુરત શહેર

(૩) પોલીસ સ્ટેશનની હદની બહાર હોય તો તે પોલીસ સ્ટેશનનું નામ. જીલ્લો-

6). ફરિયાદી / બાતમીદાર.

(૧) નામ – શ્રી, સ.ત. એન.બી.બારોટ પોલીસ ઇન્સ્પેકટર, કાઇમ બ્રાંચ સુરત શહેર

(૨) પિતાનું નામ :-

(૩) જન્મ તારીખ/વર્ષ –

(૪) રાષ્ટ્રીયતા – ભારતીય

(૫) પાસપોર્ટ નંબર - -- જારી તારીખ- – જારી કર્યા સ્થળ- ---

(૬) ધંધો – નોકરી

(૭) સરનામું – કાઇમબ્રાંચ, ચોકબજાર કુજા સુરત શહેર

7). ઓળખેલ / શકમંદ / વણઓળખેલ આરોપીની તમામ વિગતો સાથેની માહિતી.

(૧) પ્રેમસાગર ઓમપ્રકાશ ગુપ્તા ઉ.વ.૩૩ રહેવાસી. ઘર નંબર ૮૪/૮૫, સચીન પારડી શિવનગર સોસાયટી સુરત મુળગામ ખાકસીસ પોસ્ટ ખોચ જી.જાલોન ઉતરપ્રદેશ

(૨) વિશાલ ઉર્ફે છોટુ અનીલકુમાર યાદવ ઉ.વ. ૨૧ રહેવાસી. બી/૨, રૂમ નંબર ૫૨, નવસર્જન સોસાયટી સરદાર પાર્ક ગટુ વિધાલયની બાજુમાં અંકલેશ્વર જીલ્લો. ભરૂચ મુળગામ બીલવા બજાર લોડકે જમાલપુર પોસ્ટ- ખજુરાવા થાના મડીયાહું તા.જમાલપુર જીલ્લો. જોનપુર ઉતરપ્રદેશ

(૩) જયપ્રતાપ ઉર્ફે ગુડડુ રામકિશોર તોમર ઉ.વ. ૨૪ રહેવાસી. રૂમ નંબર ૨૮૧/૨૮૨, આલિશાન સીટી સોસાયટી જીતાલી ગામ તાલુકો. અંકલેશ્વર જીલ્લો. ભરૂચ મુળગામ ભીસોડા તાલુકો-થાના સોનીયા જીલ્લો. મુરૈના મધ્યપ્રદેશ

(૪) આશિષકુમાર દુધનાથ ગુપ્તા ઉ.વ.૪૭ રહેવાસી. એ/૧૦૬, એમ્પીરીયલ કોમ્પલેક્ષ, રણોલી જી.આઇ.ડી.સી. વડોદરા તથા ૯-૧૦, નિર્મલ પાર્ક સોસાયટી અંબિકાનગર સામે, ઓમકાર પુરા જોગણી માતાના મંદિર પાસે વડોદરા મૂળ રહે ગામ. બિંદાગંજ તા. પટ્ટી થાના.રાનીગંજ જી.પ્રતાપગઢ (યુ.પી)

(૫) નિલેશ પીતાંબર બહેરા ઉ.વ.૨૮ રહેવાસી. ૨૧૬, ગુ.હા.બોર્ડ જલારામ નગર ગણેશપુરા અમરોલી સુરત મૂળ રહે ગામ. કલ્યાણી જી.બાલેશ્વર (ઓરીસ્સા)

(૬) મૈત્રેય સન્મુખભાઇ વૈરાગી ઉ.વ.૩૯ રહેવાસી. ઘર નંબર ૮૫, મુક્તાનંદ સોસાયટી, જી.એન.એફ.સી. કોલોની પાછળ ભરૂચ

(૭) સુરેન્દ્રસીંગ જીતેન્દ્રસીંગ જાતે સીંગ, ઉ.વ.૩૭, રહે, અંકલેશ્વર GIDC ઢક્કન કેમીકલ પાસે, ટેન્કર નંબર GJ-06-ZZ-6221 ના કેબીનમાં, મુળ વતન ગામ. જીયાસડ, તા.મેનગર, પોસ્ટ.બછવલ, જીલ્લો.આજમગઢ, ઉત્તરપ્રદેશ

(૮) બબલુ જેનું પુરુ નામ સરનામું જણાયેલ નથી.

(૯) ટેન્કર નંબર MH 04 HY 6377 નો ચાલક તથા તપાસમાં નીકળી આવે તેઓ વિગેરે.

8). ફરીયાદી/બાતમીદાર તરફથી ગુન્હાની જાણ કરવામાં વિલંબ થવાના કારણો :-

9). ચોરાયેલી/ગુન્હામાં સંડોવાયેલ ચીજ વસ્તુઓની વિગતો.

10). ચોરાયેલી /ગુન્હામાં સંડોવાયેલ ચીજ વસ્તુની કુલ કિંમત.

11). મૃત્યુ વિષયક તપાસ અહેવાલ / અકસ્માત મોતનો નંબર હોય તો તે.

12). પ્રથમ માહિતી અહેવાલની વિગતો (જરૂર જણાય તો અલાયદો કાગળ જોડવો)

તા.૧૯/૦૧/૨૦૨૨

હું એન.બી.બારોટ પોલીસ ઇન્સ્પેકટર ક્રાઇમબ્રાંચ સુરત શહેર.

મારી શ્રીસરકાર તરફે ફરિયાદ એ રીતેની છે કે, અમો સુરત શહેર સચીન GIDC પો.સ્ટે. એ પાર્ટ નંબર-૧૧૨૧૦૦૦૨૨૦૧૦૭/૨૦૨૨ ઇ.પી.કો કલમ- ૩૦૪, ૩૩૬, ૩૩૭, ૩૩૮, ૨૮૪, ૨૭૭, ૨૭૮, ૪૬૫, ૪૬૭, ૪૬૮, ૪૭૧, ૧૨૦બી, તથા Environment Protection Act ની કલમ ૧૫ મુજબના ગુનાની તપાસ ચલાવી રહેલ છીએ.

આ ગુનાના કામે હકીકત એવી રીતે છે, તા.૦૬/૦૧/૨૦૨૨ ના કલાક ૦૪/૦૦ વાગ્યાના સુમારે સચીન GIDC રોડ નં-૦૩ વિશ્વાપ્રેમ મીલની પાસે ટેન્કર નંબર GJ-06-ZZ-6221 ના ચાલકે તથા ટેન્કરના માલીક દ્વારા ટેન્કરમાં રહેલ ઝેરી કેમીકલ પ્રવાહીની કુદરતી ખાડી (natural stream) માં અનઅધિકૃત રીતે નિકાલ કરવામા આવતા અથવા અન્ય કોઇ રીતે સપાટીના અને ભૂગર્ભ જળસોતોને, સંપર્કમા આવતા માનવ જીવન, જળચર જીવ સુષ્ટીને સમગ્ર પર્યાવરણને અત્યંત હાનિકારક, જોખમકારક નીવડે તે રીતે ઝેરી કેમીકલ વધુ માત્રા ધરાવતા પ્રવાહીનો ગેરકાયદેસર રીતે ખાડીમાં નિકાલ કરવાની પ્રવૃતીના કારણે નજીકમાં આવેલ વિશ્વાપ્રેમ મીલના કારીગરો તથા અન્ય મળી કુલ-૨૯ ને અસર થતા તેમાંથી કુલ-૦૬ વ્યક્તિઓના મોત થયેલ છે અને બાકીના સારવાર હેઠળ હોય, જેથી સદર ગુનામાં સંડોવાયેલા ટેન્કર નં.GJ-06-ZZ-6221 ના ચાલક, ટેન્કર નંબર GJ-06-ZZ-6221 ના માલિક, વગેરે વિરૂધ્ધમાં સચીન GIDC પોલીસ સ્ટેશનના પોલીસ સબ ઇન્સ્પેક્ટર શ્રી ડી.જે.પ્રજાપતિ નાઓએ ફરીયાદ આપતા સદર ગુનો દાખલ થયેલ છે. આ ગુનામાં આરોપીઓ (૧) જયપ્રતાપ ઉર્ફે ગુડડુ S/O રામકિશોર તોમર (૨) આશિષકુમાર દુધનાથ ગુપ્તા (૩) વિશાલ ઉર્ફે છોટુ S/O અનીલકુમાર યાદવ (૪) પ્રેમસાગર S/O ઓમપ્રકાશ ગુપ્તા (૫) નિલેશ પીતાંબર બહેરા (૬) મૈત્રેય સન્મુખભાઇ વૈરાગી (૭) મનસુખ ગોકળભાઇ પટેલ (૮) અભય સુરેશ દાંડેકર (૯) મછીન્દ્રનાથ મુરલીધર ગોર્હે (૧૦) રમણભાઇ ભલાભાઇ બારીયા (૧૧) સુરેન્દ્રસીંગ જીતેન્દ્રસીંગ જાતે સીંગ (૧૨) વિજયભાઇ ધીરૂભાઇ ડોબરીયા (૧૩) સૌરવ પ્રવિણભાઇ ગાબાણી નાઓને અટક કરવામાં આવેલ છે.

આ ગુનાની તપાસ દરમ્યાન નીચે મુજબની હકીકત જણાય આવેલ છે કે, સંગમ એન્વાયરો પ્રા.લી.ના માલીક/ભાગીદારો નિલેશ પિતામ્બર બહેરા તથા પ્રિતેષ સન્મુખભાઇ વૈરાગી તથા આશીષ ગુપ્તા નાઓ દ્વારા ગેરકાયદેસર રીતે "SODIAM HYDROSULPHIDE" તથા વેસ્ટ સોડીયમ થાયો સલ્ફેટ (હેઝાર્ડસ વેસ્ટ) સચીન GIDC સાતવલ્લા બ્રીજ સામે, તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં ખાલી કરેલ છે. જેની વિગત નીચે મુજબ છે.

(૧) સંગમ એન્વાયરો પ્રા.લી.ની માંગણી તથા જણાવ્યા મુજબ તા.૧૭/૧૨/૨૦૨૧ ના રોજ શ્રી કૈલાશ ટ્રાન્સપોર્ટનું ટેન્કર નંબર MH 04 HY 6377 નું "SODIAM HYDROSULPHIDE" ભરી સંગમ એન્વાયરો પ્રા.લી.ના સરનામે ઓફિસ નંબર ૪૨૪, શિલ્પી સ્કવેર, દહેજ બાયપાસ રોડ, ભરૂચ (ગુજરાત) ખાતે આવવા મુંબઇ તલોજા હાઇકલ કંપનીથી રવાના થયેલ આ ટેન્કરને કોસંબા પાસે રોકાવી લેવામાં આવેલ અને સંગમ એન્વાયરો પ્રા.લી.ના ભાગીદાર આશિષ ગુપ્તા દ્વારા આ ટેન્કર ગેરકાયદેસર રીતે નિકાલ કરવા વિશાલ ઉર્ફે છોટુ તથા જયપ્રતાપ તોમર નાઓને સોંપવામાં આવતા તેઓએ બબલુ કે જેનું પુરૂ નામઠામ જણાયેલ નથી તેનો સંપર્ક કરી પ્રેમસાગર ગુપ્તાની મદદથી સચીન GIDC સાતવલ્લા બ્રીજ સામે, તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં ખાલી કરવાનું નકકી થયેલ ત્યાર બાદ આ ટેન્કરના ડ્રાઇવર સાથે સુરેન્દ્રસીંગને બેસાડી, વિશાલ ઉર્ફે છોટુ તથા જયપ્રતાપ તોમર છકો ગાડીમાં બેસી પાયલોટીંગ કરી સુરત સચીન GIDC માં આવી પ્રેમસાગર ગુપ્તાના બતાવ્યા મુજબ સચીન GIDC સાતવલ્લા બ્રીજ સામે, તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં ટેન્કર નંબર MH 04 HY 6377 માંથી "SODIAM HYDROSULPHIDE" નામનું કેમીકલ ગેરકાયદેસર રીતે તા.૨૨/૧૨/૨૦૨૧ ના રોજ રાત્રીના એક થી ત્રણ વાગ્યાના અરસામાં ખાલી કરેલ છે. સંગમ એન્વાયરો પ્રા.લી. દ્વારા આ ટેન્કરમાં 0.01 એક કિલોગ્રામના ભાવે કુલ ૨૫,૯૧૦ કિલોગ્રામ "SODIAM HYDROSULPHIDE" ખરીદ કરી લાવવામાં આવેલ હતુ અને ટ્રાન્સપોર્ટેશન અને સર્વીસ ચાર્જ પ્રતિ કિલોગ્રામ રૂપિયા ૨૩/- લેખે ગણી કુલ ૨૫,૯૧૦ કિલોગ્રામના રૂપિયા ૫,૯૫,૯૩૦/- નું બીલ બનાવી હાઇકલ લી. કંપનીને મોકલેલ હતુ.

(૨) સંગમ એનવાયરોમેન્ટ પ્રા.લી.ના ભાગીદારો દ્વારા ઝઘડીયા GIDC ખાતે આવેલ CHEMIE ORGANIC CHEMICALS INDIA PVT LTD કંપની માંથી દાલમીયા સિમેન્ટ ભારત લી. ના ઓથોરાઇઝ ટ્રાન્સપોર્ટર તરીકે કો-પ્રોસેસીંગ વેસ્ટ સોડીયમ થાયો સલ્ફેટ (હેઝાર્ડસ વેસ્ટ) ૨૮.૯૨ મેટ્રીક ટન તા.૨૩/૧૨/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ 06 ZZ 6221 માં ભરી CHEMIE ORGANIC CHEMICALS INDIA PVT LTD કંપની પાસેથી મેન્યુફેસ્ટ નંબર ૧૪૯૨૨૮૦ તા.૨૩/૧૨/૨૦૨૧ ની કોપીઓ મેળવી આ ટેન્કરમાં ભરેલ કેમિકલને સંગમ એનવાયરોમેન્ટ પ્રા.લી.ના ભાગીદારોએ ગેરકાયદેસર રીતે નિકાલ કરવા માટે વિશાલ ઉર્ફે છોટુ તથા જયપ્રતાપ તોમરને સોપેલ. તેઓએ બબલુ કે જેનું પુરૂ નામઠામ જણાયેલ નથી તેના મારફતે સુરતના પ્રેમસાગર ગુપ્તાનો સંપર્ક કરી કેમીકલનુ ટેન્કર સુરત સચીન GIDC ની ખાડીમાં નિકાલ કરવાનું નક્કી કરી આ ટેન્કરમાં બબલુને બેસાડી, ડ્રાઇવર સુરેન્દ્રસીંગને કેમીકલ ભરેલ ટેન્કર લઇ સુરત સચીન GIDC ખાતે જવા રવાના કરેલ. સુરત સચીન GIDC વિસ્તારમાં પહોચ્યા બાદ બબલુ તથા ડ્રાઇવર સુરેન્દ્રસીંગે સુરતના પ્રેમસાગર ગુપ્તાનો સંપર્ક કરી તેને બોલાવી તેના બતાવ્યા મુજબ સચીન GIDC સાતવલ્લા બ્રીજ સામે, તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં ટેન્કર નંબર GJ 06 ZZ 6221 માંથી કો-પ્રોસેસીંગ વેસ્ટ સોડીયમ થાયો સલ્ફેટ (હેઝાર્ડસ વેસ્ટ)

નામનું કેમીકલ ગેરકાયદેસર રીતે તા.૨૪/૧૨/૨૦૨૧ ના રોજ રાત્રીના સવા એક થી સાડા ત્રણ દરમ્યાન ખાલી કરેલ છે. બાદ સંગમ એનવાયરો પ્રા.લી .દ્વારા તા.૦૧/૦૧/૨૦૨૨ ના રોજ એક ટેક્ષ ઇન્વોઇસ બીલ બનાવવામાં આવેલ જેમાં ૫૨ મેટ્રીક ટન રૂપિયા ૮,૮૦૦/- લેખે હેઝાર્ડસ વેસ્ટ કલેકશન, ટ્રાન્સપોર્ટેશન, અને કો.પ્રોસેસિંગ કન્સલટન્સી સર્વિસ ચાર્જ લગાવી રૂપિયા ૨,૫૪,૪૯૬/- દર્શાવેલ હતા. જે બીલ તેમણે આવેલ CHEMIE ORGANIC CHEMICALS INDIA PVT LTD કંપનીને મોકલી આપેલ હતુ.

આ ગુનાની તપાસ દરમ્યાન તા.૧૪/૦૧/૨૦૨૨ ના રોજ રિમાન્ડ હેઠળના આરોપીઓ (૧) પ્રેમસાગર S/O ઓમપ્રકાશ ગુપ્તા (૨) વિશાલ ઉર્ફે છોટુ S/O અનીલકુમાર યાદવ નાઓને સાથે રાખી પંચશ્રી પહલસીંગ ઉજ્જવલસીંગ સોનાર તથા પંચશ્રી અમીન મોહનભાઇ બુંદેલા રૂબરૂ ઉપરોકત કેમીકલ ભરેલ ટેન્કરો સચીન જી.આઇ.ડી.સી. સાતવલ્લા બ્રીજ સામે તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ ખાડીમાં ગેરકાયદેસર રીતે ઠાલવેલ તે જગ્યા બતવાતા રીકન્ટ્રકશન પંચનામું કરવામાં આવેલ છે.

આમ, આરોપીઓએ પુર્વઆયોજીત ગુનાહીત કાવતરૂ રચી તેઓનો સમાન ઇરાદો પાર પાડવા પોતાના આર્થિક ફાયદા સારૂ ટેન્કર નંબર MH 04 HY 6377 તથા ટેન્કર નંબર GJ 06 ZZ 6221 માં કેમીકલ ભરી આ કેમીકલ હાનિકારક અને જોખમકારક હોય જેનાથી માનવ જિંદગી જોખમમાં મુકાય તેવુ જાણતા હોવા છતા સચીન GIDC સાત વલ્લા બ્રીજ સામે તીરૂપતિ બાલાજી સોસાયટીથી આગળ આવેલ કુદરતી ખાડીમાં ગેરકાયદેસર રીતે "SODIAM HYDROSULPHIDE" તથા કો-પ્રોસેસીંગ વેસ્ટ સોડીયમ થાયો સલ્ફેટ (હેઝાર્ડસ વેસ્ટ) ઠાલવી નિકાલ કરી ગુનો કરેલ હોય મારી ઉપરોકત આરોપીઓ તથા તપાસમાં નીકળે તેઓ તમામ વિરૂધ્ધ ઇ.પી.કો. કલમ ૨૮૪, ૧૨૦(બી), ૩૪ તથા Environment Protection Act ની કલમ.૧૫ મુજબ કાયદેસર થવા ફરયાદ છે. મારા સાહેદો પોલીસ તપાસમાં નીકળે તેઓ તથા ફરિયાદમાં જણાવેલ પંચો વિગેરે છે.

એટલી મારી ફરીયાદ હકીકત મારા લખાવ્યા મુજબ બરાબર અને ખરી છે.

રૂબરૂ

.....

(એન.બી.બારોટ)
પોલીસ ઇન્સ્પેકટર
કાઇમબ્રાંચ, સુરત શહેર

13. લીધેલ પગલાં : ઉપરના અહેવાલની ઉપરની આઇટમ નં. (૨) માં જણાવ્યા પ્રમાણેનો ગુન્હો બન્યાનું જણાઈ આવતાં.

(૧) કેસની નોંધણી કરી તપાસ હાથ ધરી છે.
(૨) તપાસ કરનાર અધિકારીનું નામ.શ્રી — હોદ્દો-
(૩) તપાસ ન થઈ શકવાના કારણો. — અથવા.
(૪) તબદીલ કરેલ છે તે પો.સ્ટે. — જિલ્લો. — હદ/વિસ્તારના મુકે.

પ્રથમ માહિતી અહેવાલ ફરીયાદી/બાતમીદારને વાંચી સંભળાવેલ છે અને ફરીયાદીએ લખાવ્યા પ્રમાણેજ નોંધવામાં આવેલ છે. તેવું ફરીયાદી/બાતમીદારે સ્વીકારેલ છે અને ફરીયાદી/બાતમીદાર ને તેની નકલ વિના મુલ્યે આપવામાં આવી છે.

R.O.A.C.
પોલીસ મથકનો હવાલો ધરાવતા અધિકારીની સહી.

14. ફરીયાદી / બાતમીદારની સહી અંગુઠાની છાંપ. — નામ.

15. ફરીયાદ કોર્ટમાં રવાના કર્યાની તારીખ અને સમય.

પી. સ્ટે. અમ.
સચીન જી.આઈ.ડી.સી. પો. સ્ટે

Annexure 6

3९८८

FIRST INFORMATION REPORT

પ્રથમ માહિતી અહેવાલ

(Under Section 154 Cr.P.C.)

(ફોજદારી કાર્યસંહિતાની કલમ 154 હેઠળ)

1 District (જીલ્લો): રાજકોટ શહેર | Police Station (પોલીસ સ્ટેશન): બી-ડીવીઝન | Year (વર્ષ): 2022 | FIR No. (પ્ર.મા.અ.ક્રમાંક): 11208051220903 | Date (તારીખ): 10/03/2022

2 (i) Act (અધિનિયમ): આઈ પી સી — Sections (કલમો): 284,120 B,34

(ii) Act (અધિનિયમ): પર્યાવરણ સુરક્ષા અધિનિયમ — Sections (કલમો): 15

3 (a) (ક) Occurrence of offence: (ગુન્હો બન્યાનો સમયગાળો)

Day (દિવસ)	સોમવાર	Date from (તારીખથી)	22/11/2021	Date to (તારીખ સુધી)	23/11/2021
Time Period (સમયગાળો)		Time from (કલાકથી)	00:00	Time to (કલાક સુધી)	00:00

(b) (ખ) Information received at PS: (પોલીસ મથકે માહિતી મળ્યા) — Date (તારીખ): 10/03/2022 — Time (સમય): 20:15

(c) (ગ) General Diary Reference:Entry No. (સ્ટેશન ડાયરી સંદર્ભ: એન્ટ્રિ નં) — Time (સમય)

4 Type of Information:(માહિતીનો પ્રકાર): મૌખિક

5 Place of Occurrence: (ઘટનાનું સ્થળ)

(a) (ક) Direction and distance from P.S. (પોલિસ સ્ટેશનથી દિશા અંતર): પૂર્વ ,2.00 (કિ.મી.) — Beat No. (બીટ નંબર)

(b) (ખ) Address (સરનામું): રાજકોટ ગ્રીનલેન્ડ ચોકડી મેંગો માર્કેટ સામે, મહેશ્વરી સોસાયટીમા આવેલ શીવ સર્વીસ સ્ટેશન ખાતે રાજકોટ અક્ષાંશ- ૨૨.૩૧૭૮૯૫ રેખાંશ- ७०.८३६०४६.
રાજકોટ શહેર.

(c) (ગ) In case, outside the limit of this Police Station, then (પોલીસ સ્ટેશનની હદની બહાર હોય તો તે પોલીસ સ્ટેશનનું નામ)

Name of P.S. (પોલીસ સ્ટેશનનું નામ) — District (જીલ્લો)

6 Complainant/Informant: (ફરિયાદી / બાતમીદાર)

(a) (ક) Name (નામ): ભરતકુમાર મોહનલાલ મકવાણા — (b) (ખ) Father's/Husband's Name (પિતા/પતિનું નામ): મોહનલાલ મકવાણા

(c) (ગ) Date/Year of Birth (જન્મ તારીખ / વર્ષ): 55 — (d) (ઘ) Nationality (રાષ્ટ્રીયતા): ભારતીય

(e)
(ક)

(f) (ચ)	Occupation (ધંધો)	નોકરી	(g) (છ)	Address (સરનામું)	રેસકોર્ષ રીંગ રોડ, યુનીયન બેન્કની બાજુમા આવેલ, ગુજરાત પ્રદુષણ નીયંત્રણ બોર્ડ ની કચેરી રાજકોટ મો.ન. ૯૮૨૫૬ ૨૨૦૮૯. રાજકોટ શહેર.

7 Details of known/suspected/unknown accused with full particulars:
(Attach seperate sheet, if necessary)
(ઓળખાયેલ/શકમંદ/વણઓળખાયેલ આરોપીની તમામ વિગતો સાથેની માહિતી)
(જરૂર જણાયતો અલાયદા કાગળ ઉપર વિગત દર્શાવવી)

	Accused Name (તહોમતદારનું નામ)	Age(Approx.) (ઉમર) (આશરે)	Address (સરનામું)
(1)	આશિષકુમાર દુધનાથ ગુપ્તા		એ/૧૦૬, એમ્પેરીયલ કોમ્પ્લેક્ષ રણોલી GIDC વડોદરા , વડોદરા શહેર.
(2)	મૈત્રેય રામ્મુખલાલ વૈરાગી		ઘર નંબર ૮૫, મુક્તાનંદ સોસાયટી, જી.એન.એફ.સી. કોલોની પાછળ ભરૂચ, ગામ. ભરૂચ, તા. ભરૂચ. જી. ભરૂચ.
(3)	નિલેશ પીતાંબર બહેરા		૨૧૬, ગુ.હા.બોર્ડ જલારામ નગર ગણેશપુરા અમરોલી સુરત , સુરત શહેર.
(4)	ગોવિદભાઇ કાનાભાઇ શિયાળ	42	ભગીરથ સોસાયટી શેરી નંબર ૫, માર્કેટીંગ યાર્ડ, ગ્રીનલેન્ડ ચોકડી રાજકોટ , રાજકોટ શહેર.
(5)	ટેન્કર નો ચાલક		
(6)	ટેન્કર નો ચાલક તથા તપાસમાં ખુલે તે		

8 Reasons for delay in reporting by the complainant/Informant
(ફરિયાદી/બાતમીદાર તરફથી ગુન્હાની જાણ કરવામાં વિલંબ થવાના કારણો)

ના.

9 Particulars of properties stolen(Attach seperate sheet, if necessary)
(ચોરાયેલી/ગુન્હામાં સંડોવાયેલ ચીજ વસ્તુઓની વિગતો) (જરૂર જણાયતો અલાયદા કાગળ ઉપર વિગત દર્શાવવી).

10 Total value of property stolen
(ચોરાયેલી / ગુન્હામા સંડોવાયેલ ચીજ વસ્તુઓની કુલ કિમંત)

11 Inquest Report/U .D. case No. if any
(મૃત્યુ વિષયક તપાસ અહેવાલ / અકુદરતી મોતનો નંબર હોય તો
તે)

12 First Information contents(Attach seperate sheet, if required)
(પ્રથમ માહિતી અહેવાલની વિગતો)(જરૂર જણાયતો અલાયદો કાગળ જોડવો)

ગુન્હે આઇ.પી.સી.કલમ ૨૮૪, ૧૨૦(બી), ૩૪ તથા Environment Protection Act ની કલમ ૧૫ મુજબ તે એવી રીતે કે આ કામના આરોપીઓએ પુર્વયોજીત ગુનાહીત કાવતરૂ રચી તેઓનો સમાન ઇરાદો પાર પાડવા પોતાના આર્થીક ફાયદા સારૂ ટેન્કર નંબર GJ-06-BT-6431 તથા

૩૯૮૨

ટેન્કર નંબર GJ-06-BT-6421 મા કેમીકલ ભરી આ કેમીકલ હાનીકાર અને જોખમકારક હોય જેનાથી માનવ જીંદગી જોખમમાં મુકાય તેવુ જાણતા હોવા છતા આ કામના આરોપી ગોવિંદભાઇ કાનાભાઇ શિયાળ નુ રાજકોટ ગ્રીનલેન્ડ ચોકડી મેંગો માર્કેટ સામે, પરીશ્રમ સોસાયટીમાં આવેલ શીવ સર્વીસ સ્ટેશનની ભુગર્ભ ગટરમા ગેરકાયદેસર રીતે "સોડીયમ હાઇડ્રોસલ્ફાઇડ કેમિકલ" ઠાલવી નીકાલ કરી ગુનો કર્યા બાબત.

Complaint(ફરિયાદ)

તા.૧૦/૦૩/૨૦૨૨

મારૂ નામ ભરતકુમાર મોહનલાલ મકવાણા ઉવ. ૫૫ ધંધો. સરકારી નોકરી ઓફીસ સરનામુ- રેસકોર્ષ રીંગ રોડ, યુનીયન બેન્કની બાજુમા આવેલ ગુજરાત પ્રદુષણ નીયંત્રણ બોર્ડ ની કચેરી રાજકોટ મો.નં. ૯૮૨૫૬ ૨૨૦૮૯ રૂબરૂમા આવી જાહેર કરી મારી ફરીયાદ હકીકત લખાવું છુ કે રાજકોટ, રેસકોર્ષ રીંગ રોડ, યુનીયન બેન્કની બાજુમા આવેલ ગુજરાત પ્રદુષણ નીયંત્રણ બોર્ડ ની કચેરીમા ઇન્ચાર્જ રીજનલ ઓફીસર તરીકે તા. ૦૮/૦૩/૨૦૨૧ થી ફરજ બજાવુ છુ. ગઇ તારીખ. ૦૫/૦૨/૨૦૨૧ ના રોજ અમોને પોલીસ કમિશ્નર શ્રી, સુરત શહેરની કચેરી ખાતેથી પત્ર નંબર આરબી/સચીન જી.આઇ.ડી.સી.-૧૦૩/૩૦૪/૨૦૨૨ તા. ૨૮/૧/૨૨ નો પત્ર અમારી કચેરી ખાતે અમોને મળેલ હતો. જે પત્ર વંચાણે લેતા જેમા હકીકત જણાવેલ હતી કે સુરત શહેર સચીન જી.આઇ.ડી.સી. પોલીસ સ્ટેશન પાર્ટ એ ગુના રજીસ્ટર નંબર ૧૧૨૧૦૦૨૨૨૦૧૦૭/૨૦૨૨ ઇ.પી.કો કલમ-૩૦૪,૩૩૬,૩૩૭,૩૩૮,૨૮૪,૨૭૭,૨૭૮,૧૨૦બી, ૪૬૫,૪૬૭,૪૬૮,૪૭૧ તથા Environment Protection Act ની કલમ ૧૫ મુજબના ગુનાના કામે તા. ૦૬/૦૧/૨૦૨૨ ના રોજ વહેલી સવારના ચારેક વાગ્યાના અરસામાં સચીન GIDC રોડ નં-૩ વિશ્વપ્રેમ મીલની પાસે, પો.સ્ટેથી દક્ષીણે આશરે ૨ કિ.મી. દુર ટેન્કર નં.GJ-06-ZZ-6221 ના ચાલકે તથા ટેન્કરના માલીક દ્વારા ટેન્કરમાં રહેલ ઝેરી કેમીકલ પ્રવાહીની કુદરતી ખાડી (natural stream) માં અનઅધિકૃત રીતે નિકાલ કરવામા આવતા અથવા અન્ય કોઇ રીતે સપાટીના અને ભૂગર્ભ જળસ્ત્રોતોને, સંપર્કમા આવતા માનવ જીવન, જળચર જીવ સૃષ્ટીને સમગ્રતયા પર્યાવરણને અત્યંત હાનિકારક, જોખમકારક નીવડે તે રીતે ઝેરી કેમીકલ વધુ માત્રા ધરાવતા પ્રવાહીનો ગેરકાયદેસર રીતે ખાડીમાં નિકાલ કરવાની પ્રવૃતીમાં ઝેરી કેમીકલ નિકળતા જે ઝેરી કેમીકલના કારણે નજીકમાં આવેલ વિશ્વપ્રેમ મીલના કારીગરો કુલ-૨૯ ને અસર થતા જેમાંથી કુલ-૦૬ કારીગરોનુ મોત થયેલ હોય અને બાકીના સારવાર હેઠળ હોય, જેથી સદર ગુનામાં સંડોવાયેલા ટેન્કરના ચાલક, ટેન્કર નં.GJ-06-ZZ-6221 ના માલિક, વગેરે વિરૂધ્ધમાં તથા તપાસમાં નિકળી આવે તેઓ વિરૂધ્ધમા ઇ.પી.કો કલમ-૩૦૪,૩૩૬,૩૩૭,૩૩૮,૨૮૪,૨૭૭,૨૭૮, ૧૨૦બી, તથા Environment Protection Act ની કલમ ૧૫ મુજબ કાયદેસર થવા શ્રી સ.ત. ડી.જે.પ્રજાપતિ પો.સ.ઇ. સચીન જી.આઇ.ડી.સી. પોલીસ સ્ટેશન સુરત શહેર નાઓએ ફરીયાદ જાહેર કરતા ઉપરોક્ત ગુનો દાખલ કરવામા આવેલ છે.

સદરહુ ગુન્હાની તપાસ દરમ્યાન નીચે મુજબના આરોપીઓની ધરપકડ કરવામા આવેલ છે.

