

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA
ORIGINAL APPLICATION NO -19 OF 2019**

IN THE MATTER OF:

Kalinga Nagar Paribesh Surakhya Samiti - -- Applicant

Verses

Member Secretary, Odisha State Pollution Control Board, & others
--- Respondents

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DATE: 14/10/2024

SANKAR PRASAD PANI



ADVOCATE,

Plot No 2132/4814, NageswarTangi, Bhubaneswar 751002, sankarprasadpani@gmail.com

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**EASTERN ZONE BENCH, KOLKATA****ORIGINAL APPLICATION NO -19 OF 2019****IN THE MATTER OF:**

Kalinga Nagar Paribesh Surakhya Samiti - -- Applicant

Verses

Member Secretary, Odisha State Pollution Control Board,

& others

Respondents

SUPPLIMENTARY AFFIDAVIT

I, Aswini Kumar Dhal S/o Amulya Kumar Dhal aged about 39 years
At/PO/PS Jakhapura , Dist - Jajpur , Odisha , do hereby solemnly affirm and
declare as under:

1. That I am the President of the Applicant Organisation in the above mentioned Application. I am fully conversant with the facts and circumstances of the case and therefore competent to swear this Supplementary Affidavit.
2. It is pertinent to mention here that the respondent unit is continuously violating the environmental norms, and polluting the environment. Even after a number of show cause notices were issued by the SPCB the respondent unit is still violating the environmental norms, and not following the environmental safeguards.
3. That the applicant made representations on various occasions to the concerned authorities regarding the continuous pollution.

4. That the respondent unit was inspected by the Regional Office of the State Pollution Control Board , Kalinganagar on 26.09.2024 and during the inspection it was observed that the unit is discharging its runoff water outside the plant premises does not meet the prescribed standard of the Board. Relevant portion of the inspection report is reproduced as follows;

“From the analysis report it was revealed that runoff water discharged to outside the plant premises does not meet the prescribed standard of the Board w.r.t parameters Phenolic compound as phenol & cyanide at all the four culverts 1,2,3& 4 and parameters w.r.t. Iron as Fe does not meet the prescribed standard of the Board at culvert no 4. Appropriate decision may be taken subjected to above observations.”

Copy of the inspection report dated 26/09/2024 and test reports is annexed hereunto as **ANNEXURE-1**.

5. It is pertinent to mention here that the Regional Office of the State Pollution Control Board , Kalinganagar during inspection collected water samples from all the four culverts and found that the respondent unit is discharging water which carries phenol higher than the prescribed parameter. That the prescribed parameter for Phenolic Compound as Phenol is 1.0(mg/L) Max but during the inspection it was found that the respondent unit discharging the Phenolic Compound as Phenol in **culvert-1 is 1.481(mg/L), in culvert-2 is 1.526(mg/L), in culvert-3 is 1.367(mg/L), in culvert-4 is 1.458(mg/L)**, all the discharging parameter of Phenolic Compound as Phenol is higher than the prescribed parameter.
6. It note worthy to mention here that during inspection the Regional Office of the State Pollution Control Board , Kalinganagar inspection collected water samples from all the four culverts and found that the

respondent unit is discharging water which contains Cyanide(CN) higher than the prescribed parameter. That the **prescribed parameter for Cyanide(CN) is 0.2(mg/L) Max**, whereas the unit is **discharging water which contains Cyanide(CN) in culvert-1 is 0.315(mg/L) ,) in culvert-2 is 0.323 (mg/L),) in culvert-3 is 0.332 (mg/L),) in culvert-4 is 0.305(mg/L)**. In all the four culverts the unit is discharging the water which contains Cyanide(CN) higher than the prescribed parameter.

7. That during the inspection Regional Office of the State Pollution Control Board , Kalinganagar inspection collected water samples from all the four culverts and found that the in the **culvert No-4 the respondent unit is discharging water which contains Iron (Fe) higher than the prescribed parameter**. That the **prescribed parameter for Iron (Fe) is 3.0(mg/L)**, where as in Culvert No-4 it was found that the unit is discharging water which contains **Iron (Fe) is 3.141 (mg/L)**.
8. That after the inspection the Regional Office of the State Pollution Control Board , Kalinganagar issued a show cause notice to the **M/s. Visa Steel Ltd.**, on dated 09/10/2024 with the following non-compliances ;
 1. Run off water from the plant was getting discharged to outside through culvert 1, 2 & 3 and the characteristics of run off water is not confirming to the prescribed standard of the Board w. r. t. phenolic compounds and cyanide;
 2. The characteristics of discharge of effluent at Culvert-4 also contained phenolic compounds and Cyanide exceeding the prescribed of the board;

3. In spite of repeated directions issued to your unit and allowing sufficient time with an objective to prevent the problems of pollution, the quality of runoff water discharged to outside was found to be not meeting the prescribed standard of the Board there by confirming the allegations against your unit causing the problems of pollution . The issue assumes more significance because of presence of Phenolic compound and Cyanide in the discharge.

Copy of the showcase notice dated 09/10/2024 is annexed here unto as **ANNECXURE-2.**

9. That the respondent unit is a habitual violator of environment norms and respondent pollution control board is not taking any deterrent action so as to desist the unit from violating the norms. It is submitted that the local inhabitants are at the receiving end of the pollution caused by the private respondent, the local agricultural lands are also affected because of the untreated water release to their land and subsequently the river Brahmani which is life line of three districts are severely affected. Hence the applicant prays before the Hon'ble tribunal to direct the Pollution control Board for issue of closure order against the defaulting unit and prosecution against the Managing Director of the respondent unit under sec 19 of Environment protection Act 1986.

APPLICANT THROUGH

A handwritten signature in cursive script, appearing to read "S. Panu", written over a horizontal line.

ADVOCATE



**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
EASTERN ZONE BENCH, KOLKATA**

ORIGINAL APPLICATION NO -19 of 2019/EZ

IN THE MATTER OF:

Kalinga Nagar Paribesh Surakhya Samiti APPLICANT

VERSUS

**Member Secretary, Odisha State Pollution Control Board, & others
RESPONDENTS**

AFFIDAVIT

I, Aswini Kumar Dhal S/o Amulya Kumar Dhal aged about 41 years, At/PO/PS Jakhapura , Dist - Jajpur , Odisha do hereby solemnly affirm, and declare as under.

1. That I am the President of the Applicant Organisation in the above mentioned Application and authorized to sign this affidavit.
2. I am fully conversant with the facts and circumstances of the case and therefore competent to swear this affidavit
3. That I have read over the contents of the accompanying Affidavit and the same is true and correct and is drafted on my instruction.

Aswini Kumar Dhal

DEPONENT
President
Kalinganagar Paribesh
Surakhya Samiti

VERIFICATION

Verified on this 14 day of Oct 2024 at Jajpur Road that the contents of the above affidavit are true and correct. No part of it is false and nothing material has been concealed there from.

Identified By 14/10/2024
Advocate

Aswini Kumar Dhal
DEPONENT

President
Kalinganagar Paribesh
Surakhya Samiti

The above names Deponent / Executan
being identified by
Advocate appears before me on Dt. 14/10/24
at about 10.05 AM and on oath
states that the above facts are true to
the best of his/ her knowledge and belief

L. KUANR NOTARY PUBLIC, JAJPUR ROAD





INSPECTION REPORT OF M/S VISA STEEL LTD, KALINGANAGAR INDUSTRIAL COMPLEX, JAJPUR.

Name of the Industry Visa Steel Ltd, Kalinga Nagar Industrial Complex, Jajpur.

Date of Inspection 26.09.2024

Inspecting Officers Er M M Sahoo, DEE
Sri H S Sahu, AES

Several complaints were received by this office from Head office regarding continuous discharge of untreated waste water by M/s Visa Steel Ltd. In this connection the industry was inspected to verify the genuineness of the complaint. Sri Subash Chandra Das, Divisional Manager Environment of the industry were present during inspection.

Consent to operate was granted to the unit vide Head Office letter no 4419/IND-I-CON-5008 Dtd 22.03.2023 for following product which is valid up to 31.03.2025.

SL No	Product	Quantity
1	Captive Power Plant	75 MW(WHRB 50 MW + CFBC 25 MW)
2	Ferro Chrome Plant(FAP Unit-1 & 2)	5 X 16.5 MVA (150000 TPA)
3	Recovered Ferro Chrome (Metal Recovery Plant -2 of capacity 30 TPH)	27 TPD
4	Recoverd Ferro Chrome (Harsco Metal Recovery Plant of capacity 40 TPH)	20 TPD

OBSERVATIONS W.R.T PUBLIC COMPLAINT REGARDING DISCAHRGE OF WASTE WATER

The unit was inspected on 26.09.2024 based on several complaints received through e-mail regarding continuous discharge of untreated waste water by M/s Visa Steel Ltd. It was observed that run off water from the plant was discharging to outside through culvert-1, Culvert-2, Culvert-3. The samples were collected from all the four culverts and it is revealed from the analysis result that parameters w.r.t Phenol & cyanide does not meet the prescribed standard of the Board. The analysis results are presented below.

WATER ANALYSIS:

Water samples were collected on 26.09.2024 and the analysis report is presented below.

Sl No	Sources of Sampling/Location	Parameters						
		pH	TSS (mg/l)	Cr ⁺⁶ (mg/l)	Iron (Fe) (mg/l)	O & G (mg/l)	Phenolic Compounds As phenol (mg/l)	Cyanide (as CN) (mg/l)
1	Drain Discharge of M/s Visa Steel Limited leading to outside near culvert 1.	7.1	26	0.046	0.020	1.2	1.481	0.315
2	Drain Discharge of M/s Visa Steel Limited leading to outside near culvert 2.	7.2	12	0.022	2.734	0.8	1.526	0.323

3	Drain Discharge of M/s Visa Steel Limited leading to outside near culvert 3.	7.3	14	0.012	0.189	1.4	1.367	0.332
4	Water sample collected from culvert no 4	7.1	17	0.043	3.141	1.8	1.458	0.305
	Prescribed standard at outlet (Inland surface)	5.5-9.0	100.0	0.1	1.0	0.2	1.0	0.2

REMARKS

From the analysis report it was revealed that runoff water discharged to outside the plant premises does not meet the prescribed standard of the Board w.r.t parameters Phenolic compound as phenol & cyanide at all the four culverts 1,2,3 & 4 and parameters w.r.t iron as Fe does not meet the prescribed standard of the Board at culvert no 4. Appropriate decision may be taken subjected to above observations.

Sri H S Sahu
08/10/24
Sri H S Sahu
Asst Env Scientist

M. M Sahoo
08/10/24
Er M M Sahoo
Dy Env Engineer



FAX : 2562822/2560955
 TEL : 2564033/2563294
 EPABX : 2561909/2562847
 E-mail : paribesh1@ospboard.org
 Website : www.ospboard.org

STATE POLLUTION CONTROL BOARD, ODISHA

[DEPARTMENT OF FOREST, ENVIRONMENT & CLIMATE CHANGE, GOVERNMENT OF ODISHA]

Paribesh Bhawan, A/118, Nilakanthanagar, Unit-VIII,

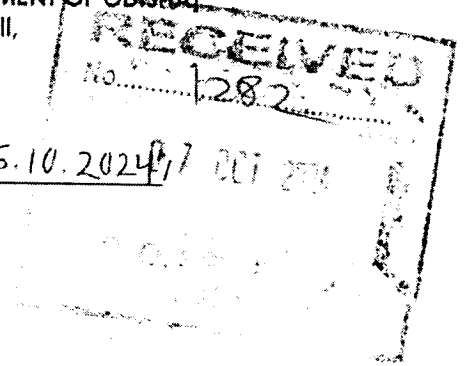
Bhubaneswar - 751 012

(CENTRAL LABORATORY)

No. 15843 /

VI-SC (LEM) Misc 38/2024-25

Dt. 05.10.2024



To

The Regional Officer,
 State Pollution Control Board, Odisha,
 Kalinga Nagar

Sub: Test Reports of wastewater samples of M/S VISA Steel Ltd. Kalinga Nagar Industrial Complex, Jajpur.

Ref: Your Letter No. 3398/Lab.07 dated 26.09.2024

Sir,

With reference to the above, please find enclosed herewith the test reports of wastewater samples, submitted on dt.27.09.2024 of M/S VISA Steel Ltd. Kalinga Nagar Industrial Complex, Jajpur.

Encl : (i) OS/747/10/2024 (For NABL Scope Parameter)
 (ii) OS/748/10/2024 (For NABL Non-Scope Parameter)

Yours faithfully,

(Signature)
 5/10/24
 Chief Env. Scientist (Lab.)



CENTRAL LABORATORY
STATE POLLUTION CONTROL BOARD, ODISHA

Plot No. B-59/2 & 59/3, Chandaka Industrial Estate, Patia,
Bhubaneswar - 751 024

E-mail: centrallab@ospcboard.org

OSPCB/CNL/F0718



TEST REPORT

Page 1 of 1

1. ULR No. : TC127402400000786F
 2 (i) Report No. : OS/747/10/2024
 3 (i) Date of issue : 05.10.2024
 2(ii) Amendment No : ---
 3(ii) Amendment Date : ---
 4. Sample Submitted By : Sri. J.K.Sahoo, Lab Attendant.
 (Name and address) Regional Office, SPCB, Kalinga Nagar, Odisha
 5. Reference Letter No. : 3398/Lab.07 dt. 26.09.2024
 6. Date of sample receipt : 27.09.2024
 7. Sample Description :
 (i) Discipline : Chemical Testing (Biological Testing, Chemical testing)
 (ii) Group : Pollution and Environment (Water/ Pollution and Environment / Atmospheric Pollution/ Soil and Hazardous Waste)
 (iii) Sub Group : Waste water (Surface water/ Ground water/ Drinking water/ Wastewater / Effluent/ Ambient Air / Stack/ Soil and Hazardous Waste)
 8. Analysis Starting Date-Analysis Completion Date : 27.09.2024 – 04.10.2024
 9. If uncertainty is desired by Customer : No
 10. Analysis Results :

(Attach separate sheet if necessary)

Sl. No.	Parameter, Unit	Standards/Regulatory Limits *	Test Method	Water Samples Collected from M/S VISA Steel Ltd.			
				Others/Sep - 24/WW/1652	Others/Sep - 24/WW/1653	Others/Sep - 24/WW/1654	Others/Sep - 24/WW/1655
				Drain discharge leading to outside near culvert No.1	Drain discharge leading to outside near culvert No.2	Drain discharge leading to outside near culvert No.3	Water sample collected from culvert No.4
				Results			
1.	pH	5.5-9.0	4500-H ⁺ -B, APHA, 23 rd Edn., 2017	7.1	7.2	7.3	7.1
2.	Total Suspended Solids (TSS), mg/L	100,max	2540 D, APHA, 23 rd Edn., 2017	26.0	12.0	14.0	17.0
3.	Hexavalent Chromium (Cr(VI)), mg/L	0.1,max	3500-Cr-B APHA, 23 rd Edn., 2017	0.046	0.022	0.012	0.043
4.	Iron (Fe), mg/L	3.0	3500 Fe-B, APHA, 23 rd Edn., 2017	0.020	2.734	0.189	3.141

* General standards for discharge of Environmental Pollutants, Schedule VI, G.S.R. 422(E) dated 19.05.1993
 Applicable for Sl. No. (Others/Sep - 24/WW/1652 to Others/Sep - 24/WW/1655)

11. Deviation from Test Method, if any :
 12. If Sampling Conducted by the Central Laboratory, Yes/ No. - No
 If Yes,

- (a) Date of Sampling :
 (b) Method Used* :
 (c) Name of Sampler with Designation :

-----End of Test Report-----

Usharani Patnaik
 5.10.2024
 Authorised Signatory
 (Water/wastewater)

(Dr.(Mrs) Usharani Patnaik, Addl. Chief Env. Scientist)

Niranjan Mallick
 5/10/24
 Board Analyst

(Mr. Niranjan Mallick, Chief Env. Scientist)

Note :

- (i) The results stated above relate only to the items tested.
 (ii) This report shall not be reproduced in full or in part without written approval from the in-charge of the Central Laboratory.
 (iii) The laboratory is not responsible for the authenticity of photocopied Test Reports.
 (iv) The Test Item will not be retained for more than 15 days from the date of issue of Test Report except in case as required by applicable Regulation.

Head Office: State Pollution Control Board, Odisha, Paribesh Bhawan, A/118, Nilakanthnagar, Unit-VIII, Bhubaneswar -751 012,
 FAX: 2562822/2560955, TEL: 2564033/2563294 EPABX: 2561909/2562847, E-mail: paribesh1@ospcboard.org Website: www.ospcboard.org

OSPCB/CNL/F0718



**CENTRAL LABORATORY
STATE POLLUTION CONTROL BOARD, ODISHA**

Plot No. B-59/2 & 59/3, Chandaka Industrial Estate, Patia,
Bhubaneswar - 751 024

E-mail: centrallab@ospcbboard.org

TEST REPORT

Page 1 of 1

1. ULR No. : -----
- 2 (i) Report No. : OS/748/10/2024
- 3 (i) Date of issue : 05.10.2024
4. Sample Submitted By : Sri. J.K.Sahoo, Lab Attendant.
(Name and address) Regional Office, SPCB, Kalinga Nagar, Odisha
5. Reference Letter No. : 3398/Lab.07 dt. 26.09.2024
6. Date of sample receipt : 27.09.2024
7. