

Item No. 03

(Court No. 1)

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

(By Video Conferencing)

Execution Application No. 20/2021
IN
Original Application No. 206/2020
(I.A. No. 155/2021)

(With report dated 30.11.2021)

Vinit Kumar

Applicant

Versus

M/s Sir Shadilal Distillery & Chemical
Works Pvt. Ltd. & Ors.

Respondent(s)

Date of hearing: 11.02.2022

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE SUDHIR AGARWAL, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER
HON'BLE PROF. A. SENTHIL VEL, EXPERT MEMBER
HON'BLE DR. AFROZ AHMAD, EXPERT MEMBER**

Applicant(s): Mr. Rahul Choudhary, Advocate in E.A 20/2021

Respondent: Mr. Pradeep Misra & Mr. Daleep Dhyani, Advocates for UPPCB
Mr. Anuj Kumar Sharma, Advocate for CPCB
Mr. Parag P. Tripathi, Senior Advocate with Mr. Abhay Chattopadhyay,
Advocate for M/s Sir Shadilal Distillery & Chemical Works Pvt. Ltd.

ORDER

1. This application seeks execution of order of this Tribunal dated 23.02.2021. By the said order, the Tribunal directed remedial action against violation of environmental norms in the operation of distillery unit of M/s Sir Shadilal Distillery and Chemical Works in District Muzaffarnagar, UP (PP) including reducing capacity as per sustainable development principle and fixing accountability for the past violations on polluter pays principle by the statutory regulator the State PCB. It may be

noted that even earlier the Tribunal dealt with the allegation of non compliance and vide order dated 17.5.2019 in OA 823/2017, remedial action was directed, after recording finding about violations. The operative part of the order dated 23.2.2021 is reproduced below:

*“10. Thus, contention raised on behalf of the unit that it should be given time to comply and no coercive action should be taken cannot be accepted. **The State PCB is entitled to take remedial action of reducing the capacity at which the unit should function till compliance, including payment of compensation already assessed. In view of the fact that the joint Committee, under directions of this Tribunal, has verified the facts and given a report which is duly substantiated by the photographs and reports of testing of samples, we direct the joint Committee to determine appropriate amount of compensation having regard to the cost of restoration, the financial capacity of the unit, the extent of violation and element of deterrence and allow the unit to operate only after compliance of the environmental norms. Needless to say, the State PCB will follow the laid down procedure and due process in taking further action.**”*

2. It is stated in the execution application that inspite of order of this Tribunal, no remedial action has been taken. Non-compliance alleged is as follows:-

“

- a) *The unit is still operating without reducing the capacity by 50%, from 150 KLPD to 75 KLPD, as a result the lagoons are filled with untreated coloured effluent more than consented storage capacity and thus is not complying with the environmental! Norms.*
- b) *Thus, Uttar Pradesh Pollution Control Board has failed to take remedial action of reducing the capacity at which the unit should function till compliance.*
- c) *The unit purposely cover some of the lagoons with sand which absorbs the spent-wash much quicker causing large-scale contamination of groundwater.*
- d) *Till date, the drain which was carrying substantial amount of sludge has not been de-sludged.*
- e) *During this monsoon season, as a result of water-logging, the toxic untreated coloured effluent discharged remains stagnant within and outside the vicinity of the unit worsening the situation and causing progressive environment degradation. The water-logging is further posing a serious threat to the surrounding environment and Kali River, which is a tributary to Hindon River, which finally meets Ganga through Yamuna.*

f) Till date no appropriate amount of compensation has been determined by the Joint Committee as directed thereof. Hence the unit is functioning in complete violation of the directions of this Hon'ble Tribunal.”

3. The applicant also filed I.A. No. 155/2021 to mention subsequent events that the State PCB conducted inspection on 08.08.2021 and gave report dated 09.08.2021 finding discharge of effluents in the drain near the unit. Compensation of Rs. 30,000/- per day has been imposed from 08.08.2021 without considering the past violations including those found in the order dated 23.2.2021. The averments in the application are:-

“2.It is submitted that after receiving complaints from the local people, the UP PCB has conducted an inspection on 08.08.2021. The report dated 09.08.2021 says that effluent containing spentwash is discharged in the drain near Molasses tanks of DSM Sugar Mills Mansurpur Campus by Sir Shadilal Distillery & Chemicals Works Pvt. Ltd. The drain near Molasses tanks of DSM Sugar Mills ultimately leads to the Mansurpur Drain. Hence, UP PCB has taken samples from two drains i.e., drain near Molasses tanks of DSM Sugar Mills Mansurpur Campus and Mansurpur drain at NH 58. The results of the samples taken clearly shows the presence of dark brown colour effluent which is much higher than the notified standards, ultimately causing grave degradation of the Kali River which is a tributary to the Hindon River.

Sample Analysis	Colour	pH	COD (mg/l)	TSS (mg/l)
Drain near Molasses Tanks of DSM Sugar Mansurpur Campus	Dark Brown	4.9	28700	14600

Sample Analysis	Colour	pH	COD (mg/l)	TSS (mg/l)
Mansurpur Drain at NH 58	Dark Brown	5.2	18400	9300

The report clearly shows the presence of highly untreated dark coloured effluent in drains, hence, the unit of Respondent No. 1 is still operating in complete violation of laws and earlier directions passed by this Hon'ble Tribunal, causing persistent environment degradation. It is submitted that this shows that the direction of the Hon'ble Tribunal contained in order dated 23.02.2021 has not been complied and the respondent unit has continued to discharge

untreated effluent. The Respondent authorities has also failed to comply the directions of the Hon'ble Tribunal.

A copy of the UP PCB report dated 9.08.2021 is annexed herewith as **Annexure A-1**.