(૧) જયપ્રતાપ ઉર્ફે ગુડ્ડુ s/o રામકિશોર તોમર ઉ.વ.૨૪ રહેવાસી. રૂમ નંબર ૨૮૧/૨૮૨, આલિશાન સીટી સોસાયટી જીતાલી ગામ તાલુકો. અંકલેશ્વર જીલ્લો. ભરૂચ

(૨) વિશાલ ઉર્ફે છોટુ s/o અનીલકુમાર યાદવ ઉ.વ.૨૧ રહેવાસી. બી/૨, રૂમ નંબર ૫૨, નવસર્જન સોસાયટી સરદાર પાર્ક ગટ્ટુ વિધાલયની બાજુમાં અંકલેશ્વર જીલ્લો. ભરૂચ

(૩) આશિષકુમાર s/o દુધનાથ ગુપ્તા ઉ.વ.૪૧ રહેવાસી. એ/૧૦૬, એમ્પેરીયલ કોમ્પ્લેક્ષ રણોલી GIDC વડોદરા

(૪) પ્રેમસાગર s/o ઓમપ્રકાશ ગુપ્તા ઉ.વ.૩૩ રહેવાસી. ઘર નંબર ૮૪/૮૫, સચીન પારડી શિવનગર સોસાયટી સુરત

(૫) નિલેશ પીતાંબર બહેરા ઉ.વ.૨૮ રહેવાસી. ૨૧૬, ગુ.હા.બોર્ડ જલારામ નગર ગણેશપુરા અમરોલી સુરત

(૬) મૈત્રેય સન્મુખભાઇ વૈરાગી ઉ.વ.૩૯ રહેવાસી. ઘર નંબર ૮૫, મુક્તાનંદ સોસાયટી, જી.એન.એફ.સી. કોલોની પાછળ ભરૂચ

(૭) મનસુખ ગોકળભાઇ પટેલ ઉ.વ.૫૦ રહેવાસી. એ/૨૦૧, પટેલ હેરીટેઝ, સેક્ટર-૭, ખારગર, નવી મુંબઇ

(૮) અભય સુરેશ દાંડેકર ઉ.વ.૪૮ રહેવાસી. એ/૫૦૩, આર્શીવાદ રેસીડેન્સી, એલ.ટી.રોડ, વઝીરાનાકા, બોરીવલી વેસ્ટ મુંબઇ

(૯) મછીન્દ્રનાથ મુરલીધર ગોર્હે ઉ.વ.૪૯ રહેવાસી. ફ્લેટ નંબર ૧૦૪, શ્રી શ્રધ્ધા કો-ઓપરેટીવ હાઉસીંગ સોસાયટી, ખાંદા કોલોની, પનવેલ જીલ્લો.રાયગઢ (મહારાષ્ટ્ર)

(૧૦) રમણભાઇ ભલાભાઇ બારીયા ઉ.વ.૪૦ રહેવાસી. બંગલા નંબર ૧૩, આકાશ રો-હાઉસ, પાંડેસરા ગામ, સુરત

(૧૧) સુરેન્દ્રસિંગ જીતેન્દ્રસિંગ ઉ.વ.૩૦ રહેવાસી. ગામ.જીયાસડ થાના.મીયાંનગર પોસ્ટ.બછવાલ જી.આઝમગઢ ઉત્તરપ્રદેશ

(૧૨) વિજયભાઇ પીરૂભાઇ ડોબરીયા ઉ.વ.૩૯ રહેવાસી. ઘર નંબર બી/૧૧૦૩, શ્યામ લકઝરી એપાર્ટમેન્ટ, સુડા ભવનની બાજુમાં વેસુ સુરત

(૧૩) સૌરભ પ્રવિણભાઇ ગાબાણી ઉ.વ.૩૬ રહેવાસી. ઘર નંબર ૮, સૌરભ સોસાયટી ટી.જી.બી. સર્કલ પાસે પાલ અડાજણ સુરત મુળગામ ગોપાવદર તા.રાણપુર જીલ્લો. બોટાદ

સદરહુ ગુનાની તપાસ દરમ્યાન આ કામના સંગમ એનવાયરો પ્રા.લી.ભરૂચના આરોપીઓ (૧) આશિષકુમાર s/o દુધનાથ ગુપ્તા (૨) મૈત્રેય સન્મુખભાઇ વૈરાગી (૩) નિલેશ પીતાંબર બહેરા નાઓએ મુંબઇ તલોજા હાઇકલ કંપની ખાતેથી (૧) તારીખ ૧૨/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-12-BY-1891 (૨) તારીખ ૨૨/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-06-BT-6431 (૩) તારીખ ૨૩/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-06-BT-6421 (૪) તા.૧૭/૧૨/૨૦૨૧ ના રોજ ટેન્કર નંબર MH-04-HY-6377 (૫) તારીખ ૦૧/૦૧/૨૦૨૨ ના રોજ ટેન્કર નંબર GJ-06-

BT-6421 માં બાય પ્રોડેક્ટ સોડીયમ હાઇડ્રો સલ્ફાઇડ કેમિકલ મંગાવેલ હતુ.
જે પૈકિ સંગમ એનવાયરો પ્રા.લી. ભરૂચ નાઓએ મુંબઇ તલોજા હાઇકલ કંપનીમાંથી તારીખ ૨૨/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-06-BT-6431 તથા તારીખ ૨૩/૧૧/૨૦૨૧ ના રોજ GJ-06-BT-6421 માં સોડીયમ હાઇડ્રો સલ્ફાઇડ કેમિકલ મંગાવી શ્રી પેટ્રોકેમીકલ્સ ડેકટરી માળીયા હાલવદ રોડ સર્વે નંબર ૧૨૬૧ પૈકીની પેટ્રોકેમિકલ રાજકોટ ખાતે મોકલેલ હોવાનુ બીલ મળી આવેલ જે આધારે રાજકોટ ખાતે આવેલ શ્રી પેટ્રોકેમીકલ્સ કંપનીના માલિક કેવલભાઇ વિનોદભાઇ વનમોરા રહેવાસી.ઘર નંબર ૩૦૨ માર્ગદર્શન એપાર્ટ. સરદાર પટેલ સોસાયટી વિભાગ-૨ નવાપર રોડ મોરબી નાઓને પુછપરછ કરતા કેકટરીમાં રેજીંગનુ ઉત્પાદન થાય છે. ડ્રાયબરની વસ્તુ બનાવવામાં આવે છે. ઉપરોક્ત કેમિકલ તેઓએ મંગાવેલ ન હોવાની ઠરિકત જણાઇ આવેલ.
આ કામે સંગમ એનવાયરો પ્રા.લી. ના ભાગીદારો (૧) આશિષકુમાર s/o દુધનાથ ગુપ્તા (૨) મૈત્રેય સન્મુખભાઇ વૈરાગી (૩) નિલેશ પીતાંબર બહેરા નાઓની વધુ પૂછપરછ કરતા તેઓએ મુંબઇ તલોજા હાઇકલ કંપનીમાંથી તારીખ ૨૨/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-06-BT-6431 (૩) તારીખ ૨૩/૧૧/૨૦૨૧ ના રોજ ટેન્કર નંબર GJ-06-BT-6421 નુ સોડીયમ હાઇડ્રો સલ્ફાઇડ કેમિકલ મંગાવેલ તે શ્રી પેટ્રોકેમિકલ કંપની રાજકોટનુ ખોટુ બીલ બનાવી ગોવિંદભાઇ કાનાભાઇ શિયાળ ઉ.વ.૪૨ રહેવાસી.જેરી નંબર ૫, ભગીરથ સોસાયટી. માર્કેટીંગ યાર્ડ. ગ્રીનલેન્ડ ચોકડી રાજકોટનાઓને મોકલતા ગોવિંદભાઇ શિયાળે રાજકોટ મેંગો માર્કેટની બાજુમાં આવેલ પોતાના શિવ સર્વીસ સ્ટેશનમાં ટેન્કરો રાખી ટેન્કરોમાં ભરેલ કેમિકલ તેઓએ ગેરકાયદેસર રીતે ખાલી કરેલ છે. આ ગેરકાયદેસર કેમિકલ ખાલી કરાવવા માટે ગોવિંદભાઇ શિયાળને સંગમ એનવાયરો પ્રા.લી. ભરૂચ તરફથી રૂપિયા ૯૨,૦૦૦/- તેના પંજાબ નેશનલ બેંક જુબેલી ચોક રાજકોટ બ્રાંચના એકાઉન્ટ નંબર 0100000100022578 માં જમા કરેલ છે.
આ કામે સંગમ એનવાયરો પ્રા.લી. ના ભાગીદારો (૧) આશિષકુમાર s/o દુધનાથ ગુપ્તા (૨) મૈત્રેય સન્મુખભાઇ વૈરાગી (૩) નિલેશ પીતાંબર બહેરા નાઓએ મુંબઇ હાઇકલ કંપનીમાંથી ટેન્કર નંબર GJ-06-BT-6431 તથા ટેન્કર નંબર GJ-06-BT-6421 માં ભરેલ સોડીયમ હાઇડ્રો સલ્ફાઇડ કેમિકલ રાજકોટ ખાતેના તેમના મળતિયા ગોવિંદભાઇ કાનાભાઇ શિયાળ મારફતે ગેરકાયદેસર રીતે કરેલ હોય જેથી સદરહુ બાબતે કાયદેસરની કાર્યવાહી થવા વીનંતી છે. જે બાબતેનો પત્ર અમોને મળેલ હતો. જે પત્ર આધારે અમોએ અમારી કચેરીના પત્ર નંબર ગુપ્તનિઓઈ/પ્રા.કે.રાજકોટ/ટી-૨૮૯/૬૯૦૭/૨૦૨૨ તા. ૦૫/૨/૨૨ ના રોજ પોલીસ કમિશ્નર શ્રી, રાજકોટ શહેર ને પત્ર પાઠવી જણાવેલ હોય કે સુરત શહેર પોલીસ કમિશ્નર શ્રી દ્વારા અમોને જે પત્ર પાઠવેલ હોય જેની નકલ આપને પણ પાઠવેલ હોય જે પત્ર આધારે મજકુર ગોવીંદભાઇ કાનાભાઇ શીયાળ ઉવ. ૪૨ રહે. ભગીરથ સોસાયટી શેરી નંબર ૫, માર્કેટીંગ યાર્ડ. ગ્રીનલેંન્ડ ચોકડી રાજકોટ વાળા વીરૂધ્ધ કાયદેસરની કાર્યવાહી કરવાની થતી હોય જેમા અમારી મદદની જરૂરીયાત હોય તો અમોને જાણ કરશો અને અમો તપાસમા સામેલ થઇશુ. તેમ પત્ર પાઠવેલ હતો
બાદ આજરોજ તમો રાજકોટ શહેર પોલીસ દ્વારા અમોને સદરહુ બનાવ બાબતે જાણ કરવામા આવતા અમો રાજકોટ શહેર બી ડીવીજન પોલીસ સ્ટેશન ખાતે આવીને બી ડીવીજન પોલીસ સ્ટેશના કર્મચારીઓને સાથે રાખીને મજકુર ગોવીંદભાઇ ઉર્ફે જગાભાઇ કાનાભાઇ શીયાળ નાઓ દ્વારા તેઓનુ રાજકોટ ગ્રીનલેન્ડ ચોકડી મહેશ્વરી સોસાયટીમા આવેલ શીવ સર્વીસ સ્ટેશન ખાતે સોડીયમ હાઇડ્રોસલ્ફાઇડ નામનુ કેરી કેમિકલ ભરેલ ટેન્કર ખાલી કરેલ હોય, જે જગ્યા ખાતે જઇ તપાસ કરતા રાજકોટ મેંગો માર્કેટની બાજુમા આવેલ મહેશ્વરી સોસાયટી ખાતે શીવ સર્વીસ સ્ટેશન આવેલ હોય જે સર્વીસ સ્ટેશન બાજુમા ખાસ પ્રકારની પાઇપ લાઇન નાખેલ છે. જે આગળ જતા ભુર્ગભ ગટર સાથે જોડાયેલ છે. સદર ભુર્ગભ ગટર આગળ જતા મેલડી માતાજીના મંદીર પાસે બેઠા પુલ પાસે કુદરતી નાળા પાસે ખુલ્લે છે જેમાંથી કેમીકલની વાસ આવતી હોવાનુ જણાયેલ છે.
આમ આ કામે (૧) આશિષકુમાર s/o દુધનાથ ગુપ્તા (૨) મૈત્રેય સન્મુખભાઇ વૈરાગી (૩) નિલેશ પીતાંબર બહેરા (૪) ગોવિંદભાઇ કાનાભાઇ શિયાળ ઉ.વ.૪૨ રહેવાસી. ભગીરથ સોસાયટી શેરી નંબર ૫, માર્કેટીંગ યાર્ડ. ગ્રીનલેન્ડ ચોકડી રાજકોટ (૪) ટેન્કર નંબર GJ-06-BT-6431 નો ચાલક (૫) ટેન્કર નંબર GJ-06-BT-6421 નો ચાલક એમ તમામ આરોપીઓએ પુર્વેઆયોજીત ગુનાહીત કાવતરૂ રચી તેઓનો સમાન ઇરાદો પાર પાડવા પોતાના આર્થીક ફાયદા સારૂ ટેન્કર નંબર GJ-06-BT-6431 તથા ટેન્કર નંબર GJ-06-BT-6421 મા કેમીકલ ભરી આ કેમીકલ જનીકારક અને જોખમકારક હોય જેનાથી માનવ જીંદગી જોખમમા મુકાય તેવુ જાણતા હોવા છતા રાજકોટ ગ્રીનલેન્ડ ચોકડી નજીક મેંગો માર્કેટ ની સામે શીવ સર્વીસ સ્ટેશન ખાતે આવેલ પાણી નીકાલની ભુર્ગભ ગટરમા ગેરકાયદેસર રીતે "સોડીયમ હાઇડ્રોસલ્ફાઇડ કેમિકલ" ઠાલવી નીકાલ કરી ગુનો કરેલ હોય મારી ઉપરોકત આરોપીઓ તથા તપાસમા નીકળે તેઓ તમામ વીરૂધ્ધમા આઇ.પી.સી.કલમ ૨૮૪, ૧૨૦(બી), ૩૪ તથા Environment Protection Act ની કલમ ૧૫ મુજબ કાયદેસર થવા ફરીયાદ છે. મારા સાહેદો ફરીયાદમા જણાવેલ તથા તપાસમા નીકળી આવે તેઓ વીગેરે છે.
એટલી મારી ફરિયાદ હકીકત મારા લખાવ્યા મુજબની બરાબર અને ખરી હોય જે વાંચી સંભળાવતા આ નીચે મે મારી સહી કરી આપેલ છે.

અંગ્રેજીમા

સહી.
રૂબરૂ
સહી.અંગ્રેજીમાં
(એમ.બી.ઓસુરા)

પોલીસ

બી

રાજકોટ શહેર

ડિવીઝન

3ALC-3

13 **Action Taken : Since the above information reveals commission of offence(s) u/s as mentioned at Item No. 2:**
(લીધેલ પગલાં : ઉપરના અહેવાલની ઉપરની આઇટમ નં.(2) માં જણાવ્યા પ્રમાણેનો ગુન્હો બન્યાનું જણાઇ આવતા)

(1) **Registered the case and took up the investigation or**(કેસની નોંધણી કરી તપાસ હાથ ધરી છે)

(2) **Directed (Name of I.O.) take up the Investigation or**(તપાસ કરનાર અધિકારીનું નામ):- મનોજભાઇ બાબાભાઇ બૌસુરા

Rank(હોદો):- પોલીસ ઇન્સ્પેક્ટર

No.:- mba200584 to take up the Investigation or(નંબર)

F.I.R. read over to the complainant/informant, admitted to be correctly recorded and a copy given to the complainant/informant, free of cost.
(પ્રથમ માહિતી અહેવાલ ફરિયાદી / બાતમીદારને વાંચી સંભળાવેલ છે અને ફરિયાદીએ લખાવ્યા પ્રમાણેજ નોંધવામા આવેલ છે. તેવુ ફરિયાદી / બાતમીદારે સ્વીકારેલ છે અને ફરીયાદી / બાતમીદારને તેની નકલ વિના મુલ્યે આપવામાં આવી છે.)

R.O.A.C.
(વાંચી સંભળાવવામાં આવ્યું અને તે બરાબર છે.)

Signature of Officer in charge, Police Station
(પોલીસ મથકનો હવાલો ધરાવતા અધિકારીની સહી.)

14 **Signature/Thumb Impression of the complainant/informant.**
(ફરિયાદી/બાતમીદારની સહી/અંગૂઠાની છાપ)

Name (નામ) દક્ષાબેન ગીરીશભાઇ દાફડા

Rank (હોદો) આસીસ્ટન્ટ સબ ઇન્સપેક્ટર **GPF No** (જીપીએફ નંબર) POL-132546

15 **Date and time of dispatch to the court.** 10/03/2022 20:15
(ફરિયાદ કોર્ટમાં રવાના કર્યાની તારીખ અને સમય)

Annexure-7

30-10-2021	INF/INFT/025353080311/HDFC0000255/Leonitamishra/		45,000.00	0.00			[illegible] Cr
30-10-2021	INF/INFT/025354830371/paymentagainst/RaipurOrissa		1,13,000.00	0.00			1,57,573.09 Cr
01-11-2021	MMT/IMPS/130416983188/Advancepayment/VaiyamChef		62,500.00	0.00			95,073.09 Cr
01-11-2021	CLG/BISHOP VENTURE LLP	831	39,282.00	0.00			55,791.09 Cr
02-11-2021	RTGS-HDFCR52021110275033591-NIPPONINDIA SHORT T-D		0.00	4,04,000.00			4,59,791.09 Cr
05-11-2021	INF/INFT/025411920931/Reimbursement/Mahesh		90,000.00	0.00			3,69,791.09 Cr
09-11-2021	NEFT-CITIN21369372607-CHEMIE ORGANIC CHEMICALS		0.00	6,02,050.50			10,71,841.59 Cr
10-11-2021	MMT/IMPS/131414403113/advancepayments/SwetaTrans/		50,000.00	0.00			10,21,841.59 Cr
10-11-2021	INF/INFT/025445311983/UTIB0003183/paymentagainst/		76,026.00	0.00			9,45,815.59 Cr
10-11-2021	INF/INFT/025445433871/HDFC0000255/againstOctober2/		10,974.00	0.00			9,34,841.59 Cr
10-11-2021	MMT/IMPS/131418[illegible]		3,333.00	0.00			9,31,508.59 Cr
10-11-2021	INF/INFT/025445566083/Officeno424Ghas/VikrantShip		10,000.00	0.00			9,21,508.59 Cr
10-11-2021	MMT/IMPS/131418[illegible]/salaryforOctober/Ashish		1,00,000.00	0.00			8,21,508.59 Cr
10-11-2021	MMT/IMPS/131418270958/salaryforOctober/Malay		1,00,000.00	0.00			7,21,508.59 Cr
10-11-2021	MMT/IMPS/131418277659/salaryforOctober/Nilesh		1,00,000.00	0.00			6,21,508.59 Cr
11-11-2021	INF/INFT/025450437871/advanceagainst/RaipurOrissa		85,000.00	0.00			5,46,508.59 Cr
15-11-2021	MMT/IMPS/131712727878/advancepayment/VaiyamChef		62,500.00	0.00			4,94,008.59 Cr
15-11-2021	INF/INFT/025487544711/advancepayments/MaaTradingCo		50,000.00	0.00			4,44,008.59 Cr
15-11-2021	NEFT-CITIN21271750734-CHEMIE ORGANIC CHEMICALS		0.00	2,53,668.40			6,97,876.99 Cr
16-11-2021	INF/INFT/025491143891/advancepayments/RaipurOrissa		40,000.00	0.00			6,57,876.99 Cr
16-11-2021	MMT/IMPS/132019357715/advancepayments/YogeshTrans/		60,000.00	0.00			5,97,876.99 Cr
18-11-2021	MMT/IMPS/132217090636/IB SANGAM ENGAYATRIFLX		0.00	20,000.00			6,17,876.99 Cr
[illegible]-2021	INF/INFT/025517301471/advancepayments/RaipurOrissa		40,000.00	0.00			5,77,876.99 Cr
[illegible]-2021	CIB/D0067096040L/GST /21112400130069		1,69,847.00	0.00			7,08,134.99 Cr
22-11-2021	NEFT-CITIN21374775022-CHEMIE ORGANIC CHEMICALS		0.00	2,54,996.32			5,63,131.31 Cr
22-11-2021	INF/INFT/025553102881/AAH8000678/paymentagainst/		4,887.00	0.00			5,58,529.31 Cr
22-11-2021	INF/INFT/025553162001/HDFC0000255/paymentagainst/		3,094.00	0.00			5,54,635.31 Cr
[illegible]-11-2021	RTGS-BARBR52021112300764990-K PATEL CHEMO PHARMA		0.00	1,64,888.00			9,30,523.31 Cr
23-11-2021	INF/INFT/025541937001/BARBODASHRA/remainingpayment/		2,03,053.00	0.00			7,36,470.31 Cr
[illegible]-11-2021	INF/INFT/025542026241/BARBODASHRA/remainingpayment/		20,000.00	0.00			7,16,470.31 Cr
[illegible]-11-2021	MMT/IMPS/132915551978/Remainingpayment/YogeshTrans/		60,800.00	0.00			6,55,670.31 Cr
26-11-2021	ATM/S1CWA765/CASH WDL/26-11-21		20,000.00	0.00			4,35,670.31 Cr
26-11-2021	RTGS-HSBCR22021112814476837-TRUSTIN TAPE PRIVATE L		0.00	5,90,856.00			11,26,526.31 Cr
29-11-2021	MMT/IMPS/133312328096/paymentsShivse/Govindbhai/P		92,000.00	0.00			11,34,526.31 Cr
29-11-2021	CASH PAID/SELF 0178 BHARUCH	532	1,00,000.00	0.00			10,34,526.31 Cr
30-11-2021	RTGS-CITIR52021113000704615-CHEMIE ORGANIC CHEMICA		0.00	5,46,128.00			15,80,654.31 Cr
30-11-2021	INF/INFT/025595819701/Remainingpayment/RaipurOrissa		68,000.00	0.00			15,12,654.31 Cr
01-12-2021	INF/INFT/025606747401/paymentagainst/KarishnEnter		9,050.00	0.00			15,03,604.31 Cr
01-12-2021	ATM/S1CNE408/CASH WDL/01-12-21		20,000.00	0.00			14,83,604.31 Cr
01-12-2021	INF/INFT/025608470211/paymentagainst/AshwinCA		25,000.00	0.00			14,58,604.31 Cr
01-12-2021	MMT/IMPS/133517695795/paymentagainst/Vasundhara/H		1,534.00	0.00			14,57,070.31 Cr
01-12-2021	MMT/IMPS/133517710898/paymentagainst/VirolRoad/		1,69,600.00	0.00			12,87,270.31 Cr
01-12-2021	INF/INFT/025609[illegible]/BARBRANOLI/paymentagainst/		91,284.00	0.00			11,95,986.31 Cr
01-12-2021	INF/INFT/025617073321/advancepayment/RaipurOrissa		40,000.00	0.00			11,55,986.31 Cr
02-12-2021	RTGS-HDFCR52021120381318454-TAGROSCHEMICALSINDIAPV		0.00	9,87,067.00			11,43,053.31 Cr
03-12-2021	INF/INFT/025625497081/HDFC0000255/salaryforNov2021/		5,666.00	0.00			11,32,387.31 Cr
[illegible]-12-2021	INF/INFT/025625527701/Rent/[illegible]		10,000.00	0.00			11,27,387.31 Cr
03-12-2021	INF/INFT/025625575151/HDFC0000255/SalaryforNov202/		1,00,000.00	0.00			20,27,387.31 Cr
03-12-2021	INF/INFT/025625579751/BARB0RANOLI/SalaryforNov202/		1,00,000.00	0.00			19,27,387.31 Cr
[illegible]-12-2021	INF/INFT/025625600221/HDFC0000255/SalaryforNov202/		1,00,000.00	0.00			18,27,387.31 Cr
[illegible]-12-2021	INF/INFT/0256[illegible]/paymentagainst/ShivShakti		5,07,320.00	0.00			13,25,067.31 Cr
[illegible]-12-2021	RTGS-BARBH52021120600857247-DEVANSH DYESTUFF-0895		0.00	4,42,191.00			17,67,258.31 Cr
[illegible]-12-2021	INF/INFT/0256[illegible]/advancepayment/		65,000.00	0.00			16,87,258.31 Cr
08-12-2021	NEFT/CITIN71305388270/[illegible] LTD [illegible]		0.00	[illegible]			40,20,657.31 Cr
08-12-2021	INF/INFT/0256[illegible]/advancepayment		56,000.00	0.00			39,64,657.31 Cr
08-12-2021	INF/INFT/0256[illegible]/RaipurOrissa		1,62,000.00	0.00			38,02,657.31 Cr
08-12-2021	INF/INFT/025676301611/Remainingpayment/		45,000.00	0.00			37,57,657.31 Cr
08-12-2021	INF/INFT/0256[illegible]/MaaTradingCo		72,125.00	0.00			36,85,532.31 Cr
09-12-2021	INF/INFT/025680873611/remainingpayment/		10,00,000.00	0.00			26,85,532.31 Cr
09-12-2021	BIL/ONL/000276292776/Prudential [illegible]		1,85,000.00	0.00			24,98,532.31 Cr
09-12-2021	INF/INFT/025681187401/UTIB0000581/paymentagainst/		60,000.00	0.00			24,38,532.31 Cr
09-12-2021	INF/INFT/025691573531/[illegible]		45,000.00	0.00			23,90,732.31 Cr
10-12-2021	INF/INFT/025692273201/UTIB0000[illegible]/paymentagainst/		1,98,000.00	0.00			21,92,732.31 Cr
10-12-2021	INF/INFT/0256957[illegible]		2,46,700.00	0.00			19,47,032.31 Cr
10-12-2021	INF/INFT/025695797711/AXAR[illegible]		0.00	6,21,249.00			25,68,281.31 Cr
10-12-2021	INF/INFT/0256[illegible]						
10-12-2021	RTGS-HDFCR52021121092975141-TAGROSCHEMICALSINDIAPV						

ICICI BANK LTD. SURAT

Annexure-8

ક્રમાંક : [illegible]

તા. ૧૮ /૦૧ /૨૦૨૨

પરીક્ષણનું પરિણામ : (૧) નમુના માર્ક એ-૧, એ-૨, એ-૩, એ-૪, એ-૫, એ-૬, બી-૧, બી-૨, બી-૩, બી-૪, બી-૫, બી-૬, સી-૧, સી-૨, સી-૩, સી-૪, સી-૫, સી-૬, ડી-૧, ડી-૨, ડી-૩, ડી-૪, ડી-૫, ડી-૬, ઈ-૧, ઈ-૨, ઈ-૩, ઈ-૪, ઈ-૫, ઈ-૬, એફ-૧, એફ-૨, એફ-૩, એફ-૪, એફ-૫ અને એફ-૬ માં S^{-2} (સલ્ફાઈડ) આયનની હાજરી શોધાયેલ છે.

(૨) નમુના માર્ક ક-૧,ક-૨,ખ-૧,ખ-૨,ગ-૧,ગ-૨,ઘ-૧,ઘ-૨,ચ-૧,ચ-૨,છ-૧,છ-૨,જ-૧,જ-૨,ઝ-૧,ઝ-૨,ટ-૧,ટ-૨,ઠ-૧,ઠ-૨,ડ-૧,ડ-૨,ઢ-૧,ઢ-૨,ણ-૧,ણ-૨,ત-૧,ત-૨,થ-૧,થ-૨,દ-૧,દ-૨,ધ-૧,ધ-૨,ન-૧,ન-૨,પ-૧,પ-૨,ફ-૧,ફ-૨,બ-૧,બ-૨,ભ-૧,ભ-૨,મ-૧,મ-૨, એ-૭, બી-૭, સી-૭, ડી-૭, ઈ-૭ અને એફ-૭ મા રાસાયણીક ઝેરની હાજરી શોધાયેલ નથી.

(૩) નમુના માર્ક એ-૭, બી-૭, સી-૭, ડી-૭, ઈ-૭ અને એફ-૭ (પ્રિઝર્વેટીવ) - સોડીયમ ક્લોરાઈડનું દ્રાવણ હોવાનું શોધાયેલ છે.

(એન.સી. મુલિયા)
(પરીક્ષણ અધિકારી)
Scientific Officer,
Ex. Asstt. Chemical **Examiner**
To Govt. Of Gujarat
Regional Forensic Science **Laboratory,**
SURAT.

નોંધ – પરીક્ષણનું પરિણામ પરીક્ષણ કરેલા નમુનાને સંબંધીત છે.

Annexure-9

20916

PM NO. CMO. 471 2022
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT-395001
DATE 31 01 -2022

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT.

TO,
PSI
DCB, Surat POLICE STATION Surat city

Sub :- Final Opinion as the cause of death........
Ref :- (1) P.M.No 471 2022 .... Date 06/01/2022
(2) Histopathology Report No 24/2022 ... Date Received on 29/01/2022
(3) Chemical Analysis Report No [illegible] Date 19/01/2022
(4) [illegible] : 3042/22 Date : received on 29/01/2022 from PI DCB Surat city

With reference to the, the Final Opinion to the the cause of the death of Kiranben Urfe Kaliben w/o Sultan Nandabhai Gamad is
(Name of the Deceased)

"Gaseous Compound posioning Containing "Sulphide ion" and its complications sustained on the body in a case of sickle cell disease. Findings are consistant with history."

Signature............

(Dr. Akshay Chaudhari)
Senior Resident (F.M.)

DEPT. OF FORENSIC MEDICINE & TOXICOLOGY
GOVT. MEDICAL COLLEGE AND
NEW CIVIL HOSPITAL, SURAT-395 001

Name Dr. Ghiya........
(IN CAPITAL LETTERS)
Designation Medical Officer NEW CIVIL HOSPITAL
G. M. S. Cl-II
New Civil Hospital
SURAT.

PM NO. CMO. 46/2022
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT-395001
DATE. 06/01/2022.
11 - 31.

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT.

TO,
PSI
Sarthana DIV. POLICE STATION
DCB. PS. Surat.

Sub :- Final Opinion as the cause of death.....
Ref :- (1) P.M.No. 46/2022 Date 06-01-2022
(2) Histopathology Report No. 23/22 Date 7-01-22.
(3) Chemical Analysis Report No. [illegible]/EE Date [illegible]/T/50 Dt 19/01/2022
(4) DCB Surat Letter - DCB Surat City - Dt. 29/01/2022

With reference to the, the Final Opinion to the the cause of the death of Sultan Nandabhai Gamad M-25 Yrs.
(Name of the Deceased)

Poisoning
Gaseous Compound Containing Sulphide Ion and it's Complications Sustained on body findings are Consistant with history. —x—

Signature..... 31/01/2022.

Name Dr M.C. Chauhan
(IN CAPITAL LETTERS)

Designation Medical Officer G.M.S.C.N.E.W CIVIL HOSPITAL SURAT.

(Dr Paresh Chandegra)
M.D.

Assistant Professor
Dept. of Forensic Medicine
Govt. Medical College.
SURAT-395001.

G. M. S. C. N.
New Civil Hospital
SURAT.

1991C

PM NO. CMO. 49/22
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT-395001
DATE 31-01-22

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT.

TO,
PSI
DCB., Surat City POLICE STATION

Sub :- Final Opinion as the cause of death.........
Ref :- (1) P.M.No. 49/22 Date 06-01-22
(2) Histopathology Report No. 25/22 Date Recd on 29-1-..
(3) Chemical Analysis Report No. 2361 Date ... 2073 ... 50
(4) Hals No-293/22, 29-1-22 18-01-22

With reference to the, the Final Opinion to the the cause of the death of Suresh Pappubha Vankla is
(Name of the Deceased)

Gaseous compound poisoning containing Sulphide Ion and complications sustained on the body - findings are consistent with History — x —

— x — x —

Signature.......

Name ... A. Barma
(IN CAPITAL LETTERS)
Designation : CMO NEW CIVIL HOSPITAL

Medical Officer
G. M. S. Cl.-II
New Civil Hospital,
SURAT.

D. C. Tailor
MD
ASSOCIATE PROFESSOR
FORENSIC MEDICINE DEPT.,
GOVT. MEDICAL COLLEGE,
NEW CIVIL HOSPITAL, SURAT

229/C

PM NO. CMO. 48/2022
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT-395001
DATE. 31/01/2022

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT

TO,
PSI
DCB POLICE STATION, Surat city.

Sub :- Final Opinion as the cause of death.

Ref :- (1) P.M.No. 48/2022 Date 06/01/2022

(2) Histopathology Report No. 26/22 Date 29/01/2022 (Received)

(3) Chemical Analysis Report No. [illegible]/2022/21/50 – dated 19/01/2022 Date

(4). જાવક નં - 342/22 - Received on date 29/01/22 from DCB Police station

With reference to the, the Final Opinion to the the cause of the death of Ambalall Pradipbhai Bajpai 35 yrs/M

(Name of the Deceased)

died due to Gaseous Compound poisoning containing Sulphide FBA and its complications sustained on the body - findings are consistent with history.

Signature ...... Dr B. H. Chavda 31/01/22

Name ...... Medical Officer C.M.S. Cl-II New Civil Hospital, Surat

(IN CAPITAL LETTERS)

Designation :-CMO, NEW CIVIL HOSPITAL SURAT.

Dr milind Patel 31/01/22
TUTOR
DEPT. OF FORENSIC MEDICINE & TOXICOLOGY
GOVT. MEDICAL COLLEGE AND
NEW CIVIL HOSPITAL, SURAT-395001

231/c

PM NO. CMO. / 45/2022
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT 395001
DATE. 31 01 2022

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT

TO,
PSI
Crime Branch POLICE STATION
Surat city

Sub :- Final Opinion as the cause of death........

Ref :- (1) P.M.No. 45/2022 Date 06/01/2022
(2) Histopathology Report No. 27/22 Date..............
(3) Chemical Analysis Report No.............. Date..............
2841H/SS/2022/A/SU date:- 19/01/2022
(4) Crime branch Surat city letter dated:- 23/01/2022

With reference to the, the Final Opinion to the the cause of the death of Vimal Shyamnandan Paswan (Name of the Deceased) is

Gaseous compound Poisoning containing Sulphide ion and its complications sustained on h/o. Findings are consistent with history

Dr. M. C. Chauhan

Medical Officer
G. M. S. Cl-II
New Civil Hospital,
SURAT.

