क्षेत्रीय कार्यालय
REGIONAL OFFICE
राजस्थान राज्य प्रदूषण नियंत्रण मण्डल, भीलवाडा
RAJASTHAN STATE POLLUTION CONTROL BOARD, BHILWARA
Email:-rorpcb.bhilwara@gmail.com
www.environment.rajasthan.gov.in

File No. RPCB/RO Bhilwara/ Gen-51 /RajKAj Ref No **Date: 27.12.2024**

Chairperson,
Rajasthan State Pollution Control Board,
Jaipur

Sub: Regarding status report of discharge of RO Reject and RO Reject accumulation outside the premises on land by the textile process houses located at Bhilwara.

Ref: - Letter of Ho dated 23.12.2024

Respected Mam,

In continuation to directions passed by your good self-vide letter under reference, all the process houses located under jurisdiction of this office, have been inspected by this office between period 23rd -27th December 2024. Along with the individual process houses units, all the check points and natural drainage/Nallahs/nearby canal passing along/in between the units were also inspected.

Detailed status report of all the process houses and natural drainage, incorporating pictorial view of the drainage pattern is enclosed herewith this letter for your kind perusal please.

With Sincere regards.

Sincerely,

Encls:- As Above

(Deepak Dhanetwal)
Regional Officer

Signature valid
Digitally signed by Deepak Dhanetwal
Designation : Senior Environmental Engineer
Date: 2024.12.27 17:35:36 IST
Reason: Approved

18–19. पन्नाधाय सर्किल. आजाद नगर. भीलवाडा
18-19, Near Pannadhaya Circle, Azad Nagar Bhilwara

A

STATUS REPORT

ON

TEXTILE PROCESS HOUSES

LOCATED AT BHILWARA

TABLE OF CONTENTS:-

REFERENCE OF THIS STATUS REPORT: -

In compliance of letter and directions issued by Chairperson Mam dated 23.12.2024, detailed report related to discharge of effluent from textile process houses located at Bhilwara has been sought and all 27 process houses located at Bhilwara were inspected during period from 23rd Decemeber 2024 to 27th December 2024, by the Board officials of this office, mainly incorporating following points: -

- Waste water discharge /effulent discharge /RO reject discharge from Process Houses, specifically during rainy seasons as well as related to complaints during rest of the year directly into natural drains passing through /in vicinity of these units.
- RO reject /High TDS effulent spray/storage at various unidentified locations by these units in premises / nearby fields in close vicinity.
- Operation of Multi Effect Evaporators (MEE) and Agitated Thin Film Dryer (ATFD)
- Sludge and MEE salt Management by these textile units

PROFILE OF PROCESS HOUSES AT BHILWARA

Textile processing is a high water intensive activity which involves several operations including scouring, dyeing, bleaching, singeing, mercericing, desizing etc., which results into generation of high volume of effluent. In Bhilwara presently 25 process houses are operating with valid consent to operate from State Board, and 02 process houses have applied for fresh consent to operate , which is under consideration at HO level .

In order to treat the effluent, units have adopted various treatment measures which includes ETP (Physico Chemical/Biological/Physico chemical followed by biological), Reverse Osmosis(RO) plants ranging from 3rd Stage of treatment upto 5th stage based on the scale of industry, followed by Multiple Effect Evaporator (MEE) and ATFD to adopt Zero Liquid discharge system based on the quantum of effluent generation.

Detailed list of these process houses is as under :-

1. **BANAS RIVER STRECH :-**

S.No.	Name of Textile / Process Unit /Dye House Unit	Address	Location of nearby natural drainage /nallah	Status of ZLD System
A. RIICO GROWTH CENTRE , HAMIRGARH.				
1.	M/s Sarvoday India Ltd (Old Name- Shree Charbhuja Processor)	Plot No. A-44, 45, 58, 59 Ricco Growth Center, Chittor Road, Hamirgarh Tehsil& District-Bhilwara	RIICO Growth Centre , Hamirgarh Nallah	ETP,RO ,MEE and ATFD installed.
2.	M/s Chairman Processors	Plot No. 48, 49, 54, 55 Ricco Growth Center, Hamirgarh, Chittor Road, Bhilwara	RIICO Growth Centre , Hamirgarh Nallah	ETP, RO ,MEE and ATFD installed.

3	M/s Anirudh Texchem Private Limited	E-170, Hamirgarh Growth Center, Chittorgarh Road, Bhilwara	RIICO Growth Centre , Hamirgarh Nallah	Less than 100 KLD (ETP,RO and vaporiser)
4	M/s AramsTexttilesPvt. LTD.	E-277-278, E-291-292, RIICO Industrial Area, Growth Center, , Hamirgarh Bhilwara	RIICO Growth Centre , Hamirgarh Nallah	ETP, RO ,MEE and ATFD installed.
5	M/s Ikore Active	RIICO Hamirgarh Growth Center, Chittorgarh Road, Bhilwara	RIICO Growth Centre , Hamirgarh Nallah	ETP, RO, Evoprator installed. (Less than 100 KLD)

B. STANDALONE UNIT (NOT IN GROUP /OR CLUSTER)

S.No.	Name of the Process	Address of the Process House	Location of nearby natural drainage /nallah	Status of ZLD System
1.	M/s Sona Processors India Ltd. Unit II (Old Name Ganesh Tex Feb)	18 Km Stone, Chittor Road, Tehsil & District-Bhilwara	Near Kanya Khedi Village (only 01 textile processing unit in said location)	ETP, RO, MEE and ATFD installed.
2.	M/s Modtex Texturisers Pvt. Ltd	Khasra No. 1542/391, 19 Km Stone, Chittor Road, Vill-Takhatpura Tehsil &Dist-Bhilwara	Near Vill-Takhatpura (only 01 textile processing unit in said location)	Less than 100 KLD (ETP, RO and mist evaporator)
3.	M/s Modern Woollens	Chittorgarh Road, Bhilwara Tehsil & District-Bhilwara	In City Area (only 01 textile processing unit in said location)	ETP, RO, Incinerator Installed.
4.	M/s Shubh Laxmi Processors *	Hamirgarh, Bhilwara	Near Villlge-Hamirgarh (only 01 textile processing unit in said location)	ETP, RO, MEE and ATFD installed.

***Consent to Operate of the unit is under consideration at HO level.**

C. CHITTORGARH ROAD –GUWARDI BLOCK (IN GROUP /OR CLUSTER)- RIGHT SIDE OF THE HIGHWAY TOWARDS BHILWARA TO CHITTORGARH				
S.No.	**Name of the Process**	**Address of the Process House**	**Location of nearby natural drainage /nallah**	**Status of ZLD System**
1.	M/s Sangam India Ltd. (Spinning Unit-I & Denim Plant)	Post Box No.-126, Biliya Kalan, Chittorgarh Road, Bhilwara	Near Biliya Village and drain at Highway ultimately leading to Guwardi Nallah	ETP, RO ,MEE and ATFD installed.
2. .	M/s A. K. Spintex	14 Km Stone, Biliya Kala Chittor Road, Bhilwara	a. Near Biliya Village and drain at Highway and b. Drain crossing highway to opposite side ultimately leading to Guwardi Nallah	ETP, RO ,MEE and ATFD installed.
3.	M/s Puja Spintex Pvt. Ltd.	13 Km Stone, Chittor Road, Village-Guwardi Dist-Bhilwara	a. Near Guwardi Village and b. Drain at Highway ultimately leading to Guwardi Nallah c. Guwardi Irrigation canal passing through premises	ETP, RO, MEE and ATFD installed.

4.	M/s Sanwariya Ji Tex Fab Industries Ltd. (Old Name- TPL Industries Limited)	Chittor Road, Village- Guwardi, Tehsil & District- Bhilwara	a. Near Guwardi Village and b. Drain at Highway ultimately leading to Guwardi Nallah c. Guwardi Irrigation canal passing through premises	ETP, RO, MEE and ATFD installed.
5.	M/s Sona Processors India Ltd.	12 Km Stone, Vill- Guwardi, Tehsil & District- Bhilwara	a. Near Guwardi Village and b. Drain at Highway ultimately leading to Guwardi Nallah c. Final nallah passing near the unit premises leading to guwardi nallah	ETP, RO ,MEE and ATFD installed.

D. CHITTORGARH ROAD –GUWARDI BLOCK (IN GROUP /OR CLUSTER)- LEFT SIDE WHEN TOWARDS BHILWARA TO CHITTORGARH (RIICO, HAMIRGARH DRAIN IS ULTIMATELY TERMINATING IN THIS DRAINAGE)

S.No.	Name of the Process	Address of the Process House	Location of nearby natural drainage /nallah	Status of ZLD System
1.	M/s Rajasthan Spinning And Weaving Mills Ltd.	Post Box No13, Village Mandpam	a. Drain crossing from highway and	ETP, RO, MEE and Salt Filtration unit installed.

		Tehsil: Bhilwara District:Bhilwara	passing through unit. b. Drain/nallah of Highway c. Back side vacant land between unit premises and railway track ultimately leading to Guwardi Nallah	
2.	M/s BSL Ltd (Processing Division)	VillageMandpam, Chittor Road, Bhilwara, Bhilwara Tehsil:Bhilwara District:Bhilwara	a. Drain/nallah of Highway. b. Back side vacant land between unit premises and railway track ultimately leading to Guwardi Nallah	ETP, RO, MEE and ATFD installed.
3.	M/s Ranjan Polysters Ltd	11, 12 Km Stone, Chittor Road, Village-Guwardi, Tehsil & District-Bhilwara	a. Drain/nallah of Highway. b. Irrigation canal passing nearby. c. Back side vacant land between unit premises and railway track ultimately leading	ETP, RO ,MEE and ATFD installed.

			to Guwardi Nallah. d. RIICO Hamrigarh and left side unit - Drain crossing to opposite side beneath highway ultimately leading to Guwardi Nallah.	
E. CHITTORGARH ROAD –MANDPIYA BLOCK (IN GROUP /OR CLUSTER)- RIGHT SIDE OF HIGHWAY TOWARDS BHILWARA TO CHITTORGARH				
S.No.	**Name of the Process**	**Address of the Process House**	**Location of nearby natural drainage /nallah**	**Status of ZLD System**
1.	M/s Janki Corporation Ltd	MandpiyaChouraha, Chittor Road, Bhilwara Tehsil & District-Bhilwara	a. Irrigation canal passing through premises. b. Nearby village. c. Road side drainage leading to Mandpiya.	ETP, RO ,MEE and ATFD installed.
2.	M/s Sangam India Ltd	Atun,Chittor Road, Tehsil & District-Bhilwara	a. Nearby village-Atun. b. Nearby village Road side drainage leading to Mandpiya.	ETP, RO, MEE and ATFD installed.