The inspection report dated 09.08.2021 is silent on past violations and has calculated compensation only from 08.08.21:

3. Furthermore, the UPPCB also directed imposition of compensation of Rs.30,000 per day from the date of inspection i.e., 08.08.2021 till compliance. That the report has wrongly calculate the environmental compensation. The Applicant is making following submissions to the report:
 - a) That an inspection was carried out on 15.07.2019-16.07.2019 by the officials of Respondent No. 3 (CPCB) before the expansion of the distillery unit i.e. when the capacity was 100KLD. That the observations made by the CPCB clearly show that the distillery unit was non-compliant in various aspects. Thereafter, the CPCB sent a notice to Respondent No. 1 on 1.10.2019 under Section 5 of the Environment (Protection) Act, 1986 pointing out certain non-compliances. Thus, it is submitted that from the date of the inspection i.e. 15.07.2019, the calculation of environment compensation has to be carried out as per the Polluter Pays Principle.
 - b) That thereafter a joint inspection was carried out by officials of the CPCB and UPPCB on 14.11.2019. In the joint inspection, waste water samples were collected and the parameters for the CPU outlet (after treating) were found beyond the maximum allowed pollutants as per the standards set by under the EP Rules, 1986. However, despite this concerning finding, the joint report did not recommend any action in complete violation of the law and the order of this Hon'ble Tribunal.
 - c) Thereafter, inspections were carried out in July, 2020 and environmental compensation of Rs. 30,000/- was imposed from 21.07.2020 to 30.07.2020 (without considering violations from 2019).
 - d) That thereafter a joint inspection was carried out by officials of the CPCB and UPPCB on 01.01.2021. The report said that environmental compensation to be imposed on industry after revoking of closure order for 108 days i.e., from 11.08.2020 to 26.11.2020 as 32.40 lakhs.
 - e) The present inspection report has also imposed environmental compensation of Rs.30,000 per day from the date of inspection i.e., 08.08.2021 till compliance.
 - f) However, since the present industry has been violating environmental laws from July, 2019 and is continuing to do it till today i.e. 18th August, 2021. Thus, the environmental compensation has to be revised to reflect this entire period as per the Polluter Pays Principle.
4. It is submitted that this Hon'ble Tribunal vide order dated 27.05.2019 in OA No. 823 of 2017 which was earlier filed on

the same subject matter, had specifically directed that in case any irregularity or non-compliance of notified standards is found, the UP PCB shall immediately close down the unit and the unit shall reopen only after the order of this Hon'ble Tribunal.

" 1. That CPCB as well as UPPCB shall jointly inspect the unit of M/s Sir Shadilal Distillery & Chemical Work Pvt. Ltd., bi-monthly from the date of this order till end of the year i.e. 31.12.2019.

2. On any of the inspection, during the period, if irregularity or noncompliance of the standards prescribed is found then the SPCB shall immediately close down the unit.

.....

4. If the units are dosed on account of being noncompliant and on removal of the deficiencies, the unit shall start operation, only after order of the Tribunal"

(emphasis supplied)

However, the report dated 09.08.2021 has failed to consider this direction of the Hon'ble Tribunal and thus unit is functioning in full swing in complete violation of the law and directions of this Hon'ble Tribunal.

5. *Thus, in light of the above observations it is clear that the unit of Respondent No. 1 is operating in complete violation of the law and earlier directions of the Hon'ble Tribunal. The high BOD/TSS level of the Mansurpur drain indicates that the industry is discharging untreated effluents in this drain which certainly does not meet the notified standards thereby causing persistent environmental degradation by worsening the water quality of Kali River, which is a major tributary to the Hindon River."*

Procedural History of proceedings in current round

4. Vide order dated 19.08.2021, the Tribunal constituted a joint Committee comprising CPCB (represented by the level not below Scientist E), State PCB (represented by the level not below Chief Engineer/Regional Officer) and District Magistrate, Muzaffarnagar, UP to verify facts and take remedial action. The Committee was to furnish a report to this Tribunal. It was observed that connected matter of the sugar unit of same industrial unit was being considered in O.A. No 16/2021, *Vinit Kumar v. DSM Sugar Mills Ltd. & Ors.*

Report of the Joint Committee dated 30.11.2021 and response of PP and the Applicant

5. Accordingly, a joint Committee has filed its report dated 30.11.2021 to which the applicant has filed his response on 09.02.2022. Though, notice to Project Proponent was not yet issued, the Project Proponent has entered appearance through Shri Parag P. Tripathi, Senior Advocate assisted by Mr. Abhay Chattopadhyay, Advocate.

6. We have heard learned Counsel for the applicant, State PCB and the Project Proponent and perused the record.

DSM Sugar Mills and Shadilal Distilleries are separate units

7. At the outset, we note the stand of DSM Sugar Mills in respect of which *O.A. No. 16/2021* is being dealt with by a separate order today, that in the past they belonged to common management but are now different. Thus, the statement in in para 6 of order dated 19.08.2021 that both the units are of same management needs correction. We take this version on record and for all purposes will proceed on this factual basis.

Analysis of the rival versions, finding and directions

8. Coming to the merits of the violation of environmental norms, the joint Committee report has given the compliance status with reference to the direction issued by this Tribunal earlier on 23.02.2021. It is stated that in pursuance of order dated 23.02.2021, direction dated 12.04.2021 was issued under Section 33A of the Water (Prevention and Control of Pollution) Act, 1974 restricting the production capacity of the unit requiring dismantling of three out of four lagoons, restricting the period of storage of the effluent, use of the effluent in boiler, treating effluent stored in the lagoon through MEE and incineration Boiler were issued. State PCB

undertook further inspection on 08.08.2021 and found that unit was bypassing its effluent through a drain connected to Mansurpur drain meeting River Kali and then Hindon. After order of this Tribunal dated 19.08.2021, further inspection was conducted on 20.09.2021 and violations were found for which compensation was assessed and recommendations for further remedial action have been made. The relevant extracts from the report are as follows:-

“6.0 ACTION TAKEN BY UPPCB

6.1 UPPCB Direction to M/s Sir Shadi Lal Distillery & Chemical Works Ltd.

In compliance of Hon’ble NGT order dated 23.02.2021, UPPCB issued direction dated 12.04.2021 to M/s Sir Shadi Lal Distillery & Chemical Works Ltd., Mansurpur, Muzaffarnagar under section 33A of Water (Prevention and Control of Pollution) Act, 1974 for compliance of the following:

1. *The 150 KLD distillery (incineration-based) shall be restricted to 120 KLD capacity.*
2. *The 03 lagoons, out of 04 installed within the premises, shall be completely dismantled by 31.05.2021.*
3. *The storage of the effluent in one lagoon shall be restricted to 07 days’ production.*
4. *The entire effluent stored in the lagoons shall be utilised in slope fired boiler by 30.04.2021.*
5. *The Unit shall treat the effluent stored in the lagoon @400 KLD through MEE and incineration boiler and maintain the record for the same.*
6. *A Bank Guarantee of Rs.10.0 Lakhs shall be submitted for the compliance of above conditions in a time bound manner.*

6.2 UPPCB Visit on 08.08.2021 and drain monitoring

UPPCB inspected the Mansurpur drain and surrounding area on 08.08.2021 in relation to a public complaint. The effluent sample from the drain near molasses tank of DSM Sugar showed following characteristic:

Drain	Colour	pH	COD	TSS
<i>Drain near molasses tank of DSM Sugar Mill</i>	<i>dark brown</i>	<i>4.9</i>	<i>28,700 mg/l</i>	<i>14,600 mg/l.</i>

The analysis result shows Distillery Unit is discharging their effluent through Sugar mill premises (from a drain near molasses tank of Sugar mill) in to the Mansurpur drain.