Signature..........................

Name Dr. Paresh V. Chandegara
(IN CAPITAL LETTERS)

Designation :-CMO, NEW CIVIL HOSPITAL
SURAT

Assistant Professor
Dept. of Forensic Medicine
Govt. Medical College
SURAT-395001

2691c

PM NO. CMO. 50/'22
DEPARTMENT OF CASUALTY
NEW CIVIL HOSPITAL
SURAT-395001
DATE. 31-01-2022

FROM,
CMO
NEW CIVIL HOSPITAL
SURAT.

TO,
PSI
D.C.B, Surat POLICE STATION, Surat city.

Sub :- Final Opinion as the cause of death.......
Ref :- (1) P.M.No. 50/'22 Date 06/01/'22
(2) Histopathology Report No. 28/22 Date Received on 29/01/22
(3) Chemical Analysis Report No. 25 HH/454/2022/21150, Dt.-19/01/'22 Date
(4) omission/3443/'22, Received on Date:- 29/01/'22, from PI, DCB, Surat city.

With reference to the, the Final Opinion to the the cause of the death of Vimalchand Fulchand Kosi. is
(Name of the Deceased)

"Gaseous compound poisoning containing "Sulphide ion" and its complications, sustained on the body. Findings are consistent with history. ——→

——— x ——— x

(Dr P.M. Modi)
(M.D)
Assistant Professor
Dept. of Forensic Medicine
Govt. Medical College,
SURAT-395001.

Signature........
Name Dr Barman
(IN CAPITAL LETTERS)
Designation Medical Officer NEW CIVIL HOSPITAL
G. M. S. Cl-II
New Civil Hospital,
SURAT.

➢ **Report about the incidence of illegal disposal of Sodium HydroSulphide (NaHS) at Sachin GIDC, Surat, Gujarat state**

Enquiry was made with the representatives of the Industry about above stated incidence and technical aspects involved therein. The response is as below:

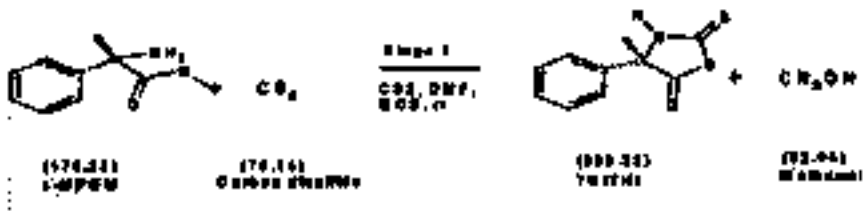
1. It was reported that during the manufacturing of the consented product Fenamidone, (100 MT/A) which is manufactured in multipurpose plant by product NaHS is generated from scrubbing operations.

Brief Manufacturing process of Fenamidone:

There are 3 stages involved in the manufacturing of this product viz

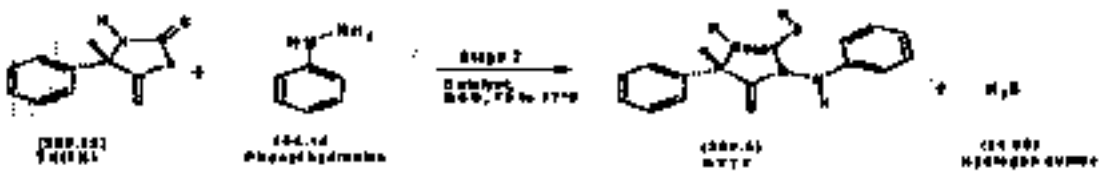
a) **Preparation of Thiazolidinonethione.**

In this reaction the methyl (S)-2-methyl-2-phyenylglycinate (S-MPG*M*) in Mono-chlorobenzene (MCB) is reacted with Carbon-di- sulphide (CS2) (reagent and solvent). Reaction is as follows:



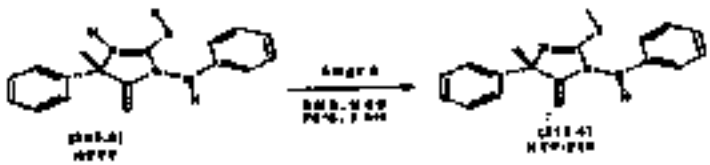
b) **Preparation of Hydrazinothiodydantoine**

Thiazolidinonethione (THITH) is further reacted with Phenylhydrazine in presence of catalyst i.e. Tributylamine, acetic acid and Sulfur. H2S is liberated in this reaction. Gaseous H2S is further scrubbed in two stages generating by product Sodium Hydro Sulphide (NaHS) as a result. This by-product was being transported to Gujarat State by M/s. Sangam Enviro Pvt. Ltd., Village Deshrath, Dist. Vadodra, Gujarat State.



c) Fenamidone Preparation:

Hydrazinothiodydantoine HYTY further methylated with Dimethyl sulfate in Mono-chlorobenzene (MCB). The reaction mixture is neutralised with aqueous Sodium Hydroxide, washed with water, and concentrated to crystallise Fenamidone. The solid is separated by filtration, washed with MCB, and dried under vacuum. The reaction is as below.



2. Industry representative has informed that they are manufacturing Fenamidone from year 2008 on campaign basis. The details as provided by the industry for last 3 years is as below.

from 2019 to Jan 2021			
Year	Fenamidone Production Qty, (MT)	By Product (NaHS) Production Qty, (MT)	Name of by product Customer / Industry
FY 19-20	98.75	157.8	M/s. Apollo Chemicals, Dahisar, Mumbai. This firm is in the trading business and supplying material to M/s. Reina Industries, GIDC Estate, Ankleshwar. This industry is engaged in manufacturing of Sodium sulphide-150 TPM on 100% basis. GPCB has granted consent on 25.09.2019 which was valid up to 16.07.2024.
FY 20-21	0	0	0
FY 21-22	158.2	19.66	M/s. Eureka Chemicals, MIDC Taloja, Raigad. This industry is engaged in manufacturing of Sodium sulphide (Liquid) - 990 MT/M. MPCB has granted consent on 15.03.2019 which was valid up to 31.01.2024.
		141.55	M/s. Sangam Enviro Pvt. Ltd., Village Desharath, Vadodra, Gujarat

MAHARASHTRA POLLUTION CONTROL BOARD

Tel: 24010706/24010437
Fax: 24023516
Website: http://mpcb.gov.in
Email: cac-cell@mpcb.gov.in

Kalpataru Point, 2nd and 4th floor, Opp. Cine Planet Cinema, Near Sion Circle, Sion (E), Mumbai-400022

RED/L.S.I (R22)
No:- Format1.0/CAC/UAN No.MPCB-CONSENT-0000113461/CR - 2111000349

Date: 10/11/2021

To,
M/s Hikal Ltd.,
Plot No. T-21, M.I.D.C. Taloja,
Tal. Panvel, Dist. Raigad - 410 208.

Your Service is Our Duty

Sub: **Grant of renewal of Consent to Operate.**

Ref:
1. Previous Consent to Operate accorded vide No. Format 1.0/ CAC/ UAN No. 0000100993/ CO-2103000439 dtd. 08.03.2021.
2. Minutes of Consent Appraisal Committee meeting held on 03, 17 & 20.08.2021.

Your application No.MPCB-CONSENT-0000113461 Dated 30.04.2021

For: grant of Consent to Operate under Section 26 of the Water (Prevention & Control of Pollution) Act, 1974 & under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981, Authorization under Rule 6 of the Hazardous & Other Wastes (Management & Transboundary Movement) Rules 2016, and Authorization under Bio-Medical Waste (Management & Handling) Rules, 2018 is considered and the consent is hereby granted subject to the following terms and conditions and as detailed in the schedule I, II, III & IV annexed to this order:

1. **The consent to renewal is granted for a period up to 31/07/2024**
2. **The capital investment of the project is Rs.378.49 Crs. (As per C.A Certificate submitted by industry Existing C.I. Rs. 354.36 Crs + Increase in C.I. Rs. 24.13 Crs)**
3. **Consent is valid for the manufacture of:**

Sr No	Product	Maximum Quantity	UOM
Products			
1	Thiabendazole	490	MT/A
2	HTP-213 (Fenomidone)	100	MT/A
3	HTP-650 (B.A.S-650) (Ametoctradine)	750	MT/A
4	IKF-5411 (Isofetamid Technical) or MPDC DME	60	MT/A
5	MPDC-DME	400	MT/A
6	In House Pilot Plant for Agro/ Pharma Products and intermediates (Facility shall be used only for development of Consented products and new products on laboratory scale)	0	-

Sr No	Product	Maximum Quantity	UOM
By Products			
7	Recovered Ammonia	900	MT/A
8	Sodium Hydro Sulphide	150	MT/A
9	Aluminium Hydroxide/ Potassium Chloride	382	MT/A
10	Spent HCl (Approx. 30%)	1462	MT/A
11	Spent H2SO4 (98 %)	904	MT/A
12	Intermediates: Recovered Solvents (Mono Chloro Acetone/ Toluene/ Methanol/ IPA/ DMF/ Mono Chloro Benzene/ Benzene	500	MT/A

4. **Conditions under Water (P&CP), 1974 Act for discharge of effluent:**

Sr No	Description	Permitted (in CMD)	Standards to	Disposal Path
1.	Trade effluent	742	As per Schedule-I	Treated trade effluent shall be discharged to the CETP
2.	Domestic effluent	30	As per Schedule-I	Treated domestic effluent shall be discharged to the CETP

5. **Conditions under Air (P& CP) Act, 1981 for air emissions:**

Sr No.	Stack No.	Description of stack / source	Number of Stack	Standards to be achieved
1	S-1	D.G. Set (1,500 KVA)	1	As per Schedule -II
2	S-2 to S-7	Process Vents (6 Nos.)	6	As per Schedule -II
3	S-8 to S-10	Boilers (3 Nos.)	3	As per Schedule -II
4	S-11 to S-17	Process Vents (7 Nos.)	7	As per Schedule -II

6. **Non-Hazardous Wastes:**

Sr No	Type of Waste	Quantity	UoM	Treatment	Disposal
1	Boiler Ash	5400	MT/A	NA	Sale to Brick Manufacturers
2	Metal Scrap	50	MT/M	NA	Sale to Auth. Party/ Scrap Merchant
3	Wood	5	MT/M	NA	Sale to Auth. Party/ Scrap Merchant
4	Glass Bottles	20	No/D	NA	Sale to Auth. Party/ Scrap Merchant

7. **Conditions under Hazardous & Other Wastes (M & T M) Rules 2016 for treatment and disposal of hazardous waste:**

Sr No	Category No./ Type	Quantity	UoM	Treatment	Disposal
1	5.1 Used or spent oil	9	MT/A	Recycle	Sale to Auth. Party/ Recycler

Sr No	Category No./ Type	Quantity	UoM	Treatment	Disposal
2	29.1 Process wastes or residues	2112.65	MT/A	Preprocessing/ Incineration	Sale to MPCB or CPCB Auth. Preprocessor/ CHWTSDF
3	29.2 Sludge containing residual pesticides	30	MT/A	Preprocessing/ Incineration	Sale to MPCB or CPCB Auth. Preprocessor/ CHWTSDF
4	29.4 Spent solvents	3713	MT/A	Recycle/ Preprocessing/ Incineration	Sale to MPCB or CPCB Auth. Party/ Recycler/ Preprocessor/ CHWTSDF
5	33.1 Empty barrels /containers /liners	1800	Nos./Y	Recycle	Sale to Auth. Party/ Recycler/ CHWTSDF
6	35.3 Chemical sludge from waste water treatment	30	MT/A	Secured Landfill	CHWTSDF
7	36.2 Filter Medium	100	MT/A	Preprocessing/ Incineration	Sale to MPCB or CPCB Auth. Preprocessor/ CHWTSDF
8	37.2 Ash and flue gas cleaning residue	10	MT/A	Incineration/ Secured Landfill	CHWTSDF
9	37.3 Concentration or evaporation residues	9000	MT/A	Secured Landfill after treatment	CHWTSDF
10	Potassium Bromide	308	MT/A	Recycle	Sale to Auth. Party/ Recycler/ CHWTSDF
11	Spent Caustic	520	MT/A	Recycle	Sale to Auth. Party/ Recycler/ CHWTSDF

8. **Conditions under Batteries (Management & Handling) Rules, 2001:**

Sr No	Type of Waste	Quantity	UoM	Disposal Path
1	Used Batteries	30.00	Nos./Y	Sale to Auth. Recycler/ Reprocessor

Specific Conditions for used Batteries:

i. The applicant shall ensure that used batteries are not disposed of in any manner other than by depositing with the authorized dealer/ manufacturer/ registered recycler/ importer/ re-conditioner or at the designated collection center.

ii. The applicant shall file half-yearly return in Form VIII to the M.P.C. Board.

iii. Bulk consumers to their user units may auction used batteries to registered recyclers only.

9. **Conditions under Plastic Waste Management Rules, 2016 (Notification dtd. 18/03/2016):**

Sr No	Type of Waste	Quantity	UoM	Disposal Path
1	Plastic Waste	50.00	Kg/Day	Sale to Auth. Party/ Recycler
2	Plastic Bottles	5.00	Kg/Day	Sale to Auth. Party/ Recycler

10. **Treatment and Disposal of Biomedical Waste generated to CBMWTSDF:**

Sr.No	Category	Type of Waste	Quantity not to exceed (Kg/M)	Segregation Color coding	Treatment & Disposal
1	Yellow	a) Soiled Waste	5.00	Yellow colored non-chlorinated plastic bags or containers	CBMWTSDF/ CHWTSDF

11. The Board reserves the right to review, amend, suspend, revoke this consent and the same shall be binding on the industry.
12. This consent should not be construed as exemption from obtaining necessary NOC/ permission from any other Government authorities.
13. Industry, the by-product generator, should ensure that all the vehicles used to transport by-products to the vendor industry to be fitted with web based GPS system to record the origin to destination position and shall self monitor the compliance and submit monthly report to the Board.
14. Industry shall obtain affidavit from vendors stating that the by-product purchased from PP is used as raw material in their respective industries.
15. Industry shall improve operation & maintenance of ETP or upgrade existing ETP to achieve Consented standards.
16. Treated effluent shall be discharged into CETP for further treatment & disposal after confirming to the norms.
17. Bank Guarantee of Rs. 5 Lakh is forfeited for poor operation and maintenance of ETP and industry shall top up Bank Guarantee with double amount totaling Bank Guarantee of Rs. 30 Lakh towards operation & maintenance of pollution control systems and towards compliance of Consent conditions.

For and on behalf of the
Maharashtra Pollution Control Board.

(Ashok Shingare IAS),
Member Secretary

Received Consent fee of -

Sr.No	Amount(Rs.)	Transaction/DR.No.	Date	Transaction Type
1	2270940.00	TXN2105002364	01/06/2021	Online Payment
2	50000.00	TXN2106001265	15/06/2021	Online Payment

Consent fees of Rs. 7,56,980/- is adjusted out of the previous balance fees of Rs. 9,09,680/- of Consent to Operate No. Format 1.0/ CAC/ UAN No. 0000100993/ CO-2103000439 dtd. 08.03.2021. Balance fees of Rs. 1,52,700/- will be considered at the time of next renewal of Consent.

Copy to:

1. Regional Officer, MPCB, Navi Mumbai and Sub-Regional Officer, MPCB, Taloja
- They are directed to ensure the compliance of the consent conditions.
2. Chief Accounts Officer, MPCB,Sion, Mumbai
3. CC-CAC Desk- for record & website updating purpose.

SCHEDULE-I

Terms & conditions for compliance of Water Pollution Control:

1. A] As per your application, you have segregated trade effluent into weak stream & strong stream and provided Effluent Treatment Plant (ETP) comprising of:

i) Strong COD/TDS stream of 55 CMD - Treatment system comprising of Primary, Stripper, Multi effect evaporator (3 stage) with design capacity of 135 CMD followed by ATFD. The MEE condensate is treated in weak stream ETP.

ii) Weak COD/TDS stream of 687 CMD - Treatment system comprising of Primary (Collection tank, Neutralization tank, Equalization tank, Flash mixer, Primary Clarifier/Primary Settling Tank), Secondary (Activated sludge process), Tertiary (Pressure sand filter, Activated carbon filter, Ozonation) .

B] The Applicant shall operate the effluent treatment plant (ETP) to treat the trade effluent so as to achieve the following standards prescribed by the Board or under EP Act, 1986 and Rules made there under from time to time, whichever is stringent:

Sr.No	*Parameters*	*Limiting concentration not to exceed in mg/l, except for pH*
(1)	pH	6.5 to 8.5
(2)	Oil & Grease	10 mg/l
(3)	BOD (3 days 27°C)	100 mg/l
(4)	Total Suspended solids	100 mg/l
(5)	Mercury	0.01 mg/l
(6)	Arsenic	0.2 mg/l
(7)	Cyanide	0.2 mg/l
(8)	Phenolics (C6H5OH)	1.0 mg/l
(9)	Phosphate (as P)	5.0 mg/l
(10)	COD	250 mg/l.
(11)	Pesticides	Shall be Nil

C] The treated effluent shall be discharged to the CETP for further treatment & disposal after confirming above standards. In no case, effluent shall find its way for gardening / outside factory premises.

2. A] As per your consent application, you have provided STP of designed capacity 50 CMD based on MBBR technology for the treatment of 30 CMD of sewage.

B] The Applicant shall operate the sewage treatment system to treat the sewage so as to achieve the following standards.

Sr.No	*Parameters*	*Standards (mg/l)*	
1	BOD	Not to exceed	30 mg/l
2	Suspended Solids	Not to exceed	50 mg/l

C] The treated sewage shall be discharged to the CETP for further treatment & disposal after confirming above standards. In no case, effluent shall find its way for gardening / outside factory premises.

3. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification there of & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.
4. The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
5. The Applicant shall comply with the provisions of the Water (Prevention & Control of Pollution) Act, 1974 and as amended, by installing water meters and other provisions as contained in the said act:

Sr. No.	Purpose for water consumed	Water consumption quantity (CMD)
1.	Industrial Cooling, spraying in mine pits or boiler feed	304.00
2.	Domestic purpose	35.00
3.	Processing whereby water gets polluted & pollutants are easily biodegradable	793.00
4.	Processing whereby water gets polluted & pollutants are not easily biodegradable and are toxic	0.00
5.	Gardening	30

6. The Applicant shall provide Specific Water Pollution control system as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance/ CREP guidelines.

SCHEDULE-II

Terms & conditions for compliance of Air Pollution Control:

1. As per your application, you have provided the Air pollution control (APC) system and erected following stack (s) to observe the following fuel pattern:

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-1	Emergency D.G. Set (1500 KVA)	Acoustic Enclosure	6.00	HSD 10 MT/M	1	SO2	160 Kg/Day
S-2	Ventilation Blower Plant-1 (BLW-201)	Stack	27.00	-	-	-	-
S-3	Acid Scrubber (C-502)	Scrubber	25.00	-	-	Acid Mist	20 Mg/Nm^3
S-4	Vent Sorb Blower Plant-2 (BLW-501)	Stack	25.00	-	-	-	-
S-5	Ventilation Blower Plant-3 (BLW-605)	Stack	13.00	-	-	-	-

Stack No.	Source	APC System provided/proposed	Stack Height(in mtr)	Type of Fuel	Sulphur Content(in %)	Pollutant	Standard
S-6	Ventilation Blower MCA (BLW-101)	Stack	13.00	-	-	-	-
S-7	Emergency Chlorine Blower (BLW-870/1)	Stack	17.00	-	-	Cl2	5 Mg/Nm^3
S-8	Steam Boiler [B-920A/B (Standby)]	Stack	40.00	FO 943 MT/M	4.5	S02	2828 Kg/Day
S-9	Briquette Boiler (MR-1)	Dust Collector followed by Bag Filter		Briquette 1000 MT/M	0.06	S02	39 Kg/Day
S-10	Baby Boiler (MR-14812)	Stack	30.00	Natural Gas 5 MT/M	-	-	-
S-11	Ammonia Scrubber (C-1203)	Scrubber	20.00	-	-	NH3	30 Mg/Nm^3
S-12	Bag Filter Blower (BLW-601)	Fabric Bag Filter	22.00	-	-	PM	150 Mg/Nm^3
S-13	Bag Filter Blower (BLW-602)	Fabric Bag Filter	22.00	-	-	PM	150 Mg/Nm^3
S-14	Bag Filter Blower (BLW-603)	Fabric Bag Filter	22.00	-	-	PM	150 Mg/Nm^3
S-15	Process Flare Stack (Burning shall be smokeless)	Stack	30.00	Natural Gas 5 MT/M	-	-	-
S-16	Scrubber for HTP-213	Scrubber	30.00	-	-	H2S	5 Mg/Nm^3
S-17	General Common Scrubber HTP-213	Scrubber	30.00	-	-	VOC Emission (Acetone, Toulene, Xylene)	100 Mg/Nm^3

The 2 Nos. of Furnace Oil fired boilers shall remain stand-by when briquette fired boiler is in operation.

2. The Applicant shall provide Specific Air Pollution control equipments as per the conditions of EP Act, 1986 and rule made there under from time to time/ Environmental Clearance / CREP guidelines.
3. The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.
4. The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).

SCHEDULE-III
Details of Bank Guarantees:

Sr. No.	Consent (C2E/ C2O /C2R)	Amt of BG Imposed	Submission Period	Purpose of BG	Compliance Period	Validity Date
1	C2R	3000000	Existing Rs. 20 Lakh + Top up Rs. 10 Lakh	Towards O&M of pollution control systems and towards compliance of the Consent conditions	31.07.2024	30.11.2024

The above Bank Guarantee(s) shall be submitted by the applicant in favour of Regional Officer at the respective Regional Office within 15 days from the date of issue of Consent.

BG Forfeiture History

Srno.	Consent (C2E/C2O/C2R)	Amount of BG imposed	Submission Period	Purpose of BG	Amount of BG Forfeiture	Reason of BG Forfeiture
1	C2R	2500000	Existing	Towards O&M of pollution control systems and towards compliance of the Consent conditions	500000	for poor operation and maintenance of ETP

BG Return details

Srno.	Consent (C2E/C2O/C2R)	BG imposed	Purpose of BG	Amount of BG Returned
NA				

SCHEDULE-IV
General Conditions:

1. The waste generator shall,-
   a) take steps to minimize generation of plastic waste and segregate plastic waste at source in accordance with the Plastic Waste Management Rules, 2016 or as amended from time to time.
   b) not litter the plastic waste and ensure segregated storage of waste at source and handover segregated waste to urban local body or gram panchayat or agencies appointed by them or registered waste pickers', registered recyclers or waste collection agencies;
2. All institutional generators of plastic waste, shall segregate and store the waste generated by them in accordance with the Plastic Waste Management Rules, 2016 amendment from time to time and handover segregated wastes to authorized waste processing or disposal facilities or deposition centers either on its own or through the authorized waste collection agency.
3. All waste generators shall pay such user fee or charge as may be specified in the byelaws of the local bodies for plastic waste management such as waste collection or operation of the facility thereof, etc.;

4. Every person responsible for organizing an event in open space, which involves service of food stuff in plastic or multilayered packaging shall segregate and manage the waste generated during such events in accordance with the Plastic Waste Management Rules, 2016 amendment from time to time.
5. The Energy source for lighting purpose shall preferably be LED based
6. The PP shall harvest rainwater from roof tops of the buildings and storm water drains to recharge the ground water and utilize the same for different industrial applications within the plant
7. Conditions for D.G. Set
   a) Noise from the D.G. Set should be controlled by providing an acoustic enclosure or by treating the room acoustically.
   b) Industry should provide acoustic enclosure for control of noise. The acoustic enclosure/ acoustic treatment of the room should be designed for minimum 25 dB (A) insertion loss or for meeting the ambient noise standards, whichever is on higher side. A suitable exhaust muffler with insertion loss of 25 dB (A) shall also be provided. The measurement of insertion loss will be done at different points at 0.5 meters from acoustic enclosure/room and then average.
   c) Industry should make efforts to bring down noise level due to DG set, outside industrial premises, within ambient noise requirements by proper sitting and control measures.
   d) Installation of DG Set must be strictly in compliance with recommendations of DG Set manufacturer.
   e) A proper routine and preventive maintenance procedure for DG set should be set and followed in consultation with the DG manufacturer which would help to prevent noise levels of DG set from deteriorating with use.
   f) D.G. Set shall be operated only in case of power failure.
   g) The applicant should not cause any nuisance in the surrounding area due to operation of D.G. Set.
   h) The applicant shall comply with the notification of MoEFCC, India on Environment (Protection) second Amendment Rules vide GSR 371(E) dated 17.05.2002 and its amendments regarding noise limit for generator sets run with diesel.
8. The applicant shall maintain good housekeeping.
9. The non-hazardous solid waste arising in the factory premises, sweepings, etc. be disposed of scientifically so as not to cause any nuisance / pollution. The applicant shall take necessary permissions from civic authorities for disposal of solid waste.
10. The applicant shall not change or alter the quantity, quality, the rate of discharge, temperature or the mode of the effluent/emissions or hazardous wastes or control equipments provided for without previous written permission of the Board. The industry will not carry out any activity, for which this consent has not been granted/without prior consent of the Board.
11. The industry shall ensure that fugitive emissions from the activity are controlled so as to maintain clean and safe environment in and around the factory premises.
12. The industry shall submit quarterly statement in respect of industries obligation towards consent and pollution control compliance's duly supported with documentary evidences (format can downloaded from MPCB official site).
13. The industry shall submit official e-mail address and any change will be duly informed to the MPCB.
14. The industry shall achieve the National Ambient Air Quality standards prescribed vide Government of India, Notification No. B-29016/20/90/PCI-L dated. 18.11.2009 as amended.

15. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions. The Applicant shall obtain prior consent of the Board to take steps to establish the unit or establish any treatment and disposal system or an extension or addition thereto.
16. The industry shall ensure replacement of pollution control system or its parts after expiry of its expected life as defined by manufacturer so as to ensure the compliance of standards and safety of the operation thereof.
17. The PP shall provide personal protection equipment as per norms of Factory Act
18. Industry should monitor effluent quality, stack emissions and ambient air quality monthly/quarterly.
19. Whenever due to any accident or other unforeseen act or even, such emissions occur or is apprehended to occur in excess of standards laid down, such information shall be forthwith Reported to Board, concerned Police Station, office of Directorate of Health Services, Department of Explosives, Inspectorate of Factories and Local Body. In case of failure of pollution control equipments, the production process connected to it shall be stopped.
20. The applicant shall provide an alternate electric power source sufficient to operate all pollution control facilities installed to maintain compliance with the terms and conditions of the consent. In the absence, the applicant shall stop, reduce or otherwise, control production to abide by terms and conditions of this consent.
21. The industry shall recycle/reprocess/reuse/recover Hazardous Waste as per the provision contain in the Hazardous and Other Wastes (M & TM) Rules 2016, which can be recycled /processed /reused /recovered and only waste which has to be incinerated shall go to incineration and waste which can be used for land filling and cannot be recycled/reprocessed etc. should go for that purpose, in order to reduce load on incineration and landfill site/environment.
22. An inspection book shall be opened and made available to the Board's officers during their visit to the applicant.
23. Industry shall strictly comply with the Water (P&CP) Act, 1974, Air (P&CP) Act, 1981 and Environmental Protection Act, 1986 and industry specific standard under EP Rules 1986 which are available on MPCB website (www.mpcb.gov.in).
24. Separate drainage system shall be provided for collection of trade and sewage effluents. Terminal manholes shall be provided at the end of the collection system with arrangement for measuring the flow. No effluent shall be admitted in the pipes/sewers downstream of the terminal manholes. No effluent shall find its way other than in designed and provided collection system.
25. Neither storm water nor discharge from other premises shall be allowed to mix with the effluents from the factory.
26. The industry should not cause any nuisance in surrounding area.
27. The industry shall take adequate measures for control of noise levels from its own sources within the premises so as to maintain ambient air quality standard in respect of noise to less than 75 dB (A) during day time and 70 dB (A) during night time. Day time is reckoned in between 6 a.m. and 10 p.m. and night time is reckoned between 10 p.m. and 6 a.m.
28. The industry shall create the Environmental Cell by appointing an Environmental Engineer, Chemist and Agriculture expert for looking after day to day activities related to Environment and irrigation field where treated effluent is used for irrigation.

29. The applicant shall provide ports in the chimney/(s) and facilities such as ladder, platform etc. for monitoring the air emissions and the same shall be open for inspection to/and for use of the Board's Staff. The chimney(s) vents attached to various sources of emission shall be designated by numbers such as S-1, S-2, etc. and these shall be painted/ displayed to facilitate identification.
30. The industry should comply with the Hazardous and Other Wastes (M & TM) Rules, 2016 and submit the Annual Returns as per Rule 6(5) & 20(2) of Hazardous and Other Wastes (M & TM) Rules, 2016 for the preceding year April to March in Form-IV by 30th June of every year.
31. The applicant shall install a separate meter showing the consumption of energy for operation of domestic and industrial effluent treatment plants and air pollution control system. A register showing consumption of chemicals used for treatment shall be maintained.
32. The applicant shall bring minimum 33% of the available open land under green coverage/ plantation. The applicant shall submit a yearly statement by 30th September every year on available open plot area, number of trees surviving as on 31st March of the year and number of trees planted by September end.
33. The Board reserves its rights to review plans, specifications or other data relating to plant setup for the treatment of waterworks for the purification thereof & the system for the disposal of sewage or trade effluent or in connection with the grant of any consent conditions.
34. The firm shall submit to this office, the 30th day of September every year, the Environment Statement Report for the financial year ending 31st March in the prescribed FORM-V as per the provisions of Rule 14 of the Environment (Protection) (second Amendment) Rules, 1992.
35. The Applicant shall obtain necessary prior permission for providing additional control equipment with necessary specifications and operation thereof or alteration or replacement/alteration well before its life come to an end or erection of new pollution control equipment.
36. The Board reserves its rights to vary all or any of the condition in the consent, if due to any technological improvement or otherwise such variation (including the change of any control equipment, other in whole or in part is necessary).
37. The applicant shall provide facility for collection of environmental samples and samples of trade and sewage effluents, air emissions and hazardous waste to the Board staff at the terminal or designated points and shall pay to the Board for the services rendered in this behalf.

For and on behalf of the
Maharashtra Pollution Control Board.

(Ashok Shingare IAS),
Member Secretary

Annexure - 2 Consent Renewal Application 91

Annexure-12

Maharashtra Pollution Control Board

महाराष्ट्र प्रदूषण नियंत्रण मंडळ

Application for Consent/ Authorisation

Sir,
I/We hereby apply for*

1. Consent to Establish/Operate/Renewal of consent under section 25 and 26 of the Water (Prevention & Control of Pollution) Act, 1974 as amended.

2. Consent to Establish/Operate/Renewal of consent under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981, as amended.

3. Authorization/renewal of authorization under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 in connection with my/our/existing/proposed/altered/ additional manufacturing/processing activity from the premises as per the details given below.

Consent Information

UAN No:
MPCB-CONSENT-0000029509

Industry Information

Consent To: Renewal (Normal)	***IIN No.:***	***Submit to:*** SRO - Taloja	
Type of Institution: Industry	***Industry Type:*** Agrobase	***Category:*** Red	***Scale:*** L.S.I
EC Reqd. No	***EC Obtained*** No	***EC Ref. No.*** -	
Whether construction-buildup area is more than 20,000 sq.mtr.(Existing Expansion Unit)		No	

General Information

1. Name, designation, office address with Telephone/Fax numbers, e-mail of the Applicant Occupier/Industry/Institution / Local Body.

Name
Milind Rasiklal Desai

Designation
DGM - EHS

Area
Taloja

Telephone
9619101598

Email
milind_desai@hikal.com

Address
T - 21, MIDC Ind. Area, Taloja, Dist. - Raigad, Maharashtra.

Taluka
Panvel

District
Raigad

Fax
27411844

Pan Number
AAACH0383A

2. (a) Name and location of the industrial unit/premises for which the application is made (Give revenue Survey Number/Plot number name of Taluka and District, also telephone and fax number)

Industry name
M/s. Hikal Ltd.

Location of Unit
M.I.D.C. Taloja

Survey number/Plot Number
T-21

Taluka
Panvel

District
Raigad

(b) Details of the planning permission obtained from the local body/Town and Country Planning authority/Metropolitan Development authority/ designated Authority.

Planning permission
NA

Planning Authority
NA

Name of the local body under whose jurisdiction the unit is located and Name of the licence issuing authority

Name of Local Body
SRO-Taloja

Name of the licence issuing authority
MPCB

3. Names,addresses with Telephone and Fax Number of Managing Director / Managing Partner and officer responsible for matters connected with pollution control and/or Hazardous waste disposal.

Name of Managing Director
Mr. Sameer Hiramath

Telephone number
02230973100

Fax number
022-27574277

Officer responsible for day to day business
Mr. Rajesh Bhagat

4. (a.) Are you registered Industrial unit ?

Yes

Registration number
11-48020 dated 08/07/1998

Date of registration
Jul 8, 1998

5. Gross capital investment of the unit without depreciation till the date of application (Cost of building, land, plant and machinery). (To be supported by an affidavit/undertaking on Rs.20/- stamp paper, annual report or certificate from a Chartered Accountant for proposed unit(s), give estimated figure)

Gross capital (in Lakh)	**** Verified***	**** Consent Fee***
2433.00	CA Certificate	250000.00

6. If the site is located near sea-shore/river bank/nther water bodies/Highway, indicate the crow fly distance and the name of the water body, if any.

