



1<sup>st</sup> September, 2021 / ૧૫૫૧૨

To,  
Shri Sanjeev Kumar, IAS  
Chairman - Gujarat Pollution Control Board,  
Paryavaran Bhavan, Sector-10-A,  
Gandhinagar.

**Subject: Removal of Fixed Dissolved Solids (FDS) parameter from Inlet & outlet Norms of CETP in existing CC&A of Ahmedabad region considering Hon'ble Gujarat High Court's order dated 05/08/1995 for Special Civil Application no 770 of 1995**

Respected Sir,

Greetings from Gujarat Chamber of Commerce and Industry.

In connection with the above subject, we would like to inform you that GPCB has prescribed inlet and outlet Norms of Fixed Dissolved Solids (FDS) 2100 mg/lit in CC&A of all CETPs Ahmedabad since 2017 only. In earlier CCA issued to CETPs, norms of FDS/TDS were not given.

In earlier CCA, the condition was mentioned as "*The effluent conforming to the above standards shall be conveyed to Naroda-Pirana Mega Pipeline through the closed pipeline and from collection system to Pirana Sewage treatment plant of Ahmedabad Municipal Corporation through closed pipeline & shall be mixed with treated sewage so that concentration of total dissolved solid remain below 2100 mg/lit before disposal into river Sabarmati.*" (Copy of the same is attached herewith as Annexure I.) Subsequently, in CC&A issued after 2017, the permissible limit of Fixed Dissolved Solids (FDS) in inlet and outlet of CETP was arbitrarily given 2100 mg/lit without referring to technical compliance.

Natubhai Patel  
President

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Sr. Vice President

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Vice President

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Hon. Secretary

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Hon. Secretary (R)

Sachin K. Patel  
Hon. Treasurer



Sir, this was discussed in the meeting with GPCB and GIDC officials on 01/07/2021. We will like to submit that since the commissioning of the mega pipeline, treated wastewater of CETPs (Vatva, Naroda, Odhav) is being discharged into the mega pipeline, which ultimately meets into river Sabarmati in closed condition. Any CETP makes no change in the mode of disposal.

In Special Civil Application no 770 of 1995, The Honorable High Court-appointed Bhanujan Committee to deal with pollution in the Ahmedabad region.

The committee covered various issues like collection, treatment and disposal of industrial wastewater of Naroda, Odhav, Vatva area and also monitoring and enforcement of laws in consultation with GPCB & AMC.

The relevant part of the report, as mentioned in Honorable High Court order dt. 05/08/1995 is as under:

***13. The units should provide primary treatment before discharging their effluents to the collection system. Except for TDS, the rest of the pollutants are likely to come down to the norms in combined secondary treatment.***

***14. TDS dilution is feasible by mixing the treated effluent with Municipal sewerage. The relative volume of these two would give scope for such mixing.***

The recommendations of the Bhanujan Committee report were also considered by the Honorable High Court. In Honorable High Court order dt. 05/08/1995 in Special Civil Application no 770 of 1995, it has been

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*mentioned that "Norms regarding TDS can be fully meet only after the treated effluent from the industrial units are mixed with Pirana Sewage discharge after treatment. Therefore, the TDS is expected to be reduced to the level of the GPCB norms either as a result of the secondary treatment given by the industrial unit concerned at the plant level or by mixing the treated industrial effluent of the estate taken together and mixed with the municipal sewage after the treatment in the pirana plant. "*

The Honorable High Court has passed this direction after considering the recommendation of Bhanujan Committee report (Copy of the same is attached herewith as Annexure-II.)

Sir, we will like to mention that after the Honorable High Court order, the Mega pipeline was commissioned by AMC, and CETPs have made financial contribution also. Since the commencement of the Mega pipeline, all CETPs are discharging treated wastewater into the Mega pipeline. The discharge point of the Mega pipeline and Pirana Sewage pipeline in the river Sabarmati is adj. to each other. Hence treated wastewater from the Mega pipeline and treated sewage from Pirana is mixed and then combined wastewater is going into the river Sabarmati.

More than 80 % of CETP member industries are manufacturing Dyes and Dyes intermediates. In the manufacturing of Dyes and Dyes intermediates, industries use salts as primary raw material. As a result, TDS & FDS concentration is always high in the effluent. No alternate process is developed for the replacement of salt.

After 2015, the members of CETPs of Ahmedabad have started segregating High TDS effluent and evaporated in common MEE and Spray

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dryers. Hence the concentration of FDS in the Inlet & outlet of CETPs have been reduced significantly after 2015. Earlier, FDS concentration in the outlet of CETPS was more than 25,000 mg/lit, which is reduced to less than 12,000 mg/lit at present.

However, due to the significant usage of salts by member industries, reduction in TDS /FDS beyond a specific limit is not possible. Hence mega pipelines were encouraged by GPCB & AMC.

We would also like to mention that in the earlier notification of MoEF&CC, the limit of Dissolved solids was given 2100 mg/lit for the CETPs. (Copy of the same is attached herewith as Annexure III.) However, considering Hon. The high court order and discharge location norms for TDS/FDS was not given in the CCA of CETPs and individual members of Ahmedabad region. However, after 2016, GPCB has started prescribing norms for FDS in CCA of CETPs and individual members, which is a violation of Hon'ble High court Directions.

Considering all these aspects, we kindly request you to remove the Fixed Dissolved Solids (FDS) parameter from the inlet & outlet Norms of CETPs of Ahmedabad and member industry in existing CC&A.

With warm regards,

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President

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