UPPCB also collected water sample form the Mansurpur drain at NH-58 and found the following:

Drain	Colour	pH	COD	TSS
Drain near NH-58	dark brown	5.2	18,400 mg/l	9,300 mg/l.

The above result indicates that the Distillery unit bypasses its effluent, through a drain located within the DSM Sugar Mill premise, and discharging into the Mansurpur drain which meets River Kali (West) onward (a tributary of Hindon River).

It was concluded that M/s Sir Shadi Lal Distillery & Chemical Works Ltd. discharging its effluent, through DSM Sugar Mills internal drain, into the Mansurpur drain and recommended that Environmental Compensation @ **Rs.30,000/-** per day may be levied to the distillery unit till the Unit resolve the issue of effluent discharge/management. Based on the inspection report, UPPCB issued show cause notice to the distillery Unit vide letter dated 03.09.2021 under section 33(A) of the Water Act, 1974 for closure and imposition of environmental compensation (EC) @ Rs.30,000/- per day.

7.0 ORDERS PASSED BY THE HON'BLE NGT ON 19.08.2021.

The E.A 20/2021 [with I.A No. 155/2021] in O.A No. 206/2020 titled Vinit Kumar vs M/s Sir Shadilal Distillery and Chemical Works and Ors] came up for hearing before the Hon'ble NGT on 19.08.2021 and Hon'ble NGT directed the following:

“5. In view of above, we direct a joint Committee comprising CPCB (represented by the level not below Scientist E), State PCB (represented by the level not below Chief Engineer/Regional Officer) and District Magistrate, Muzaffarnagar, UP to verify facts and take remedial actions. The CPCB and State PCB will be the nodal agency for coordination and compliance. The joint Committee may meet within 15 days from today. The Committee will be at liberty to associate any other expert/institution and consider the viewpoint of the industrial unit also.”

6. We note that in respect of another connected matter being O.A. No 16/2021, Vinit Kumar v. DSM Sugar Mills Ltd. & Ors., relating to the sugar unit of the same industrial unit, the Tribunal has constituted the very same joint Committee and listed for further consideration on 02.12.2021.”

7. Accordingly, the joint Committee may give its report covering both the units within two months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/OCR Support PDF and not in the form of Image PDF”.

8.0 JOINT MONITORING OF CPCB, UPPCB & DISTRICT ADMINISTRATION ON 20.09.2021 AND RECOMMENDATIONS

In compliance to said orders of the Hon'ble NGT dated 23.02.2020 and 19.08.2021, a joint team of officials from CPCB, UPPCB and ADM

(F/R)-Muzaffarnagar visited the industries i.e. (i) M/s Sir Shadi Lal Distillery & Chemical Works and (ii) M/s DSM Sugar Mill on **20.09.2021**.

The M/s DSM Sugar Mill Ltd. was found closed due to off crushing season.

The joint team conducted inspection of M/s Sir Shadi Lal Distillery & Chemical Works (“distillery unit”) and its surrounding area on 20.09.2021.

A: General Information about M/s Sir Shadilal Distillery & Chemical Works:

1.	Name of the unit and Address	M/s. Sir Shadilal Distillery & Chemical Works, Mansurpur, Muzaffarnagar, Uttar Pradesh.
2.	Spatial Co-ordinates (Lat & long)	Lat:29.34975 Lon:77.71924
3.	Year of Commissioning.	1960
4.	Sector	Distillery
5.	Production capacity <ul style="list-style-type: none"> • Installed Prod. Cap. • Present Production 	250 KLD (100 KLD+ 150 KLD) <120 KLD
6.	Status of consents & Authorization (validity/ applied)	Air Consent: valid up to 31.12.2024 (Annexure-1) Water Consent: valid up to 31.12.2024 (Annexure-II) HW Authorization: Yes valid (Annexure-III)
7.	Environmental display board at the entrance gate (Yes/No)	Yes

B: Water Pollution and its Control:

8.	Water Supply Source No. of bore wells Water Consumption (KLD) (with details of water meters installed) Logbook maintained: (Y/N) CGWA Permission Obtained: (Y/N)	Bore wells 02 nos. 880 KLD (As per logbook record of Aug and Sept 2021) Yes Yes (valid upto 25.12.2020). Applied for Renewal of NOC by the Unit.
9.	Effluent Treatment plant (ETP)	<ul style="list-style-type: none"> ➤ For ‘spent wash’ management: MEE (integrated) and Incineration Boiler. ➤ For MEE condensate & Spent lees: Installed Condensate polishing Unit (CPU) comprising of following: Collection tank---PHE, buffer tank---anaerobic digester--- aeration tank (diffused aeration) --- secondary clarifier --- tube settler ---Tertiary clarifier --- MGF ---ACF --- Ultra Filtration (UF) --- and Reverse Osmosis (RO) plant.

C: Information regarding Bio-composting: Found under Closure in compliance of UPPCB direction.