Distance From	***Distance(Km)***	**** Name***
SH/NH	27.50	Thane-Belapur
River	7.00	Kasadi River
Human Habitation	8.10	
Religious Place	5.00	
Historical Place	126.60	
Creek/Sea	11.90	Creek/Sea

6b. Enter Latitude and Longitude details of site

Latitude
19.0812

Longitude
73.1214

7. Does the location satisfy the Requirements Under relevant Central/State Govt. Notification such as Coastal Regulation Zone. Notification on Ecologically Fragile Area, Industrial Location policy, etc. If so, give details.

Location	Approved Industry Area	Sensitive Area	If Yes, Name Of Area	Industry Location with Reference to CRZ
M.I.D.C. Taloja	Yes	No		

8. If the site is situated in notified industrial estate.

		Details
(a) Whether effluent collection, treatment and disposal system has been provided by the authority.	Yes	
(b) Will the applicant utilize the system, if provided.	Yes	
(c) If not provided, details of proposed arrangement.	NA	

9.

(a) Total plot area (in squear meter)	(b) Built up area and (in squear meter)	(c) Area available for the use of treated sewage/ trade effluent for gardening/irrigation. (in squear meter)
60,726	3000	20,390

10. Month and year of commissioning of the Unit.

2008-06-01

11. Number of workers and office staff

Workers	staff	Hrs. of shift	Weekly off
70	169	8	Sunday

12.

(a) Do you have a residential colony Within the premises in respect of Which the present application is Made ?	No	NA	
(b) If yes, please state population staying			
Number of person staying	**Water consumption**	**Sewage generation**	**Whether is STP provided?**
			No

(c) Indicate its location and distance with reference to plant site.

Number of person staying	Water consumption
NA	

13. List of products and by-products Manufactured in tonnes/month, Kl/month or numbers/month with their types i.e.Dyes, drugs etc. (Give figures corresponding to maximum installed production capacity

Products Name and Quantity

Product Name	UOM	Product Name	Existing	Consented	Proposed Revision	Total	Remarks
Agrobase	MT/A	Thiabendazole	700	700	0	700	
Agrobase	MT/A	C.I.T.D.	145	145	0	145	
Agrobase	MT/A	HTP-213 (Fenamidone	300	300	0	300	

Agrobase	MT/A	HTP- 650 (B.A.S-650) (Ametoctradine)	750	750	0	750
Agrobase	MT/A	HTP-528 (Ethyclozate)	10	10	0	10

Products Name and Quantity

Product Name	*UOM*	*Quantity*	*Remarks*
Recovered Ammonia	MT/A	1250	
Sodium/Potassium Methyl Sulphate Solution (100%)	MT/A	458	
Sodium/Potassium Thiomethoxide solution (100%)	MT/A	382	
Spent HCl (App. 30%)	MT/A	1462	
Spent H2SO4 (98%)	MT/A	904	
Spent Caustic	MT/A	520	
Monochloro acetone	MT/A	500	

14. List of raw materials and process chemicals with annual consumption corresponding to above stated production figures, in tonnes/month or kl/month or numbers/month.

Name of Raw Material	*UOM*	*Quantity*	*Hazardous Waste*	*Hazardous Chemicals*	*Remarks*
Acetone	MT/A	1026	No	No	
Carbon disulphide	MT/A	776	No	No	
Anhydrous ammonia	MT/A	902.9	No	No	
Aniline	MT/A	357.8	No	No	
Chlorine	MT/A	1352.4	No	No	
Isopropyl Acetate	MT/A	15.11	No	No	
35% HCl solution	MT/A	47.55	No	No	
MIBK	MT/A	70.44	No	No	
25% Caustic solution	MT/A	77.07	No	No	
Hydrazine Hydrate	MT/A	5.91	No	No	
Ethanol	MT/A	99.31	No	No	
NaHCO3	MT/A	17.754	No	No	
Amitrol	MT/A	260	No	No	
Trimethylamine	MT/A	80	No	No	
CNBA	MT/A	11.77	No	No	
Malonic acid	MT/A	8.791	No	No	
Ammonium formate	MT/A	10.09	No	No	
Formic acid	MT/A	12.37	No	No	
Sulphur	MT/A	3	No	No	
Caustic soda	MT/A	360	No	No	
Xylene	MT/A	1845	No	No	

KOMe	MT/A	611	No	No
Decanonotrile	MT/A	540	No	No
Ethyl propionate	MT/A	468	No	No
Toluene	MT/A	507	No	No
SMPGM	MT/A	240	No	No
Dimethyl sulphate	MT/A	120	No	No
Monochlorobenzene	MT/A	600	No	No
Phenyl Hydrazine	MT/A	120	No	No
DMF	MT/A	240	No	No
CS2	MT/A	248	No	No
KOH	MT/A	213	No	No
DMS	MT/A	399	No	No
NH3	MT/A	309	No	No
Cys. HCl	MT/A	215	No	No
KOH/NaOH	MT/A	797	No	No
Sulphuric acid	MT/A	713	No	No
Chlorosulphonic acid	MT/A	482.7	No	No
Liq. Oxyger. in sm3	MT/A	155851.8	No	No
Activated carbon	MT/A	29.17	No	No
Cyanamide solution	MT/A	129	No	No
PTC-BTAC	MT/A	3	No	No
Benzene	MT/A	84	No	No
Orthochloro Benzene	MT/A	30.2	No	No
Methanol	MT/A	1412.7	No	No
Sodium hydroxide	MT/A	3830.4	No	No
Soda ash	MT/A	638.3	No	No
Hydrochloric acid	MT/A	2514.1	No	No

15. Description of process of manufacture for each of the products showing input, output, quality and quantity of solid, liquid and gaseous wastes, if any from each unit process.

Material balance and process attached

Part B : Waste Water aspects

16. Water consumption for different uses (m3/day)

Purpose	*Consumption*	*Effluent Generation*	*Treatment*	*Remarks*	*Disposal*	*Remarks*
Domestic Pourpose	35.00	30.00	Septic Tank		CETP	
Water gets Polluted & Pollutants are Biodegradable	793.47	788.95	Primary + Secondary + Tertiary		CETP	

Water gets Polluted,Pollutants are not Biodegradable & Toxic	0.00	0.00	--NA--	--NA--
Industrial Cooling,spraying in mine pits or boiler feed	244.00	0.00	--NA--	--NA--
Others	0.00			

17. Source of water supply, Name of authority granting permission if applicable and quantity permitted.

Source of water supply	***Name of authority granting permission***	***Qauntity permitted***
M.I.D.C.	M.I.D.C.	1102.47

18. Quantity of waste water (effluent) generated (m3/day)

Domastic	***Boiler Blowdown***	***Industrial***	***Cooling water blowdown***
25	3	0	2
Process	***DM Plants/Softening***	***Washing***	***Tail race discharge from***
788.95	0	0	0

* 19. Water budget calculations accounting for difference between water consumption and effluent generated.

Effluent generated 818.95 CMD

20. Present treatment of sewage/canteen effluent (Give sizes/capacities of treatment units).

Capacity of STP (m3/day)

30

Treatment unit	***Size (mxm)***	***Retention time (hr)***
Septic tank	30	24
Treatment tank	1283	42

21. Present treatment of trade effluent (Give sizes/capacities of treatment units) (A schematic diagram of the treatment scheme with inlet/outlet characteristics of each unit operation/process is to be provided. Include details of residue Management system (ETP sludges)

Capacity of ETP (m3/day)

1000

Treatment unit	***Size (mxm)***	***Retention time (hr)***
Neutralization tank	20	1
Flash mixer	8	0.23
Primary clarifier	100	2.94
Equalization tank - 1	330	9.70
Equalization tank - 2	330	9.70
Aeration tank - 1	1283	37.73
Aeration tank- 2	1283	37.73
Secondary clarifier - 1	175	5.15
Aeration tank - 3	1283	37.73
Secondary clarifier - 2	175	5.15
Tertiary tank	115	3.38

V - Notch	16	0.47	57

22.

(i) Are sewage and trade effluents mixed together?	Yes
If yes, state at which stage-Whether before, intermittently or after treatment.	Secondary treatment

23. Capacity of treated effluent sump, Guard Pond if any.

Capacity of treated effluent sump (m3)	16
Effluent sump/Guard pond details	Yes
If yes, state at which stage-Whether before, intermittently or after treatment.	No

24. Mode of disposal of treated effluent With respective quantity, m3/day

(i) Into stream/river (name of river)	NA	***(ii) Into creek/estuary (name of Creek/estuary)***	NA
(iii) Into sea	NA	***(iv) Into drain/sewer (owner of sewer)***	NA
(v) On land for irrigation on owned land/ase land. Specify cropped area.	NA	***(vi) Connected to CETP***	YES
(vii) Quantity of treated effluent reused/ recycled, m3/day Provide a location map of disposal arrangement indicating the outlet(s) for sampling. Treated effluent reused / recycled (m3/day)	0		

25. (a) Quality of untreated/treated effluents (Specify pH and concentration of SS, BOD,COD and specific pollutants relevant to the industry. TDS to be reported for disposal on land or into stream/river.

Untreated Effluent

pH	2-12	
SS (mg/l)	100	
BOD (mg/l)	412	
COD (mg/l)	5000	
TDS (mg/l)	7000	
Specific pollutant if any	***Name***	***Value***
1	NA	

Treated Effluent

pH	6.5-8.5	
SS (mg/l)	50	
BOD (mg/l)	20	
COD (mg/l)	200	
TDS (mg/l)	1000	
Specific pollutant if any	***Name***	***Value***
1	NA	

(b) Enclose a copy of the latest report of analysis from the laboratory approved by State Board/ Committee/Central Board/Central Government in the Ministry of Environment expected characteristics of the untreated/treated effluent

Attached JVS reports

---

26. Fuel consumption

Fuel Type	***UOM***	***Fuel Consumption TPD/LKD***	***Calorific value***
Bagasse	MT/M	3000	3000
Ash content	***Sulphur content***	***Quantity***	***Other (specify)***
12	0	1	

Fuel Type	***UOM***	***Fuel Consumption TPD/LKD***	***Calorific value***
Furnace Oil	MT/M	943	10000
Ash content	***Sulphur content***	***Quantity***	***Other (specify)***
0	500	1	

---

27. (a) Details of stack (process & fuel stacks: D. G.)

(a) Stack number(s)	***(b) Stack attached to***	***(c) Capacity***	***(d) Fuel Type***
1	Emergency D.G. Set 625 KVA	NA	HSD
(e) Fuel quantity (Kg/hr.)	***(f) Material of construction***	***(g) Shape (round/rectangular)***	***(h) Height, m (above ground level)***
0	NA	Round	6
(i) Diameter/Size, in meters	***(j) Gas quantity, Nm3/hr.***	***(k) Gas temperature °C***	***(l) Exit gas velocity, m/sec.***
0.2	1105	248	17.1
(m) Control equipment preceding the stack	***(n) Nature of pollutants likely to present in stack gases such as Cl2, Nox, Sox TPM etc.***	***(o) Emissions control system provided***	***(p) In case of D.G. Set power generation capacity in KVA***
NA	Nox, So2, TPM	NA	NA

---

27. (B) Whether any release of odoriferous compounds such as Mercaptans, Phorate etc. Are coming out from any storages or process house.

NA

---

28. Do you have adequate facility for collection of samples of emissions in the form of port holes, platform, ladder\etc. As per Central Board Publication "Emission regulations Part-III" (December, 1985)

Poart hole	Yes	***Details***
Platform	Yes	***Details***
Ladder	Yes	***Details***

---

29. Quality of treated flue gas emissions and process emissions. Quantity of treated flue gas emissions and process emissions.

Sr. No	***Stack attached to***	***Parameter***	***Concentration mg/Nm3***	***flow (Nm3/hr)***
1	Details are attached	As per list	0	0

(Specify concentration of criteria pollutants and industry/process-specific pollutants stack-wise. Enclose a copy of the latest report of analysis from the laboratory approved by State Board/Central Board/ Central Government in the Ministry of Environment & Forests. For proposed unit furnish expected characteristics of the emissions.

Reports attached

Part - D: Hazardous Waste aspect

30. Information about Hazardous Waste Management as defined in Hazardous Waste (Management & Handling) Rules, 1989 as amended in Jan.,2000. Type/Category of Waste as per

Waste (Annually) Schedule I

Cat No	***Type***	***Qty***	***Min***
5.1	5.1 Used /spent oil	9	
Max	***Method of collection***	***Method of reception***	***Method of storage***
	Drums	Drum	Separate hazardous waste pad
Method of transport	***Method of treatment***	***Method of disposal***	
MPCB Approved Hazardous waste transporter	sale	sale to MPCB approved party	

Waste (Annually) Schedule II

31. Details about use of hazardous waste

Name of hazardous waste/Spent chemical	***Quantity used/month***	***Party from whom purchased***	***Party to whom sold***
NA	0	NA	NA

32.

a. Details about technical capability and equipments available with the applicant to handle the Hazardous Waste

NA

b. Characteristics of hazardous waste(s) Specify concentration of relevant pollutants. Enclose a copy of the latest report of analysis from the laboratory approved by State Board/Central Board/Central Govt. in the ministry of Environment & Forests. For proposed units furnish expected characteristics

NA

33.

Copy of format of manifest/record Keeping practiced by the applicant.

YES

34.

Details of self-monitoring (source and environment system)

COD,BOD,TSS,pH

35.

Are you using any imported hazardous waste. If yes, give details.

NA

36.

Copy of actual user Registration/certificate obtained from State Pollution Control Board/Ministry of Environment & Forests, Government of India, for use of hazardous waste.

Consent

37.

Present treatment of hazardous waste, if any (give type and capacity of treatment units)

As per consent

38. Quantity of hazardous waste disposal

(i) Within factory

0

(ii) Outside the factory (specify location and enclose copies of agreement.)

0

(iii) Through sale (enclosed documentary proof and copies of agreement.)

0

(iv) Outside state/Union Territory, If yes particulars of (1 & 3) above.

0

(v) Other (Specify)

0

Part - E: Additional information

39.

a. Do you have any proposals to upgrade the present system for treatment and disposal of effluent/emissions and/or hazardous waste.

NA

b. If yes, give the details with time- schedule for the implementation and approximate expenditure to be incurred on it.

NA

40.

Capital and recurring (O & M) expenditure on various aspect of environment protection such as effluent, emission, hazardous waste, solid waste, tree- plantation, monitoring, data acquisition etc. (give figures separately for items implemented/to be implemented).

APP. 200000/-

41.

To which of the pollution control equipment, separate meters for recording consumption of electric energy are installed ?

PLANTWISE

42.

Which of the pollution control items are connected to D.G. Set (captive power source) to ensure their running in the event of normal power failure

SCRUUBERS

---

43. Nature, quantity and method of disposal of non- hazardous solid waste generated separately from the process of manufacture and waste treatment. (Give details of area/capacity available in applicant's land)

Type	*Quantity*	*UOM*	*Treatment*	*Disposal*	*Other Details*
Metal Scrap	0	--NA--	----	Sale	As & when generated
Wood	0	--NA--	----	Sale	As & when generated
Plastic waste	50	Kg/Day	----	Sale	NA
Plastic bottels	5	Kg/Day	----	Sale	NA
Boiler ash	5100	MT/A	----	Sale	NA
Glass bottels	20	No/D	----	Sale	NA

44. Hazardous Chemicals - Give details of Chemicals and quantities handled and Stored.

(i) Is the unit a Majot Accident Hazard unit as per Mfg.Storage Import Hazardous Chemicals Rules ?
Yes

(ii) Is the unit an isolated storage as defined under the MSIHC Rules ?
Yes

(iii) Indicate status of compliance of Rules 5,7,10,11,12,13 and 18 of the MSIHC Rules.
Yes

(iv) Has approval of site been obtained from the concerned authority?
Yes

(v) Has the unit prepared an off-site Emergency Plan? Is it updated ?
Yes

(vi) Has information on Imports of Chemicals been provided to the concerned authority?
NA

(vii) Does the unit possess a policy under the PLI Act?
Yes

---

45. Brief details of tree plantation/green belt development within applicant's premises (in hectors)

Open Space Availability	***Plantation Done On***	***Number of Trees Planted***
10000 Square meter	6000 Square meter(60 %)	1000

46.

Information of schemes for waste Minimization, resource recovery and recycling - implemented and to be implemented, separately.
NA

47.

(a) The applicant shall indicate whether Industry comes under Public Hearing, If so, the relevant documents such as EIA, EMP, Risk Analysis etc. shall be submitted, if so, the relevant documents enclosed shall be indicated accordingly.
NA

(b) Any other additional information that the applicants desires to give
NA

(c) Whether Environmental Statement submitted ? If submitted, give date of submission.
28-09-2016

48.

I/We further declare that the information furnished above is corect to the best of my/our knowledge.

49.

I/We hereby submit that in case of any change from what is stated in this application in respect of raw materials, products, process of manufacture and treatment and/or disposal of effluent, emission, hazardous wastes etc. in quality and quantity; a fresh application for Consent/Authorization shall be made and until the grant of fresh Consent/Authorization no change shall be made.

50.

I/We indertake to furnish any other information within one month of its being called by the Board

---

Yours faithfully

Signature :
Name : Mr. Ashish Dagade
Designation : Head-Crop Protection Manufacturing

Additional Information

Air Pollution

Sr No.	Air Pollution Source	Pollutants	APCS Provided	Remark
1	Boiler stack	SO2,NOX	Yes	NA

Separate EM Provided	Yes	**Other Emission Sources**	Process emission
Measures Proposed	NA	**Foul Smell Coming Out**	No
Air Sampling Facility Details	Third party monitoring		

D.G. Set Details

Description	Capacity(KVA)	Remarks
D.G.Set	625	NA

Hazardous Waste Generation

Hazardous Waste	Quantity	UOM	Treatment	Disposal	Other Details
5.1 Used /spent oil	6.860	MT/A	Sale	Sale	NA
20.2 Spent solvent	185.68	MT/A	Sale	Sale	NA
29.1 Process wastes/residue	257.112	MT/A	Incineration	Incineration	NA
29.2 Chemical sludge containing residue pesticide	95.385	MT/A	Incineration	Incineration	NA
35.1 Filters and filter material which have organic liquid	3.155	MT/A	Incineration	Incineration	NA

CHWTSDF Details

Member of CHWTSDF	CHWTSDF Name	Remarks
Yes	Mumbai Waste Management Limited (MWML)	NA

Cess Details

Cess Applicable	Cess Paid	If Yes, UpTo
Yes	Yes	Jun 30 2016 12:00:00:000AM

Legal Actions

Legal Action Taken	Legal Record Of Company	Legal Action Details	Remarks
No			

INSTITUTE OF CHEMICAL TECHNOLOGY | रसायन तंत्रज्ञान संस्था
University under Section-3 of UGC Act 1956 | Estd. 1933 NBA Accredited, Grade 'A' by MHRD University For Excellence
Elite Status & Centre of Excellence - Goverment of Maharashtra

January 17, 2018

M/s Hikal Ltd.
Plot No. T-21, MIDC Taloja
Dist. Raigad – 410 208

Subject: **Analysis of possible pollution load with respect to the proposed change in product mix in the same category for the chemical intermediates manufacturing unit of M/s Hikal Ltd, MIDC, Taloja**

Dear Sir/Madam,

M/s Hikal Ltd. has been manufacturing many varieties of chemical intermediates used in agrochemicals, pharmaceuticals and other chemical industries at the Taloja unit. Due to the changes in the market demands, the company wishes to introduce new products and change the capacity of the existing products so that the total production remains within the sanctioned capacity. The company has applied for the renewal of **Consent to operate with change in Product mix in the same category.** I have analyzed the information related to the proposed changes in terms of the required processing steps and the material and energy balances for the synthesis of new products as well as products with changed production capacity. Also, I had detailed discussions with the company representatives, Mr. Mohit Gharat (Asst. Gen. Manager, EHS) and Mr. Narendra Dharmadhikari (Asst. Gen. Mabnager, Technical services). Based on the understanding of the different aspects provided in the application document and subsequent discussions, I am of the opinion that:

1. **M/s Hikal Limited proposes to introduce four new products, IKF-5411** (at maximum capacity of 60 MT/A), **MPDC-DME** (at maximum capacity of 400 MT/A), **Trifloxystrobin** (at maximum capacity of 10 MT/A) and **Prothioconazole** (at maximum capacity 10 MT/A). To maintain the total production within the sanctioned limits, the company also proposes to reduce the **production of Thiabendazole** from existing of 700 MT/A to 516 MT/A (net reduction of 184 MT/A), **production of HTP-218** from existing of 300 MT/A to 155 MT/A (net reduction of 145 MT/A) and **production of HTP-528** from existing of 10 MT/A to 4 MT/A (net reduction of 6 MT/A) as well as stop the production of CITD (net reduction of 145 MT/A). Thus, the changes in the production profile is such that expected increase of 480 MT/A due to addition of new products is matched by the reduction in the production of existing products and hence Overall, **the total production of the main products from the plant remains within the existing limits of the sanctioned production capacity (1905 MT/A).** It is also important to understand that the selection of the products for the proposed reduction in the capacity has been based on the fact that overall effluent generation from the production is also not affected.

Parekh

Nathalal Parekh Marg, Matunga,
MUMBAI - 400 019. INDIA
www.ictmumbai.edu.in

Tel. : +91-22-3361-1111/ 2222
Fax: +91-22-3361-1020
Email: initials.surname@ictmumbai.edu.in

2. The company is also proposing to provide an option for production of HTP 218 and MPDC-DME (revised capacity of 155 MT/A) as well as for IKF-5411 and MPDC-DME (proposed capacity of 60 MT/A). It is important to note that the calculations for the effluent have been done based on the higher effluent generation and hence the option of producing the product with lower effluent can easily be recommended.

3. The analysis of the process flow diagrams and the conditions for temperature and pressures used during the manufacture of products with changed production capacities as well as newly introduced products confirmed that the process conditions are not drastically different and hence the utility requirement for these products will be similar. The manufacturing of the new products will be performed in same set of reactors and separation equipments without any major modifications in the piping network. The analysis also revealed that there **will not be any additional generation of wastewater both in terms of the quantum of the effluent as well as the expected COD loading in the stream. The provided annexure I depict the details of the effluent generation per Kg of the product for all the products (both existing as well as changed) and this confirms that there is no increase in the effluent generation based on the new production profile.** There is also no increase in the water consumption after the proposed changes in the production profile.

4. The analysis of the process flow diagram for the new products also revealed some changes in the pattern of generation of the byproducts. For example, in the new products, inorganic salts are now likely to be recovered which will be purified to the desired quality and sold as by-product from the plant. Also the company has made changes in the solvent recovery systems and it is expected now that solvents as toluene/methanol/IPA/DMF/MCB will be recovered now as a by-product rather than the earlier disposal as mixed solvents. It is proposed to include them in the category of solvents (earlier only monochloro acetone was included at total capacity of 500 MT/A which should be now changed to 700 MT/A). The increase in the capacity of recovered solvents as well as in the category of various inorganic salts (Category I from existing 1250 MT/A to 1800 MT/A and Category II from 458 MT/A to 1300 MT/A) is expected to counterbalanced by a reduction of spent acids/caustic (from 2886 MT/A to 1676 MT/A) and removing the byproduct category of sodium/potassium thiomethoxide solution (net reduction as 382 MT/A). Thus the total increase of 1592 MT/A is again balanced by reduction by same amount as 1592 MT/A.

5. The company has an established Effluent treatment facility being used for treatment of domestic effluent (permitted quantity of 30 m^3/day) and industrial effluent (permitted quantity of 788.95 m^3/day as per the consent). The facility for treatment of wastewater consists of physicochemical treatment followed by activated sludge process based on the diffused aeration system. The main processing units include neutralization, equalization, flash mixer for chemical dosing, primary clarifiers, two sets of biological oxidation reactors and secondary clarifiers followed by the sludge thickner and the sludge drying beds. Further, in

Parab

Nathalal Parekh Marg, Matunga,
MUMBAI - 400 019. INDIA
www.ictmumbai.edu.in

Tel.: +91-22-3361-1111/ 2222
Fax: +91-22-3361-1020
Email: initials.surname@ictmumbai.edu.in

INSTITUTE OF CHEMICAL TECHNOLOGY | रसायन तंत्रज्ञान संस्था
University under Section-3 of UGC Act 1956 | Estd. 1933 | NBA Accredited, Grade 'A' by MHRD | University For Excellence
Elite Status & Centre of Excellence - Goverment of Maharashtra

the tertiary treatment, effluent is treated with Sodium Hypochlorite so as to remove the bacterial effect and colour (partially) after which the effluent passes through V - Notch chamber and disposed off to CETP through MIDC sewer for further treatment. The quality reports obtained from the Padmaja Aerobiologicals Pvt. Ltd. (PAPL) confirmed the adequacy of the ETP facility as the COD and BOD at the outlet of ETP (before going into the MIDC sewer) was observed to be 114 mg/L and 42 mg/L also confirming the compliance of the discharge from the plant to the consented values. The ratio of the BOD to COD was also found to be around 0.4 which also confirmed the adequate biodegradability for the effluent stream. The reports for the air emissions also show the compliance with the discharge standards. The solid hazardous waste including the sludge is also being sent to CHWTSDF and the process will be continued after the new production profile. The disposal of other hazardous wastes such as activated carbon, discarded liners etc will be continued as per the same quantity mentioned in the existing consent. It is recommended to include new category (33) for disposal of barrels/containers used for handling of hazardous wastes/chemicals (maximum of 1800 Nos.) to be sold to approved party after decontamination and sludge and filters contaminated with oil (3.3) to be sent to CHWTSDF. Also there are no changes in the utility requirements which mean that the fuel consumption will remain the same and hence the air emissions will be within the consented limits.

6. I am also aware of the operating guidelines on EIA notification issued by MoEF dated 14th December 2006 which clarifies that Environmental Clearance will not be required wherein there is no change in product capacity within the same group and there is no increment in pollution load.

Overall, I am of the opinion that this proposed addition of new products in the profile within the sanctioned production capacity, **may not result in any additional impact on the pollution load (wastewater and air emissions) from the plant as compared to the existing plant with the consented limits.** The proposed changes in the grouping of the products with option for production as well as new categories of the byproducts/intermediates based on the process changes also appear to be fine without any adverse impact on the emissions. I would **like to recommend the case of M/s Hikal Limited, Taloja** for the Renewal of **Consent to operate with change in product mix in the same category, providing the option for product categories and inclusion of new byproduct/intermediate categories.**

Yours sincerely,

Parag

Dr. Parag Gogate

Associate Professor of Chemical Engineering,

Chemical Engineering Department

Nathalal Parekh Marg, Matunga,
MUMBAI - 400 019. INDIA
www.ictmumbai.edu.in

Tel. : +91-22-3361-1111/ 2222
Fax: +91-22-3361-1020
Email: initials.surname@ictmumbai.edu.in

Summary of Material Balance (Existing & Proposed)

Existing Material Balance

Sr. No.	Product	Existing, TPA	Existing, TPD	Water Consumption		Waste Water		Hazardous Waste generation		Air Emission		Solvent Consumption	
				or ton of pro	kL per day	kL Per ton of product	kL per day	MT per MT of product	MT per Annum	MT per MT of product	MT per Annum	MT per MT of product	MT per Annum
1	Thiabendazole	700	3.0	256.9	772	250.5	753	2.3	1618	2.4	1665	3.9	2698
2	C.I.T.D.	145	0.4	11.0	5	12.6	6	12.9	1866	0.2	29	0.6	87
3	HTP-213 (Fenamidone)	300	0.9	6.8	6	10.7	10	2.0	587	0.2	73	1.0	305
4	HTP-650 (B.A.S.- 650) (Ametoctradine)	750	2.3	3.9	9	7.9	18	0.1	72	0.2	180	1.1	855
5	HTP-528 (Ethyclozate)	10	0.03	59.0	2	82.0	2	0.0	0	3.5	35	2.0	20
	Total	1905	6.7		793		788		4143		1983		3965

Proposed Material Balance (Product Mix change)

Sr. No.	Product	Proposed, TPA	Proposed, TPD	Water Consumption		Waste Water		Hazardous Waste generation		Air Emission		Solvent Consumption	
				or ton of pro	kL per day	kL Per ton of product	kL per day	MT per MT of product	MT per Annum	MT per MT of product	MT per Annum	MT per MT of product	MT per Annum
1	Thiabendazole	516	2.9	256.9	757	250.5	739	2.3	1193	2.4	1227	3.9	1989
2	C.I.T.D.	0	0.0	11.0	0	12.6	0	12.9	0	0.2	0	0.6	0
3	HTP-213 (Fenamidone) or MPDC-DME	155	0.5	6.8	3	10.7	5	2.0	303	0.2	38	1.0	158
4	HTP-650 (B.A.S.- 650) (Ametoctradine)	750	2.3	3.9	9	7.9	18	0.1	72	0.2	180	1.1	855
5	HTP-528 (Ethyclozate)	4	0.01	59.0	1	82.0	1	0.0	0	3.5	14	2.0	8
6	IKF-5411 or MPDC-DME	60	0.2	14.1	3	17.1	3	9.9	592	0.5	29	0.5	27
7	MPDC-DME	400	1.2	4.6	6	0.1	0.11	0.1	36	0.0	0	0.3	110
8	Trifloxystrobin	10	0.03	30.7	1	187.7	5.69	188	1877	1.3	13	1.0	10
9	Prothioconazole	10	0.03	52.5	2	4.6	0.14	5	46	1.7	17	11.2	112
	Total	1905	7.2		781		772		4119		1518		3268
	Consent Limit				793.47		788.95		4143		NA		NA

Thiabendazole Material Balance

Stage -1: MCA Material Balance

Input	Kg/hr
Acetone	3031
Chlorine	218
Caustic	25
Water	1275
Total	**4549**

Monochloro Acetone Preparation MCA

Output	Kg/hr
MonoChloroAcetone (MCA)	166
Recovered Acetone	2973
Off Gas HCl	35
Aqueous Waste	1100
Spent HCl	275
Total	**4549**

Stage -2: 4-MT Material Balance

Input	Kg
Carbon disulphide	4950
Ammonia	2229
Isopropyl Acetate	87
Sulphuric Acid	447
Caustic Lye	3202
Water	8307
Total	**19261**

4-Methyl Thiazole Preparation 4-MT

Output	Kg
4-Methyl Thiazole (4-MT)	3500
Low boiler for incineration	68
Aqueous Waste	14693
Ammonia	1000
Total	**19261**

Stage -3: CNT Material Balance

Input	Kg/hr
4-Methyl Thiazole	330
Ammonia	56
Compressed Air	12000
Water	6000
Sulphuric Acid	1145
Caustic	140
Benzene	3200
Sodium Hypochlorite	350
Steam	800
Soft Water	400
Total	**24421**

Cyanothiazole Preparation CNT

Output	Kg/hr
Cyanothiazole (CNT)	81
4-Methyl Thiazole (4-MT)	257
Air	11973
Benzene off Gas	224
Aqueous Benzene Waste	8906
CNT Tar	1.67
Recovered Benzene	2967
Spent Benzene for Sale	11.5
Total	**24421**

Stage -4: Amidine hydrochloride Material Balance

Input	Kg
Spent Orthodichlorobenzene	4680
Recovered Orthdichlorobenzene	1300
Cyanothiazole	1020
Aniline	840
Anhydrous Hydrochloric Acid	630
Water for Hcl Scrubber	12000
Caustic	280
Total	**20750**

Amidine Hydrochloride Preparation

Output	Kg
Recovered Orthodichlorobenzene	3654
ODCB Tar	13.5
ODCB off gas	315
Aqueous Amidine Layer	15448
Amidine Waste	3
Hcl Scrubber Aqueous	12416.5
Total	**31750**

Stage -5: Thiabendazole Material Balance

Input	Kg/hr
Amidine hydrochloride	1325
Methanol	869
Sodium Carbonate	610
Sodium Hypochloride	968
Water (Amidine)	1146
30% HCl	150
Water	3975
28% Ammonia	121
Hot Air	1000
Methanol Column Steam	1100
Total	11214

Thiabendazole Preparation TBZ

Output	Kg/hr
Thiabendazole	14%
Recovered Methanol	79%
Aqueous methanol waste	5286
Centrifuge Mt.	3906
Air+Moisture	1014
Methanol off Gas	68
Total	11214

Parameter	Qty	CC per MT of TBZ
Water Consumption per day, Kl	894	256.9
Waste Water generation per day, Kl	872	250.5
Hazardous Waste generation per day, MT	8	2.3
Air Emission per day, MT	8	2.4
Solvent Consumption per day, MT	13	3.9

Thiabendazole Produced Per day, MT	3.48

C.I.T.D. Material balance

Input	Kg
Cyanoamide	890
PTC - BTAC	20
CS2	880
48% KOH	1470
DMS	2750
20% NH3	2130
Cysteamine HCl	1480
KOH/NaOH	5500
Toluene	3500
Water	10950
Total	**29570**

CITD Preparation

Ouput	Kg
Aqueous ML	12600
Spent Scrubber solution	4970
STM Solution	7500
Recovered Toluene	2900
Resiude	400
Off gases	200
CITD	1000
Total	**29570**

Parameter	Qty	CC per MT of CITD
Water Consumption per batch, KL	**11**	**11.0**
Waste Water generation per batch, KL	**13**	**12.6**
Hazardous Waste generation per batch, MT	**12.87**	**12.9**
Air Emmision per batch, MT	**0.20**	**0.2**
Solvent Consumption per batch, MT	**0.60**	**0.6**

CITD Produced Per batch, MT	1

HTP-213 (Fenomidone) Material Balance

THITHI Stage Material balance

Input	Kg
sMPGM	2300
Dimethyl Formamide	1490
Carbon disulphide	1841
8 % HCl	250
Water	8000
Monochlorobenzene	6770
Acetone	2860
Total	**23511**