F. CHITTORGARH ROAD –MANDPIYA BLOCK (IN GROUP /OR CLUSTER)- LEFT SIDE OF HIGHWAY TOWARDS BHILWARA TO CHITTORGARH				
S.No.	**Name of the Process**	**Address of the Process House**	**Location of nearby natural drainage /nallah**	**Status of ZLD System**
1.	M/s Shri Anant Syntex Limited(Old Name Anant Syntex Limited)	Post Box No. 107, Vill- Gathila Kheda, Chittor Road, Bhilwara	a. Nearby village- Gathila Kheda. b. Nearby village Road side drainage leading to Mandpiya.	ETP, RO, MEE and ATFD installed.
2.	M/s Super Gold Suiting Pvt Ltd.	Khasra No. 538/1, & 637 Ricco Industrial Area, Mandpiya Tehsil-, District- Bhilwara	a. Drain passing through the unit premises. b. Final drain passing near the unit (Final point leading to Mandpiya Village drainage	ETP, RO, MEE and ATFD installed.

2. KOTHARI RIVER STRETCH

S.No.	Name of Textile / Process Unit /Dye House Unit	Address	Location of nearby natural drainage /nallah	Status of ZLD System
A. MANDAL				
1.	M/s Kanchan India Limited (Process unit)	Near Railway Crosing, Ajmer Road, Tehsil-Mandal , District-Bhilwara	Kothari River Streach	ETP, RO ,MEE and ATFD installed.
2.	M/s Saileela Processors Pvt. Ltd., (Old name-Suzuki Processor Ltd.)	Village: Gudda, Post Office Mandal ,Tehsil:MandalDistrict:Bhilwara	Kothari River Streach	ETP, RO ,MEE and ATFD installed.
3.	M/s Sulzer Processors Pvt. Ltd.	Opp. Railway Station, Mandal Tehsil-Mandal District-Bhilwara	Kothari River Streach	ETP, RO ,MEE and ATFD installed.

RIICO PUR & RAJSAMAND ROAD:-

S.No.	Name of Textile / Process Unit /Dye House Unit	Address	Location of nearby natural drainage /nallah	Status of ZLD System
RIICO AREA ,PUR ROAD AND RAJSAMAND ROAD				
1.	M/s Ronak Process Ltd.	G-138, 142 Phase-IV,RIICO Industrial Area, Pur Road, Bhilwara	RIICO Pur Road	ETP, RO, MEE and ATFD installed.

2.	M/s Abhilasha Polyster	F-106, RIICO Industrial Area, Bhilwara Tehsil &Dist- Bhilwara	RIICO Pur Road	Less than 100 KLD (ETP,RO and mist evaporator)
3.	M/s Rolex Processors Pvt. Ltd.	13-14, Km Stone Gangapur Road, Vill- Pur, Tehsil &Dist-Bhilwara	Isolated Unit /Rajsamand Road	ETP, RO ,MEE and ATFD installed.
4.	M/s Vardhan Textueisers	37-38,44-45,RIICO Industrial Area-3, Behind M/s Swastik Process, Pur Road, Bhilwara ,Tehsil:BhilwaraDistrict:Bhilwara	RIICO Pur Road	Less than 100 KLD (ETP,RO and mist evaporator)
5.	M/s Swastik Suitings	7 to 14, Industrial Area, 6 km Stone, Pur Road, Bhilwara	RIICO Pur Road	ETP, RO ,MEE and ATFD installed.
6.	M/s Samarpan Synthetics**	13-14 Km Stone Gangapur Road, Vill- Pur, Tehsil &Dist-Bhilwara	Isolated Unit /Rajsamand Road	ETP, RO ,MEE and ATFD installed.

**** Applied for Fresh Consent to Operate. Under consideration at HO, Jaipur**

AJMER ROAD- MANDAL:-

S.No.	Name of Textile / Process Unit /Dye House Unit	Address	Location of nearby natural drainage /nallah	Status of ZLD System
MANDAL				
1	M/s Kanchan India Limited (Spinning unit)	18 Mile Stone, OppBhilwara Midway, Ajmer Road, VillageNanakpuraTehsil :MandalDistrict:Bhilwara	Standalone unit	ETP, RO ,MEE and ATFD installed.
2.	M/s RSWM Ltd.	Gulabpura,Tehsil-Hurda, District-Bhilwara	Standalone unit (Khari River)	ETP, RO ,MEE and ATFD installed.
3.	M/s Laxmi Vishal Processors Pvt. Ltd.	Dhunwaliya, Tehsil-Hurda, Dist-Bhilwara	Standalone unit	ETP, RO ,MEE and ATFD installed.

ISSUES RELATED TO OPERATION OF TEXTILE PROCESS UNITS :-

That as per available office records, total 33 textile units are presently established/operative in Bhilwara. Detailed of these process/textile units is as under:-

S.No.	Effulent generation quantum	No. of units	Type
1.	More than 200 KLD	**Total- 27** 25 (Valid CTO/applied for renewal) 02 (Fresh CTO Applied)	Process Houses
2.	More than 100 KLD and upto 200 KLD	01 (Dyeing and Finishing Unit)	Dyeing and Finishing Unit
3.	Less than 100 KLD	05 (Yarn dying /small scale)	Yarn dying /small scale
Total		**33**	

SCOPE OF ACTION TAKEN IN COMPLIANCE OF HO ORDER DATED 23.12.2024

All 27 process houses located in Bhilwara, were inspected for a period from 23rd Decemeber 2024 to 27th December 2024, by the officials of this office, in light of following important points :-

- To verify the operational status of EffulentTreatment Plant (ETP) .
- To verify the operational status of MEE Plant and ATFD.
- To verify the RO reject disposal pattern which also includes generation of Salt from ATFD.
- Primary observations regarding management of RO Reject based on log books and sludge generation and its disposal records.
- Vigilance of various check points as identified by this office and nearby surrounding of premises wall and natural drainages in close vicinity ofthese units.
- Verification of premises /area in vicinity of units for purpose of verification of status of activity related to discharge of RO reject /high TDS effulent spray on

land for evoparation of effulent. In summer and winter seasons, there exists few problems from these process houses, related to evident/usual discharge of their RO Reject directly into the drains, but there always remains a possibility by these units to use spray system within their premises or in nearby field to dispose of the RO Reject. In order to address the same, all those possible areas in the close vicinity of these process house premises were checked thoroughly, to trace any such ongoing incident.

- **Vigilance of identified natural drainage patterns, check points for verification of such incidents along with verification of TDS concenentration of water flowing in these drains** :- In order to trace out any illegal discharge activities into these drains/nallahs, this officehas identified few check points at the confluences of natural drains and these check points arebeing monitored in order to get any traces of discharge of High TDS effluent based on the primary check of TDS concentration.Details of which will follow in further part of this report.Regular vigilance activities are being carried out through out the year and also during 23rdDec to 27th Dec 2024.

MODUS OPERANDI FOR CARRYING OUT VIGILANCE ACTIVITIES, PICTORIAL VIEW OF NATURAL DRAINAGES ALONG WITH STATUS OF NATURAL DRAINS /CHECK POINTS DURING THE FIELD VISIT ON DATED 23.12.24 TO 27.12.24

1. **Vigilance Pattern and Modus Operandi followed at Confluence of RIICO Storm Water drains at RIICO T Junction Point :-** RIICO storm water drain passes in front of two process houses namely, M/s Chairman Processors Pvt Ltd and M/s Sarvoday Processors Pvt Ltd , RIICO Growth Centre Hameergarh, including industrial establishments other than process houses. In case of any discharge being done by these two units, the only source of discharge is throughRIICO Storm Water Drain. This drainpasses in front of these two process houses and merges at RIICO T Junction Point,

with another drain coming from other side of the RIICO, not having any process house.This RIICO T Junction Point is **Check Point No.1.**

In case of any unusual activity (discharge of Effluent), source of generation is being verified by officials of this office.