D: Air Pollution and its Control:

10.	Sources of Air Pollution	Boiler 56 TPH (Slope fired Incineration boiler)
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	Type of Fuel/s used with consumption and Stack details with APCD	Fuel are Coal, Slope and Rice Husk	70-75% slope 25-30% of Husk + Coal
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E: Solid & Hazardous Waste Management:

11.	Type & Quantity of Waste Generated	Fermenter sludge: 10 MT/day Boiler ash: 90 MT/Day
12.	Facility of Storage/ Disposal	Fermenter sludge: Centrifuge-Drying-Manure Boiler ash: Ash & Slag is sold to M/s MD Biocoal Pvt Ltd, Sirsa, Haryana

8.1 Observations during the visit on 20.09.2021 by the joint team of CPCB, UPPCB and ADM (F/R)- Muzaffarnagar

1. During inspection, the distillery unit was in operation. The ETP for the spent wash treatment systems comprises of MEE (integrated), Incineration Boiler & for the MEE condensate and other process effluent the Unit has CPU.
2. The unit is a molasses-based Distillery with an installed production capacity of 250 KLD (100 KLD + 150 KLD new).
3. During the visit, the 100 KLD capacity distillery (bio-compost based) was found nonoperational, however, the 150 KLD plant (incineration boiler based) was operational.
4. The unit has condensate polishing unit (CPU) for the treatment of MEE condensate & spent lees. The CPU was found operational during the visit.
5. The Unit has removed all the flexible pipelines from the premises, however an underground pipeline (Pic.1) was found near CPU area. The Unit could not provide the reason of the underground pipeline emanating from the CPU plant. The underground pipeline should be removed to avoid any misuse of the same in future.
6. The Joint team collected sample from the CPU/ETP, lagoon and drain and lab analysis results are tabulated as below:

Sample Locations	Parameters						Ammonia
	Ph	COD	BOD	TS	TSS	TDS	
Lagoon within premises							
Spent-wash stored in lagoon	5.7	187755	67049	219610	--	--	
MEE Concentrate (to Incineration boiler)	5.1	385306	141077	584770	--	--	
CPU (CONDENSATE POLISHING UNIT)							
CPU Location	pH	COD	BOD	TS	TSS	TDS	
Inlet of CPU	3.2	3110	1859	1312	13	1292	
Secondary Clarifier (Outlet)	7.8	03	01	2160	29	2124	
ACF (Outlet)	8.0	73	27	2120	18	2096	
Ultra-filtration (Outlet)	8.1	31	12	2164	21	2140	
RO Permeate	5.3	10	03	304	BDL	304	
Drain water sampling results							
Drain Location	pH	COD	BOD	TS	TSS	TDS	Ammonia
Mansoorpur Drain at NH-58 (1.5 km downstream of distillery)	7.0	424	89	1260	100	1152	27

Drain behind M/s DSM Sugar mill near railway track (<200 mtr from distillery)	6.7	704	157	2100	1322	772	--
Drain near Bopara Village (2.5-3.0 Km downstream from distillery)	7.2	544	87	1212	880	336	37

All values in mg/l except pH. The Lab Analysis report is annexed at **Annexure-IV**.

7. During the visit, no discharge of effluent was observed from the distillery unit. Samples were collected from different locations and results are depicted above table.
8. It was observed that a pipeline from distillery unit meets the common drain (lying within the Sugar mill premise) and this common drain is the only drain from where distillery could discharge its effluent into the Mansurpur drain. Sugar mill representative could not explain why they have provided the common drain for distillery unit for discharge from their premises.
9. The joint team collected water sample from the drain behind the sugar mill near railway track. No flow was observed and the effluent was found stagnant in the drain. The analysis result of the drain behind sugar mill near railway track showed colour - light brown; pH-6.7; BOD-157 mg/l; COD-704 mg/l; TSS-1322 mg/l and TDS- 2100 mg/l, though the Sugar mill was closed due to off season.
10. It was observed that the effluent from the common drain onwards reaches Gram Sabha pond, and the drain near the gram sabha pond should be made pucca so that no effluent (treated / untreated) could reach the gram sabha pond and the cost may be bear by the Sugar mill.
11. The effluent and sludge stored in the lagoons require to be treated / disposed of in a scientific manner before restricting the storage capacity of the lagoons. Sludge was also found in the bio-compost yard and the same needs to be dispose off accordingly.
12. **During the visit, coloured untreated effluent found discharged/disposed on the land (pic. 4) adjacent to a small tank (pic. 8).**
13. The Mansurpur drain was found having sludge near NH-58, therefore, the distillery unit needs to de-sludge the drain near NH-58 Road and should provide the documentary evidence including photographs to UPPCB.
14. **Slope fired boiler.** The fired incineration boiler was found operational. During the visit, all 06 out of 06 feed nozzles/fire gun of boiler were operational. During the visit, the slope was being fired @ 16 TPH in incineration.
15. **Groundwater sample analysis.** During the visit groundwater samples were collected from the compost yard and some nearby residences/ places outside factory premises and results are depicted below:

GW Sample Location	pH	COD	TDS	NO3-NO3	Conductivity	Chloride	Sulfate
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Groundwater -1 (near Bio-composting yard)	7.8	BDL	588	3.0	877	18	47
Ground water -2 (outside Premises)	7.6	BDL	970	31.6	1384	104	137
Ground water -3 (outside Premises)	7.8	07	648	1.1	962	40	61
Ground Water-4 (Bopara Village)	7.9	BDL	482	3.9	698	24	42
BIS Standards IS 10500 : 2012 (Acceptable limit)	6.5-8.5	--	500	45	-	-	-
BIS Standards IS 10500 : 2012 (Permissible limit in the absence of alternate source)	6.5-8.5	--	2000	45	-	-	-

All values in mg/l except pH. The Lab Analysis report is annexed at **Annexure-V.**

8.2 Compliance status of the last joint inspection team recommendations:

S.No.	Recommendation of last joint visit on 26.11.2020 by CPCB & UPPCB	Status (as on 20.09.2021)
1.	The Unit should not operate 100 KLD plant (based on bio-composting facility) in compliance of UPPCB's directions and bio-composting should remain closed.	The 100KLD plant is closed. Complied.
2.	The Unit should restrict the production capacity of 150 KLD plant to 75 KLD (i.e. 50% capacity) till compliance of the following and should submit the excise production certificate to UPPCB on monthly basis.	<ul style="list-style-type: none"> • UPPCB directed the distillery Unit to restrict the production capacity to 120 KLD vide its direction dated 12.04.2021. • As per the ethanol production record, the Unit production is within 120 KLD since February 2021. Copy of the production detail (Sept 2020 to October 2021) is attached at Annexure- VI. Complying
(i)	The Unit should treat the coloured effluent stored in the lagoons/tanks through MEE and incineration boiler and shall empty the lagoons / tanks and thereafter dismantle them in a scientific manner.	The 03 lagoons (out of 4) are not dismantled till date and effluent /sludge stored in these lagoons needs to be treated /disposed in scientific manner. Non-Complying
(j)	The Unit should restrict the storage capacity of concentrated spent wash to maximum permitted 07 days equivalent of its generation for incineration purpose.	The Unit storage capacity of concentrated spent wash is more than 07 days equivalent of production. Non-Complying
(i)	The Unit shall deposit Environmental Compensation of Rs.32.40 Lakhs for the period of 108 days (11.08.2020 to 26.11.2020).	The Unit has submitted EC of Rs 32.40 Lakhs. Complied
(ii)	The Unit should provide environmental data display board at the entrance gate and shall regularly update the data.	The Unit has installed environmental data display board and was found updated during the visit. Complying