THITHI Preparation

Ouput	Kg
THITHI Organic mass	6803
Carbon disulphide	693
Carbon disulphide + Acetone	2054
Acetone + Monochlorobenzene	3021
Carbon disulphide, Acetone, MCB off g	600
Aqueous Waste	10340
Total	**23511**

HYTY Stage Material balance

Input	Kg
THITHI Organic Mass	6803
Acetonitrile	104
Acetic Acid	62
Dimethyl Formamide	104
Tert Butyl Alcohol	187
Phenyl Hydrazine	1155
Monochlorobenzene	3300
Caustic Lye 48%	1029
Total	**12744**

HYTY Preparation

Ouput	Kg
HYTY Organic Mass	11491
NaSH	1253
Total	**12744**

Fenamidone Stage Material balance

Input	Kg
HYTY Organic Mass	11491
Dimethyl Sulphate	1620
18% Caustic Solution	1900
Water	8580
Monochlorobenzene	6380
Total	**29971**

HTP-213 Preparation

Ouput	Kg
Fenamidone (HTP-213)	2450
Recovered Monochlorobenzene	10938
Aqueous Waste	15793
Monochlorobenzene Off Gases	300
Monochlorobenzene Residue	490
Total	**29971**

Parameter	Qty	CC per MT of Fena
Water Consumption per batch, KL	17	6.8
Waste Water generation per batch, KL	26	10.7
Hazardous Waste generation per batch, MT	5	2.0
Air Emmision per batch, MT	1	0.2
Solvent Consumption per batch, MT	2	1.0

Fenamidone Produced Per batch, MT	2.45

HTP-650 (B.A.S.-650) (Ametoctradine) Material Balance

CK Stage Material balance

Input	Kg
Xylene	3250
KOMe	2160
Decanonitrile	1900
Ethyl Propionate	1653
30% Hydrochloric Acid	3767
Water	6155
Total	**18885**

CK Formation

Ouput	Kg
Off gas HCl	135
Aqueous M L	12250
Organic Mass	6500
Total	**18885**

HTP-650 Material balance

Input	Kg
Organic Mass	6500
Chlorosulphonic Acid	167
Amitrol	920
Xylene	3270
Triethyl Amine	283
Metanol	3149
Water	4000
Total	**18289**

HTP-650 Formation

Ouput	Kg
Recovered Water to ETP	8244
Recovered Xylene	5117
Recovered Methanol	1591
Xylene Off Gases	330
Methanol Off Gases	160
Residue	250
HTP-650	2597
Total	**18289**

Parameter	Qty	CC per MT of HTP 650
Water Consumption per batch, KL	**10**	**3.9**
Waste Water generation per batch, KL	**20**	**7.9**
Hazardous Waste generation per batch, MT	**0.25**	**0.1**
Air Emmision per batch, MT	**0.63**	**0.2**
Solvent Consumption per batch, MT	**2.96**	**1.1**

HTP 650 Produced Per batch, MT	**2.597**

Ethyclozate Material Balance

Stage I Material balance

Input	Kg
Malonic Acid	299
Ammonium Formate	343.2
CNBA	400
Formic Acid	421.2
24% Hydrochloric Acid	999.2
Water	4149
MIBK	1800
25% Caustic solution	2938
Total	**11349.6**

Compound I Preparation

Ouput	Kg
Recovered MIBK	1443.6
Aqueous ML	9166
Residue	
Off Gases	
Compound I Wet Cake	740
Total	**11349.6**

Stage II Material balance

Input	Kg
CS lye	460
Water	10124
Compound I Wet Cake	740
Activated Carbon	53
Hydrazine Hydrate	201
30% Hydrochloric Acid	1476
Hyflo super cell	5
Total	**13059**

Compound II Preparation

Ouput	Kg
Aqueous ML	12152
LOD & Off gases	517
Compound II	390
Total	**13059**

Ethyclozate Material balance

Input	Kg
Compound II	390
Ethanol	3891
Sulphuric Acid	19
25% Caustic solution	37
Hyflo super cell	6
5% Sodium Bicarbonate solution	615
Water	4910
Total	**9867**

Ethyclozate Preparation

Ouput	Kg
Recovered Ethanol	3596
Aqueous ML	5337
LOD & Off gases	609
Ethyclozate	325
Total	**9867**

Parameter	Qty	CC per MT of Ethyclozate
Water Consumption per day, KL	19	59
Waste Water generation per day, KL	27	82
Hazardous Waste generation per day, MT	0	0
Air Emmision per day, MT	1	3
Solvent Consumption per day, MT	1	2

Ethyclozate Produced Per batch, MT	**0.33**

IKF Material Balance

Stage I Material balance

Input	Kg
AlCl3	1358
Chlorobenzene	3048
M-Cresol	551
2-MPC	868
Water	7711
Methanol	490
20% Caustic Solution	1222
35% Hydrochloric Acid	626
ISOPAR-G	1448
Total	**17322**

HPP Preparation

Ouput	Kg
Hydrochloric Acid	297
Aqueous Waste	6773
CB vapor loss	178
Waste CB	3033
ML	5049
ISOPAR-G	1375
LOD	33
HPP	584
Total	**17322**

Stage II Material balance

Input	Kg
50% TBAB	32
2-Bromopropane	671
40% KOH	540
HPP	584
Water	686
Total	**2513**

IPP Preparation

Ouput	Kg
Aqueous Waste	1579
2-Bromopropane +Water	172
IPP	762
Total	**2513**

Stage III Material balance

Input	Kg
Acetic Acid	719
DMSO	340
IPP	762
HCl	340
Water	2057
30% H2O2	423
Toluene	892
10% NaOH aq	380
13% NaClO	1183
Total	**7096**

CPP Preparation

Ouput	Kg
Aqueous Waste	5562
Toluene	699
CPP	835
Total	**7096**

Stage VI Material balance

Input	Kg
Toluene	2440
DMF	2
MTCA	403
SOCl2	370
12% Na2CO3	1623
APP/ Toluene	2917
Water	3016
IPA	1008
40% IPA	931
Total	**13310**

IKF Preparation

Ouput	Kg
SO2, HCl	282
Distilled toluene	1046
Toluene	4282
Water	724
Aqueous Waste	1664
ML	4006
LOD	350
IKF-5411	956
Total	**13310**

Parameter	Qty	CC per MT of IKF
Water Consumption per batch, KL	13	14.1
Waste Water generation per batch, KL	16	17.1
Hazardous Waste generation per batch, MT	9.44	9.9
Air Emission per batch, MT	0.46	0.5
Solvent Consumption per batch, MT	0.43	0.5

IKF-5411 Produced Per batch, MT	0.956

MPDC DME Material balance

Input	Kg
Di propyl	4700
Process Water lot 1	1818
98% H2SO4	2522
Propionaldehyde	3229
37% Formaldehyde	4422
Solid hydroquinone Slury	327
NaCl solution + Hydroquinone	655
Total	**17473**

ACROLEIN CATALYST PREPARATION & REACTION/ DISTILLATION

Ouput	Kg
Catalyst for Reuse	13741
Aqueous Waste	2352
Acrolein catalyst	3589
Total	17473

Input	Kg
30% NaOCl13 Solution	4154
DMD	2522
MMA	1941
Acetic Acid	2771
93% H2SO4 Solution	942
29% Aqueous Ammonia	1246
2 MA	1336
Water	4479
Toluene	4422
50% Caustic lye	709
Total	**24522**

MnO-DOXS REACTION AND CYCLIZATION EXTRACTION

Ouput	Kg
Distilled Methanol	4845
Aqueous Waste	10679
Base Extracted Toluene Layer	8998
Total	24522

Input	Kg
Base Extracted Toluene Layer	8998
Extracted Mother Liquor	5716
Methanol	2149
Water	6683
Total	**21546**

TOLUENE STRIPPING , PRECIPITATON, CRYSTALLIZATION, FILTRATION AND DRYING

Ouput	Kg
MPDC DME Dry Powder	3010
Filtration Mother liquor	10046
Aqueous Waste	326
Distilled Toluene	8164
Total	21546

Input	Kg
Mother Liquor - 1	5733
Organic Layer from previous ste	1392
Toluene	2494
Mother Liquor - 2	5733
Total	**15352**

MOTHER LIQUOR EXTRACTION

Ouput	Kg
Extracted Organic Layer 1	1890
Extracted Organic Layer 2	1836
Aqueous Waste	10168
Toluene Layer for next extractio	1392
Total	15352

Input	Kg
Solvent for Recovery	8144
Total	**8144**

SOLVENT RECOVERY

Ouput	Kg
Low Boilers	137
Heavy Boilers	133
Recovered Toluene	1356
Toluene for Washing	6516
Total	8144

Input	Kg
Toluene for Washing	6516
50% Caustic lye	483
Water	755
Total	**7754**

TOLUENE WASHING

Ouput	Kg
Aqueous Waste	1668
Organic Layer	6086
Total	7754

Parameter	Qty	CC per MT of MPDC DME
Water Consumption per batch, KL	14	4.6
Waste Water generation per batch, KL	25	8.3
Hazardous Waste generation per batch, MT	0.3	0.1
Air Emmision per batch, MT	0.00	0.0
Solvent Consumption per batch, MT	0.83	0.3

MPDC DME Produced Per batch, MT	3.01

Trifloxystrobin Material balance

Input	kg
o-Toluidine	66.5
Con. HCl	200
Water	665
NaNO2	45
Glyoxylic acid	85
MeONH2.HCl	77
Na2CO3	186
CuSO4.H2O	77
Heptane	67
MDC	798
Total	2267

O-toluidine to Int-5

Ouput	kg
Int-5	109
Recovered Heptane	60
Recovered MDC	720
Aqueous waste	1378
Total	2267

Input	kg
Int-5	109
Methanol	330
Thionyl chloride	57
Water	840
IPA	151
48% NaOH	130
Total	1617

Int-5 to Int-6

Ouput	kg
Int 6	58
Aqueous filtrate	588
Aqueous Waste	556
Recoverred methanol	275
Recovered IPA	140
Total	1617

Input	kg
Int 6	58
NaBrO3	52
NaHSO3	58
EDC	359
Water	287
IPA	96
Total	910

Int-6 to Int-7

Ouput	kg
Int-7	60
Recoverd EDC	340
Aqeous layer	360
Recovered IPA	90
Vent loss	60
Total	910

Input	Kg
KRM-2	50
Hydroxylamine hydrochloride	18
NaOH	16
Water	297
Total	381

Synthesis of Int-8

Ouput	Kg
Int-8	43
Aqeous layer	334
Vent loss	4
Total	381

Input	Kg
Int-7	60
Int-8	43
K2CO3 Powder	73
TBAB	3.5
Acetone	300
Isopropyl alcohol	150
Water	90
Total	720

Int-7 + Int-8 to Trifloxystrobin

Ouput	Kg
Trifloxystrobin	71
Recovered Acetone	260
Wet cake	129
Recovered IPA	145
Aqueous ML	90
Vent losses	25
Total	720

Parameter	Qty	CC per MT of Trifloxystrobin
Water Consumption per batch, KL	2.2	30.7
Waste Water generation per batch, KL	2.7	38.3
Hazardous Waste generation per batch, MT	13.3	187.7
Air Emmision per batch, MT	0.09	1.3
Solvent Consumption per batch, MT	0.07	1.0

Trifloxystrobin Produced Per batch, MT	0.071

Prothioconazole Material balance

Input	kg
2-Acetyl butyrolactone	250
Sulfuryl Chloride	381
48% Caustic lye	475
Water for Scrubber	750
Conc. Hydrochloric acid	435
Water for dilution	250
DCM	250
Total	**2691**

2-Acetyl butyrolactone to Int-1

Output	kg
Intermediate-1	215
48% Caustic lye	1366
Aqueous Effluent	750
Organic Effluent	290
Weight loss	51
Total	**2691**

Input	kg
Intermediate-1	215
48.50% Caustic lye	178
Tetra n-Butylammonium Bromide (TBAB)	7
DCM	691
Process Water for dilution	220
Conc. HCl	73
Saturated brine solution	124
Total	**1489**

Int-1 to Int-3

Output	kg
Intermediate-3	700
in DCM solution	
Main Aqueous layer	582
Brine aqueous layer	125
Weight loss	17
Total	**1439**

Input	kg
Intermediate-3(in DCM solution)	795
Sulfuryl Chloride	288
Methanol	76
48.5% Caustic lye (Scrubber)	241
Water	491
Saturated $NaHCO_3$ solution	158
DCM	127
Saturated brine solution	70
Total	**2235**

Int-3 to Int-4

Output	kg
Intermediate-4	158
Recovered DCM	837
Scrubber solution	788
Main Aq. layer	262
Bicarbonate + Brine wash mixture	276
Residue + DCM mixture	98
Weight loss	16
Total	**2235**

Input	kg
Intermediate-4	155
2-Chlorobenzyl chloride	209
Magnesium	154
Iodine	0.22
Triethylamine	178
Toluene	977
35% Hydrochloric acid	33
Water	505
Total	**2234**

Int-4 to Int-5'

Output	kg
Intermediate-5'	275
Aq. layer	1042
Recovered toluene	857
Recover Mg	120
Total	**2271**

Input	kg
Intermediate-5'	275
80% Aq. Hydrazine hydrate	97
n-Butanol	446
Water	179
30% aq. HCl	440
Toluene	1078
Saturated Brine solution (25% w/w)	158
Total	**2823**

Int-5' to Int-6

Output	kg
Intermediate-6	158
Aq. layer	552
Recovered solvent	1359
MDR	750
Weight losses	38
Total	**2823**

Input	kg
Intermediate-6	158
24% aq. NaOH solution	84
40.22% aq. Formaldehyde solution	80
Sodium thiocyanate	50
Sodium hydrogen sulfate	74
Ethyl acetate	1435
Water	790
Dichloromethane	850
Total	**3469**

Int-6 to Int-7

Output	kg
Intermediate-7	101
Recovered DCM	773
Recovered Ethylacetate	1145
Aqueous waste	1250
Total	**3469**

Input	kg
Intermediate-7	101
Toluene	1246
Ethanol	200
Ferric chloride	55
Water	1800
20% Aq. HCl	6
Sodium chloride	22
Total	**7665**

Int-7 to Int-8

Output	kg
Intermediate-8	85
Recovered Toluene	1354
Recovered Ethanol	175
Aqueous waste	1238
Weight loss	33
Total	**3661**

Parameter	Qty	CC per MT of Prothioconazole
Water Consumption per batch, KL	6.5	33
Waste Water generation per batch, KL	7.5	38
Hazardous Waste generation per batch, MT	0.6	3
Air Emission per batch, MT	0.33	2
Solvent Consumption per batch, MT	0.95	11

Prothioconazole Produced Per batch, MT	0.185

Annexure-13A

Undertaking

From,
Hikal Limited
Plot T-21, MIDC Ind. Area,
Taloja – 410208, District - Raigad

To,
The Member Secretary,
Maharashtra Pollution Control Board,
Kalpataru Point, Sion (East),
Mumbai - 400 022

Dear Sir,

We hereby certify that for the proposed change in product mix in the same category with no increase in pollution load, we are not making any change in machinery and plant layout.

Existing machinery and plant layout remains unchanged for the proposed change in product mix.

For Hikal Limited,

Authorized signatory

Date: February 05, 2018

Hikal Ltd.

Factory: T-21, MIDC Ind. Area, Taloja - 410 208, Dist Raigad, Maharashtra India Tel: +91-22-3099 0100 Fax: +91-22-2741 1844

Admin. Office: Great Eastern Chambers, 6th Floor, Sector 11, CBD Belapur, Navi Mumbai - 400 614 India Tel: +91-22-3097 3100 Fax: +91-22-3097 3281

Regd. Office: 717/718, Maker Chambers - V, 7th Floor, Nariman Point, Mumbai - 400 021 India Tel: +91-22-6630 1831 / 2283 4587 Fax: +91-22-2283 3913

www.hikal.com info@hikal.com CIN: L24200MH1988PTC048028

Proposed change in Product mix is in the same category

Sr. No.	Product Name	Chemical name	CAS No.	Product Category *
1	Thiabendazole	2-(4-thiazolyl)IH-Benzimidazole.	148-79-8	Fungicides
2	HTP-218 (Fenamidone) or MPDC-DME	(s)-1-anilino-4-methyl-2-methylthio-4phenylimidazolin-5-one	161326-34-7	Fungicides
3	HTP-650 (B.A.S.-650) (Ametoctradine)	ametoctradine(ISO);5-ethyl-6octyl[1,2,4]triazolo[1,5-α]pyrimidin-7-amine	865318-97-4	Fungicide
4	HTP-528 (Ethyclozate)	Ethyl 5 - chloro – 1 H – indazol - 3 - acetate	27512-72-7	Plant Growth Regulator
5	IKF-5411 or MPDC-DME	N-[1,1-dimethyl-2-(4-isopropoxy-o-tolyl)-2-oxoethyl]-3-methylthiophene-2-carboxamide	875915-78-9	Fungicides / Intermediate for Herbicides
6	MPDC-DME	5-Methylpyridine-2,3-dicarboxylic acid dimethyl ester	112110-16-4	Intermediate for Herbicides
7	Trifloxystrobin	Trifloxystrobin	141517-21-7	Fungicides
8	Prothioconazole	Prothioconazole	178928-70-6	Fungicides

HIKAL

Ref: HKL/TAL/ENV/2018/005
Date: June 09, 2018

To,
Mr. P.K.Mirashe
Assistant Secretary, Technical &
Chairman, The Technical Committee for Product Mix
Maharashtra Pollution Control Board,
Kalpataru Point, 3rd and 4th floor,
Opp. Cine Planet, Sion Circle, Mumbai - 400022

Subject: **Application for the amendment in existing Consent to Operate for proposed change in product mix in the same category without increase in pollution load**

Reference: 1) On-line application no. 10000386900 dated November 20, 2017 (UAN No. MPCB-CONSENT-0000036593)
2) Minutes of Second Meeting of Product Mix Technical Committee dated May 19, 2018

Respected Sir,

As per the recommendations of Technical Committee during second meeting dated May 19, 2018, we are submitting herewith additional documents as stated below:

1. Unit wise effluent treatment system with its performance
2. Sources of emissions, its concentration at source and treatment system provided (existing as well as after product mix)
3. Hazardous waste generation and its disposal (existing as well as after product mix)

We have submitted on-line application for product mix change on November 20, 2017. We have so far attended two technical committee meetings on April 21, 2018 and May 19, 2018 and timely furnished all the required submissions.

Since the next date for hearing has not been announced yet and the product has seasonal demand, in view of this, kindly grant us approval based on our submissions and process our application for proposed product mix change in the same category without increase in pollution load which has been certified by ICT, Mumbai.

Thanking you,

For M/s. Hikal Ltd.

Authorized signatory

Hikal Ltd.

Factory: T-21, MIDC Ind. Area, Taloja - 410 208, Dist Raigad, Maharashtra, India. Tel.: +91 22 3099 0100 Fax: +91 22 2741 1944

Admin. Office: Great Eastern Chambers, 6th Floor, Sector 11, CBD Belapur, Navi Mumbai - 400 614, India. Tel.: +91-22-3097 8100 Fax: +91-22-3097 32

Regd. Office: 717/718, Maker Chambers - V, 7th Floor, Nariman Point, Mumbai - 400 021, India. Tel.: +91-22-6650 1801 / 2283 4587 Fax: +91 22 2285 39

www.hikal.com info@hikal.com CIN: L24200MH1988PTC048028

Hikal Limited, Taloja - Hazardous waste data

Existing and proposed Hazardous Waste streams

Hazardous waste Category	Hazardous waste streams	Constituents	Source / Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
5.1	Used / Spent Oil	Used / Spent Oil	Maintenance of equipments	Maintenance / Utility			0.025	9.13		0.025	9.125	Sale to authorized reprocessor
20.2	Spent Benzene	Benzene	Cyanathiazole (CNT) preperation	Thiabendazole	1.06	3	3.18	1159.38	2.8	2.96	1082.09	Sale to authorized reprocessors
20.2	Spent solution	Toluene	CITD Preparation	C.I.T.D.	4.97	0.4	1.99	725.62	0	0	0	Sale to authorized reprocessors
20.2	Recovered MCB	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.122	0.9	0.11	40.22	0.3	0.04	13.41	Sale to authorized reprocessors
20.2	ML	IPP	IKF preperation	IKF-5413	4.190	0	0.00	0	0.2	0.84	305.90	Sale to authorized reprocessors
20.2	ML	Methanol	HPP preperation	IKF-5411	7.062	0	0.00	0	0.2	1.41	515.49	Sale to authorized reprocessors
20.2	Low Boiler	2MA	Solvent recovery	MPDC DME	0.046	0	0.00	0	0.2	0.01	3.37	Sale to authorized reprocessors
20.2	High Boiler	DME	Solvent recovery	MPDC DME	0.044	0	0.00	0	0.2	0.01	3.23	Sale to authorized reprocessors
29.2	Amidine Waste	Sulfur, Chloride	Amidine Hydrochloride Preparation	Thiabendazole	0.03	3	0.08	29.26	2.8	0.07	27.31	Incineration at CHWTSDF
29.1	CNT Tar from Column 3	Mixed Thiazole, Tar	Cyanathiazole (CNT) preperation	Thiabendazole	0.01	3	0.026	9.46	2.8	0.024	8.83	Incineration at CHWTSDF
29.1	Low Boiler waste	CS_2, Acetone, Iso Propyl Acetate	4-Methyl Thiazole (4-MT) preperation	Thiabendazole	0.02	3	0.070	25.68	2.8	0.066	23.96	Incineration at CHWTSDF
29.1	ODCB Tar	Chloro benzenes	Amidine Hydrochloride Preparation	Thiabendazole	0.01	3	0.017	6.37	2.8	0.016	5.95	Incineration at CHWTSDF
29.1	STM Solution	Sodium Thio Methoxide	CITD Preparation	C.I.T.D.	7.5	0.4	3.00	1095	0	0	0	Incineration at CHWTSDF
29.1	CITD Residue	Organic residue	CITD Preparation	C.I.T.D.	0.4	0.4	0.16	58.4	0	0	0	Landfill at CHWTSDF
29.1	CS_2	CS_2	THITHI Preparation	HTP-213 (Fenamidone)	0.283	0.9	0.25	92.92	0.3	0.08	30.97	Incineration at CHWTSDF
29.1	CS_2 + Acetone	CS_2 + Acetone	THITHI Preparation	HTP-213 (Fenamidone)	0.838	0.9	0.75	275.40	0.3	0.25	91.80	Incineration at CHWTSDF
29.1	NaSH	NaSH	HYTY Preparation	HTP-213 (Fenamidone)	0.864	0.9	0.78	283.87	0.3	0.26	94.62	Incineration at CHWTSDF
29.1	MCB residue	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.544	0.9	0.49	178.85	0.3	0.16	59.62	Incineration at CHWTSDF
29.1	Residue	Methanol, D-Xylene	HTP-650 Formation	HTP-650 (B.A.S.-650) (Ametoctradine)	0.096	2.3	0.22	80.81	2.3	0.22	80.81	Incineration at CHWTSDF
29.1	Residue	2-HPP	HPP preperation	IKF-5412	0.035	0	0.00	0	0.2	0.01	2.52	Incineration at CHWTSDF
29.1	Residue	KBr	IKF preperation	IKF-5414	0.366	0	0.00	0	0.2	0.07	26.73	Incineration at CHWTSDF
29.1	Activated Carbon	Activated Carbon	Filteration	Manufacturing			0.122	44.53		0.122	44.53	
29.1	Evaporator residue	Salts + Lime	High TDS Treatment	Evaporator			0.00	0		4.61	1682.7	Landfill at CHWTSDF
35.2	Biological sludge	Sludge from treatement of waste water	Waste water treatement	ETP			0.037	13.51		0.037	13.51	Landfill at CHWTSDF
35.1	Filter & Fiber cloth	Filters and filter material contaminated with organic liquid	Filteration, ANF operation	Manufacturing			0.137	50.01		0.137	50.01	Incineration at CHWTSDF
11.4	Boiler soot	Flue gas dust and other particulates	Boiler opeartion	Boiler			0.027	9.86		0.027	9.86	Incineration at CHWTSDF
33.3	Product liners (discarded containers / barrales / liners)	discarded containers / barrales / liners	Drum handling	RM warehouse				500 Nos.			500 Nos.	Crushed after decontamination and scrap sale
						Total	11.47	4188.27		11.47	4186.28	
						Consent quantity		4188.65			4188.65	

285

Hikal Limited, Taloja - Hazardous waste data

Existing and proposed Hazardous Waste streams

Hazardous waste Category	Hazardous waste streams	Constituents	Source / Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
5.1	Used / Spent Oil	Used / Spent Oil	Maintenance of equipments	Maintenance / Utility			0.025	9.13		0.025	9.125	Sale to authorized reprocessor
20.2	Spent Benzene	Benzene	Cyanathiazole (CNT) preperation	Thiabendazole	1.06	3	3.18	1159.38	2.8	2.96	1082.09	Sale to authorized reprocessors
20.2	Spent solution	Toluene	CITD Preparation	C.I.T.D.	4.97	0.4	1.99	725.62	0	0	0	Sale to authorized reprocessors
20.2	Recovered MCB	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.122	0.9	0.11	40.22	0.3	0.04	13.41	Sale to authorized reprocessors
20.2	ML	IPP	IKF preperation	IKF-5413	4.190	0	0.00	0	0.2	0.84	305.90	Sale to authorized reprocessors
20.2	ML	Methanol	HPP preperation	IKF-5411	7.062	0	0.00	0	0.2	1.41	515.49	Sale to authorized reprocessors
20.2	Low Boiler	2MA	Solvent recovery	MPDC DME	0.046	0	0.00	0	0.2	0.01	3.37	Sale to authorized reprocessors
20.2	High Boiler	DME	Solvent recovery	MPDC DME	0.044	0	0.00	0	0.2	0.01	3.23	Sale to authorized reprocessors
29.2	Amidine Waste	Sulfur, Chloride	Amidine Hydrochloride Preparation	Thiabendazole	0.03	3	0.08	29.26	2.8	0.07	27.31	Incineration at CHWTSDF
29.1	CNT Tar from Column 3	Mixed Thiazole, Tar	Cyanathiazole (CNT) preperation	Thiabendazole	0.01	3	0.026	9.46	2.8	0.024	8.83	Incineration at CHWTSDF
29.1	Low Boiler waste	CS_2, Acetone, Iso Propyl Acetate	4-Methyl Thiazole (4-MT) preperation	Thiabendazole	0.02	3	0.070	25.68	2.8	0.066	23.96	Incineration at CHWTSDF
29.1	ODCB Tar	Chloro benzenes	Amidine Hydrochloride Preparation	Thiabendazole	0.01	3	0.017	6.37	2.8	0.016	5.95	Incineration at CHWTSDF
29.1	STM Solution	Sodium Thio Methoxide	CITD Preparation	C.I.T.D.	7.5	0.4	3.00	1095	0	0	0	Incineration at CHWTSDF
29.1	CITD Residue	Organic residue	CITD Preparation	C.I.T.D.	0.4	0.4	0.16	58.4	0	0	0	Landfill at CHWTSDF
29.1	CS_2	CS_2	THITHI Preparation	HTP-213 (Fenamidone)	0.283	0.9	0.25	92.92	0.3	0.08	30.97	Incineration at CHWTSDF
29.1	CS_2 + Acetone	CS_2 + Acetone	THITHI Preparation	HTP-213 (Fenamidone)	0.838	0.9	0.75	275.40	0.3	0.25	91.80	Incineration at CHWTSDF
29.1	NaSH	NaSH	HYTY Preparation	HTP-213 (Fenamidone)	0.864	0.9	0.78	283.87	0.3	0.26	94.62	Incineration at CHWTSDF
29.1	MCB residue	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.544	0.9	0.49	178.85	0.3	0.16	59.62	Incineration at CHWTSDF
29.1	Residue	Methanol, O-Xylene	HTP-650 Formation	HTP-650 (B.A.S.-650) (Ametoctradine)	0.096	2.3	0.22	80.81	2.3	0.22	80.81	Incineration at CHWTSDF
29.1	Residue	2-HPP	HPP preperation	IKF-5412	0.035	0	0.00	0	0.2	0.01	2.52	Incineration at CHWTSDF
29.1	Residue	KBr	IKF preperation	IKF-5414	0.368	0	0.00	0	0.2	0.07	26.73	Incineration at CHWTSDF
29.1	Activated Carbon	Activated Carbon	Filteration	Manufacturing			0.122	44.53		0.122	44.53	
29.1	Evaporator residue	Salts + Lime	High TDS Treatment	Evaporator			0.00	0		4.61	1682.7	Landfill at CHWTSDF
33.2	Biological sludge	Sludge from treatement of waste water	Waste water treatement	ETP			0.037	13.51		0.037	13.51	Landfill at CHWTSDF
35.1	Filter & Filter cloth	Filters and filter material contaminated with organic liquid	Filteration, ANF operation	Manufacturing			0.137	50.01		0.137	50.01	Incineration at CHWTSDF
11.4	Boiler soot	Flue gas dust and other particulates	Boiler opeartion	Boiler			0.027	9.86		0.027	9.86	Incineration at CHWTSDF
33.3	Product liners (discarded containers / barrales / liners)	discarded containers / barrales / liners	Drum handling	RM warehouse				500 Nos.			500 Nos.	Crushed after decontamination and scrap sale
						Total	11.47	4188.27		11.47	4188.28	
						Consent quantity		4188.65			4188.65	

Annexure-15

282

Hazardous waste generation and its disposal (Existing and Proposed)

Hazardous waste Category	Hazardous Waste streams	Constituents	Source Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
5.1	Used / Spent Oil	Used / Spent Oil	Maintenance of equipments	Maintenance / Utiley			0.02	9		0.02	9	Sale to authorized reprocessor
29.4	Spent Benzene	Benzene	Cyanthiazole (CNT) preperation	Thiabendazole	0.06	3	0.17	62	2.8	0.16	58	Sale to authorized reprocessors
	Spent solution	Toluene	CITD Preparation	C.I.T.D.	4.97	0.4	1.99	725	0	0	0	Sale to authorized reprocessors
	Spent Solvent	Mixed solvent	Cyanthiazole (CNT) preperation	Thiabendazole	0.60	3	1.80	658	2.8	1.68	614	Sale to authorized reprocessors
	Spent Solvent	IPP	IKF preperation	IKF-5413	3.48	0	0	0	0.2	0.70	254	Sale to authorized reprocessors
	Spent Solvent	Methanol	HPP preperation	IKF-5411	7.05	0	0	0	0.2	1.41	515	Sale to authorized reprocessors
	Spent Acetone	Acetone	THITHI Preparation	HTP-213 (Fenamidone)	1.42	0.9	1.28	468	0.30	0.43	156	Incineration at CHWTSDF
	Spent Solvent	IPP	IKF preperation	IKF-5413	4.01	0	0	0	0.2	0.80	292.44	Sale to authorized reprocessors
								1913			1889	

7

Hazardous waste generation and its disposal (Existing and Proposed)

Hazardous Waste Category	Hazardous waste streams	Constituents	Source Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
29.1	Low Boiler waste	CS2, Acetone, Iso Propyl Acetate	4-Methyl Thiazole (4-MT) preperation	Thiabendazole	0.02	3	0.07	25	2.8	0.06	23.37	Incineration at CHWTSDF
	Organic Tar from Column 3	Mixed Thiazole, Tar	Cyanothiazole (CNT) preperation	Thiabendazole	0.01	3	0.03	9	2.8	0.02	8.83	Incineration at CHWTSDF
	Amidine Waste	Sulfur, Chloride	Amidine Hydrochloride Preparation	Thiabendazole	0.0001	3	0.0004	0.15	2.8	0.0004	0.14	Incineration at CHWTSDF
	ODCB Tar	Chloro Benzenes	Amidine Hydrochloride Preparation	Thiabendazole	0.01	3	0.02	6	2.8	0.02	5.95	Incineration at CHWTSDF
	Activated Carbon	Activated Carbon	Filteration	Manufacturing			0.11	41		0.11	41	Sale to authorized reprocessor
	Chemical residue / residue pesticides	NaSH	HYTY Preparation	HTP-213 (Fenamidone)	0.74	0.9	0.67	243.56	0.30	0.22	81.19	Incineration at CHWTSDF
	HTP 213 waste residue	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.08	0.9	0.07	25	0.30	0.02	8.38	Incineration at CHWTSDF
	CDIM Residue	Sodium Thio Methoxide	CITD Preparation	C.I.T.D.	0.82	0.4	0.33	120	0	0	0	Landfill at CHWTSDF
	CITD Residue	Organic residue	CITD Preparation	C.I.T.D.	6.17	0.4	2.47	900	0	0	0	Landfill at CHWTSDF
	Process residue	NaSH	HYTY Preparation	HTP-213 (Fenamidone)	0.12	0.9	0.11	40.79	0.30	0.04	13.60	Incineration at CHWTSDF

8

Hazardous waste generation and its disposal (Existing and Proposed)

Hazardous Waste Category	Hazardous waste streams	Constituents	Source / Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
29.1	MCB residue	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.47	0.9	0.42	153.89	0.30	0.14	51.90	Incineration at CHWTSDF
	Residue	Methanol, O-Xylene	HTP-650 Formation	HTP-650 (B.A.S.- 650) (Ametoctradin e)	0.33	2.3	0.29	105.84	2.30	0.29	105.84	Incineration at CHWTSDF
	Residue	2-HPP	HPP preperation	KF-5412	0.03	0	0	0	0.20	0.01	2.52	Incineration at CHWTSDF
	Residue	KBr	IKF preperation	KF-5414	0.37	0	0	0	0.20	0.07	26.73	Incineration at CHWTSDF
	Spent Benzene	Benzene	Cyanathiazole (CNT) preperation	Thiabendazole	0.40	3	1.20	438	2.8	1.12	408.94	Incineration at CHWTSDF
	Recovered MCB	MCB	HTP-213 Preparation	HTP-213 (Fenamidone)	0.12	0.9	0.11	40.22	0.3	0.04	13.41	Incineration at CHWTSDF
	Low Boiler	DMA	Solvent recovery	MPDC DME	0.05	0	0	0	0.2	0.01	3.37	Incineration at CHWTSDF
	High Boiler	DME	Solvent recovery	MPDC DME	0.04	0	0	0	0.2	0.01	3.23	Incineration at CHWTSDF
	Evaporator residue	Salts + Lime	High TDS Treatment	Evaporator			0	0		3.60	1314	Landfill at CHWTSDF
								2149			2111	

Hazardous waste generation and its disposal (Existing and Proposed)

Hazardous waste Category	Hazardous waste streams	Constituents	Source / Process step	Product name	Hazardous Waste quantity (MT/MT)	Existing			Proposed			Disposal method
						Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	Production (MTPD)	Hazardous Waste (MTPD)	Hazardous Waste (MTPA)	
29.2	Chemical sludge	Sulfur, Chloride	Amidine Hydrochloride Preparation	Thiabendaz ole	0.03	3	0.08	30	2.8	0.08	28	Incineration at CHWTSDF
35.3	Biological sludge	Sludge from Waste Water Treatment	Waste water treatement	ETP			0.07	27		0.07	27	Landfill at CHWTSDF
36.2	Filter & Filter cloth	Filters and filter material contaminated with organic liquid	Filteration, ANF operation	Manufactur ing			0.14	50		0.14	50	Incineration at CHWTSDF
37.2	Boiler soot	Flue gas dust and other particulates	Boiler operation	Boiler			0.03	10		0.03	10	Incineration at CHWTSDF
33.1	Product liners (discarded containers / barrales / liners)	Empty barrels / containers / liners used for handling of hazardous chemical / wastes	Drum handling	FM warehouse				500 Nos.			500 Nos.	Crushed after decontamination and scrap sale
						Total	11.47	4187.65			4124.08	
						Consent quantity		4188.65			4188.65	

Sr. No.	Name of Industry	Recommendations
		Considering the above, overall production quantity will be increased compared to existing production quantity. 2. PP unable to show the unit wise performance of Effluent Treatment Plant in terms of percentage reduction in BOD/COD. Finally, after due deliberations, it was decided to defer the case and was advised that: 1. PP shall not apply under product mix or PP needs to carry out revised study & submit revised NIPL certificate by taking account into all above points as there is enhancement in production quantity. 2. PP shall submit adequacy report of existing treatment system along with design criteria.
2	M/s. Hikal Ltd. T - 21, MIDC Ind. Area, Taloja, Dist. - Raigad, Maharashtra.	PP gave presentation on points raised during 2nd meeting dated 19/5/2018 towards amendment in existing consent for change in product-mix which is as below: 1. Unit wise effluent treatment system with its performance 2. Sources of emission, its concentration at source and treatment system provided 3. Hazardous Waste generation and its disposal After interaction with the PP, it was noted that, 1. PP is having its existing treatment system consisting of primary (Equalization, Neutralization, Flash Mixer, Primary Clarifier), Secondary (Aeration Tank, Secondary Clarifier-I, Aeration Tank-II, Secondary Clarifier-II) and Tertiary treatment system. PP has shown the unit wise percentage reduction of BOD & COD. 2. Emission load after product mix will be @ 11.36 MT/Day (existing- 12.35 MT/Day). To control process emission, PP is having scrubbing system at all sources of emissions. 3. Hazardous Waste generation after product mix will be 4124.08 MT/A (existing-4187.65 MT/A) and its disposal will be as per the provisions of Hazardous & Other Waste (Management & Transboundry Movement) Rule, 2016. After due deliberation, it was decided to recommend the case under product mix considering the following points: 1. Trade effluent: Hydraulic load after product mix is 742 CMD (existing 793 CMD) and organic load 4792 kg/day (existing 4983 kg/day) 2. Emission load after product mix will be 11.36 MT/Day (existing- 12.35 MT/Day) and PP agreed to install online monitoring system for air emissions & make its connectivity to Boards server.

Annexure-17

Sr. No.	Name of Industry	Recommendations
		3. Hazardous Waste generation after product mix will be 4124.08 MT/A (existing-4187.65 MT/A), Spent Ammonia generated from mfg of Thiabendazole shall be disposed through Actual user (present practice is sale to Authorized party) and Activated carbon generated shall be disposed at CHWTSDF (present practice to dispose to Authorized reprocessor) 4. **Production activity:** a. **Reduction of production quantity of** Thiabendazole 700 MT/A to 490 MT/A, HTP-218 (Fenomidone) or MPDC-DME 300 MT/A to 100 MT/A, b. **Retained Products:** HTP-650 (B.A.S.-50) Ametoctradine)-750 MT/A c. **Removal of** HTP-528 (Ethyclozate)-10 MT/A, C.I.T.D-145 MT/A d. **Addition of** IKF-5411 or MPDC-DME-60 MT/A, MPDC-DME- 400 MT/A e. Existing In house Pilot Plant for Agro/Pharma Products and intermediates (Facility Shall be used only used only for development of consented products and new products on Laboratory Scale shall be continued. f. Overall production quantity as per Environmental Clearance is 1800 MT/A and after product mix will be same i.e.1800 MT/A. **By-Product:** a. Recovered Ammonia-900 MT/A (Existing consented quantity-1250 MT/A) b. Sodium Hydro Sulphide/Potassium Bromide- 458 MT/A (Existing consented quantity-458 MT/A) c. Potassium Chloride/Aluminium Chloride Solution- 382 MT/A (Existing consented quantity-382 MT/A) d. Spent HCl (App. 30%)-1462 MT/A (Existing consented quantity-1462 MT/A) e. Spent H2SO4 (98%)-904 MT/A (Existing consented quantity-904 MT/A) f. Spent Caustic-520 MT/A (Existing consented quantity-520 MT/A) g. Recovered Solvents (Mono Chloro Acetone/Toluene/ Methanol/IPA/DMF/ Mono Choloro Benzene/ Benzene)-500 MT/A (Existing consented quantity-500 MT/A) h. Total by-product quantity will be 5126 MT/A (Existing consented quantity-5476 MT/A) i. PP shall follow provisions of Hazardous & Other Waste (M&TM) Rules, 2016 for selling of by-product.
3	Lupin Limited, T-142,Å M.I.D.C. Tarapur via Boisar, Tal & Dist-Palgha	PP gave presentation on amendment in existing consent for change in product-mix. After due delibrations with the PP, it was noted that, 2. No Increase in Pollution Load certificate issued by ICT shows introduction of three new products, however during presentation shown introduction of six new products. Hence, on the basis of

Annexure-18

TRANSPORT DEPARTMENT, GUJARAT

926

PERMIT IN RESPECT OF NATIONAL PERMITMULTI AXLE GOODS VCH(<=50TONS)

PART-A

1. Permit No	GJ2021-NP-5991B
2. Name Of The Permit Holder	SHREE MARUTI IMPEX INDIA
3. Father's Name	NA
4. Address	14, VRUNDAVAN SOCIETY IPCL ROAD, KARACHIYA RANOLI, GUJARAT Vadodara-391350
5. The Permit is valid for	All Over India
6. Name Of the States/UT's for which permit is valid	As mentioned in authorisation certificate
7. Type and Capacity of Vehicle including trailer and articulated vehicle	
(i) Registration No/Manuf. year of the motor vehicle	GJ06BT6421 / 2021
(ii) Type of vehicle	Goods Carrier
(iii) Unladen Weight(kgs)	13500
(iv) Gross Vehicle Weight	42000
(v) Date of Registration of the Vehicle	09-Aug-2021
(vi) Maker/Model	ASHOK LEYLAND LTD / GM4220/66 H CO
(vii) Seating Capacity	2
(viii) Gross Combination Weight	0
(vi) Service Type	Goods Service
8. Valid	From:- 11-Aug-2021 To:- 10-Aug-2026
9. Nature of Goods to be carried	HAZARDOUS::OTHER::TO CARRY PETROLEUM PRODUCTS
10. Condition of Permit	List Attached
11. The Holder of the permit shall exercise such supervision over the network of his employees as is necessary to ensure that the vehicle is operated in conformity with the Act and Rules made thereunder and with due regard to comfort, convenience and safety of public	
12. The records to be maintained and the dates on which the returns are to be sent to Transport Authority	Quarterly
13. Authorization No.	GJ2021-NP/AUTH-1771C
14. Authorization Validity	From: 11-Aug-2021 To: 10-Aug-2022
15. Region Covered :	GUJARAT STATE

Date 11-Aug-2021 16:43:02

Note : This is a computer generated certificate of Permit and can be verified online through QRCode. No signature required.

TRANSPORT DEPARTMENT, GUJARAT

PERMIT IN RESPECT OF NATIONAL PERMITMULTI AXLE GOODS VCH(<=50TONS)

PART-A

1. Permit No	GJ2021-NP-8012B
2. Name Of The Permit Holder	SHREE MARUTI IMPEX INDIA
3. Father's Name	NA
4. Address	14, VRUNDAVAN SOCIETY IPCL ROAD, KARACHIYA RANOLI, GUJARAT Vadodara-391350
5. The Permit is valid for	All Over India
6. Name Of the States/UT's for which permit is valid	As mentioned in authorisation certificate
7. Type and Capacity of Vehicle including trailer and articulated vehicle	
(i) Registration No/Manuf. year of the motor vehicle	GJ06BT6431 / 2021
(ii) Type of vehicle	Goods Carrier
(iii) Unladen Weight(kgs)	13740
(iv) Gross Vehicle Weight	42000
(v) Date of Registration of the Vehicle	04-Sep-2021
(vi) Maker/Model	ASHOK LEYLAND LTD / GM4220/66 H CO
(vii) Seating Capacity	2
(viii) Gross Combination Weight	0
(vi) Service Type	Goods Service
8. Valid	From:- 15-Sep-2021 To:- 14-Sep-2026
9. Nature of Goods to be carried	HAZARDOUS::OTHER::TO CARRY PETROLEUM PRODUCTS
10. Condition of Permit	List Attached
11. The Holder of the permit shall exercise such supervision over the network of his employees as is necessary to ensure that the vehicle is operated in conformity with the Act and Rules made thereunder and with due regard to comfort, convenience and safety of public	
12. The records to be maintained and the dates on which the returns are to be sent to Transport Authority	Quarterly
13. Authorization No.	GJ2021-NP/AUTH-4418C
14. Authorization Validity	From: 15-Sep-2021 To: 14-Sep-2022
15. Region Covered :	GUJARAT STATE

Date 15-Sep-2021 14:22:17

Note : This is a computer generated certificate of Permit and can be verified online through QRCode. No signature required.

Scanned By Scanner Go

2022

TRANSPORT DEPARTMENT,MAHARASTRA

FORM 47

[See Rule 87(2) of CMVR-1989]

AUTHORIZATION CERTIFICATE OF N.P. (GOODS)

1.National Permit Authorization Number	NP/MH/4/102021/15214 Dated: 05-Oct-2021
2.Name of Permit Holder	PRAVIN
3.Address	HAPPY VALLEY HOMES,,G.B.ROAD, MANPADA,,Thane-400610
4.Registration Mark of Vehicle	MH04HY6377
5.Date of Registration	29-Sep-2017
6. Maker & Model	TATA MOTORS LTD
7.Engine Number	ISBE5.91804071G63606655
8. Chassis Number	MAT541024H1G13116
9. Validity of NP Authorization	02-Oct-2022
10.Validity of Basic Goods Permit	02-Oct-2022
11.Type of Vehicle	203
12.GVW(in Kgs)	42000
13.Unladen Weight(in Kgs)	12500
14.Seating Capacity	1

Sl No.	History

This authorization is issued on 05-Oct-2021 and valid throughout the territory of India upto 02-Oct-2022. Certified that the National Permit holder has paid the consolidated fee of 16500/- through Internet Banking vide Transaction Id: 2110102117162909, Bank Reference No 0510210008573 dated: 05-Oct-2021 at .

Printed On: 05-Oct-2021 14:25:34 PM

Regional Officer,
RTO-THANE, MAHARASTRA

Digitally signed by vahan.parivahan.gov.in
Date: 2021.10.05 14:35:34 IST

9336

TRANSPORT DEPARTMENT, GUJRAT

FORM 47

(See Rule 87(2) of CMVR, 1989)

AUTHORIZATION CERTIFICATE OF N.P. (GOODS)

1. National Permit Authorization No	:	NP/GJ/[illegible]082021/26386 Dated: 12-Aug-2021
2. Name of Permit Holder	:	[illegible]ANWAR RAYMA
3. Address	:	[illegible] JANGI, BHACHAU, Kachchh-37[illegible]
4. Registration Mark of Vehicle	:	GJ12BY[illegible]
5. Date of Registration	:	09-Aug-2021
6. Maker & Model	:	[illegible] COMMERCIAL VEHICLES LTD
7. Engine Number	:	[illegible]EDX[illegible]534056*K6*P
8. Chassis Number	:	MC2BESRC0MA068562
9. Validity of NP Authorization	:	09-Aug-2022
10. Validity of Basic Goods Permit	:	09-Aug-2026
11. Type of Vehicle	:	MULTI AXLE GOODS VCH(<=50tons)[illegible]
12. GVW(in Kgs)	:	[illegible]2000
13. Unladen Weight(in Kgs)	:	[illegible]2500
14. Seating Capacity	:	2

This authorization is issued on 12-Aug-2021 and valid throughout the territory of India upto 09-Aug-2022.

Certified that the National Permit holder has paid the consolidated fee of ₹ 16500/- through Bank Challan vide Transaction Id: 2108003[illegible]690908, Bank Reference No [illegible]048065 Dated: 11-Aug-2021 at State Bank of India Only.

Printed On: 12-Aug-202[illegible] 17:17:38 P[illegible]

RTO BHUJ, GUJRAT

12-08-2021

Annexure-19

236

भारत सरकार
Government of India
वाणिज्य और उद्योग मंत्रालय
Ministry of Commerce & Industry
पेट्रोलियम तथा विस्फोटक सुरक्षा संगठन (पैसो)
Petroleum & Explosives Safety Organisation (PESO)
आठवी मंजिल, यश कमल बिल्डींग, सयाजी गंज
वडोदरा- 390020
8th Floor, Yash Kamal Building, Sayajigunj,
Vadodara - 390020

No.: P/WB/GJ/11/43169(P513936)

E-mai

Mr. ANWAR RAYMA,
S/O AHMED,
JANGI, BHACHAU,
Bhachau,
Taluka: Bhachau,

State: Gujarat
PIN: 370150

टैंक लॉरी पंजीकरण संख्या GJ-12 BY1891 द्वारा भूमार्ग से पेट्रोलियम उत्पादों के परिवहन के लिए अनुज्ञप्ति जारी करने के संबंध में।

Licence to transport Petroleum Products on land by Tank Lorry Reg .No GJ-12 BY1891 - Grant of licence regarding.

कृपया आपके पत्र क्रमांक OIN846061 दिनांक 18/08/2021 का अवलोकन करें।
Please refer to your letter No. OIN846061, dated 18/08/2021.

निम्नलिखित पेट्रोलियम पदार्थों के वर्ग तथा मात्रा के टैंक ट्रक पंजीकरण संख्या GJ-12 BY1891 द्वारा परिवहन के लिए पेट्रोलियम नियम, 2002 18/08/2026 तक वैध अनुज्ञप्ति संख्या P/WB/GJ/11/43169 (P513936) दिनांक 19/08/2021 अग्रेषित की जा रही है।
Licence No. P/WB/GJ/11/43169 (P513936) dated 19/08/2021 granted in Form XI under the Petroleum Rules, 2002 ar
ransport of the following kind and quantities of Petroleum by tank truck Reg .No GJ-12 BY1891 is forwarded herewith.

पेट्रोलियम का विवरण /Description of Petroleum	अनुज्ञप्त क्षमता (किलोलीटर में)/T licenced in K.L.
Class A/B	35.00 KL

या पेट्रोलियम नियम 2002 के अधीन बनाए गए नियम 148 में दी गई प्रक्रिया का कड़ाई से पालन करे और अनुज्ञप्ति के नवीकरण हेतु समस्त
ाप्ति की तारीख या उससे पूर्व इस कार्यालय को प्रेषित करें।
ase follow the procedure strictly as laid down in rule 148 of the Petroleum Rules, 2002 and submit complete documen
nce to this office, so as to reach on or before the date on which licence expires.

अनुमोदन/ अनुमति अन्य प्राधिकारियों से आवश्यक अनुमति/क्लीयरन्स प्राप्त करने से या यथा लागू अन्य विधियों से छूट नहीं देती है।
approval/permission, however, does not absolve from obtaining necessary permission/clearance
cable.

On Rs.100 Stamp Paper (2 Stamp Duty of Rs. 50 /-)

Date : 30-10-2021

Sub: Affidavit

We are receiving "sodium hydro sulphide (Lower Grade – By product) from M/s Hikal Limited, Plot No T 21 MIDC Industrial Area Taloja 410208 Maharashtra through our authorized transporter.

We will utilize this material at Textile plants & Cement plants, with whom we have authorizations. Material will lift by Sangam Enviro Pvt Ltd (UDYAM REGISTRATION NUMBER: - UDYAM-GJ-24-0001525).

We hereby declare that above by product receiving to us are used as a raw material in our industry. Each time we check quantity of by product transported from Hikal is same during receiving to us without any weight loss.

This affidavit is given as per requirement from M/s Hikal Ltd.Taloja.

Yours Faithfully,

For,
Sangam Enviro Pvt Ltd.

30/10/21

Authorized Signatory

SANGAM ENVIRO PVT LTD.

Fw: Clarification from M/S Hikal Limited on various media articles mentioning our company with the Gas Leak incidence at Sachin GIDC area

GPCB Gas Surat

ROHQ <rohq@mpcb.gov.in> 30 Mar 2022, 22:07
to AMIT, me

sir,
I am submitting herewith mail of hikal received on 10th jan 2022 , which was already forwarded to Shivaniben Unit Head GPCB.
With Regards,

Regional Officer (HQ),
Maharashtra Pollution Control Board

From: Nandkumar Gurav <rohq@mpcb.gov.in>
Sent: Thursday, March 24, 2022 4:18 PM
To: uh-gpcb-sura <uh-gpcb-sura@gujarat.gov.in>
Subject: Fw: Clarification from M/S Hikal Limited on various media articles mentioning our company with the Gas Leak incidence at Sachin GIDC area

Madam,

Forwarded herewith the mail received from Sameer Hiremath from Hikal,regarding Clarification from M/S Hikal Limited on various media articles mentioning our company with the Gas Leak incidence at Sachin GIDC area. The chronology of action taken is also enclosed herewith:

Date	Chronology of Events
06/01/2022	Incidence occurred
08/01/2022	Visit carried out by MPC Board officials
10/01/2022	Sameer Hiremath from Hikal sent a Clarification from M/S Hikal Limited on various media articles mentioning our company with the "Gas Leak incidence at Sachin GIDC area"
14/01/2022	Proposed Directions issued to the industry
14/02/2022	Personal hearing extended to M/s. Hikal Ltd
15/02/2022	Closure issued to the industry
18/02/2022	Industry filed a writ petition in Bombay High Court
21/02/2022	Bombay High Court set aside the order issued by the Board and directed to give hearing to the industry on 01/03/2022.
01/03/2022	Personal Hearing extended to the industry on 01/03/2022.

We are in process of initiating further orders after the hearing extended on 01/03/2022.

With Regards,
Nandkumar Gurav
Regional Officer (HQ),
Maharashtra Pollution Control Board

From: Sameer Hiremath <sameer_hiremath@hikal.com>
Sent: Monday, January 10, 2022 12:21 PM
To: Ashok A Shingare <ms@mpcb.gov.in>
Cc: P.K. Mirashe <ast@mpcb.gov.in>; Nandkumar Gurav <rohq@mpcb.gov.in>; RO Navimumbai <ronavimumbai@mpcb.gov.in>; Vimal Kulshrestha <Vimal_Kulshrestha@Hikal.com>
Subject: Clarification from M/S Hikal Limited on various media articles mentioning our company with the Gas Leak incidence at Sachin GIDC area

To,
The Member Secretary
MPCB, Sion
Mumbai

Sub: Clarification from M/S Hikal Limited on various media articles mentioning our company with the "Gas Leak incidence at Sachin GIDC area"

Dear Sir,

We would like to clarify from M/S Hikal's side and share some facts relating to "the Gas Leak incidence at Sachin GIDC area" and the company's name being mentioned in several news articles.

1) Hikal Limited is engaged in the manufacturing of Pharmaceuticals, Crop Protection, and Speciality Chemical business. The company manufactures Crop Protection products at its Taloja plant. The company has a valid MPCB consent for the manufacturing of, among other products including by-product "Sodium Hydro Sulphide (NaHS)". The said consent is valid up to 31.07.2024. NaHS dilute solution 16% -18% is a by-product generated at the Taloja factory . To make the product usable to the Cement ,craft Industry, Paper manufacturing, Leather & Textile, and Dye Industry, the Dilute NaHS solution generated by us as a by-product needs to be processed and concentrated to 30%+. NaHS solution itself is not hazardous and is a safe product to handle in addition to being stable during storage and

transportation.

2) Hikal supplied the NaHS dilute solution 16% - 18% to Sangam Enviro Private Limited for further processing to be made usable as a product in the Textile and Cement industry. Hikal paid a processing and transportation fee to Sangam Enviro Private Limited to further process the by-product and make it saleable to the Textile and Cement industry. This is as per the agreement signed between both parties and affidavit signed by Sangam Enviro Private Limited. Hikal sold dilute 16-18 % NaHS solution to Sangam Enviro Private Limited under an executed affidavit by Sangam Enviro Private Limited stating that NaHS solution would be used as a product in the Textile and Cement plant against proper authorizations.

3) Sangam Enviro Private Limited is an MSME registered Enterprise for the collection, treatment, processing and sale of by-products. On 01.01.2022 Hikal delivered a quantity of 28,290 Kgs of NaHS 16%-18% dilute solution 16% - 18% to Sangam Enviro Private Limited. The material was loaded in a Tanker No. GJ-06-BT-6421 which was arranged by Sangam Enviro Private Limited at Hikal's Taloja plant. The final destination of the consignment post processing and treatment was to the Cement and or Textile Industry as per the agreement signed and affidavit signed by Sangam Enviro Private Limited.

4) On 06.01.2022, as per the media reports, around 6 people died and 23 people were hospitalized in Surat (Police Jurisdiction - Sachin GIDC) due to exposure to toxic fumes generated from a different Tanker No. GJ-06-ZZ-6221. As tanker No. GJ-06-ZZ-6221 was involved in the incident and the different tanker bearing No. GJ-06-BT-6421 which was dispatched from the Hikal Taloja Site may have belonged to the same transporter, the Gujarat Police is seeking clarification from Hikal in the said matter. We are cooperating with them.

5) We have apprehensions and as reported in media articles, the transporter before reaching the final destination (i.e. Bharuch) allegedly shifted the material from Tanker No. GJ-06-BT-6421 to the other tanker No. GJ-06-ZZ-6221 illegally and in contravention of the affidavit given to us and while doing so, the material may have reacted with another substance (maybe acid) which might have been already there in tanker No. GJ-06-ZZ-6221 resulting into the generation of toxic fumes.

Hikal has abided by all the conditions of consent issued by MPCB for the sale of NaHS solution. Sangam Enviro Private Limited is fully responsible for the incident.

We would like to clarify that Hikal abides by all the rules and regulations and follows the highest level of HSE standards while conducting business.

We request for an in person or online meeting at the earliest as per your convenience.

Thanking you,

Yours Sincerely,
for HIKAL LIMITED

Sameer Hiremath
Managing Director

Hikal Ltd
Maker Chamber 5, Nariman Point
Mumbai - 400 021, India

T : 91- 22 - 62770441
W : http://www.hikal.com

...

Annexure-21

ANNEXURE 21

E

Re: Fw: lifting of Sodium Hydro sulphide & Spent Ammonia

Machindranath Gorhe to Abhay Dandekar, Parasuram Chavakula

Cc Gajendra Pawar, Hasit Dangi

27-10-2021 10:03

From: Machindranath Gorhe/EHS/taloja/Hikal

To: Abhay Dandekar/Purchase/CBD/Hikal@HIKAL, Parasuram Chavakula/Purchase/CBD/Hikal@HIKAL

Cc: Gajendra Pawar/Production/taloja/Hikal@HIKAL, Hasit Dangi/taloja/Hikal@HIKAL

Dear Abhay,

At site situation is very serious. around 6-7 tankers of ammonia and NASH is standing inside on road. It is very dangerous with respect to plant safety. Total main road is blocked by these tankers.

I had a discussion with Mr. Jagdale, Eureka about Affidavit. He replied that there is no space for unloading our material and also having heavy NH3 smell to our material. As MPCB tightened the control they were not taking our NASH. However he will check with his team again and revert by today afternoon final decision.

As per my last communication, I received NASH analysis report from MWML and disposal path suggested is incineration with cost of Rs. 71000/- per MT.

I still suggest to discuss & evaluate the M/s Sangam Enviro for NASH as well as Spent Ammonia disposal.

Please take immediate action on the same disposal.

@ Dear Parasuram Sir: Please look into the matter and give necessary approval & advise.

Best Regards,

Machindranath Gorhe
Asst. General Manager - EHS (Crop Protection)
Hikal Limited, Plot No. T-21, MIDC Taloja
Dist. Raigad 410 208 Maharashtra, India.
Telephone : +91 02230990100
Extension : 3285
Mobile : 9819447719
E-Mail : machindranath_gorhe@hikal.com
Web : http://www.hikal.com

D 8

Re: Fw: lifting of Sodium Hydro sulphide

Machindranath Gorhe To Abhay Dandekar 01-10-2021 10:48

Gajendra Pawar, Hasit Dangi, Parasuram Chavakula

Machindranath Gorhe/EHS/taloja/Hikal

Abhay Dandekar/Purchase/CBD/Hikal@HIKAL

Dear Abhay,

Inside the Taloja factory, total 6 tankers hold inside which is very serious with respect to plant safety as well as any visit of MPCB official. We need to take action on immediate basis to remove all tankers from site. .

In my opinion, we can consider & evaluate this NASH disposal option for time being till we get another end user option. Otherwise we need to dispose these tankers to MWML for incineration on urgent basis which cost is more than Rs 50/- per Kilogram. Today i am sending sample to MWML for analysis and incineration cost proposal details.

As you are aware that recovered ammonia also not going directly to end user. During last zoom meeting call we discussed this with senior management. We shopuld take proper Affidavit from the agency. Please expedite the actions and take approval on priority

Dear Hasit Sir: Need your advise and approval in this regard.

Best Regards,

Machindranath Gorhe
Asst. General Manager - EHS (Crop Protection)
Hikal Limited, Plot No. T-21, MIDC Taloja
Dist. Raigad 410 208 Maharashtra, India.
Telephone : +91 02230990100
Extension : 3285
Mobile : 9819447719
E-Mail : machindranath_gorhe@hikal.com
Web : http://www.hikal.com

HIKAL

T - 21, M. I. D. C. Area, TALOJA, RAIGAD, 410208, State - Maharashtra, Country - India, Code - 27
PAN:AAACH0383A GST:27AAACH0383A1Z5

E-WAYBILLNUMBER : 241359394123
E-WAY BILL DATE : 12-NOV-21
E-INVOICE ACKNO : 122111971241561
EINVOICE ACKDT : 2021-11-12 18:25:00
IRN:0baa25eeab9bfb9c0082c8c36c6c2283e0dd07cedb959dc86e5bf4c58c1b7e8a

TAX INVOICE

Bill To :	SANGAM ENVIRO PRIVATE LTD OFFICE NO.424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT INDIA	Invoice No. :	321220800312
		Invoice Date :	12-NOV-21
		Time of Preparation:	18:11:16
		Reference: 1066	
		Order No :	1066
Tel No	Contact Person: NILESH BEHERA PHONE:	Customer PO No :	As per mail from Mr. Abhay sir dt. 08.11.201
Pan No :	ABECS0245D	Order Date:	10-NOV-21
GSTIN :	24ABECS0245D1ZV		
Consignee :	SANGAM ENVIRO PRIVATE LTD OFFICE NO.424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT State Code:- 24 INDIA Contact Person: NILESH BEHERA PHONE: ABECS0245D 24ABECS0245D1ZV	Place of Supply :	GUJARAT State Code :- 24
		Delivery Id :	453320
		L.R. No./AWB No. :	1204
		L.R. Date/AWB Date:	11-NOV-2021
		Transporter :	NEELKANTH LOGISTICS
		Vehicle No. :	GJ12BY1891
		Container No. :	
		Seal No. :	

Sr. No.	HSN Code	Prod. Code	Description	Quantity	UOM	Rate	Currency	Amount
1	28331990	8119000021	SODIUM HYDROSULPHIDE	29030	KGS	0.01	INR	290.3

Lot Number	Lot Quantity	Tax Name	Tax Amount
24092021-1	29030 KGS	IGST @18%	52.25

Total INR 342.55
Three Hundred Forty Two Rupees and Fifty Five Paise

Commissionerate : Raigad (VT)
Division : VI, Kalamboli (VT-06)
Range : III
Range Code : (VT0603)
PAN No. : AAACH0383A
GST No. : 27AAACH0383A1Z5
CIN No. : L24200MH1988PTC048028

Date Time- Removal of Goods :
Terms of Payment: IMMEDIATE
Terms Due Date : 12-NOV-21
Trans Type : 03-MISC SALES

I/We hereby certify that my/our Registration Certificate under the GST Act is in force on the date on which the sale of the goods specified in this Bill/Cash memorandum is made by me/us that the transaction of sale covered by this Bill/Cash memorandum has been effected by me/us in the regular course of my/our business. Interest @24% per annum will be charged if payment is not made on the due date.

Whether the tax is payable on reverse charge – No

Hikal Limited,
Authorised Signatory

12/11/2021 Parmar

Most user

2214

HiKAL

T - 21, M. I. D. C. Area, TALOJA, RAIGAD, 410208, State - Maharashtra, Country - India, Code - 27
PAN:AAACH0383A GST:27AAACH0383A1Z5

E-WAYBILL NUMBER : 231372238091
E-WAY BILL DATE : 17-DEC-21
E-INVOICE ACKNO : 122112181916357
E-INVOICE ACKDT : 2021-12-17 16:39:00
IRN:9a63440a45ce75868f898f33b2a9d845332ddd54f08df6af5f0948ec8e2cdc2

TAX INVOICE

Bill To :	SANGAM ENVIRO PRIVATE LTD OFFICE NO.424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT INDIA	Invoice No. :	321220800374
		Invoice Date :	17-DEC-21
		Time of Preparation:	16:12:41
		Reference: 1066	
		Order No :	1066
Tel No	Contact Person: NILESH BEHERA PHONE	Customer PO No :	As per mail from Mr. Abhay sir dt. 08.11.201
		Order Date:	10-NOV-21
Pan No : GSTIN :	ABECS0245D 24ABECS0245D1ZV		
Consignee :	SANGAM ENVIRO PRIVATE LTD OFFICE NO.424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT State Code - 24 INDIA Contact Person: NILESH BEHERA PHONE ABECS0245D 24ABECS0245D1ZV	Place of Supply :	GUJARAT State Code:- 24
		Delivery Id :	464762
		L.R. No./AWB No. :	3041
		L.R. Date/AWB Date:	15-DEC-2021
		Transporter :	SHREE KAILASH TRANSPORT
		Vehicle No. :	MH04HY6377
		Container No. :	
		Seal No. :	

Sr. No.	HSN Code	Prod. Code	Description	Quantity	UOM	Rate	Currency	Amount
1	28331990	8119000021	SODIUM HYDROSULPHIDE	25910	KGS	0.01	INR	259.1

Lot Number	Lot Quantity
17/12	24630 KGS
20112021-2	970 KGS
20112021-3	310 KGS

Tax Name	Tax Amount
IGST @18%	46.64

Total INR 305.74
Three Hundred Five Rupees and Seventy Four Paise

Commissionerate : Raigad (VT)
Division: VI, Kalamboli (VT-05)
Range : III
Range Code : (VT06003)
PAN No : AAACH0383A
GST No : 27AAACH0383A1Z5
CIN No : L24200MH1988PTC048028

Date Time- Removal of Goods :

Terms of Payment:	IMMEDIATE
Terms Due Date :	17-DEC-21
Trans Type :	03-MISC SALES

I/We hereby certify that my/our Registration Certificate under the GST Act is in force on the date on which the sale of the goods specified in this Bill/Cash memorandum is made by me/us that the transaction of sale covered by this Bill/Cash memorandum has been effected by me/us in the regular course of my/our business. Interest @24% per annum will be charged if payment is not made on the due date.