Detailed sketch map of RIICO T Junction and drainage pattern is as under fig 1:-

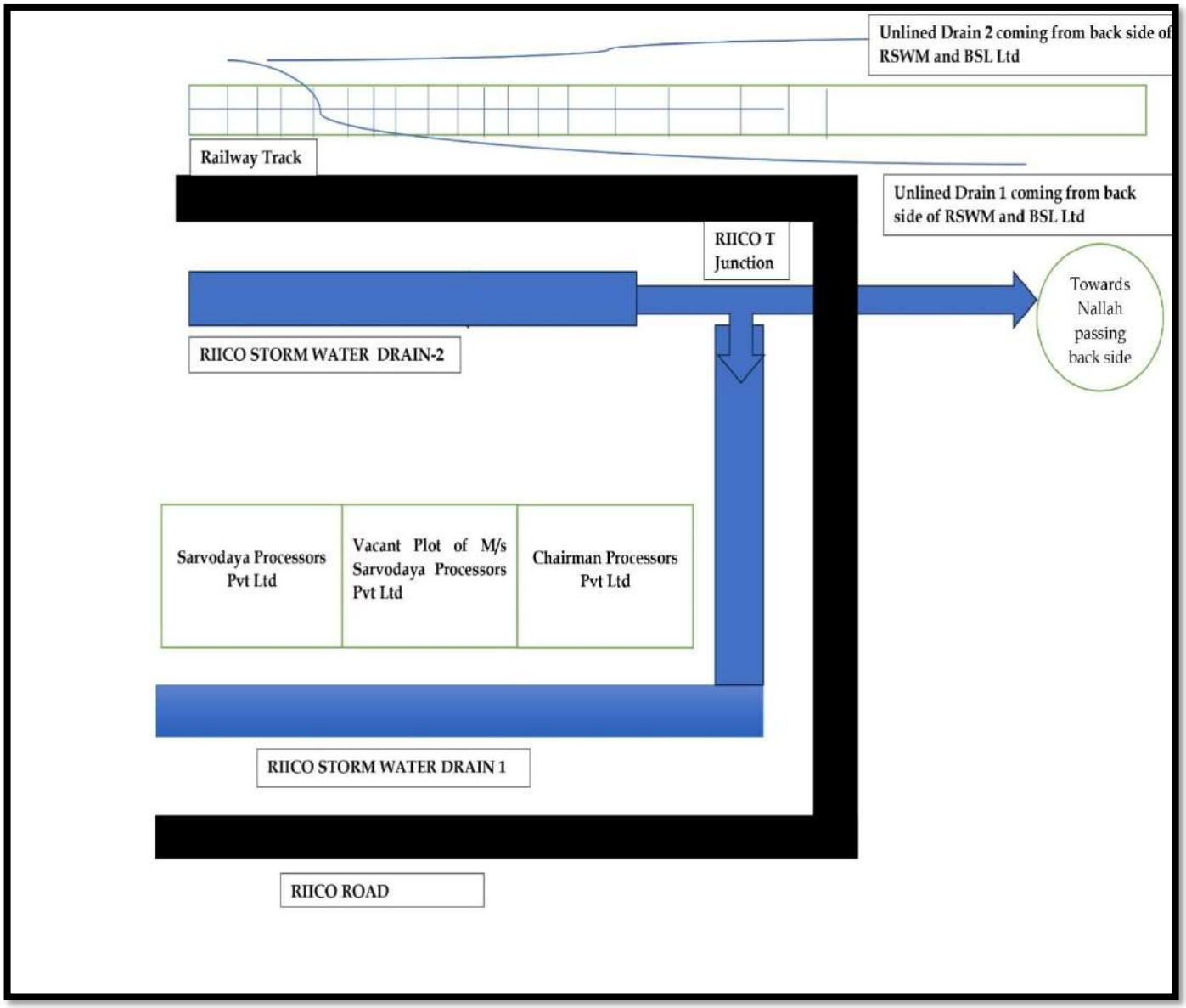

Figure 1 Drainage Pattern at RIICO T Junction (Check Point No.1)

Status of Monitoring on 24th December 2024 at Check Point No.1 :-

During inspection carried out on 24th December 2024 at check point No.1, no High TDS effluent was observed at RIICO T Junction. TDS measure at this check point was 2020 mgpl, which indicates that, there is no high TDS Effluent was being discharged by these two process houses.

Figure 2- TDS Measurement at Check Point No-1 - RIICO T Junction

It is worth to mention here that this is RIICO Storm water drain and also carries domestic waste water too, originating from different type of industries operating at RIICO, other than process houses.

2. **Vigilance Pattern and Modus Operandi followed at Check Point located at Chittor Highway near Ranjan Processors Pvt Ltd :-** RIICO storm drain culminates at railway underpass along railway track. Further two unlined drains marked as Drain 1, originated from the back side area of M/s RSWM Ltd and drain 2,. originated from the back side area of M/s RSWM Ltd and M/s BSL Ltd were identified. Unline drain 1 merges with another unlined drain and marked as Drain No .3, originating after

culminating of RIICO storm water drain, passes through railway underpass and becomes a confluence area of merger of these three drains , and leads towards the back side area of M/s Ranjan Processors , marked as Drain no.4 . This drain no. 4 ultimately reached upto the Chittor highway near Ranjan Processors,being identified as **Check Point 2,** further leads towards M/s Sona Processors after crossing the National Highway .

In case no unsual activity observed at Check Point 1 , TDS of check point 2 is being measured and in case there is high TDS observed at check point no. 2 , it can be inferred that there is some discharge related activity is being done either through drain 1 or through drain 2 which orginates from M/s RSWM Ltd and M/s BSL Ltd.

Further, as this drain no.3 also passes along back side of M/s Ranjan Processors, so there may be possibility that discharge activity being done by M/s Ranjan Processors too.

To verify the defaulter among these 03 process houses, these units being inspected by officials on an individual basis.

Drainage Pattern of Check Point No 2 is as under in fig 3 :-

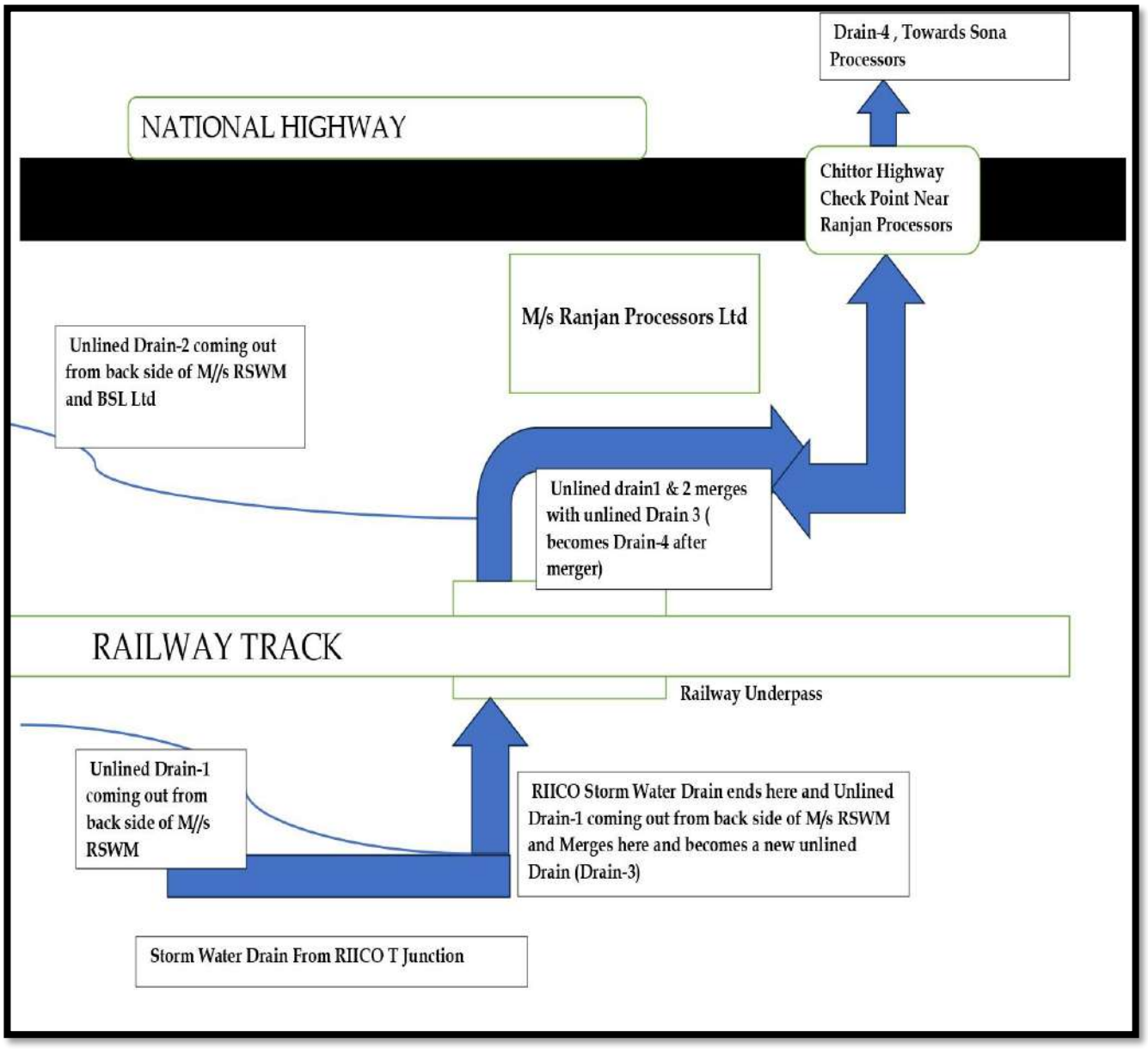

Figure 3- Drainage Pattern at Check Point No.2

Status of Monitoring on 24th December 2024 at Check Point No.2 :-

During inspection carried out on 24th December 2024, at check point No.2, no High TDS effluent was observed at this point. TDS measured at this check point was 960 mgpl, which inferred that, there is no high TDS Effluent was being discharged by these three process houses.

Figure 4- TDS at Check Point No 2 - Drain Near Ranjan Processors

Further, as in our previous vigilance activities, M/s RSWM Ltd was identified as a chronic defaulter and earlier also, it was observed that High TDS effluent was bein& 2g discharged by the unit through Drain no.1 &2 , as such back side boundary wall area of M/s RSWM and M/s BSL Ltd was visited. During the course of inspection, at the back side area, it was observed that High TDS(10000 mgpl, which is highest limit of handy hyna TDS meter) effluent was found accumulated behind M/s RSWM Ltd , confined in an unlined structure of dimesion 900 ft (L)*13 ft(W)*2.5 ft(D), along the boundary wall of said unit. Sample from this area was collected and submitted at Regional Laboratory, of this office.

No accumulation or discharge was observed at the back side area of M/s BSL Ltd.

3. **Vigilance Pattern and Modus Operandi followed at Check Point located at Chittor Highway near Sona Processors Pvt Ltd :-** In case there observed no High TDS in the drainage at check point No.2 , it inferred that either none of the industires located at RIICO Hamirgarh(M/s Sarvodaya India Pvt Ltd and M/s Chairman Processors Ltd), M/s RSWM Ltd , M/s BSL , M/s Ranjan Processors are induldged in any activities resulted into discharge into drain or there is possibility that they have stored/accumulated effluent in a confined area not open to flow(which got verified by the team during vigilance of individual industries).

Further, from check point No.2 , drain no 4, leads towards M/s Sona Processors and from Check point no.2 it got mixed with Highway Drain coming from M/s Sanwariya Texfab and M/s Puja Spintex outside the vacant plot adjacent to M/s Sona Processors Ltd and ultimately lead towards M/s Sona Processors and marked herein as Drain No.5. A the boundary between M/s Sona Processors and Admin building of M/s Sona Processors, Check Point No.3 has been identified from where Drain 5 moves and further leads to Guwardi Nalah. In case there is no High TDS observed at Both Check Point No1 and Check Point No.2 and High TDS effluent observes at Check Point No.3 , it can be inferred as M/s Sona Processors is induldged in discharging activity.

In this case individual verification of M/s Sona Processors is being done to trace the source of effluent, if any.

Drainage Pattern of Check Point No 3 is as under in fig 5 :-

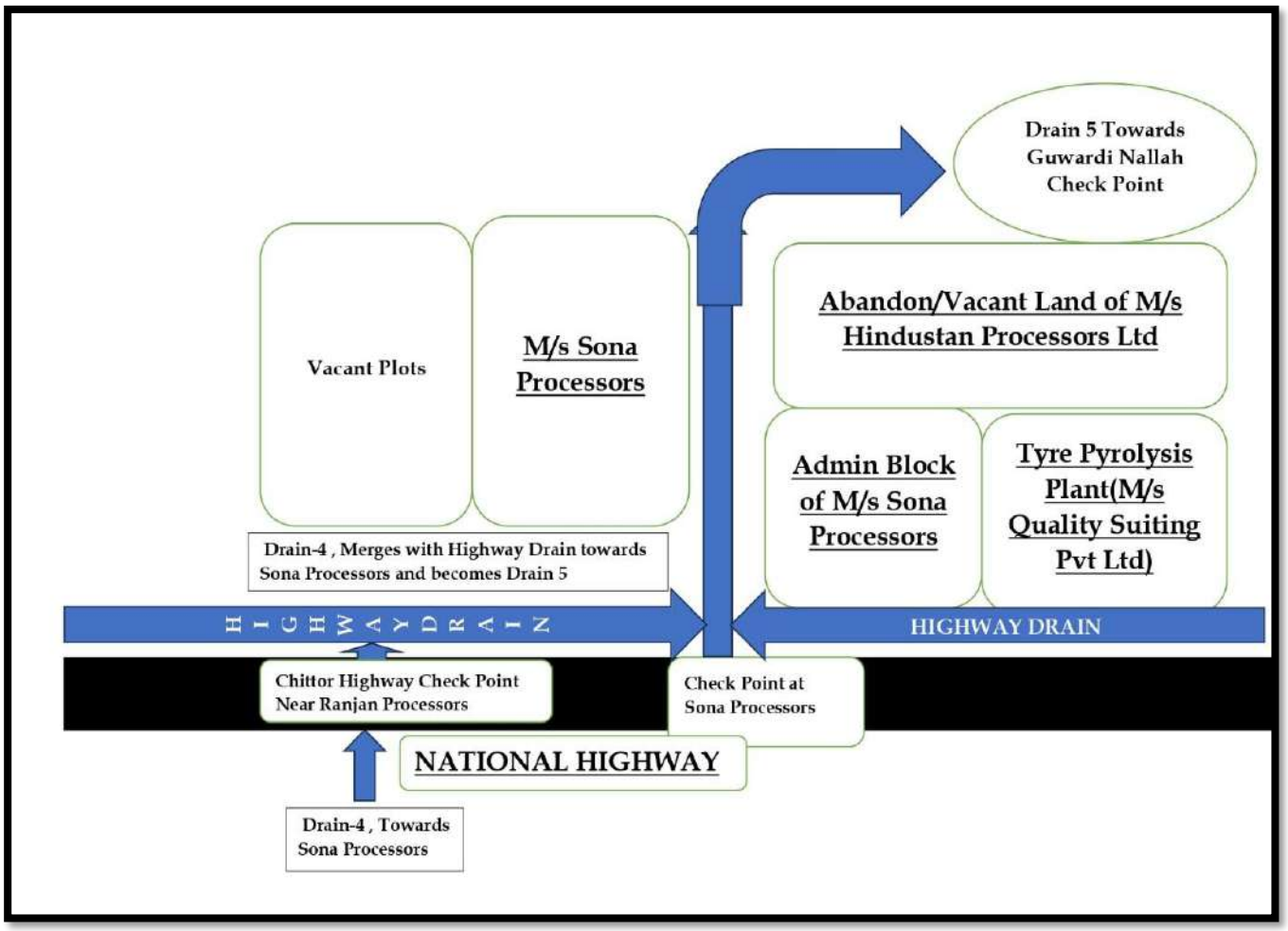

Figure 5 Drainage Pattern at Check Point No.3

Status of Monitoring on 25th December 2024 at Check Point No.3 :-

During inspection carried out on 25th December 2024, at check point No.3, no High TDS effluent was observed at this point. TDS measured at this check point was 2090 mgpl, which inferred that, there is no high TDS Effluent was being discharged by M/s Sona Processors.

Figure 6 - TDS measurement at Check Point No3 - M/s Sona Processors Ltd

4. **Vigilance Pattern and Modus Operandi followed at Check Point located at inlet of M/s RSWM Ltd. :-** One of the check point has been identified at the inlet area of M/s RSWM Ltd , marked as **Check Point No 4**. At this check point, Drain no. C enters into the premises of M/s RSWM, which forms by the confluence of Drain A and Drain B , as marked in the drainage pattern . Drain A passes through the Sangam India Ltd, Biliyan Kalan and further merged with natural drain B, crossing M/s AK Spintex premises, coming from Agricultural field behind this unit and further becomes Drain C leads towards the inlet of M/s RSWM Ltd, after crossing the Chittor Highway near checkpoint No.4.

   In case there observed HIGH TDS value at check point No.4 ,i.e inlet of RSWM, Mandapam, it can be inferred that there is possible discharge of effluent from either from M/s Sangam India Ltd or M/s A.K. Spintex . In that case individual units i.e. M/s

AK Spintex and/or M/s Sangam India Ltd, being inspected individually to trace the source, If any.

Drainage Pattern of Check Point No 4 is as under in fig 7 :-

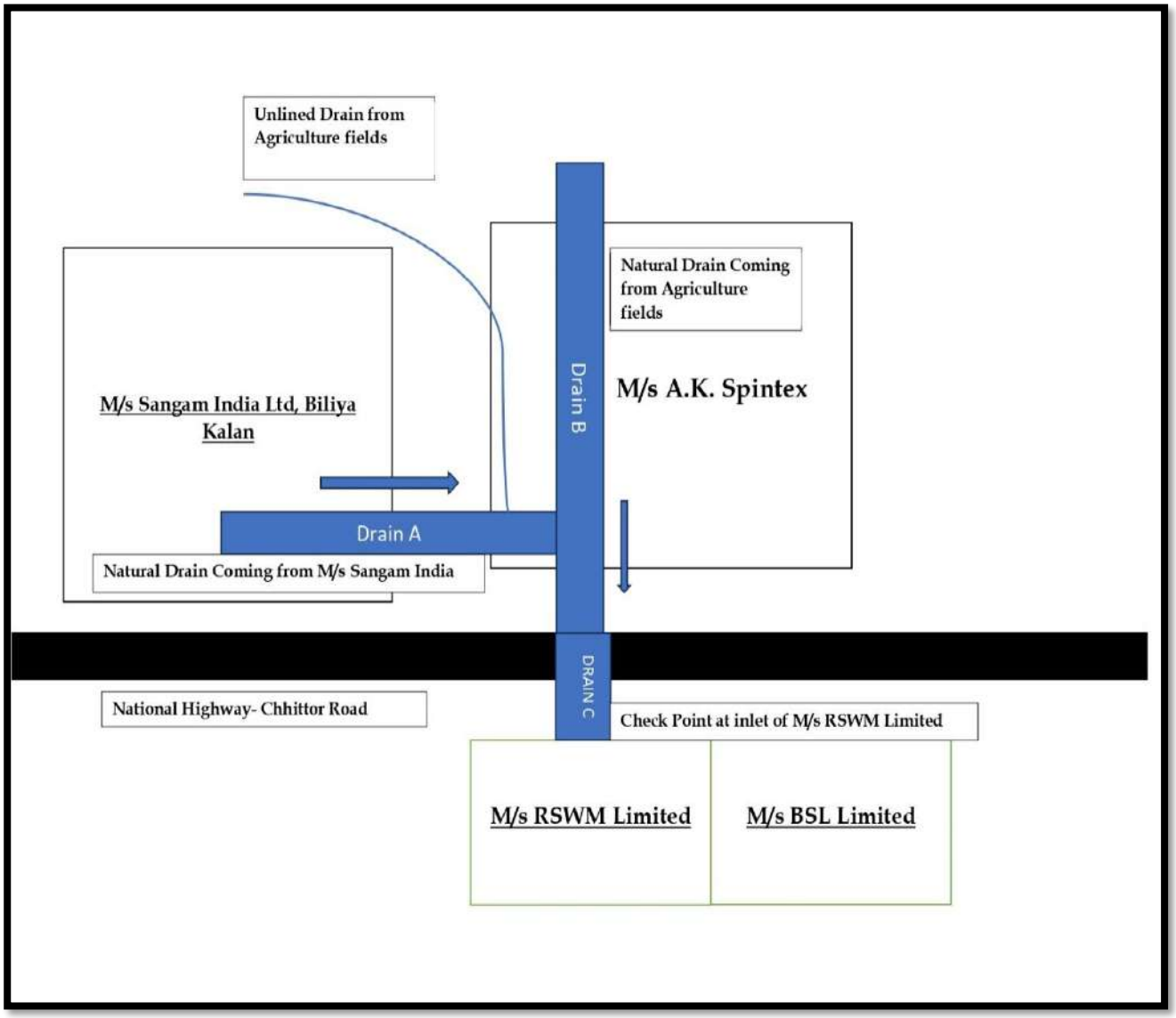

Figure 7 Drainage Pattern at Check Point No.4

This drain, marked as Drain C, enters into the RSWM premises and passes through the premises in between the process area and MEE/ETP area and further exit the premises of M/s RSWM through back end of its boundary and enters to the gap area between M/s RSWM Ltd and M/s BSL Ltd.