(iii)	The Unit should install flow-meter at the outlet of MEE-Condensate with totalizer and shall maintain the logbook for MEE Condensate & Concentrate.	The Unit has not installed flow-meter (m ³ /hr) at the outlet of MEE condensate with totalizer. Non-Complying
(iv)	The Unit should obtain Authorisation under Hazardous and other Waste Rules, 2016 from UPPCB.	The Unit has obtained Authorisation from UPPCB. Complied
(vii)	The Unit shall remove all the flexible pipelines from the premises immediately	The Unit has removed flexible pipelines, however an underground pipeline was observed and the same needs to be removed. Partially Complying.
3	The Unit should de-sludge the drain at least upto 03 Km down and the sludge shall be dispose off in a scientific manner.	During the visit, sludge in the drain near NH-58 was found. The unit claims to have de-sludged the drain, however, no documentary /photographic evidence was provided to the joint team.

8.3 Compliance status of UPPCB's Direction dated 12.04.2021 issued to M/s Sir Shadilal Distillery & Chemical Works during the joint visit on 20.09.2021

The compliance status of the UPPCB direction dated 12.04.2021 is given below:

S.No.	UPPCB Directions dt 12.04.2021 issued u/s 33A of Water Act.	Status (as on 20.09.2021)
1.	The 150 KLD incineration based distillery shall be restricted to 120 KLD capacity.	The Unit has restricted the production capacity to 120 KLD. Complying
2.	The 03 lagoons, out of 04 installed within the premises, shall be completely dismantled by 31.05.2021.	The 03 lagoons (out of 4) are not dismantled till date and effluent /sludge stored in these lagoons needs to be treated /disposed in scientific manner. Non-Complying
3.	The storage of the effluent in one lagoon shall be restricted to 07 days' production.	The Unit has more than 07 days' storage capacity. Non-Complying
4.	The entire effluent stored in the lagoons shall be utilised in slope fired boiler by 30.04.2021.	The stored effluent is completely not utilised and effluent is still lying in the lagoons. Partially complying
5.	The Unit shall treat the effluent stored in the lagoon @400 KLD through MEE and incineration boiler and maintain the record for the same.	it was observed that, in two lagoons, the Unit has very small quantity of effluent left, however the sludge is still not disposed off. In other two lagoons the effluent is still present and needs to be disposed off in a scientific manner. Partially Complying
6.	A Bank Guarantee of Rs.10.0 Lakhs shall be submitted for the compliance of above conditions in a time bound	---

8.4 Assessment of Environmental Compensation (EC)

As per the CPCBs methodology for assessing Environmental Compensation (**EC**), following formula derived for calculation of Environmental Compensation:

$$EC=PI \times N \times R \times S \times LF$$

Where,

EC is Environmental Compensation in rupees

PI= Pollution Index of industrial sector = 80 (for red category)

N = Number of days of violation took place

R = A factor in Rupees for EC = 250 (from 100 – 500)

S = Factor for scale of operation; = 1.5 (1.5 for large unit)

LF = Location factor = 1.0 (1 for less than 1 million population of town)

$$EC = 80 \times 250 \times 1.5 = \text{Rs.}30,000/- \text{ per day}$$

Calculation of Environmental Compensation (EC)

- During the last joint visit of CPCB & UPPCB on 26.11.2020, the unit has been found violating the UPPCB consent condition and drain condition shows contamination /pollution of local drain. Therefore, the Unit was imposed Environmental Compensation (EC) of Rs. 32.40 Lakhs for 108 days (from 11.08.2020 to 26.11.2020).
- During the UPPCB's visit on 08.08.2021, the unit was found violating the ZLD condition and found discharging high organic load effluent into the Mansurpur drain through a common channel (lying within the sugar mill premises).
- The Unit was jointly inspected by CPCB, UPPCB and ADM (F/R)-Muzaffarnagar on 20.09.2021 and found non-complying with UPPCB directions dated 12.04.2021 regarding treatment of stored effluent & dismantling of lagoons, restriction of storage capacity and untreated coloured effluent was found discharged /disposed of on earthen land at lagoon/bio-compost area.

Hence, Environmental Compensation may be imposed to the distillery Unit from the date 27.11.2020 to 08.08.2021 and from 09.08.2021 to 20.09.2021 i.e. for 298 days.

Industry has submitted the certificate stating their production was closed for 17 days (during 27.11.2020 to 20.09.2021) verified by Excise Department (**Annexure-VII**). Hence nos. of days of violation to be considered is 298 – 17 = 281 days.

$$EC = \text{Rs.}30,000/- \times 281 \text{ days} = \text{Rs.}84.30 \text{ Lakhs.}$$

9.0 CONCLUSION OF THE JOINT TEAM OF CPCB AND UPPCB AND ADM (F/R)-MUZAFFARNAGAR

Based on the visit conducted by the joint team of CPCB, UPPCB and ADM (F/R)-Muzaffarnagar on 20.09.2021 and past inspection by UPPCB & CPCB, following is concluded:

- *The distillery Unit is operating only its 150 KLD plant (incineration based) and other 100 KLD plant (bio-compost based) is closed in compliance of the UPPCB direction dated 30.07.2020 & 10.08.2020.*
- *The production capacity of this 150 KLD distillery plant (incineration-based) has been restricted to 120 KLD by UPPCB vide their direction dated 12.04.2021.*
- *The distillery unit (150 KLD) has slope fired incineration boiler and also has CPU (condensate polishing unit) for the treatment of condensate and spent lees. Both, the incineration boiler and CPU was operational during the visit.*
- ***The Unit is in the process of restricting the storage capacity of the lagoons which is, at present, more than the consented storage capacity i.e. 07 days equivalent in case of incineration.***
- ***The Unit needs to treat the entire effluent stored in the lagoons through MEE & Incineration boiler and need to take requisite steps for collection, treatment and disposal of sludge in the lagoon and near bio-compost yard. The Unit shall restrict the capacity as per the UPPCB direction dated 12.04.2021 and during the visit the Unit was found noncomplying with the UPPCBs direction dated 12.04.2021 as tabulated above.***
- *During the earlier joint visit by CPCB and UPPCB on 09.03.2021 in relation to M/s DSM Sugar mill, the effluent analysis results of the common drain (located within the sugar mill premises) showed BOD-563 mg/l and TDS-3744 mg/l and effluent analysis results of the drain behind sugar mill near railway track showed BOD-307 mg/l and TDS-3964 mg/l which indicates contamination of drain with industrial discharge.*
- ***During the visit conducted by UPPCB, RO office, Muzaffarnagar on 08.08.2021 in relation to a public complaint, the distillery Unit was found discharging coloured effluent, into the Mansurpur drain, through a common channel (located within the sugar mill premises) and thus violating the environment discharge norms and posing threat to the River Kali (West) & Hindon River water quality and surrounding environment.***
- *During the present joint visit on 20.09.2021, no effluent was found being discharged into the Manusurpur drain. However, the common drain/channel (lying with the sugar mill) was found having stagnant light-coloured effluent, though the Sugar mill was closed. The analysis result of the drain behind sugar mill (near railway track) showed colour as light brown; pH-6.7; BOD-157 mg/l; COD-704 mg/l; TSS-1322 mg/l and TDS- 2100 mg/l.*
- ***Coloured effluent was found discharged/ disposed on the land adjacent to a tank (pic.04) near bio-compost yard which may poses threat to the groundwater quality. The distillery Unit is suggested to take consultancy services of reputed institute such as IIT/NIT/NSI/VSI etc. for the treatment, collection and disposal of coloured effluent and sludge lying in the lagoons as well in the earthen land.***

- *An Environmental Compensation of Rs.84.30 Lakhs may be imposed to the Unit from the date 27.11.2020 to 20.09.2021 (for 281 days excluding non-operational days).*

10. RECOMMENDATIONS

Based on the joint visit on 20.09.2021 and the UPPCB's inspection reports dated 08.08.2021, following are recommended for compliance:

- 1. The Unit shall operate with restricted production capacity of 120 KLD till it completely complied with the UPPCB's direction dated 12.04.2021 issued under section 33(A) of the Water Act, 1974.**
- 2. The Unit shall take consultancy services of reputed Institute such as IIT/NIT/VSI/NSI etc. and shall scientifically collect, treat and dispose of the entire effluent stored in the lagoons and earthen land as well as sludge excavated from the lagoons/tanks and bio-compost yard as per the recommendations of the institute. The complete effluent and sludge disposal report along with documentary evidence shall be submitted to UPPCB.**
- 3. The Unit shall deposit Environmental Compensation of Rs.84.30 Lakhs for 281 days' period excluding non-operational days (during 27.11.2020 to 20.09.2021).**
- 4. UPPCB shall conduct monthly monitoring of the Mansurpur drain for one-year period to assess the contamination of drain, if any, and shall take necessary action accordingly.**
- 5. The Unit shall install flow-meter at the outlet of MEE-Condensate with totalizer and shall maintain the logbook for MEE Condensate & Concentrate.**
- 6. The Unit shall remove the underground pipeline, near CPU area, from the premises immediately.**
- 7. The Unit shall de-sludge the drain near NH-58 highway area within a month and the sludge shall be dispose off in a scientific manner.”**

Applicant's Version

9. The applicant has given following response to the report:-

“

- (i) *The Joint Committee has given a finding that underground pipeline was in existence and pipeline from distillery unit meets the common drain lying within the Sugar Mill premises and this common drain is the only drain from where the distillery could discharge effluent into the Mansurpur drain. The Joint Committee made observation with respect to the storage of sludge in lagoons and observe that it requires to be disposed in scientific manner. It is pertinent to point out that the unit is required to be Zero Liquid Discharge as per condition No. 17 of the consent*

dated 09.12.2018 (**page 55**) under Section 25/26 of Water Act.

- (ii) *That in para 8, under the heading 'General Information' the report has recorded that environmental display board at the entrance gate. It is submitted that when the Applicant has verified no environmental display board was found on the entrance gate of the distillery. The copy of the photograph taken on 06.02.2022 showing the entrance of the distillery without any display board is annexed herewith and marked as **ANNEXURE A/1**.*

- (iii) *That the report in para 8.1 (5) has recorded that unit has removed all the flexible pipelines from the premises which not seems to be correct observation by the committee. The Applicant is filing photographs taken on 19.11.2021 showing flexible pipes in the premises of distillery unit. A copy of the photographs dated 19.11.2021 showing flexible pipes in the premises of distillery unit is annexed herewith and marked as **ANNEXURE A/2**.*

- (iv) *The report in para 8.1 (11) has just recorded that effluent and sludge stored in the lagoons require to be treated / disposed of in the scientific manner. However, the committee failed to observe that lagoons keep overflowing and also stored in kachcha tank causing pollution. The photographs taken on 20.11.2021 and 23.11.2021 showing kachcha lagoons and overflowing of the effluent is annexed herewith and marked as **ANNEXURE A/3**.*

- (v) *That the committee has given the observation in para 8.2 and para 9 that the unit has restricted its production capacity from 150 KLD to 120 KLD by the direction of the UPPCB. It is submitted that the earlier joint inspection report (at page 106) on the basis of inspection dated 21.07.2020, 27.07.2020 and 28.07.2020 recommended that the unit should restrict the production capacity from 150 KLD to 75 KLD till the compliant of certain conditions. It is submitted that the unit was required to treat effluent stored in the lagoons, empty the lagoons / tanks and dismantle them in scientific manner, shall remove all flexible pipelines from the premises and should desludge the drain upto 3 k.m. However, from the report dated 30.11.2021 it is clear that these conditions are not complied and the UPPCB should not have allowed to increase the production capacity from 75 KLD to 120 KLD.*

- (vi) *That the Joint Committee report in para 8.2 has given status of the compliance by distillery unit of the earlier recommendation. The committee has recorded that:*
 - a) *The recommendation about treatment of coloured effluent stored in lagoons / tanks and shall empty the lagoons /*