Whether the tax is payable on reverse charge – No

Hikal Limited
Authorised Signatory

HIKAL

T - 21, M. I. D. C. Area, TALOJA, RAIGAD, 410208, State - Maharashtra, Country - India, Code - 27
PAN:AAACH0383A GST:27AAACH0383A1Z5

E-WAYBILLNUMBER : 211382557897
E-WAY BILL DATE : 22-NOV-21
E-INVOICE ACKNO : 122112019211887
EINVOICE ACKDT : 2021-11-22 10:42:00
IRN :cec65c38387154ba98ba60f5fdac2d2681e882c9ae1446cdc341962c603dc7be

TAX INVOICE

Bill To :	SANGAM ENVIRO PRIVATE LTD OFFICE NO 424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT INDIA	Invoice No. :	321220800329
		Invoice Date :	22-NOV-21
		Time of Preparation:	10:11:14
		Reference: 1066	
		Order No :	1066
Tel No	Contact Person: NILESH BEHERA PHONE	Customer PO No :	As per mail from Mr Abhay sir dt. 08.11.201
Pan No :	ABEC50245D	Order Date:	10-NOV-21
GSTIN :	24ABECS0245D1ZV		
Consignee	SANGAM ENVIRO PRIVATE LTD OFFICE NO.424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT State Code:- 24 INDIA Contact Person: NILESH BEHERA PHONE: ABECS0245D 24ABECS0245D1ZV	Place of Supply :	GUJARAT State Code:- 24
		Delivery Id :	456296
		L.R. No./AWB No. :	005
		L.R. Date/AWB Date :	21-NOV-2021
		Transporter :	SHREE MARUTI IMPEX INDIA
		Vehicle No. :	GJ06BT6431
		Container No. :	
		Seal No. :	

Sr. No.	HSN Code	Prod. Code	Description	Quantity	UOM	Rate	Currency	Amount
1	28331990	8119000021	SODIUM HYDROSULPHIDE	29270	KGS	0.01	INR	292.7

Lot Number	Lot Quantity	Tax Name	Tax Amount
20112021-2	29270 KGS	IGST @18%	52.69

Commissionerate : Raigad (VT)	Division : VI, Kalamboli (VT-06)
Range : III	Range Code : (VT06003)
PAN No : AAACH0383A	
GST No : 27AAACH0383A1Z5	
CIN No : L24200MH1988PTC048026	

Total INR 345.39

Three Hundred Forty Five Rupees and Thirty Nine Paise

Date Time- Removal of Goods :

Terms of Payment:	IMMEDIATE
Terms Due Date :	22-NOV-21
Trans Type :	03-MISC SALES

I/We hereby certify that my/our Registration Certificate under the GST Act is in force on the date on which the sale of the goods specified in this Bill/Cash memorandum is made by me/us that the transaction of sale covered by this Bill/Cash memorandum has been effected by me/us in the regular course of my/our business. Interest @24% per annum will be charged if payment is not made on the due date

Whether the tax is payable on reverse charge – No

Hikal Limited
Authorised signatory

22/11/2021.

346

HiKAL

T - 21, M I D C Area, TALOJA, RAIGAD, 410208, State - Maharashtra,
Country - India, Code - 27
PAN AAACH0383A GST 27AAACH0383A1Z5

E-WAYBILLNUMBER : 281363148451
E-WAY BILL DATE : 23-NOV-21
E-INVOICE ACKNO : 122112000410368
EINVOICE ACKDT : 2021-11-23 15:59:00
IRN 0013710a97cbdf8ace634138d79bfe95e83afb29c6ceeb1c1379df2fba0a9ea31

TAX INVOICE

Bill To :	SANGAM ENVIRO PRIVATE LTD OFFICE NO 424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT INDIA	Invoice No. :	321220800332
		Invoice Date :	23-NOV-21
		Time of Preparation:	15:11:49
		Reference: 1066	
		Order No :	1066
Tel No	Contact Person: NILESH BEHERA PHONE	Customer PO No :	As per mail from Mr Abhay sir dt 08.11.201
		Order Date:	10-NOV-21
Pan No : GSTIN :	ABECS0245D 24ABECS0245D1ZV		
Consignee :	SANGAM ENVIRO PRIVATE LTD OFFICE NO 424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT State Code:- 24 INDIA Contact Person: NILESH BEHERA PHONE ABECS0245D 24ABECS0245D1ZV	Place of Supply	GUJARAT State Code:- 24
		Delivery Id	456332
		L.R. No./AWB No.	005
		L.R. Date/AWB Date	21-NOV-2021
		Transporter :	SHREE MARUTI IMPEX INDIA
		Vehicle No.	GJ06BT6421
		Container No.	
		Seal No.	

Sr. No.	HSN Code	Prod. Code	Description	Quantity	UOM	Rate	Currency	Amount
1	28331990	8119000021	SODIUM HYDROSULPHIDE	29050	KGS	0.01	INR	290.5

Lot Number	Lot Quantity
20112021-2	4760 KGS
20112021-3	9690 KGS
24092021-1	14500 KGS

Tax Name	Tax Amount
IGST @18%	52.29
Total	INR 342.79

Three Hundred Forty Two Rupees and Seventy Nine Paise

Commissionerate : Raigad (VT)
Range : III
Division : VI, Kalamboli (VT-06)
Range Code : (VT06003)

PAN No : AAACH0383A
GST No : 27AAACH0383A1Z5
CIN No : L24200MH1988PTC048028

Date Time- Removal of Goods :

Terms of Payment: IMMEDIATE
Terms Due Date : 23-NOV-21
Trans Type : 03-MISC SALES

I/We hereby certify that my/our Registration Certificate under the GST Act is in force on the date on which the sale of the goods specified in this Bill/Cash memorandum is made by me/us that the transaction of sale covered by this Bill/Cash memorandum has been effected by me/us in the regular course of my/our business. Interest @24% per annum will be charged if payment is not made on the due date

Whether the tax is payable on reverse charge – No

Hikal Limited
Authorised signatory

852

RIKAL

T. T. M. I. D. C. Area, TALOJA, RAIGAD, 410208, State - Maharashtra, Country - India, Code - 27
PAN AAACH0383A GST 27AAACH0383A1Z5

E-WAYBILL NUMBER : 271377979589
E-WAY BILL DATE : 01-JAN-22
E-INVOICE ACKNO : 122212272202957
E-INVOICE ACKDT : 2022-01-01 19:21:00
IRN 3d3d0d28dc53985991fb4e57d9e1fdadc1628d819bd6897f62109f2fe2f5ffb58

TAX INVOICE

Bill To :	SANGAM ENVIRO PRIVATE LTD OFFICE NO 424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT INDIA
Tel No	Contact Person: NILESH BEHERA PHONE
Pan No :	ABECS0245D
GSTIN :	24ABECS0245D1ZV
Consignee	SANGAM ENVIRO PRIVATE LTD OFFICE NO 424 SHILPI SQUARE DAHEJ BYPASS ROAD VILLAGE BHARUCH 392001 GUJARAT State Code:- 24 INDIA Contact Person: NILESH BEHERA PHONE: ABECS0245D 24ABECS0245D1ZV

Invoice No. :	3212208800398
Invoice Date :	01-JAN-22
Time of Preparation:	19:01:22
Reference:	1065
Order No :	1065
Customer PO No :	As per mail from Mr Abhay sir dt. 08.11.201
Order Date:	10-NOV-21
Place of Supply	GUJARAT State Code:- 24
Delivery Id :	466838
L.R. No./AWB No.	005
L.R. Date/AWB Date	31-DEC-2021
Transporter :	SHREE MARUTI IMPEX
Vehicle No. :	GJ06BT6421
Container No. :	
Seal No. :	

Sr. No.	HSN Code	Prod. Code	Description	Quantity	UOM	Rate	Currency	Amount
1	28331900	8119000021	SODIUM HYDROSULPHIDE	28290	KGS	0.01	INR	282.9

Lot Number	Lot Quantity	Tax Name	Tax Amount
31122021-1	28290 KGS	IGST @18%	50.92

Commissionerate : Raigad (VT)
Division : VI, Kalamboli (VT-06)
Range : III
Range Code : (VT06003)

PAN No. AAACH0383A
GST No. 27AAACH0383A1Z5
CIN No. L24200MH1988PTC048028

Total INR 333.82

Three Hundred Thirty Three Rupees and Eighty Two Paise

Date Time- Removal of Goods :

Terms of Payment:	IMMEDIATE
Terms Due Date :	01-JAN-22
Trans Type :	03-MISC SALES

We hereby certify that my/our Registration Certificate under the GST Act is in force on the date on which the sale of the goods specified in this Bill/Cash memorandum is made by me/us that the transaction of sale covered by this Bill/Cash memorandum has been effected by me/us in the regular course of my/our business. Interest @24% per annum will be charged if payment is not made on the due date.

Whether the tax is payable on reverse charge – No

For RIKAL LIMITED
Rikal Limited.
Authorised signatory

01.01.2022

feeding mechanism to avoid any back fire due to pressure build-up inside the kiln. Bag filters are utilised at transfer points to avoid any dust emission into the atmosphere in case of feeding fine AFRs.

For optimal performance (co-processing without additional emissions), waste materials (pre-processed or as received) should be fed to the cement kiln through appropriate feed points, in adequate proportions and with proper waste quality and emission monitoring systems.

Different feed points can be used to feed the waste materials into the cement kiln for co-processing. The most common ones are:

- Main burner at the rotary kiln outlet end
- Rotary kiln inlet end
- Pre-calciner
- Mid kiln (for long dry and wet kilns)

Appropriate feed points have to be selected according to the physical, chemical and toxicological characteristics of the waste materials. Wastes of high calorific value have to be always fed into the high temperature combustion zones of the kiln system. Wastes containing stable toxic components and also wastes containing more than 1.5% chlorine should be fed to the main burner to ensure complete combustion in the high temperature and long retention time.

Alternative raw materials containing constituents that can be volatilized at operating temperatures in the pre-heater system have to be fed into the high temperature zones of the kiln system.

Coal feeding circuit and raw material feeding circuits of the cement plant must not be utilised to feed any type of wastes for co-processing unless a trial is performed to demonstrate the suitability of the same and specific approval from the SPCB is obtained along with the authorisation. SPCBs may consult CPCB in specific cases in this regard.

Feeding of alternative raw materials containing volatile (organic and inorganic) components to the kiln via the normal raw meal supply should be avoided unless it has been demonstrated by trial runs in the kiln that there is no VOC emission from the stack. Such trial runs should be carried out with permission from SPCBs. SPCB should consult CPCB if they feel that trial is needed in specific difficult cases.

Destruction of waste materials that are covered under the Stockholm convention and Montreal Protocol such as PCBs, Expired or obsolete pesticides, Ozone Depleting Substances etc. must however be undertaken in a given kiln only after obtaining specific approval from SPCB and other concerned organisations. For this, SPCB in consultation with CPCB will provide steps to be followed including implementing a trial as per a defined protocol.

7.1 Suitability of Substances for co-processing:

The decision on what type of substances can be used is based on the clinker production processes, the raw material and fuel compositions , the feeding points, the air pollution control devices and the given waste management

problems. The Accept - Refuse Chart in **Annexure-4** could be used by plant operators to help them in considering, which type of substance is suitable for co processing.

As a basic rule, waste accepted for co-processing must be safe enough to handle in the given facility and shall contribute to recovery of material or energy value present in it or provide its safe disposal.

Sometimes, some waste streams are not suitable in large volumes but can be co-processed in small volumes with controlled feed rate into the system.

The wastes listed below are normally not recommended till otherwise proved / evidenced for and hence need not be considered for pre and co-processing.

- Biomedical waste
- Asbestos containing waste.
- Electronic scrap.
- Entire batteries.
- Explosives.
- Corrosives.
- Mineral acid wastes.
- Radioactive Wastes.
- Unsorted municipal garbage.

7.2 Operating Conditions:

Cement plants shall ensure to prevent waste feed in following conditions;

i. at start up, until the temperature of 850°C in calciner or 1100°C at kiln inlet as the case may be.

ii. Whenever the temperature of 850°C or 1100°C as the case may be is not maintained.

iii. Whenever emission monitoring show that any emission limits value is exceeded due to disturbances or failures of air pollution control devices.

iv. In case of disturbed process condition in the kiln

The management of the pre and co-processing plant shall be in the hands of a skilled person, competent to manage the hazardous waste in an environmentally sound manner.

8.0 Emission standards:

The cement kilns undertaking co-processing of the different wastes as above must comply with the following notified emission standards notified vide GSR 497 (E) dated 10.5.2016;

Annexure-24

Sr.no	Employee Name	Age Police Report	Status	DEPARTMENT	POST	SALARY	DOJ	DOD	STATUS	Mimimum Wages Income Per Month	Future Prospects	total	50% Expenses	multiplier	Multyplier	total	Loss of love and affectiom	Loss of Estate & Funeral Expenses	Total	
1	AMBADATT BAJPAI	45	Death	COLOUR STORE	HELPER	15200			*15,200/- Wages 30%45	16,740.00	8,370.00	25,110.30	12,555.00	15.00	12,555 x12x15	2,259,900.00	300,000.00	150,000.00	2,709,900.00	
2	Kiran @ Kali Damdr w/o Sultana Damad	22	Death	BOILER	HELPER	11000			* 11,000/- Wages 50%22	16,740.00	8,370.00	25,110.00	12,555.00	17.00	12,555x12x17	2,561,220.00	300,000.00	150,000.00	3,011,220.00	
3	Sultana Nandubhai Damad	21	Death	BOILER	FIRE MAN	13000			*13,000/- Wages 50% 21	16,740.00	8,370.00	25,110.00	12,555.00	17.00	12,555x12x17	2,561,220.00	300,000.00	150,000.00	3,011,220.00	
4	SURESHPappu bhai VAKALA	22	Death	BOILER	FIRE MAN	13000			*13,000/- Wages 50%22	16,740.00	8,370.00	25,110.00	12,555.00	17.00	12,555x12x17	2,561,220.00	300,000.00	150,000.00	3,011,220.00	
5	VIMAL Shyam Nandan Paswan	48	Death	WASHING	HELPER	13000			*13,000/- Wages 30&48	16,740.00	8,370.00	25,110.00	12,555.00	13.00	12,555x12x15	2,259,900.00	300,000.00	150,000.00	2,709,900.00	
6	BimalFulchand Koli	23	Death	PADDING	OPERATOR	30000			23	30,000.00	15,000.00	45,000.00	22,500.00	17.00	22500x12x17	4,590,000.00	400,000.00	200,000.00	5,190,000.00	
											Minimum Wages where it is shown less					injury/pain	suffering/loss of love affection/treatment care afterdischarge		19,643,460.00	
7	Ashok Rajkishor Tivari	32	Injured	GENERAL	DESIGNER khata	35200	1/17/2022	1/10/2022	CONTINUE	35,200.00						28,000.00	50,000.00		78,000.00	
8	Avdhesh Ramdayal Prajapati	30	Injured	MAINTAINANCE	WIRE MAN	33300	NOT	1/10/2022	LEAVE	33,300.00						28,000.00	50,000.00		78,000.00	
9	Chhotelal Nankai Saroj	27	Injured	WASHING	HELPER	*12000	NOT	1/10/2022	LEAVE	12,000.00	16,740.00					28,000.00	30,000.00		58,000.00	
10	Dukhi shyam arakhita Behera	50	Injured	COLOUR KITCHEN	HELPER	25900	1/27/2022	1/11/2022	CONTINUE	25,900.00						28,000.00	50,000.00		78,000.00	
11	Gariban Mangu Das	38	Injured	BATCHING	SILAI MAN	23800	1/26/2022	1/10/2022	CONTINUE	23,800.00						28,000.00	50,000.00		78,000.00	
12	Jitu sing Gorachand Singh	32	Injured	PRINTING	HELPER	*12000	2/1/2022	1/10/2022	CONTINUE	12,000.00	16,740.00					28,000.00	30,000.00		58,000.00	
13	Mahabeer Shriram Prajapati	47	Injured	WASHING	GHANTI MAN	22000	1/29/2022	1/11/2022	CONTINUE	22,000.00						28,000.00	50,000.00		78,000.00	
14	Manoj Vishwakarma	34	Injured	MAINTAINANCE	FITTER	27600	1/30/2022	1/11/2022	CONTINUE	27,600.00						28,000.00	50,000.00		78,000.00	
15	Punit Rambriksha Singh	30	Injured	MAINTAINANCE	FITTER	25500	1/30/2022	1/12/2022	LEAVE FORM 01-02-2022 AND REJOIN IN MARCH	25,500.00						28,000.00	50,000.00		78,000.00	
16	Radhe Shyam Sukhdev Ray	39	Injured	MAINTAINANCE	HELPER	*14000	2/1/2022	1/11/2022	CONTINUE	14,000.00	16,740.00					28,000.00	30,000.00		58,000.00	
17	Rajnath Chhotalal Yadav (Ramnath)	38	Injured	DYEING	JOBBER	33100	1/23/2022	1/10/2022	LEAVE FORM 01-02-2022 AND REJOIN IN MARCH	33,100.00						28,000.00	50,000.00		78,000.00	
18	Raju Kuber Saroj	22	Injured	WASHING	JOBBER	40900	1/20/2022	1/10/2022	LEAVE FORM 01-02-2022	40,900.00						28,000.00	50,000.00		78,000.00	
19	Ravendra Yadav Bhalu Yadav	23	Injured	DYEING	OPERATOR	24000	2/1/2022	1/8/2022	CONTINUE	24,000.00						28,000.00	50,000.00		78,000.00	
20	Ravi Kuber Saroj	18	Injured	WASHING	GHANTI MAN	25100	NOT	1/7/2022	LEAVE	25,100.00						28,000.00	50,000.00		78,000.00	
21	Sandeep Jayaram Rajpoot	18	Injured	WASHING	HELPER	*13000	NOT	1/10/2022	LEAVE	13,000.00	16,740.00					28,000.00	30,000.00		58,000.00	
22	Satendra Lalbihari Chaudhari	34	Injured	DYEING	OPERATOR	20000	2/1/2022	1/10/2022	CONTINUE	20,000.00						28,000.00	50,000.00		78,000.00	
23	Sunil Ramnaresh Patel	18	Injured	WASHING	HELPER	*15200	NOT	1/10/2022	LEAVE	15,200.00	16,740.00					28,000.00	50,000.00		78,000.00	
24	Umesh Dashrath Badagaiya	28	Injured	SECURITY	GUARD	*13000	NOT	1/11/2022	LEAVE	13,000.00	16,740.00					28,000.00	30,000.00		58,000.00	
25	Vijendra Ramdhiyal Singh	24	Injured	MAINTAINANCE	FITTER	27600	1/31/2022	1/10/2022	CONTINUE	27,600.00						28,000.00	50,000.00		78,000.00	
26	Laxmi Shankar Yadav	48	Injured	PADDING	OPERATOR	35000	2/1/2022	1/11/2022	CONTINUE	35,000.00						28,000.00	50,000.00		78,000.00	
27	Dheeraj Kallu prasad Tripathi	25	Injured	SECURITY	GUARD	21900	1/10/2022	1/9/2022	LEAVE FORM 16-01-22	21,900.00						28,000.00	50,000.00		78,000.00	
28	Sonu Sukhalal Nishad	20	Injured	PADDING	HELPER	23200	NOT	1/8/2022	LEAVE	23,200.00						28,000.00	50,000.00		78,000.00	
29	Ramtirth Shri Ramani Mishra	42	Injured	labour	Labourer	*4800	NOT	1/8/2022	NOT PERMENANT		16,740.00					25,000.00	30,000.00		55,000.00	
						* MinumumWages as per Notifucation Rs276+72+358x30=16,740													21,314,460.00	1,671,000.00

21,314,460.00

Annexure-25

GLOBE ENVIRO CARE LTD.
Common Effluent Treatment Plant
Plot No. : P-1 off Rd. No. 2, B/H KayTex Mill,
G.I.D.C., Sachin, SURAT - 394 230.
Ph. : (0261) 6547121 / 6587120
CIN Number: U29199GJ1998PLC033633
Email : naik.vatsal@gmail.com / globeenviro2001@gmail.com

Date: 17.01.2022

To,

Regional Officer

Gujarat Pollution Control Board

338, Belgium Square,

Surat.

Subject: Details for Treatment of lifted effluent

1) Ref. mail of dated 06.01.2022: Lifting of contaminated liquid waste to the CETP for further treatment and disposal.
2) Ref. mail of dated 13.01.2022: Due to effects of pollutants of Nahal water, you are directed to MEE of whole lifted effluent.

Respected Madam/Sir,

In connection with above referred mail (Reff No-1) to directed to lifting of contamination liquid waste to our CETP of M/s. GECL, we have collected about 73,170 Liters of contaminated liquid waste to our CETP though dedicated takers, tanker wise details are attached herewith for your ready reference.

In connection with your mail dated 13/01/2022 (Reff No-2) and as directed us to treat the all-contaminated liquid waste in MEE, we have treated all collected contaminated liquid waste in our MEE.

We would like to Highlighted that treatment cost for the treatment of Contaminated liquid waste in MEE is around 4.0 Rs/ Kg, i.e. 2,92,680 Rs. We herewith request to board to compensate treatment cost to our CETP from the defaulter industries.

Weight slip of all tankers attached here for your ready reference.

Thanking You,

Yours Faithfully,

For Globe Enviro Care Ltd

Authorized Signatory

Annexure-26

કલેકટર અને જિલ્લા મેજીસ્ટ્રેટની કચેરી

વહિવટ શાખા, બી-૪, જુલ્લા સેવા સદન-૨, અઠવાલાઇન્સ, સુરત

ફોન નં.૦૨૬૧-૨૬૫૧૧૫૧, ૨૬૬૦૦૨૧ ફેક્સ:૨૬૫૫૬૫૩

Email:- collector-sur@gujarat.gov.in

56.vahivatsurat@gmail.com

INWARD
No. 44969
Date 16/03/2022

નં.વહિવટ/CMRF/સહાય/સચિન જીઆઇડીસી/વશી. ૩૭૬ /૨૨, તા. 03/૦૩/૨૦૨૨

વંચાણમાં લીધુ:-

(૧) સેક્શન અધિકારીશ્રી, મહેસુલ વિભાગ, ગુજરાત સરકારના તા.૧૯/૦૨/૨૨ના હુકમ નં.સીએલએસ/૧૦૨૦૨૨/૫/સ.૪

(૨) અત્રેના પત્ર ક્રમાંક: વહીવટ/ સચિન જીઆઇડીસી-અકસ્માત/સહાય/વશી. ૧૧૩ થી ૧૨૩/૨૨ તા.૧૦/૦૧/૨૨

(3) મામલતદારશ્રી ચોર્યાસીના પત્ર નં.ડીઝાસ્ટર/આકસ્મિક દુર્ઘટના સહાય/વશી/૨૨, તા.૦૩-૦૩-૨૦૨૨

હુકમ:-

મોજે:સચિન જી.આઈ.ડી.સી.રોડ નં.૩ પાસે આવેલ વિશ્વપ્રેમ ડાઈંગ મીલની બાજુમાં આવેલ ખાડી ખાતે તા.૦૬/૦૧/૨૦૨૨ ના રોજ સવારે ૦૪:૦૦ કલાકે એક ટ્રક નં.GJ-06-ZZ-6221 માંથી પાઈપ મારફતે કેમીકલને પાણીમાં છોડવામાં આવેલ. જે અંગે સ્થળે હાજર જી.આઈ.ડી.સી. તથા સ્થાનિકો દ્વારા જણાવ્યા મુજબ કેમિકલ પાણીમાં ભળતા ધુમાડો નિકળેલ. સદર ધુમાડો પવનની દિશા સાથે વિશ્વપ્રેમ ડાઈંગ મીલ તરફ જતાં તેમા કામ કરતા કર્મચારીઓને ગેસની તીવ્ર ગંધ આવતાં કર્મચારીઓ બહાર દોડી આવતાં તેઓને ગેસની અસર થયેલ છે. સદરહું ગેસની અસર થયેલ આશરે -૨૩ વ્યક્તિઓને સીવીલ હોસ્પિટલમાં દાખલ કરવામાં આવેલ છે. જે પૈકી કુલ-૬ વ્યક્તિઓ મરણ પામેલ છે તથા ૧૭ વ્યક્તિઓને ઇજા થયેલ છે. જે અન્વયે આમુખ-૨ ના પત્રથી સહાય મળવા અંગે દરખાસ્ત કરેલ છે.

આમુખ-(૧)મા જણાવેલ સેક્શન અધિકારીશ્રી, મહેસુલ વિભાગ, ગુજરાત સરકારના તા.૧૯/૦૨/૨૦૨૨ ના હુકમ નં.સીએલએસ/૧૦૨૦૨૨/૫/સ.૪ થી કુલ ૬(છ) મૃતક વ્યક્તિને કુલ રૂા.૨૪,૦૦,૦૦૦/-(અંકે રૂા.ચોવિસ લાખ પુરા)ની સહાય ફાળવવાનો હુકમ કરવામા આવેલ છે.

આમુખ-(૧)ના હુકમ અન્વયે તા.૦૨/૦૩/૨૦૨૨ થી કુલ રૂા.૨૪,૦૦,૦૦૦/-(અંકે રૂા.ચોવિસ લાખ પુરા)ની સહાય અત્રેના રીલીફ ફંડના ખાતામાં ઓનલાઈન જમા કરાવેલ છે.

આમુખ-(૩) મામલતદારશ્રી ચોર્યાસીના પત્ર નં.ડીઝાસ્ટર/આકસ્મિક દુર્ઘટના સહાય/વશી/૨૨, તા.૩-૩-૨૨ પત્રથી સદરહું અકસ્માતમાં મૃત્યુ પામેલ કુલ ૬ (છ) વ્યકિતને સહાય ચુકવવાના કામે તેમના કાયદેસરના વારસોની વિગતો રજુ કરેલ છે.

આમુખ-(૩)મા જણાવ્યા મુજબના મૃતકના વારસદારની વિગતો અનુસાર નીચે દર્શાવ્યા મુજબ સહાય ચુકવવા અંગે હુકમ કરવામાં આવે છે.

ક્રમ	મૃતકનું નામ	જેને ચેક ઈસ્યુ કરવાનો હોય તેના વારસદારનું નામ	બેંકની વિગત મુજબ નામ	ચેકની વિગત	સહાયની રકમ રૂા.
૦૧	કિરણ સુલતાન ડમર	BHANVARA SINGH S/O BABU DAMAR (FATHER)	BHANVARA SINGH S/O BABU DAMAR	૮૦૪૪૩૮ તા.૧૬/૦૩/૨૨	૪.૦૦ લાખ
૦૨	સુલતાન નંદા ગામડ	NANDA S/O AMRA GAMAD (FATHER)	NANDA SO AMRA GAMAD	૮૦૪૪૩૯ તા.૧૬/૦૩/૨૨	૪.૦૦ લાખ
૦૩	સુરેશ પપ્પુ વખાલા	SAVEETA W/O PAPPU WAKHALA (MOTHER)	SAVEETA W/O PAPPU WAKHALA	૮૦૪૪૪૦ તા.૧૬/૦૩/૨૨	૪.૦૦ લાખ
૦૪	અભાદત્ત બાજપાઇ	MRS RAMA BAJPAI (WIFE)	MRS RAMA BAJPAI	૮૦૪૪૪૧ તા.૧૬/૦૩/૨૨	૪.૦૦ લાખ

૦૫	વિમલચંદ ફુલચંદ કોરી	PHOOL CHANDRA S AND PARVATI (FATHER & MOTHER)	PHOOL CHANDRA S AND PARVATI	૮૦૪૪૪૨ તા.૨૫/૦૩/૨૨	૪.૦૦ લાખ
૦૬	વિમલ પાસવાન	MRS REKHA DEVI (WIFE)	MRS REKHA DEVI	૮૦૪૪૪૩ તા.૨૫/૦૩/૨૨	૪.૦૦ લાખ

31.

(આયુષ ઓક)

કલેકટર સુરત

પ્રતિ,

નકલ જયભારતસહ રવાના:-

(૧) મામલતદારશ્રી ચોર્યાસી, જિ. સુરત તરફ

૨/-આ સાથે ઉપર મુજબના કુલ ૦૬ (સાત) ચેક તથા પહોંચનો નમુનો ચુકવણા અર્થે સામેલ રાખેલ છે. જે મુજબ કાયદેસરના વારસદારોની ખાત્રી કરીને, બાંહેધરી મેળવીને, અધિકૃત અધિકારીશ્રીની હાજરીમાં ચુકવવાની રહેશે. તેમજ સહાયની રકમનો ચેક આપ્યા બાદ પહોંચ સત્વરે અત્રે મોકલી આપવાનો રહેશે.

નકલ સવિનય રવાના:-

(1) Collector and DM Patna, State:- Bihar........For Information

(2) Collector and DM Kaushambi, State:- Uttar Pradesh........For Information

(3) Collector and DM Jhabua, State:- Madhya Pradesh........For Information

(4) માન.કમિશ્નરશ્રી સુરત મહાનગરપાલિકા, સુરત તરફ જાણ સારૂ.

(5) જિલ્લા વિકાસ અધિકારીશ્રી, જિ.પં.સુરત તરફ જાણ સારૂ.

(6) સેકશન અધિકારીશ્રી(સ-૪), મહેસુલ વિભાગ, સચિવાલય, ગાંધીનગર...........જાણ થવા વિનંતી સહ.

(7) ઉપસચિવશ્રી, મુખ્યમંત્રીશ્રીનું રાહત ફંડ, મહેસુલ વિભાગ, ગાંધીનગર............જાણ થવા વિનંતી સહ.

Annexure-27

Sr no	Tanker Registration Number	Date of Movement	Trip
1	GJ-06-ZZ-6221	06/01/2022	1
2	MH-04-HY-6377	18/11/2021 21/11/2021	1+1
3	GJ-12-BY-1891	Nov-2021	1
4	GJ-06-BT-6421	21/11/2021 01/01/2022	1+1
5	GJ-06-BT-6431(Rajkot)	21/11/2021	1
6	GJ-06-TT-8555	23/12/2021(Chemie Organic)	1

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, **Gandhinagar**-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

BY R.P.A.D.

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

WHEREAS you M/s. Chemie Organic Chemicals (I) Pvt. Ltd. are having an industrial plant at **Plot No: 750, GIDC JHAGADIA, DIST.BHARUCH.**

AND WHEREAS Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A), AWH -99736, valid up to 16/10/2023 and amended thereof with conditions mentioned therein.

AND WHEREAS, during the Inspection of your industry on **07/01/2022, 03/02/2022 AND 16/03/2022** under Section-10 of EPA-1986, it was observed that:

1. Unit has changed process route of MCA (Meta Chloro Aniline) product from hydrogenation to NaSH without obtaining necessary permission of Board.
2. Unit has not obtained Authorization for hazardous waste generated due to process route change of MCA (Meta Chloro Aniline).
3. Unit has send hazardous waste to outstate Receiver industry M/s DBL India Ltd (Dalmia Bharat Limited, Odisha) for which unit has not followed procedure for interstate transport and not intimated this Board before giving hazardous waste/co-processing waste to the transporter as per provision of HOWMR-2016.
4. This Board has not received copy 7 of manifest from out state Receiver industry M/s DBL India Ltd (Dalmia Bharat Limited, Odisha) as per provision of HOWMR-2016.
5. As per GPS record it is seen that tanker GJ-06-ZZ-6221 has left the premises of M/s. Chemie Organic Chemicals (I) P. Ltd. at about 16:30 hrs on 23.12.2021 and has gone towards highway near Panoli GIDC area, taken rounds in this area and GPS is then stopped at @ 11:41 PM on 23.12.2021,thus Unit has not used GPS mounted vehicle till its final destination and no record of GPS tracking for the hazardous wastes disposed by the unit has been submitted for tanker no GJ 06 ZZ 6221 of date-23/12/2021.
6. Unit is unable to furnish details regarding GPS of any hazardous waste movement from their unit.
7. Unit has not submitted CCTV footages for time period from 13/12/2021 to 06/01/2022.
8. Unit was not using online manifest system for the disposal of spent H_2SO_4 and sent through tax invoices only
9. Unit has not obtained authorization for disposal of co-processing waste.

Outward No:637392/01/04/2022

10. During inspection it is observed that huge quantity of MS/ HDPE drums (total @ 250 nos. of 200 lit. capacity each) filled with intermediates/ residues without any nomenclature are stored haphazardly within unit premises in internal roads of unit in open near various manufacturing plants.
11. No specific logbook/ record are maintained for this hazardous waste stock-generation-disposal.
12. During inspection on dated 03/02/2022, it was observed that unit has not obtained authorization for disposal of co- processing waste (as mentioned in manifest) from the Board and used the tanker no- GJ-06-TT-8555 for disposal of co- processing waste and movement of this tanker is suspicious illegal movement. also not furnished details of GPS.
13. As per the letter of Police Commissioner's Office, Surat City unit has disposed off Hazardous waste chemical into Amlakhadi through tanker no. GJ-06-TT-8555.
14. During inspection on dated 16/03/2022, it was observed that as per responsibility of sender of Hazardous waste, unit has not ensured that the hazardous wastes have reached its intended destination through GPS tracking system.
15. Transporter details mentioned in manifest and that mentioned in tax invoices are found contradictory.
16. GPS tracking of hazardous waste disposed through M/s. Sangam Enviro Pvt Ltd. is not ensured by the unit and unit is unable to furnish details regarding any GPS records for movement of hazardous wastes.

AND WHEREAS written instructions were given to you during visit as part of opportunity of hearing.

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

ORDER

UNDER THE CIRCUMSTANCES, I A.V.SHAH, Member Secretary of Gujarat Pollution Control Board in exercise of the power conferred on file no. Legal-G-28 under section (5) of the Environment (Protection) Act -1986 issue the Directions as under:

1. To prohibit the manufacturing activity **on immediate** at Plot No: 758, GIDC JHAGADIA DIST.BHARUCH.
2. To stop operation of D.G. set and CPP(if any) with immediate effect.
3. To close the operation of your industrial plant on the above mentioned site with immediate effect.
4. To direct the concerned authority to stop supply of electricity and water with immediate effect.
5. This order will be effective with immediate effect.

(P.T.O.)

Outward No: 6270 dt: 11/04/2022

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, Gandhinagar-382 010
Phone : (079) 23226295
Fax : (079) 23232156
Website : www.gpcb.gov.in

6. Pay Rs. 50 Lac as interim Environment Damage Compensation by RTGS immediately in Following A/C.

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

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

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(A.V.SHAH)
MEMBER SECRETARY

NO: GPCB/ANK/CCA-164(10)/ID-15014/ Dated: /04/2022

Issued to:
M/s. CHEMIE ORGANIC CHEMICALS (I) PVT. LTD,
PLOT NO: 758
GIDC JHAGADIA,
DIST: BHARUCH, GUJARAT.

COPY TO:

1. **The Dy. Engineer (O&M)**
Dakshin Gujarat Vij Company Ltd (DGVCL),
Industrial Sub-Division office, DGVCL,
Near O.N.G.C.,
Ankleshwar, Dist. Bharuch.....
I am directed to request you to disconnect supply of **ELECTRICITY** (except single phase) with **Immediate effect** from the date of issue of this order to the industrial plant of **M/s. CHEMIE ORGANIC CHEMICALS (I) PVT. LTD.**, PLOT NO: 758, GIDC Jhagadia, DIST.BHARUCH & intimate to us accordingly.

Outward No: GPCB/ANK/CCA-164/10/2022

2. **The Chief Officer**
   Office of the Notified Area Authority
   Plot No.40,
   GIDC Jhagadia.
   Dist: Bharuch .....
   I am directed to request you to disconnect supply of **WATER** with **Immediate effect** from the date of issue of this order to the industrial plant of **M/s. CHEMIE ORGANIC CHEMICALS (I) PVT. LTD.,** PLOT NO: 758, GIDC Jhagadia, DIST.BHARUCH & Intimate to us accordingly.

3. **Regional Transport Officer, Vadodara**
   RTO Office,
   Vadodara.... I am directed to request you to cancel the registration of Tanker No. GJ-06-TT-8555 as it is involved in illegal transportation hazardous waste.

4. **The Gujarat State Transport Commissioner**
   Commissioner of Transport office,
   Dr. Jivraj Mehta Bhavan,
   Block No.6, 2nd floor,
   Sector 10-A, Gandhinagar.... I am directed to request you to cancel the registration of Tanker No. GJ-06-TT-8555 as it is involved in illegal transportation hazardous waste.

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

For and on behalf of
GUJARAT POLLUTION CONTROL BOARD

(A.V.SHAH)
MEMBER SECRETARY

Outward No:637392, 01/04/2022

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, **Gandhinagar**-382 010
Phone : (079) 23226295
Fax (079) 23232156
Website : www.gpcb.gov.in

BY R.P.A.D.

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

WHEREAS you M/s. Raina Industries are having an industrial plant at **Plot No: A2/6104/10, GIDC ANKLESHWAR, DIST.BHARUCH.**

AND WHEREAS Gujarat Pollution Control Board has granted Consolidated Consent and Authorization (CC&A), AWH-103505, valid up to 16/07/2024 and amended thereof with conditions mentioned therein

AND WHEREAS, during the Inspection of your industry on **04/03/2022** under Section-10 of EPA-1986, It was observed that:

1. Unit is granted CC&A with condition to use fresh raw material however, unit has started using Hazardous waste i.e sodium hydrogen sulphide solution as raw material.
2. Unit has not obtained Rule-9 permission for the use of Hazardous waste i.e sodium hydrogen sulphide solution as raw material for manufacturing of Sodium Sulphide.
3. Unit has not submitted MOU detail for the procurement of hydrogen sulphide solution from M/s. Hikal Ltd., Taloja or M/s. Apollo Chemical Dahisar, Mumbai i.e outstate industry.
4. New civil construction work is observed going on at the backside of the production plant for which no any details are submitted.
5. Unit has not submitted all required detail for the procurement of sodium hydrogen sulphide solution (NaHS) from M/s. Hikal Ltd., Taloja or M/s. Apollo Chemical Dahisar, Mumbai or anywhere for the period of 2019-20, 2020-21 & 2021-22 with requisite documents

AND WHEREAS written instructions were given to you during visit as part of opportunity of hearing.

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

Outward No: 331455, 05/04/2022

ORDER

UNDER THE CIRCUMSTANCES, I A.V.SHAH, Member Secretary of Gujarat Pollution Control Board in exercise of the power conferred on file no. Legal-G-28 under section (5) of the Environment (Protection) Act -1986 issue the Directions as under:

1. To prohibit the manufacturing activity on **15th day** at Plot No: A2/6104/10, GIDC ANKLESHWAR, DIST.BHARUCH.
2. To stop operation of D.G. set and CPP on **15th day** (if any).
3. To close the operation of your Industrial plant on the above mentioned site on 15th day.
4. To direct the concerned authority to stop supply of electricity and water on 15th day.
5. This order will be effective with **15th day**.
6. Interim Environment Damage Compensation (EDC) may be decided and communicated by board later on. Unit shall pay interim EDC as and when communicated by board at the time of revocation.

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

For and on behalf of
Gujarat Pollution Control Board

(A.V.SHAH)
MEMBER SECRETARY

NO: GPCB/ANK/CCA-629(1)/ID-15534/ Dated: /04/2022

Issued to:

M/s. RAINA INDUSTRIES
PLOT NO: A2/6104/10
GIDC ANKLESHWAR,
DIST: BHARUCH, GUJARAT.

Outward No:6377551/05/04/2022

(P.T.O.)

GPCB

GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN
Sector-10-A, **Gandhinagar**-382 010
Phone : (079) 23226295
Fax . (079) 23232156
Website : www gpcb gov in

COPY TO:

1. **The Dy. Engineer (O&M)**
   Dakshin Gujarat Vij Company Ltd (DGVCL),
   GIDC Sub-Division, DGVCL,
   Plot No.U/4/2, opp: GIDC Police Station,
   GIDC Ankleshwar, Dist. Bharuch....
   I am directed to request you to disconnect supply of **ELECTRICITY** (except single phase) **with 15th day effect** from the date of issue of this order to the industrial plant of **M/s. RAINA INDUSTRIES**, PLOT NO: A2/6104/10, GIDC ANKLESHWAR, DIST.BHARUCH & intimate to us accordingly.

2. **The Chief Officer**
   Ankleshwar Notified Area
   Plot No.618/619,
   GIDC Ankleshwar,
   Dist: Bharuch .....
   I am directed to request you to disconnect supply of **WATER** with 15th day **effect** from the date of issue of this order to the industrial plant of **M/s. RAINA INDUSTRIES,** PLOT NO: A2/6104/10, GIDC ANKLESHWAR, DIST.BHARUCH & intimate to us accordingly.

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

For and on behalf of
Gujarat Pollution Control Board

(A.V.SHAH)
MEMBER SECRETARY

Outward No:637755, 05/04/2022

Annexure-30

Inspection Report in the matter of illegal disposal of spent chemical / by-product at Sachin GIDC, Surat, Gujarat state.

M/s. Hikal Ltd, Plot No. T-21, MIDC Taloja was Jointly inspected on 08.01.2022, by following officials of MPCB, Navi Mumbai in respect of aforesaid incident.

1. Mr. D.B. Patil, Regional Officer, Navi Mumbai.
2. Mr. Sachin Adkar, Sub Regional Officer, Taloja.
3. Mr. Umesh Jadhav, Field Officer, Taloja.

From the industry side following representatives were present.

1. Mr. Hasit Dangi, Head Operations, (hasit.dangi@hikal.com, 8291945841)
2. Mr. Gajendra Pawar, Head Production & Factory manager (gajendra.pawar@hikal.com, 8291214523)
3. Mr. Machindranath Gorhe, Head EHS (machindranath.gorhe@hikal.com, 9819447719)

➢ **Details of inspection are as follows:**

➢ The industry has obtained Environment Clearance from MoEF, GoI dated 28.08.2007 for expansion of Pesticide Unit.

Name of the Product	Existing (MTPA)	After expansion (MTPA)
Thiabendazole	948	700
Bilenazate	300	100
ADMP	456	200
HTP-213	--	300
IPDO	--	300
Intermediates of HTP-293	--	200
Total	1,704	1,800

By-products and high COD stream and its treatment and disposal is not incorporated in EC.

Consent details:

1. Industry has obtained valid consent of Board granted on 10.11.2021, valid up to 31.07.2024.
2. Red/LSI CAC case, engaged in manufacturing of Pesticides - fungicides (Technical grade) products.
3. The consented valid manufacturing Products & by-products as below:

Sr. No.	Product	Maximum Quantity	UOM
1	Thiabendazole	490	MT/A
2	HTP-213 (Fenamidone)	100	MT/A
3	HTP-650 (B.A.-S-650) (Ametoctradine)	750	MT/A
4	IKF-5411 (Isofetamid Technical) or MPDC DME	60	MT/A
5	MPDC-DME	400	MT/A
6	In House Pilot Plant for Agro/Pharma products and intermediates (Facility shall be used only for development or Consented products and new products on laboratory scale)	0	MT/A

Sr. No.	By-Products	Maximum Quantity	UOM
1	Recovered Ammonia	900	MT/A
2	Sodium Hydro Sulphide	150	MT/A
3	Aluminium Hydroxide / Potassium Chloride	382	MT/A
4	Spent HCl (Approx. 30%)	1462	MT/A
5	Spent H2SO4 (98%)	904	MT/A
6	Intermediates: Recovered Solvents) Mono Chloro Acetone / Toluene / Methanol / IPA / DMF / Mono Chloro Benzene /Benzene	500	MT/A

4. The consented industrial effluent quantity is 742 CMD & domestic effluent quantity is 30 CMD respectively.
5. During manufacturing process high COD and low COD effluent streams are generated.

Treatment and disposal of High COD streams:

About 56 CMD high COD stream is generated as reported by industry representatives during inspection. This stream is generated while taking the products Fenamidone, Ametoctradine, Isofetamid Technical or MPDC DME & MPDC-DME. For High COD stream treatment industry has provided dedicated Stripper, triple effect MEE (135 KLD) & Agitated Thin Film Dryer (ATFD) of 72 KLD capacities. Salts generated (9000 MT/A as per consent) from ATFD is disposed to Mumbai Waste Management Ltd., Common Hazardous Waste Treatment Storage and Disposal facility in MIDC Taloja.

Treatment and disposal of Low COD streams:

About 600 CMD low COD stream is generated as reported by industry representatives during inspection. This stream is generated while taking the products Thiabendazole and floor washing and utility. For the treatment of this effluent stream industry has provided primary, secondary, and tertiary treatment facilities and treated effluent is discharged into CETP for further treatment and disposal.

6. APC system: Gaseous emissions (H_2S, HCL, & NH_3) from manufacturing process industry has provided requisite Scrubbing system to control emissions.
7. Hazardous Waste aspect: Hazardous Waste viz 29.1 Process waste or residues, 29.2 Sludge containing residual pesticides, 33.1 Empty barrels, 36.2 spent carbon or filter medium, 37.3 concentration or evaporation residues, 37.2 Ash and flue gas cleaning residues, Spent caustic Is disposed at CHWTSDF and remaining i.e. 5.1 Used or spent oil, 9.4 Spent solvents, Potassium Bromide is dispose by to MPCB authorised recycle / reprocessor.

➢ **Report about the incidence of illegal disposal of Sodium HydroSulphide (NaHS) at Sachin GIDC, Surat, Gujarat state**

Enquiry was made with the representatives of the industry about above stated incidence and technical aspects involved therein. The response is as below:

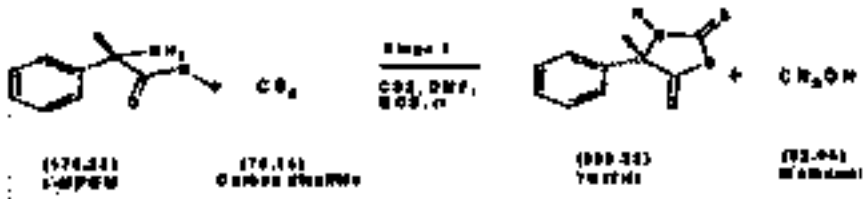
1. It was reported that during the manufacturing of the consented product Fenamidone, (100 MT/A) which is manufactured in multipurpose plant by product NaHS is generated from scrubbing operations.

Brief Manufacturing process of Fenamidone:

There are 3 stages involved in the manufacturing of this product viz

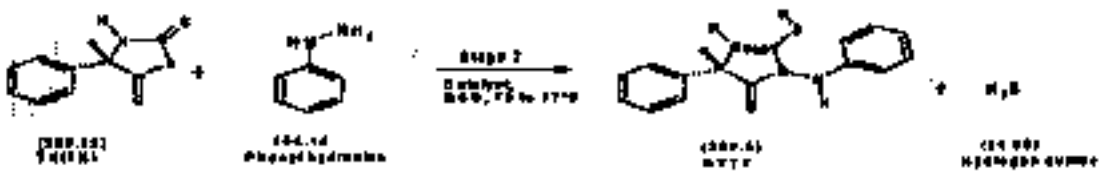
a) Preparation of Thiazolidinonethione.

In this reaction the methyl (S)-2-methyl-2-phyenylglycinate (S-MPG*M*) in Monochlorobenzene (MCB) is reacted with Carbon-di- sulphide (CS2) (reagent and solvent). Reaction is as follows:



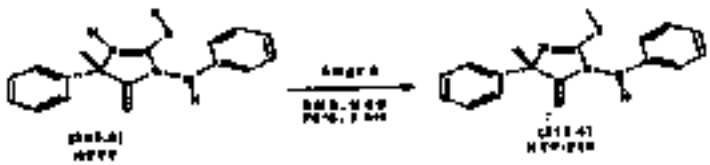
b) Preparation of Hydrazinothiodydantoine

Thiazolidinonethione (THITH) is further reacted with Phenylhydrazine in presence of catalyst i.e. Tributylamine, acetic acid and Sulfur. H2S is liberated in this reaction. Gaseous H2S is further scrubbed in two stages generating by product Sodium Hydro Sulphide (NaHS) as a result. This by-product was being transported to Gujarat State by M/s. Sangam Enviro Pvt. Ltd., Village Deshrath, Dist. Vadodra, Gujarat State.



c) Fenamidone Preparation:

Hydrazinothiodydantoine HYTY further methylated with Dimethyl sulfate in Mono-chlorobenzene (MCB). The reaction mixture is neutralised with aqueous Sodium Hydroxide, washed with water, and concentrated to crystallise Fenamidone. The solid is separated by filtration, washed with MCB, and dried under vacuum. The reaction is as below.



2. Industry representative has informed that they are manufacturing Fenamidone from year 2008 on campaign basis. The details as provided by the industry for last 3 years is as below.

from 2019 to Jan 2021			
Year	Fenamidone Production Qty, (MT)	By Product (NaHS) Production Qty, (MT)	Name of by product Customer / Industry
FY 19-20	98.75	157.8	M/s. Apollo Chemicals, Dahisar, Mumbai. This firm is in the trading business and supplying material to M/s. Reina Industries, GIDC Estate, Ankleshwar. This industry is engaged in manufacturing of Sodium sulphide-150 TPM on 100% basis. GPCB has granted consent on 25.09.2019 which was valid up to 16.07.2024.
FY 20-21	0	0	0
FY 21-22	158.2	19.66	M/s. Eureka Chemicals, MIDC Taloja, Raigad. This industry is engaged in manufacturing of Sodium sulphide (Liquid) - 990 MT/M. MPCB has granted consent on 15.03.2019 which was valid up to 31.01.2024.
		141.55	M/s. Sangam Enviro Pvt. Ltd., Village Desharath, Vadodra, Gujarat

3. Industry representatives informed that, during year 2021, the by-product generation was 161.21 MT, and have disposed 19.66 MT to M/s. Eureka Chemicals, MIDC Taloja and 141.55 MT to M/s. Sangam Enviro Pvt. Ltd., Village-Dashrath, Vadodara city, State Gujarat.

4. The details of NaHs disposal during the 2021-22 is as below.

Sr. No.	Date of Disposal	Tanker No	Qty (MT)	Remarks
1	14/10/2021	MH-46J-0508	19.66	M/s. Eureka Chemicals, Taloja
2	12/11/2021	GJ-12BY-1881	29.0	M/s. Sangam Enviro Pvt. Ltd., Gujarat State
3	20/11/2021	GJ-06BT-6421	28.05	
4	22/11/2021	GJ-06BT-6431	29.27	
5	17/12/2021	MH-04HY-6377	25.910	
6	01/01/2022	GJ-06BT-6421	28.29	

- As per consent condition number 13 : Industry, the by-product generator, should ensure that all the vehicles used to transport by-products to the vendor industry to be fitted with web based GPS system to record the origin to destination position and shall self monitor the compliance and submit monthly report to the Board.

  Industry representative informed that out of above 6 tanker trips to M/s. Sangam Enviro Pvt. Ltd., Gujarat State. The GPS tracking of these tankers is carried out by M/s. Sangam Enviro Pvt Ltd., but GPS tracking record is available for only 2 trips. (Copy enclosed)

- As per consent condition number 14 : Industry shall obtain affidavit from vendors stating that the by-product purchased from PP is used as raw material in their respective industries.

  M/s. Hikal Ltd., Taloja has obtained affidavit from M/s. Sangam Enviro Pvt. Ltd., stating that they are receiving Sodium hydro sulphide (Lower Grade-By product) from M/s. Hikal Limited, Plot No. T-21, MIDC Taloja, Maharashtra through their authorized transporter. (Affidavit dtd.30/10/2021). (Copy enclosed)

  Further it is stated in affidavit that they will utilize this material in at textile and cement plants, with whom they have agreement. In the same affidavit it is further stated that this material received is used as raw material in their industry.

- **Details about M/s. Sangam Enviro Pvt. Ltd., Gujarat State**

1. They have obtained MSME registration (Udyam Registration Certificate) vide no. UDYAM-GJ-24-0001525, dtd. 9/8/2020 having official address at Village Dashrath, Dist. Vadodra, Gujarat State.
2. As per Udyam Registration Certificate issued by MSME authority the National Industry Classification Codes(s). is reproduce as below:

	Sr. No.	Nic 2 Digit	Nic 4 Digit	Nic 5 Digit	Activity
National Industry Classification Code(s)	1	37-Sewerage	3700-Sewerage	37002-Collecting and transporting of human or industrial waste water or rain water by means of sewerage networks, collectors, tanks and other means of transport (sewage vehicles etc.	Manufacturing
	2	38-Waste collection, treatment and disposal activities; materials recovery	3822-Treatment and disposal of hazardous waste	38221- Treatment and disposal of toxic live or dead animals and other, contaminated waste, disposal of used goods; incineration of hazardous waste	Manufacturing
	3	38-Waste collection, treatment and disposal activities; material recovery	3812-Collection of hazardous waste	38120- Collection of hazardous waste	Manufacturing
	4	39-Remediation activities and other waste management services	3900-Remediation activities and other waste management services	39000-Remediation activities and waste management services	Manufacturing

3. The said firm has submitted affidavit stating that they are receiving Sodium hydro sulphide (Lower Grade-By product) from M/s. Hikal Limited, Plot No. T-21, MIDC Taloja, Maharashtra through their authorized transporter.
4. Further it is stated in affidavit that they will utilize this material in at textile and cement plants, with whom they have agreement. In the same affidavit it is further stated that this material received is used as raw material in their industry.
5. It was reported by the representative of the industry that the services of the above firm were engaged since last 2 months. (Affidavit dated 30/10/2021). (Copy enclosed)

6. The representatives further reported the details of last trip of the tanker which was sent to Gujarat State through the above said firm. Same as below.

i) Vehicle No. GJ06BT6421
ii) Transporter – Shri Maruti Impex
iii) Invoice No- 321220800398
iv) Invoice Date- 01/01/2022, Time – 19:01:22
v) Bill To- Sangam Enviro Pvt. Ltd., Office No. 424, Shilpi Square, Dahej bypass road, Village-Bharuch, Gujarat-392001.
vi) Gross weight – 42310 kg, Tare wight- 14020 kg, Net weight- 28290 kg

The details of certificate of analysis (CoA) M/s. Hikal Ltd., Taloja is as below:

Product Name : Sodium Sulphide
Source : T-4013
Tanker Number : GJ06BT6421
Date : 01.01.2022
Party Name : Sangam Enviro Pvt. Ltd.

Test	Finding
Description	Reddish coloured liquid
Total Sulphide	24.86 % w/w
Sodium Sulphide	0.0 % w/w
Sodium Hydrosulphide	18.04 % w/w
Excess alkali	0.00 % w/w

As reported by industry representative this solution contains 18.04 % Sodium Hydrosulphide in water

➢ MATERIAL SAFETY DATA SHEET- Sodium Hydrosulphide Solution.

a. Identification : Sodium Hydrosulphide Solution
b. Hazards identification
Physical hazards : Corrosive to metals
Health hazards : Acute toxicity (Oral)
Environmental hazards : Hazardous to the aquatic environment

Composition / Information on Ingredients

Mixtures

Chemical name	CAS number	%
Sodium hydrosulphide	16721-80-5	18
Sodium Sulphide	1313-82-2	0

Composition Comments

Components not listed are either non-hazardous or are below reportable limits. All concentrations are in percent by weight unless ingredient is a gas. Gas concentrations are percent by volume.

- **Physical Properties**

Odor threshold	Not available
pH	11.5-12.5
Melting point/freezing point	Not available
Initial boiling point and boiling range	253-269 F (122.78-131.67 C)
Flash Point	Not available.
Evaporation rate	Not available
Flammability (Solid, gas)	Not available

- **Stability and reactivity**

Reactivity: Reacts violently with strong acids. This product will react with oxidizing agents. May be corrosive to metals. Reacts violently with diazonium salts.

Chemical Stability: Material is stable under normal conditions.

Possibility of hazardous reactions: Heating this product will evolve toxic fumes of hydrogen sulfide, sulfoxides and sodium oxide. Fire conditions will also cause the production of sulfur dioxide. Contact with acids increase the formation of hydrogen sulfide. Hydrogen sulfide may form flammable mixtures with air. Heating to decomposition emits toxic fumes of sulfoxides and sodium oxide.

Conditions to avoid: Contact with incompatible materials. Do not mix with other chemicals.

Incompatible Materials: Acids, alkalis, oxidizing agents, light metals, aldehydes or organic anhydrides. Alkylene oxides. Aldehydes. Alcohols. Glycols. Phenols.

Hazardous decompoelition products: Uncontrolled heating of this product will evolve toxic fumes of hydrogen sulfide, sulfoxides and sodium oxide. Fire conditions will also cause the production of sulfur dioxide.

REMARKS:

1. As per consent dtd 10.11.2021 "Sodium Hydrosulphide" is incorporated as a by-product.

2. Sodium Hydrosulphide is a by-product generated in the manufacture of HTP-213 (Fenamidone), H_2S generated during manufacturing is scrubbed with caustic solution (20 - 30 %) to get Sodium Hydrosulphide (18 - 20 %)

3. Industry has practise of selling this by-product Sodium Hydrosulphide to vendors for further use in textile & cement industries (as per affidavit submission by the vendor industry).

4. On 8.1.2022 while inspecting industry representative inform that Gujarat Police authority has visited M/s. Hikal Ltd., Taloja on 7.1.2022. In this regard industry representative informed that, police authorities who visited on 7.1.2022 has informed M/s. Hikal Ltd that on 6.1.2022 early morning the incidence took place at Sachin GIDC, Surat, and the tanker containing by-product Sodium Hydrosulphide caused leak and has caused the death of 6 people and hospitalization of 23 people.

5. From the above report it is noted that M/s. Hikal Ltd., MIDC Taloja has dispatched by product sodium hydrosulphide on 1.1.2022 bearing tanker no. GJ06BT6421. Details as below:

   i) Tanker no. GJ06BT6421
   ii) Transporter – Shri Maruti Impex
   iii) Invoice No- 321220800398
   iv) Invoice Date- 01/01/2022, Time – 19:01:22
   v) Bill To- Sangam Enviro Pvt. Ltd., Office No. 424, Shilpi Square, Dahej bypass road, Village-Bharuch, Gujarat-392001.
   vi) Gross weight – 42310 kg, Tare wight- 14020 kg, Net weight- 28290 kg

   But the industry representative has not submitted GPS track record of this tanker no. GJ06BT6421.

6. As per Material safety data sheet (MSDS) solution contains mixture of 18% Sodium Hydrosulphide by-product and 82% non-hazardous ingredients hence, may be concluded as low grade hazardous chemical mixture.

7. From the above 'Material safety data sheet (MSDS) the possibility of Hydrogen Sulphide (H2S) gas generation due to mixing of sodium hydrosulphide with acidic solution or any other non-compatible material cannot be ruled out causing above incidence"

8. In order to avoid/control generation of byproduct Sodium Hydrosulphide, it needs to explore the possibility of flaring/incineration of Hydrogen Sulphide (H2S) gas.

9/12/22

(Sachin Adkar)
Sub Regional Officer, Taloja

(Umesh Jadhav)
Field Officer, Taloja

(D. B. Patil)
Regional Officer, Navi Mumbai

F. No. J-11011/ 63/2007- IA II (I)
Government of India
Ministry of Environment and Forests
(I.A. Division)

Paryavaran Bhawan
CGO Complex, Lodhi Road
New Delhi – 110 003

E-mail : pb.rastogi@nic.in
Telefax : 011: 2436 7668
Dated 28th August, 2007

To,

M/s HIKAL Ltd., T-21
MIDC Industrial Area
Taloja – 41C208, Raigad
Maharashtra.

E-mail : rajendra_chirwatkar@hikal.com
Fax No. : 02741-1844/022-27544277, 22843034

Subject : Expansion of Pesticide Unit at Plot No. T-21, MIDC Industrial Area, Taloja, Raigad, Maharashtra by M/s HIKAL Ltd. – Environmental clearance reg.

Sir,

This has reference to your letter no. HL/MOEF/03/06 dated 8th December, 2006 alongwith project documents including Form I and EIA/EMP report for seeking environmental clearance under the EIA Notification, 1994 and subsequent clarifications/additional information furnished vide your letters dated 23rd April, 2007 and 11th August 2007 on the above mentioned project.

2.0 The Ministry of Environment and Forests has examined your application. It is noted that proposal is for the expansion of Pesticide Unit at Plot No.T-21, notified MIDC Industrial Area, Taloja, Raigad, Maharashtra which is declared as Chemical Zone. Following pesticides will be manufactured as per details given below :

Name of the product	Existing (MTPA)	After expansion (MTPA)
Thiabendazole	948	700
Bifenazate	300	100
ADMP	456	200
HTP-213	--	300
IPDO	--	300
Intermediates of HTP-293	-	200
Total	**1,704**	**1,800**

Total project area is 60,000 m^2 and expansion will be carried in 3,000 m^2 in the same premises. No additional land will be required. Total cost of the project is Rs. 15.00 Crores. Rs. 100 Lakhs and Rs. 35 Lakhs are earmarked towards the capital cost and recurring cost/annum respectively for the environmental pollution control measures.

3.0 No public hearing / consultation is required due to project being located in notified MIDC industrial area as per para 7 (i) III (i)(b) of EIA Notification, 2006.

4.0. The Ministry of Environment and Forests hereby accords environmental clearance to the above project under the provisions of EIA Notification dated 14th September, 2006 subject to strict compliance of the following specific and general conditions:

A. SPECIFIC CONDITIONS :

i. Dust collectors and venturi scrubbers shall be provided to control the particulate emissions.

ii. Fugitive emissions in the work zone environment shall be periodically monitored for specific pollutants like solvents, VOC, HCl, SO_2 etc. with instruments of proper range. The flue gas emissions shall conform to the standards prescribed by the MPCB.

iii. Total water requirement from MIDC supply effluent generation shall not exceed 1,200 m^3/day as per the permission accorded by the MIDC. The wastewater generation shall not exceed 823 m^3/day and treated for primary, secondary and tertiary treatment. Treated effluent shall be sent to common effluent treatment plant (CETP) for further treatment. The quality of the treated effluent shall conform to the standards prescribed by MPCB / EPA Rules. Toxicity Factor - 4 (TF-4) test shall be carried out as per the latest CPCB guidelines.

iv. The solid waste shall be segregated according to its calorific content and stored separately for treatment and disposal. ETP Sludge, evaporation salts, spent carbon etc. shall be incinerated in the common incinerator facility installed at TSDF at Taloja, Maharashtra and no incinerator shall be installed at the project site. Used oil and batteries shall be sold to authorized recyclers.

B. GENERAL CONDITIONS :

i. The project authorities must strictly adhere to the stipulations made by the Maharashtra Pollution Control Board (MPCB) and the State Government.

ii. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess adequacy of the conditions imposed and to add additional environmental protection measures required, if any.

iii. The gaseous emissions (SO_2, NO_x, HC, HCl & Cl_2) and particulate matter from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.

iv. The process emissions (SO_2 and HCl) shall be scrubbed by the caustic or wet scrubber from all the stacks. Vents from scrubbers and condensers shall be periodically monitored and maintained as per the best practicable technology. The VOC emissions generated due to use of organic chemicals from various reactors shall be controlled by installing chilled water and chilled brine condenser system to condense the organic vapours to recycle and reuse in the process.

v. Adequate number of influent and effluent quality monitoring stations should be set up in consultation with the MPCB. Regular monitoring shall be carried out for relevant parameters.

vi. As per the Charter on Corporate Responsibility on Environmental Protection the bio-assay test shall be replaced by Toxicity Factor test method developed by CPCB.

vii. All the solvent recovery condensers shall be cooled with low temperature brine to reduce solvent loss to the environment. Spent solvents shall be recovered as far as possible & recovery shall not be less than 95 percent. All venting equipments shall have vapour recovery system. Reactors shall be provided with mechanical seal to handle the odorous chemicals. Action shall be taken to reduce the air emissions in the work zone environment as far as possible.

viii. Green belt of adequate width and density shall be developed in 33 % of the total project area to mitigate the effect of fugitive emissions all round the plant in consultation with the local DFO as per the CPCB guidelines.

ix. The company shall undertake rainwater harvesting measures to recharge the ground water as well as reduce consumption of fresh water.

x. As proposed, Rs. 100 Lakhs and Rs. 35 Lakhs earmarked towards the capital cost and recurring cost for the environmental pollution control measures shall be used exclusively to implement the conditions stipulated by the Ministry of Environment & Forests as well as the State Government. An implementation schedule for all conditions stipulated herein shall be submitted to the Regional office of the Ministry at Bhopal. The funds shall not be diverted for any other purposes.

xi. The Company shall undertake eco-development measures including community welfare measures in the project area for the overall improvement of the environment. The eco-development plan shall be submitted to the MPCB within three months of receipt of this letter for approval.

xii. The project authorities must strictly comply with the rules and regulations under the Manufacture, Storage and Import of Hazardous Chemicals Rules, 2000. Prior approvals of Chief Inspector of Factories, Chief Inspector of Explosives, Fire Safety Inspectorate etc. must be obtained.

xiii. The project authorities must strictly comply with the rules and regulations with regard to handling and disposal of hazardous wastes in accordance with the Hazardous Wastes (Management and Handling) Rules, 2000. Authorization

from the MPCB must be obtained for collection, storage, treatment and disposal of hazardous wastes.

xiv. Multiple safety systems shall be provided in reaction vessel handling flammable solvents or in which pressurized operations are carried out and hazard analysis of all operations shall be carried out. All the safety measures mentioned in the Factory Act shall be strictly adopted. Safety audit of the plant by a qualified safety engineer shall be carried out at least once in two years.

xv. The overall noise levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (P) Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).

xvi. Occupational health surveillance programme shall be undertaken as regular exercise for all the employees, specifically for those engaged in handling hazardous substances. First aid facilities in the Occupational Health Care Centre shall be strengthened and medical records of each employee should be maintained separately.

xvii. A separate Environment Management Cell equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and monitoring functions.

xviii. The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report.

xix. The implementation of the project vis-à-vis environmental action plans shall be monitored by Ministry's Regional Office at Bhopal / MPCB / CPCB. A six monthly compliance status report should be submitted to monitoring agencies.

xx. The Project Proponent should advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned informing that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the Maharashtra Pollution Control Board / Committee and may also be seen at Website of the Ministry and Forests at http://envfor.nic.in. The advertisement shall be made within 7 days from the date of issue of the clearance letter and a copy of the same shall be forwarded to the Ministry's Regional Office at Bhopal.

xxi. The Project Authorities shall inform the Regional Office as well as the Ministry the date of financial closure and final approval of the project by the concerned authorities and the date of start of land development work.

5.0. The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.

6.0. The Ministry reserves the right to stipulate additional conditions if found necessary. The company shall implement these conditions in a time bound manner.

7.0. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the Public Liability Insurance Act, 1991alongwith their amendments and rules.

(Dr. P. B. Rastogi)
Additional Director

Copy to:

1. The Secretary, Department of Environment and Forests, Govt. of Maharashtra, Mumbai - 400 001, Maharashtra.
2. The Chief Conservator of Forests (Central), Ministry of Environment & Forests, Regional Office, Link Road No. 3, E - 5, Arera Colony, Bhopal - 462 016, M.P.
3. The Chairman, Central Pollution Control Board Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar New Delhi – 110 032.
4. The Chairman, Maharashtra Pollution Control Board, Shri Chatrapati Shivaji Maharaj Municipal Market Building, 4th Floor, Mata Ramabai Ambedker Road, Mumbai - 400 001, Maharashtra.
5. Monitoring Cell, Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi.
6. Guard File.
7. Monitoring File.
8. Record File.

23/8/07

(Dr. P. B. Rastogi)
Additional Director