This gap area acts as a drain and unlined drain 1 and drain 2 originated from this point as mentioned at Check Point No.1 and Fig.1.

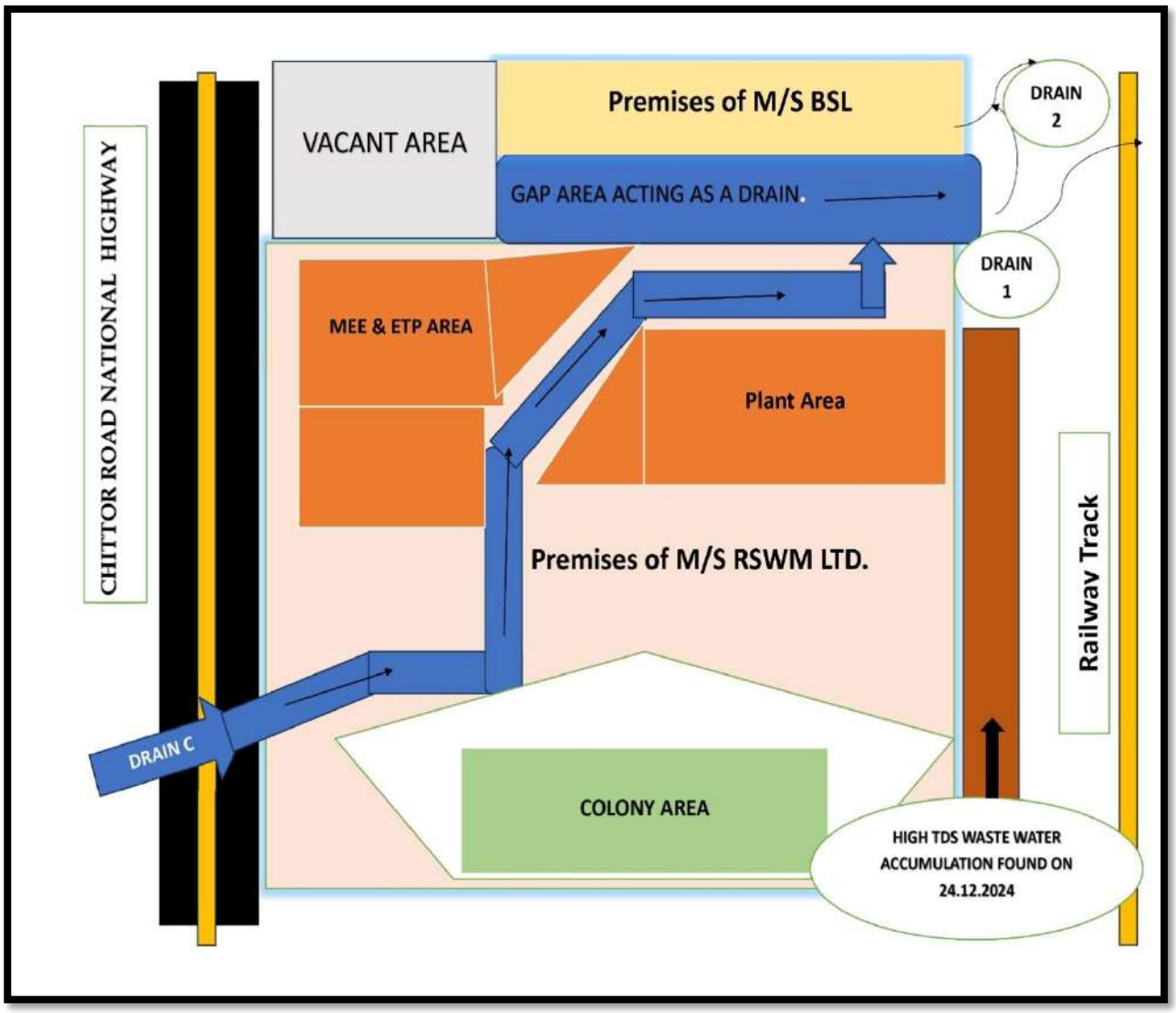

Figure 8 Drainage Pattern within the premises of M/s RSWM Mandapam

Status of Monitoring on 24th December 2024 at Check Point No.4 :-

During inspection carried out on 24th December 2024, at check point No.4, no High TDS effluent was observed at this point. TDS measured at this check point was 920 mgpl, which inferred that, there is no high TDS Effluent was being discharged either by M/s Sangam India Ltd or M/s AK Spintex.

Figure 9- TDS measurment at Check Point No 4- Inlet of M/s RSWM Ltd, Mandapam, Bhilwara

Further, huge amount of High TDS effluent was found accumulated on an open shallow land of dimesnsions approx. **900 ft (L) X 13 ft (W) X 2.5 Ft (Depth).** This area was found surrounded by kachha boundary wall , due to which it was not found flowing from that area and if this quantity of effluent with High TDS(10000 mgpl, maximum limit of handy hyna TDS meter), allowed to flow, it will raises the TDS of entire water flowing through various check points through drain 1 and drain 2, which ultimately leads to Guwardi Nallah(Check Point No.5), leading to Banas River.

Figure 10- Area where High TDS Effluent accumulated

Figure 11- Stretch where High TDS Effluent was found accumulated behind M/s RSWM Ltd

Figure 12 TDS of Effluent accumulated on back side area of M/s RSWM Ltd Mandapam

ACTION TAKEN:-This open land waste water accumulation outside the premises of M/s RSWM Ltd was observed earlier too and reported to HO time to time by this office. Previously, vide this office letter dated 26.06.2024, it was also flagged and detailed report of this unit was sent to HO, mentioning the fact that, High TDS (10000 mgpl, maximum limit of handy hyna TDS meter) effluent was accumulated at the same area. At that time, dimesnsion of unlined kachha pit was reported as 311.59 mtr(L) X 23.28 mtr(width) X 1.0 mtr (Depth).

Further, in various reports sent by this office , it has been categorically mentioned that , unit may be directed by HO , to lift this High TDS effluent, which is surely RO Reject, back to MEE and dispose it in a scientific manner. (Copy of all such reports are enclosed herewith as Annexure)

5. **Vigilance Pattern and Modus Operandi followed for Check Point located on Guwardi Nallah ,Chittor highway Puliya, Marked as Check Point No. 5 :-** Guwardi Nallah is the last check point, marked as **Check Point No.5**, of the process houses located at Chittor Road, connected through Natural Drainage Pattern. Guwardi Nallah Area is the confluence area of all the drainage marked as Drain 5, as mentioned in above various check points, along with domestic effluent lines coming from villages/colonies/settlements, located at the upstream of Guwardi Nallah, seepage of Guwardi Dam, and Canal which is allowed to flow in winter season. All the water accumulated at this check point ultimately leads to the Banas River through Drain 6. Drainage Pattern of Guwardi Nallah is as under: -

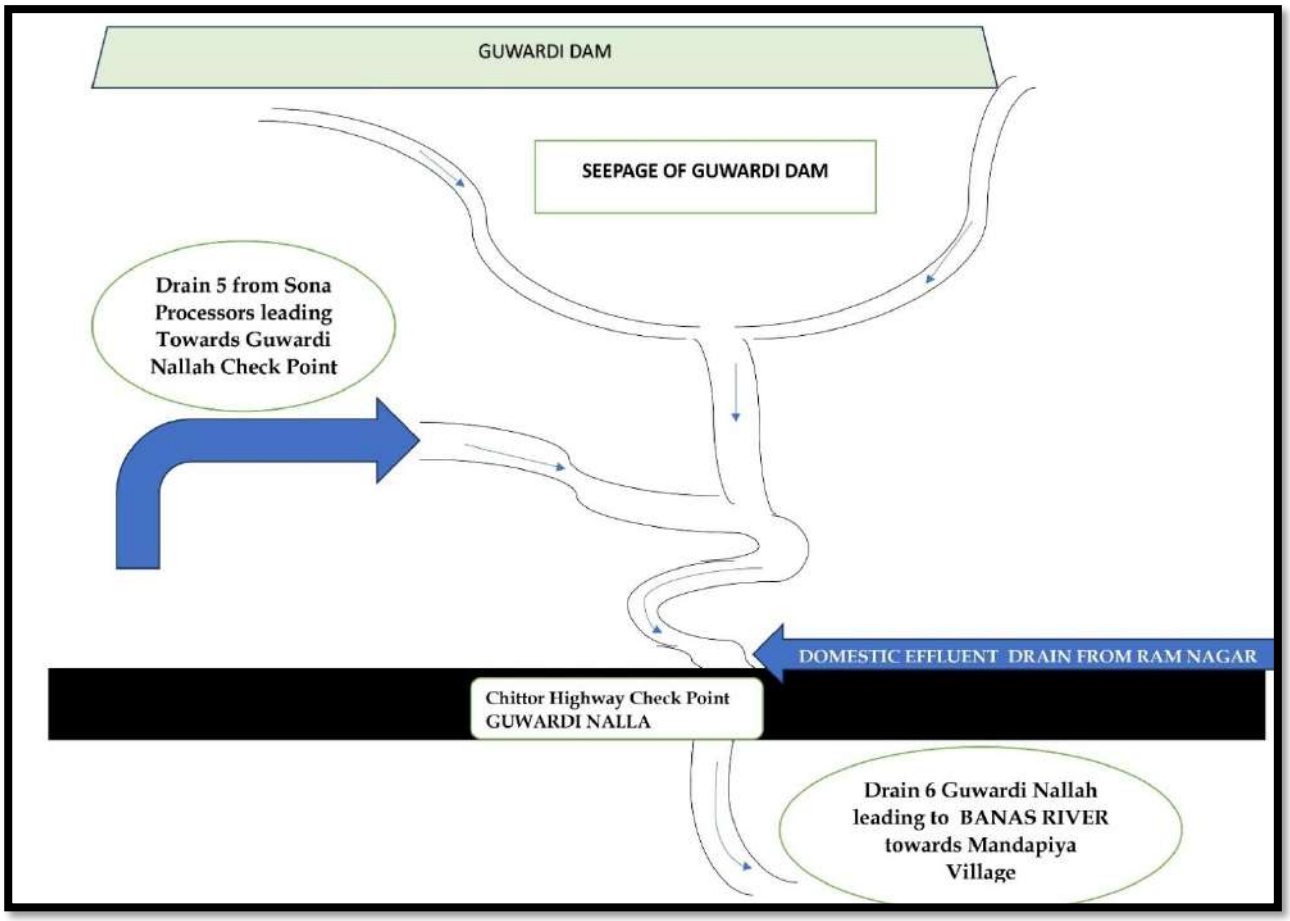

Figure 13 Drainage Pattern of Guwardi Nallah.

Status of Monitoring on 24th December 2024 at Check Point No.5 :-

During inspection carried out on 24th December 2024, at check point No.5, water was found accumulated in the Guwardi Nallah and flow was also observed at this check point. TDS of the accumulated water and flowing water was measured at this check point , which was found to be 2420 mgpl.

Generally, TDS of the RO Reject was found to be around 50000-80000 mgpl (depends on various factors), and TDS observed at Check Point 5 was 2420 mgpl, as such it is primarily inferred that effluent flowing in the Guwardi Nallah was not reject from RO plant.

Figure 14- TDS measurement at Guwardi Nallah - Check Point No 5

Figure 15-Appearance of Guwardi Nallah - Check Point

Figure 16 Guwardi Nallah Leading Towards Banas River

6. **Vigilance Pattern and Modus Operandi followed at Check Point located onBanas River, Marked as Check Point No. 6**

Further, ultimate point of discharge was all type of effluents, which includes domestic effluents , effluent from villages, effluent from process houses, if any, etc is Banas river, near village Mandapiya, marked as check point no 6.

Status of Monitoring on 24th December 2024 at Check Point No.6:-

During the visit at check point no 6 , Banas river, it was observed that no traces of textile effluent, based on its typical appearance and smell, was observed either in flowing state or at accumulated state at checkpoint stretch area of river.

Further, to check the quality of water, TDS of both flowing water and accumulated water was measures and it was observed as 2610 mgpl and 3260 mgpl respectively.

Figure 17 TDS of flowing water at Banas River

Figure 18 Appearance of Banas Water

Figure 19 TDS of accumulated water at Banas

For qualitative analysis of Banas Water, a sample was collected from the check point No.6, to trace the presence of metals (content of process dyes), in the water, if any, and sent to Regional Laboratory, Kota for further analysis. Report of the same is pending at Laboratory level.

It is worth to mention here that, an earlier drive was also carried out by this office in the month of June 2024 , report of the same was forwarded to HO on 25.06.2024 and TDS observed at the same check points located at Banas River area was 6200 mgpl and 8140 mgpl against 2610 and 3260 mgpl observed this time.

7. **Vigilance Pattern and Modus Operandi followed for Check Point located at Kothari River, Marked as Check Point No. 7.**

Kothari River located at the downstream of process houses located at Ajmer Road, namely:-

a. **M/s Kanchan India Ltd, Mandal**
b. **M/s Sulzer Processors Ltd.**
c. **M/s Saileela Processors.**

Any kind of effluent, if generated, from these process houses, is ultimately lead to the Kothari River .

Status of Monitoring on 24th December 2024 at Check Point No.7 :- As mentioned above, during the inspection dated 23.12.2024, it was observed that no effluent was discharged outside the premises of M/s Kanchan India Ltd Mandal. Further, it was also observed that high TDS Effluent , was found sprayed by M/s Sulzer Processors, on its own land , located outside its premises, for which consent to establish has been issued by State Board for establishement of new ETP.

In order to trace down any effluent generation by any of the above-mentioned industries, TDS of Kothari River, at check point No. 7 was measured as it comesout to

be 660 mgpl.

Figure 20- TDS at Kothari River

As such primarily, it can be inferred from the above, that though units have not discharged any effluent into any drain. However, M/s Sulzer Processors sprayed the High TDS Effluent, outside the premises, on its own land.

Inspection of nearby vicinity of M/s Saileela Processors. :-In order to check any unusual activity from aforesaid unit, operational deficiencies were observed in the process house, as reported above, in individual inspection report section of this document. However, no evident discharge/ spray was observed by the unit in the nearby vicinity or within the premises.

Further, **Check Point No 8**, drain located at Chhatri ka Kheda,leading towards Kothari River, downstream of Saileela Processors was also checked. During the visit, no significant flow was observed in the drain at check point no 8. TDS of accumulated water in the drain was checked and it comes out to be 1130 mgpl.

Figure 21 TDS Measurement at Check Point No 8- Chhatri ka Kheda

ACTION TAKEN BY STATE BOARD IN PAST INCLUDING IMPOSING EC's

-All the units as mentioned above have been equipped with Zero liquid discharge system and thus ultimately leads to recovery of treated effluent and reuse in process and evaporation of concentrate and conversion into salt leading to CTDF (Common Treatment and Disposal Facility), Udaipur. Despite installing ZLD system, due to some intentional causes (to save the cost of production) or unintentional causes (technical fault /natural conditions like heavy rains) / complaints related to illegal waste water discharge have been regularly received at this office from time to time and Board takes action against the violating industry accordingly.

In recent years, action taken by State Board including imposition of Environmental compensation are summarised as below:-

S. No.	Name of the Unit	Date of imposition of EC	Compensation Amount (Rs)
1	M/s Sarvodaya India Ltd., (Old Name- Shree Charbhuja Processors Ltd.), Plot no. A-44-45-58-59, RIICO Growth Center, Chittorgarh Road, Hamirgarh	14.03.2022	1734000
2	M/s Sarvodaya India Ltd., (Old Name- Shree Charbhuja Processors Ltd.), Plot no. A-44-45-58-59, RIICO Growth Center, Chittorgarh Road, Hamirgarh	03.03.2023	432000
3	M/s Rolex Processors (P) Ltd., 13-14 KM Stone, Gangapur Road, Village- Pur, District- Bhilwara	14.03.2022	765000
4	M/s Ronak Processors Pvt. Ltd., G- 138 to 142 IVth Phase, RIICO Industrial Area, Pur Road, Bhilwara	14.03.2022	720000
5	M/s Chairman Processors Ltd., Plot No.- A-48, 49, 54, 55, RIICO Growth Centre, Hamirgarh, Bhilwara	14.03.2022	360000
6	M/s Ranjan Polyesters Ltd., 11-12 KM Stone, Chittorgarh Road, Village- Guwardi, Tehsil & District- Bhilwara	14.03.2022	360000
7	M/s Pooja Spintex (P) Ltd., 13 KM Stone, Chittorgarh Road, Village- Guwardi, Tehsil & District- Bhilwara	14.03.2022	360000

8	M/s Shri Anant Syntex Limited (Old name- Anant Syntex Limited), Village- Gathila Khera, Chittorgarh Road, Tehsil & District- Bhilwara	14.03.2022	360000
9	M/s Shri Anant Syntex Limited (Old name- Anant Syntex Limited), Village- Gathila Khera, Chittorgarh Road, Tehsil & District- Bhilwara	23.01.2023	495000
10	M/s Sona Processors (India) Ltd., 12 th KM Stone, Chittorgarh Road, Village- Guwardi, Tehsil & District- Bhilwara	14.03.2022	360000
11	M/s Sona Processors (India) Ltd., 12 th KM Stone, Chittorgarh Road, Village- Guwardi, Tehsil & District- Bhilwara	29.07.2024	759375
12	M/s A.K. Spintex Ltd., 14 Km Stone,MandpiyaChouraha, Chittor Road, Biliyan Kalan, Tehsil: bhilwara	03.03.2023	612000
13	M/s Sanwariyaji Tex Fab Industries Ltd. Old Name- TPL Industries Ltd.),- 11/12th Km Chittor Road, Guwardi, P.O. Sarupganj (Hamirgarh) , Bhilwara	06.04.2023	705600
14	M/s Sanwariyaji Tex Fab Industries Ltd. Old Name- TPL Industries Ltd.),- 11/12th Km Chittor Road, Guwardi, P.O. Sarupganj (Hamirgarh) , Bhilwara	13.10.2023	562500
15	M/s Sanwariyaji Tex Fab Industries Ltd. Old Name- TPL Industries Ltd.),- 11/12th Km	11.03.2024	125000

	Chittor Road, Guwardi, P.O. Sarupganj (Hamirgarh) , Bhilwara		
16	M/s Sona Salection India Limited (Old Name-Sona Processors India Ltd. Unit II), 18 Km Stone, Chittorgarh Road, Hamirgarh, District:Bhilwara	06.04.2023	676800
17	Swastik Sutting, 7 to 14, Industrial Area, 6 km Stone, Pur Road, Bhilwara	28.11.2023	472500
18.	BSL Ltd (Processing Division) ,VillageMandpam, Chittor Road, Bhilwara, Bhilwara Tehsil:BhilwaraDistrict:Bhilwara	16.05.2024	2422500
TOTAL EC IMPOSED		**Rs. 1,22,82,275/-**	

Out of total imposed EC of an amount of Rs 1,22,82,275/- , so far, EC of Rs. 9859775/- has been recoved of and 01 case is pending for recovery for amount Rs. 24,22,500/- due to legal matter by M/s BSL Suitings.

RECOMMNDATIONS /SUGGESTIONS FORWARDED VIDE THISOFFICE REPORT DATED 14.06.24

It is also pertinent to mention here that a detailed report related to process house waste water discharge related issues has also been sent to HO, Jaipur vide this office letter dated 14.06.24, mentiong status of all check points, industrial violations observed and suggestions /recommendations for preventions of these type of incidents viz :-

- Stern action under the provisions of Water Act,1974 including imposition of EC may be taken against M/s Anant Syntex ,Gathila Kheda for having arrangement of flanges system at fresh water conveying line revealing strong possibility and proof of uses of this line for waste water discharge into mandpiya drainage.
- Show cause notice may be issued to M/s Sanwariya Ji Tex Fab, Chittorgarh Road for waste water accumulation in Pit connected with Guwardi canal outside premises primarily due to their ignorance.
- That textile units which are requires to enhance capacity of RO plant (i.e. units not having RO plant capacity equivalent effluent generation quantum due to reuse of tertiary treated in process) may be directed to submit action plan for up gradation of RO plant in time bound manner at least 1.25 capacity of effluent generation with provide capping @ tertiary reuse; as tertiary treated TDS ultimately increased after 2-3 cycles and ultimately contributes incremental higher TDS effluent and volume and without adequate capacity of RO plant same cannot suppose be recycled .
- Industrial units which are only based on physico chemical treatment based ETP plant may be directed to installation of Upgraded automisedBiological section for effective removal of COD/BOD load; so except TDS load other load on RO plant may be minimised and Smooth functioning of RO may facilitate maximum recovery, reduce down time, reduce maintenance.
- Presently, possibility of discharge and flow of any waste water in natural drains are identified on the basis of various check points /IP camera and flowmeters as mentioned above by RSPCB. But due to underground Banas fresh water lines passes

a long pathway comprising Banas river bed , agriculture field , Mandpiya and Guwardi Village and natural drain stretch , railway tracks , Highway and other complex rooting which provides possibility for hidden discharge and drain through these lines and after mixing into natural drainage path way ,it is very difficult to trace out the culprit unit. Besides, drain pipes passing beneath highway and its bridges are very difficult for human approach for trace out the defaulter unit. Therefore, Looking to the complex nature of drainage pattern and underground Banas Fresh Water line, it may be directed to textile units that Banas well conveying fresh water line leading to industrial premise –any textile units (if having valid permission from respective authority) may only be allowed with over head arrangements and tapping points at various interval to check the type of water flowing into this line at any time.

- That a letter may be sent to Highway Authority for cleaning and checking of all the highway drains passing through this industrial cluster followed by removal of any unauthorised line /connecting pipes passing through these drains and explore possibility for passing of these drains directly to the natural drainage nallah as much as possible avoiding industrial possible drainage including provisions of light at Highway drains for better vigilance.
- Cleaning drive may be conducted for Guwardi and mandpiya stretch.

DETAILS OF COMPLAINTS RECEIVED AND ACTION TAKEN STATUS upto 30.11.2024

Issues related to discharge of effluent from process houses mostly comes during rainy season. In order to keep an eye on process houses, vigilance squad was constituted vide this office order dated 22.07.2024, and four teams were constituted in this order with the directions: -

a. **To carry out daily vigilance, during rainy season, twice in a day i.e minimum 1.5 Hrs in day time and 1.5 hrs in night.**
b. **To submit daily report and file the same in report file.**

c. In case of any evident non compliance observed, including discharge of effluent from the premises, report to Head Office Jaipur for further necessary action.

d. To intimate the complainant, that his/her complaint has been addressed.

Further, in order to become more accessible, this office has issued a 24/7 vigilance helpline number, through which common people can register their complaints to this office, subject to the conditions to attach the GPS coordinated photographs along with the complaint, so as to filter out the complaints which are not genuine. Copy of vigilance team constitution order dated 22.07.24 and details of complaints received and disposal status upto 30 .11.24 is enclosed as annexure.

DETAILS OF REPORT /VIGILANCE REPORTS FORWARDED TO HEAD OFFICE SINCE JULY 24

For prevention and to keep vigilance on any illegal discharge during rainy seasons, a office order has been issued at local office level consitituting 04 Teams of Board officials for vigilance during rainy seasons.

A whatsapp complaint & helpline no. was also issued in public domain to address any incident related to illegal discharge during rainy seasons by process houses and same was also published in news paper for local people awareness.

Based on the complaints received /visit of vigilance teams, 16 matters were forwaded to HO Jaipur, related to waste water accumulation /discharge since July 24 and details of same are mentioned as under :-

S.No	Name of Industry	Date of Inspection/Violation Observed	Details of Violation	Recommendations made	Recommended for Action on	Final Action at HO level
1.	M/s Sona Processors, Guwardi, Chittor Road, Bhilwara	18.07.2024	Unit was found discharging RO Reject from the premises.	To initiate action against violation of ZLD Conditions	22.07.2024	EC was imposed by HO.
2.	M/s Sona Processors, Guwardi, Chittor Road, Bhilwara	07.07.2024	Unit was found discharging RO Reject from the premises.	To initiate action against violation of ZLD Conditions	09.07.2024	
3.	M/s RSWM , Mandapam , Chittor Road	01.10.2024	Waste Water was found accumulated outside the premises	To direct the unit to lift the water within premises	15.10.2024	Final Action Pending at HO
4.	M/s Anant Syntex Pvt Ltd, Chittor Road, Bhilwara	12.08.2024	ETP tanks were found in damaged conditions. Flexible	To impose EC on the unit for the violations observed	24.08.2024	Final Action Pending at HO

			Pipes were observed within the premises			
5.	M/s Rolex Processors Pvt Ltd. Pur Road, Bhilwara	03.08.2024	Unit was found discharging RO Reject outside the premises through flexible pipes	To initiate action against violation of ZLD Conditions	12.08.2024	Letter has been issued from HO for imposition of EC. Further, in continuation to this, EC calculation sheet has been forwarded by this office vide letter dated 12.09.2024. EC has not imposed on unit has on today.

6.	M/s Sarvoday India Ltd. RIICO Growth Centre Hameergarh, Bhilwara	02.08.2024	RO Reject was found accumulated near solar panel within the premises. Further Seepage was observed from the boundary wall. Sample was collected from the premises.	To initiate action against violation of ZLD Conditions	12.08.2024	Letter has been issued from HO for imposition of EC. Further, in continuation to this, EC calculation sheet has been forwarded by this office vide letter dated 12.09.2024. EC has not imposed on unit has on today by HO .
7.	M/s Sarvoday India Ltd. RIICO Growth Centre	03.09.2024	It was observed that unit has discharged	To initiate action against violation of ZLD Conditions	04.09.2024	Final Action Pending at HO

	Hameergarh, Bhilwara		Ro Reject and was found at T Junction of RIICO , which is a check point			
8.	Sona Selection India Ltd., Chittor Road, Bhilwara	12.09.2024	Unit was found discharging RO Reject outside the premises, in nearby field through flexible pipes	To initiate action against the unit in light of HO order dated 24.11.2022, which also included temporary closure of unit during rainy season.	12.09.2024	Final Action Pending at HO
9.	M/s RSWM Ltd, Mandapiya, Chittor Road, Bhilwara	24.07.2024 and 26.07.2024	High TDS RO Reject was observed within the drain of the unit.- 24.07.2024 High RO Reject was observed near the	To issue show cause notice against the unit for violating ZLD condition	01.08.2024	Final Action Pending at HO

			boundary wall of the unit- 26.07.2024			
10	M/s Ronak Processors PVt Ltd RIICO PurRoad, Bhilwara	17.09.2024	RO Reject was found discharging into RIICO Drain	To issue show cause notice against the unit for violating ZLD condition	20.09.2024	Letter has been issued from HO for imposition of EC. Further, in continuation to this, EC calculation sheet has been forwarded by this office vide letter dated 30.09.2024. EC has not imposed on unit has on today by HO .

11	M/s Sarvoday India Ltd. RIICO Growth Centre Hameergarh, Bhilwara	15.09.2024 and 17.09.2024	Huge Amount of RO Reject was found accumulated at Solar Area	TO initiate Suitable action against the unit for violation of ZLD	20.09.2024	Final Action Pending at HO
12	M/s Chairman Processors Pvt Ltd, RIICO Growth Centre, Hameergarh, Chittor Road, Bhilwara	03.09.2024	Industrial Effluent was discharging through ETP, which ultimately reached at RIICO T Junction and leads to Guwardi Drain. TDS of Stagnant water accumulated within the premises was observed 8900 PPM, which got	To initiate action against unit for violation of ZLD conditions	06.09.2024	Final Action Pending at HO

			diluted due to rain water.			
13	M/s RSWM , Mandapam , Chittor Road	04.08.2024	Unit was found discharging RO Reject outside the premises into the revenue drain	To initiate action against unit for violation of ZLD conditions	08.08.2024	Final Action Pending at HO
14	M/s RSWM , Mandapam , Chittor Road	17.11.2024	Waste Water was found accumulated outside the RSWM	TO direct the RSWM to lift the waste water back to ETP	19.11.2024	Final Action Pending at HO
15	M/s BSL Ltd , Chittor Road, Bhilwara	20.10.2024	Huge quantum of RO Reject was found accumulated near the solar panel area.	No evident discharge was found. However, waste water found accumulated near the solar panel.	24.10.2024	Final Action Pending at HO
16	M/s Sanwariya ji Tex fab Industries	08.10.2024	Huge quantum of RO Reject was found	-	09.10.2024	Final Action

	Ltd, Chittor Road, Bhilwara		accumulated near the solar panel area.			Pending at HO

INSPECTION OF PROCESS HOUSES DURING 23rd -27th Dec-2024

All the process houses located at Bhilwara were inspected by this office,as per directions given in order dated 23.12.2024, during the period 23rd Dec- 27th December 2024. Inspection reports of individual units collectively are ensloed along with this status report as annexure for kind perusal and ready reference. Further, based on the findings of inspection reports , summarised view on core components of operation of individual units related to waste water treatment is tabulated as under .