- tanks and dismantle them in scientific manner stand not complied.
- b) The recommendation about restricting storage capacity of concentrated spent wash to maximum permitted seven days stand not complied.
- c) The recommendation about deposit of environmental compensation of Rs. 32.40 lacs has been recorded as complied however, the unit seems to be habitual violator and continue to violate the environmental norms including recommendation and direction of the State and Central Board. The violator is taking it as pollute and pay principle, by which he can get away by just paying some amount and polluting the environment.
- d) The recommendation with respect to installation of flow meter stand not complied.
- e) The recommendation with respect to removal of flexible pipelines is recorded as partially complied, wherein it has been recorded that flexible pipelines has been removed however, underground pipeline was observed. It is submitted the Applicant has filed photographs showing large number of flexible pipeline lying in the premises of the distillery.
- f) The recommendation about desludging the drain upto 3 k.m. recorded as not complied.
- (vii) The Joint Committee has calculated the environmental compensation to be paid from 27.11.2020 to 08.08.2021 and 09.08.2021 to 20.09.2021, It is submitted that the committee has not taken into account the past violations by the unit and also the non-compliance of the earlier recommendations. The committee should have considered that the unit is habitual offender and want to get away from the liability just by paying some compensation amount. The inspection report dated 22.02.2020 (**at page 89**) and joint report (**at page 106**) has recorded about the non-compliance of the environment norms by the unit, The Joint Committee should also have taken into account the production done and profit made by the unit to calculate the compensation.
- (viii) The Joint Committee also failed to take into consideration the new construction without obtaining any permission is being undertaken by the unit.
- (ix) The unit was inspected by the local administration SDM and ADM on 13.10.2021 photograph shows and samples were collected. However, there is no record of finding by local administration is available. The copy of the photograph is filed and annexed as **ANNEXURE A- 4**.
- (x) The Joint committee inspection dated 17-11-2021 for DSM Sugar mill & Distillery has also recorded observation about Distillery unit. In para 3.3 of the report, it records that:

"During the visit on 17-11-2021 huge amount of coloured effluent was found collected/pooled at bio compost yard and on earthen land adjacent to the tank."

It is submitted that the position of bio compost yad has not improved even now and photographs dated 04-02-2022 & 20-01-2022 shows condition

deteriorating to worst. The copy of photographs dated 20-01-2022 and 0402-2022 is filed and annexed as **ANNEXURE A-5.**

(xi) **That the Distillery unit as per condition No. 28 of the Consent under Water Act dated 09.12.2018 (page 55) is required to cover 33% of the area with plantation of tall trees. Further as per condition No. 28 of consent order u/s 21/22 under Air Act 1981 dated 09.12.2018 (Page 59) also unit is required to cover minimum 33% of the land on which industry is established by the plantation of tall tree. But in complete violation of the condition, the unit has not developed green belt and joint committee complete silent no any comment in this regard.**

(xii) That it is pertinent to mention here that the unit rather than complying with the requirement of green bel development is coming out with fresh construction without any permission. The photographs showing the construction and letter written by Applicant is filed and annexed as ANNEXURE A-6.

3. **That the Respondent No.1 is a habitual offender and not been complying to the environmental norms for long. The unit finds it convenient to pay the minuscule fine and get away from the liability of polluting the environment. From the excise data obtained from the excise department it clearly shows that huge amount of liquor produced by the Respondent Distillery, yet not complying with the environment norms. Following are the details of excise duty paid by unit:**

a) **State excise Duty for the year 2017-18 average (Rs-11043300000/)**

b) **State excise Duty year 2018-19 average (Rs-15331400000/)**

c) **State excise Duty year 2019-20 average (Rs-17675700200/)**

d) **State excise Duty year 2020-21 average (Rs-19718818990/)**

e) **State excise Duty year 2021-22 April to September average (Rs-11225030000/)."**

10. Learned Counsel for the applicant submitted that repeated violations are available on that report. As per condition no. 17 of the

consent dated 09.12.2018 under the Water Act, 1974, the unit is required to be ZLD. Apart from violations found by the joint Committee, further violations include overflowing of the lagoons as shown by photographs taken on 20.11.2021 and 23.11.2021. Even though the production capacity was directed to be reduced till compliance, and non-compliances continued, the unit has increased the production capacity either without permission or with permission granted without any valid justification. Compensation calculated doesn't take into account past violations and does not act as deterrent nor is related to the financial capacity in terms of law laid down *inter-alia* in *M.C. Mehta & Anr. V. Union of India*¹, *Sterlite Industries (India) Ltd. V. Union of India*² and *Goel Ganga Developers India Pvt. Ltd. v. UOI*³. Huge amount of coloured effluent has been found at Bio-compost yard. As per consent condition and EC condition granted by the MoEF&CC on 07.01.2020, 33% of the area is required to be covered by plantation of tall trees which has not been done. There is also requirement of concentrated spent wash being incinerated and not to be released in open space. ZLD condition is also incorporated in EC. The circumstances, thus, warrant deterrent compensation.

Stand of PP

11. On the other hand, learned Counsel for the Project Proponent submitted that violation by the Project Proponent is only for the period from 08.08.2021 to 20.09.2021 in-storing the effluent in the lagoons. The Project Proponent had the approval for continuing a lagoon. Others have been dismantled. The PP has since the violations. The capacity was increased on representation of the PP undertaking to take remedial actions

¹ (1987) 1 SCC 395

² (2013) 4 SCC 575

³ (2018) 18 SCC 257

and such remedial actions have now been taken. The PP has placed on record the remedial action taken by way of reply submitted to the State PCB on 15.09.2021 in response to the show cause notice dated 03.09.2021. During the hearing, the PP has placed on record its version inter-alia stating as follows:

“xxxxxx.....xxx

6. Compliance on part of the Respondent No. 1, as recommended vide the Report dated 30.11.2021:

- a. *It is submitted that as the Respondent No. 1 has entirely complied with the UPPCB’s direction dated 12.04.2021, i.e., **(i) all the legacy accumulation has been consumed in the incineration process at the Unit; (ii) all the lagoons, apart from a single lagoon with seven (7) day storage capacity, have been dismantled;** and (iii) operated its 150 KLPD Unit at a reduced capacity of 120 KLPD. Further, the Respondent No. 1 has duly intimated the UPPCB in this respect vide letter dated 08.10.2021. As such, it is submitted that the Respondent No. 1 ought to be permitted to operate the Unit at its full 150 KLPD capacity.*
- b. *Further, the Respondent No. 1 has retained the services of NSI – Kanpur to assist it with disposing of the sludge in the lagoon and bio – compost yard. The report from the NSI – Kanpur is awaited in this respect*
- c. *As intimated on multiple prior occasions, the Respondent No. 1 has installed the flow meter at the outlet of the MEE condensate with totalizer.*
- d. *The Respondent No. 1 has removed the internal underground pipeline, which connected the CPU to an internal storage tank, which connected the CPU.*
- e. *The Respondent No. 1 has commenced with the process of removing the sludge from the drain near the NH – 58 highway.”*

Finding

12. We have considered the rival submissions. The joint Committee has given the status of compliance as on 20.09.2021. Though certain deficiencies are shown to be complied, the date of compliance is not mentioned. The unit has been found to be non-compliant with regard to

treating coloured effluents stored in the lagoons and also restricting the storage period for the spent wash. Further, non-compliance has been found in not installing flow meter and partial non-compliance in not removing flexible pipeline and desludging of the drain upto three kms and disposal of sludge in unscientific manner. Non-compliances with reference to directions of the State PCB dated 12.04.2021 have been found in not dismantling three out of four lagoons, storing effluents for more than seven days, not utilizing the effluents, as directed; not treating the entire effluent stored in the lagoon. The Committee has taken violation for 281 days.

13. As against the report of the Committee, stand of the PP is that violation is only for period from 08.08.2021 to 20.09.2021.

14. We are unable to accept the stand of the PP. The unit was found non-compliant earlier vide order dated 27.5.2019 in OA 823/2017. On 1.10.2019, CPCB found non-compliance again. The non-compliance was again found on 14.11.2019. Further, non-compliance for 108 days was recorded in inspection held on 1.1.2021. Thus, it cannot be held that the unit was compliant prior to 8.8.2021 when inspection was again conducted in pursuance of order of this Tribunal dated 23.2.2021. On account of non compliances, directions for restricting the production capacity and taking other remedial measures were issued. The unit has failed to develop requisite green belt and to achieve ZLD, as per EC/consent conditions.

15. To sum up non-compliances in chronological order are:

- i. During the joint visit of CPCB and UP State PCB on 26.11.2020, the unit was found to be violating the consent conditions and the drain condition was characterized having

low pH and high BOD/COD value showing contamination/pollution of local drain/Mansurpur drain.

- ii. During the visit of UP State PCB on 08.08.2021, the distillery was violating the ZLD condition and was allegedly discharging high organic load (pH 4.9, COD 28,700) effluent into Mansurpur drain through common channel (lying within the sugar mill premises) and Mansurpur drain near NH-58 showed pH 5.2, COD 18,400 indicating contamination of drain with distillery effluent thereby a serious threat to the water quality of River Kali (West).
- iii. During joint visit of the Committee on 20.09.2021, the untreated coloured untreated effluent was found disposed of on earthen land near lagoon/bio-compost area and also found non-complying with UPPCB direction dated 12.04.2021 regarding treatment of stored effluent and dismantling of lagoon, restriction of storage capacity. The underground pipelines near CPU (Condensate Policing Unit) were required to be removed to avoid any misuse.
- iv. During visit of joint Committee on 17.11.2021 (drain visit with reference to sugar mill/DSM inspection), the Mansurpur drain water quality showed pH 5.6 and BOD 843 mg/l indicating contamination of drain with industrial discharge. The lower values of pH are on account of molasses/spent wash bearing effluent.

16. It is thus clearly established that the PP has been violating the environmental norms which include violation of ZLD condition by discharging effluent into drain as well as disposing effluent on earthen land. Overflowing of lagoon was observed on 20 and 23 November, 2021.

Analysis of water during inspection has confirmed the violations. The PP has thus to be held accountable on polluter pays principle. The compensation assessed does not cover all the non-compliance, including failure to develop green belt. No deterrent element has been provoked for repeated violations. Compensation is not related to the financial capacity *inter-alia* in terms of *M.C. Mehta & Anr. V. Union of India*⁴, *Sterlite Industries (India) Ltd. V. Union of India*⁵ and *Goel Ganga Developers India Pvt. Ltd. v. UOI, supra*.

17. As shown by the objections of the applicant quoted earlier, the excise duty paid by the Project Proponent is more than Rs. 1500 crore per year on an average. In view of the same, the Turnover of the PP does not appear to be less than Rs.2500 crore per year. Having regard to repetitive violations of serious nature, we determine the liability of the Project Proponent @ 2% of its annual turnover i.e Rs. 50 crores. The amount may be deposited with the CPCB within two months. The same may be spent on restoration of the environment in the area including the recipient waterbodies - Mansurpur drain and the pond as per an action plan to be prepared jointly by CPCB, State PCB and District Magistrate, Muzzafarnagar, UP. Part of the amount may be spent in execution of District Environment Plan in the area. The plan may be executed within one year to be overseen by the said Committee. The joint Committee may also associate the Project Proponent and other stake holders (including educational institutions, legal service authority etc.) in the execution work, if found viable. The PP may also develop necessary green belt as per EC/consent conditions, to be overseen by the Divisional Forest Officer. As regards subsequent compliances claimed by PP, the joint Committee may

⁴ (1987) 1 SCC 395

⁵ (2013) 4 SCC 575

verify the same and if any violation is still continuing, the same may be remedied forthwith by the PP, failing which the State PCB may take coercive measures as per law. The State PCB needs to monitor compliance on a regular basis and renewal of consent may not be granted unless compliances are ensured. The consent conditions and subsequent directions issued by the PCB need to be in consonance with each other. The CPCB and State PCB may file a report about compliance status as on 30.04.2022 by 15.05.2022 before the R.G. of this Tribunal by email at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF. If any direction becomes necessary, the report may be placed before the Bench.

Subject to above, the application is disposed of. I.A. No. 155/2021 also stands disposed of.

A copy of this order be forwarded to CPCB, State PCB, District Magistrate and Divisional Forest Officer, Muzzafarnagar, UP by e-mail for compliance.

Adarsh Kumar Goel, CP

Sudhir Agarwal, JM

Dr. Nagin Nanda, EM

Prof. A. Senthil Vel, EM

Dr. Afroz Ahmad, EM

February 11, 2022
Execution Application No. 20/2021
In Original Application No. 206/2020
(I.A. No. 155/2021)
SN