SUMMARY NOTE ON THE STATUS OF INDIVIDUAL UNITS ON THE BASIS OF INSPECTION

On the basis of inspections carried out by all the process houses during 23-27.12.2024 having effluent generation quantity of more than 200 KLD, 27 process houses have been summarised in following manners: -

S.No.	Name of Process House	On the basis of Inspection carried out between 23rd Dec 2024 to 25th December 2024			
		ETP & RO Operation	MEE Operation and Salt Generation/ disposal	Record Keeping & Logbooks	Waste water discharge/ Accumulation
1.	M/s Kanchan India Ltd, Mandal Bhilwara	Yes	Yes	Yes	No

2.	M/s Saileela Processors Pvt Ltd, Mandal Bhilwara	ETP civil tanks restoration required	Operative but salt generation is less	Yes	Partial waste Water spray inside premises
3.	M/s Sulzer Processors Pvt Ltd, Mandal Bhilwara	Yes	Yes	Yes	Waste Water spray outside premises on its own land.
4.	M/s Kanchan India Ltd, Nanakpura, Bhilwara	Yes	Yes	Yes	No
5.	M/s Sarvodaya India Ltd, RIICO Hameergarh , Bhilwara	Yes /new biological also constrcuted	Yes	Yes	No
6.	M/s Chairman Processors , RIICO Growth Centre Hameergarh , Bhilwara	Yes	Non operational	No	No
7.	M/s Ronak Processors Pvt Ltd, Pur Road, Bhilwara	Yes	Yes	No	No
8.	M/s Rolex Processors Pvt Ltd, Gangapur Road, Bhilwara	Yes	Yes	Yes	No
9.	M/s Laxmi Vishal Processors ,Dhuwaliya, Bhilwara	Yes	Yes	Yes	No

10.	M/s RSWM ,Gulabppura, Bhilwara	Yes	Yes	Yes	No
11.	M/s Samarpan Synthetics Pvt Ltd, Gangapur Road, Bhilwara	Towards commissioing	Towards commissioi ng	Towards commissi oing	Towards commissioing
12.	M/s Shubhlaxmi Processors Pvt Ltd, Maeergarh, Bhilwara	Yes	Yes	Yes	No (Regular complaint related to air pollution)
13.	M/s Supergold Suiting Pvt Ltd, Mandapiya, Bhilwara	Yes	Yes	Yes	No
14.	M/s Swastika Suiting Ltd, Pur Road, Bhilwara	Yes	Yes	Yes	No
15.	M/s Anant Syntex Pvt Ltd, Chittorgarh Road, Bhilwara	ETP civil tanks and chemical sludge handling area restoration required	Yes	Yes	No
16.	M/s Modern Woollens ,Chhitor Road, Bhilwara	Yes	NA (Incinerator)	Partilly mainatin ed	No

17.	M/s Puja Spintex ,Chhittor Road, Bhilwara	Yes	Yes	Yes	No
18.	M/s Ranjan Polyster Ltd, Chittor Road, Bhilwara	Yes (Chemical sludge handling area shed required to be constructed)	Yes	Yes	No
19.	M/s Sangam India Ltd, Spinning Unit, Biliya Kalan Chittor Road, Bhilwara	Yes	Yes	Yes	No
20.	M/s Sona Processors India Ltd, Guwardi ,Chhittor , Road, Bhilwara	Yes	Yes	Yes	No
21.	M/s AK Spintex Ltd , Chittor Road, Bhilwara	Yes	Yes	Yes	No
22.	M/s BSL Suitings. Mandapam, Chhittor Road, Bhilwara	Yes	Yes	Yes	No
23.	M/s Janki Corp Ltd, MandapiyaChauraha, Chhitor Highway, Bhilwara	Yes	Yes	Yes	No

24.	M/s RSWM Mandapam, Bhilwara	Yes	Yes (ATFD recently installed)	Yes	Yes (Waste water accumulation back side wall /natural drain passing through unit –Major issue)
25.	M/s Sangam India Ltd, Atun Bhilwara	Yes (back side premises wall seepage reparing required)	Yes	Yes	No
26.	M/s Sanwariya Ji Texfab, Chhittor Road, Bhilwara	Yes /new ETP under construction	Yes	Yes	No (but storage of RO reject in new ETP tanks /traces of waste water spray in nearby own plots)
27.	M/s Sona Selection ,Chhitor Road, Bhilwara	Yes	Yes	Yes	No

PICTORIAL PRESNTATION OF WASTE WATER TREATMENT PRACTICES ADOPTED BY PROCESS HOUSES

During the course of inspection dated 23-27-12-2024, all photographs related to pollution control measure related to waste water treatment techniques adopted by the process houses were taken. A pictorial album of the same in soft copy is enclosed as annexure with this report.

PRACTICES BEING ADOPTED BY THIS OFFICE AND WAY FORWARD

A. WITHIN PRESMIES AND EFFECTIVE OPERATION OF WASTE WATER TREATMENT: -

1. That neeccesary action may be intiated on the basis of inspection carried out during 23.12.24 to 27.12.24 .
2. **MEE Salt Generation And Disposal Data Related Tracking** : In order to verify the operational status of MEE, data related to generation and disposal of MEE salt is being moitored for the past 2-3 years by this office.
   - The comparative status of MEE salt generation by Textile units, year by year and its dispsoal has been increased since 2022-23, which indicates that, now units are operating MEE and ATFD, in regular manner. Though there are few industries which do not operate MEE on regular basis, comes into identification during regular vigilance activities, were directed time to time to operate the same regularly.

The data has been retrieved from CTDF Udaipur, related to MEE salt sent to them and this data indicates that generation and disposal of MEE Salt ,has increased on year to year basis

Year /Period	No. of Process House Units	MEE salt sent to CTDF, Udaipur in MT	Monthly average of MEE salt sent to CTDF, Udaipur in MT	Trend
22-23	25	6423.375	535.28 MT/Month	Assume as base year
23-24	25	8095.145	674.59 MT/Month	MEE salt disposal increasing
April 24 to Dec-24 (up to 23.12.24) For 09 months	25+02**(Applied for Fresh CTO)	6824.265	758.25 MT/Month	MEE salt disposal increasing

3. **Disposal Pattern of RO Reject: -** Although all the process Textile Houses although equipped with ETP/RO and MEE-ATFD but based on the various reasons and visits, it can be interpreted that **upto 90%** of effulent generated is being treated, recycled and also reject is evoparated through MEE and Salt generation.

   But various factors involved in disposal of balance RO reject,if any, this component of effulent is being treated in a an unscientific and improper manner, due to under mentioned possible reasons viz:-

   1. **Rainy Season:** - Discharge of Stored RO reject during rainy seasons through seepage/mixing with rain water accumulated in open premises etc.
   2. Costing of RO reject disposal and Boiler steam requirement.
   3. **Disposal of RO reject during non operation period of MEE /Technical problem Cleaning time in MEE**: - During break down of MEE, RO reject generated during this period is generally stored in Reject holding tank but after reaching storage capacity, practices related to waste water /reject spray in near by land / within premises.

4. **MEE & ATFD operation and stand by MEE-ATFD provisions**: - Unit(s) which are having more than 50 KLD reject generation may be directed to install standby MEE /Suitable RO reject managment system so as to comepensate Exising MEE breakdown /cleaning down time and having stand by provisions of MEE-ATFD , so incidents related to Waste water spray / illegal discharge may be minimised specifically during rainy season /MEE down time.
5. **Natural drain /irrigtation canal passing through units** :- Almost units located are having either natural drain /irrigtation Canal passing through units or natural drain passing near unit's premises wall .These units may be directed to provide safety dyke wall around this structures spillages /flows could not meet these channel.

B. OUTSIDE PREMISES AND EFFECTIVE OPERATION OF WASTE WATER TREATMENT: -

1. It is also pertinent to mention here that a final drain of RIICO Hamirgarh is also as a source of significant amount of domestic sewage mixed waste water. In this area misc. types of units viz, food industries, textile units other than ZLD viz. weaving, spinning units, metal fabrication, small scale chemical units are located and each unit have contribution related to domestic sewage, cooling blow down, non utilised individual STP treated. RIICO has construted storm water drain network along all these unit carrying their domestic, cooling and blowdown water and ulitimately this open nallah falls into Guwardi Drainage, which also flow of waste water in natural drains passing through Textile process houses and having TDS ranges between 500 mgpl to 2500 mgpl. Therefore RIICO may be directed to Construct STP /CETP (Mixed effulent type) @ RIICO Hamirgarh for tap this drain. As per available information RIICO has also reserved land for this purpose however not constructed CETP.
2. Industrial units which are only based on physico chemical treatment based ETP plant may be directed to installation of Upgraded automisedBiological section for effective removal of COD/BOD load; so except TDS load other load on RO plant

may be minimised and smooth functioning of RO may facilitate maximum recovery, reduce down time, and reduce maintenance.

3. Presently, possibility of discharge and flow of any waste water in natural drains are identified on the basis of various check points /IP camera and flowmeters as mentioned above by RSPCB. But due to underground Banas fresh water lines passes a long pathway comprising Banas river bed , agriculture field , Mandpiya and Guwardi Village and natural drain stretch , railway tracks , Highway and other complex rooting which provides possibility for hidden discharge and drain through these lines and after mixing into natural drainage path way ,it is very difficult to trace out the culprit unit. Besides, drain pipes passing beneath highway and its bridges are very difficult for human approach for trace out the defaulter unit. Therefore, Looking to the complex nature of drainage pattern and underground Banas Fresh Water line, it may be directed to textile units that Banas well conveying fresh water line leading to industrial premise –any textile units (if having valid permission from respective authority) may only be allowed with over head arrangements and tapping points at various interval to check the type of water flowing into this line at any time.
4. That a letter may be sent to Highway Authority for cleaning and checking of all the highway drains passing through this industrial cluster followed by removal of any unauthorised line /connecting pipes passing through these drains and explore possibility for passing of these drains directly to the natural drainage nallah as much as possible avoiding industrial possible drainage including provisions of light at Highway drains for better vigilance.
5. Natural drainage channels may be cleaned before each rainy season. For which this office is planning to initiate a drive to clean all the check points as mentioned in this report.

Status report is submitted for your kind perusal please.

Regional Officer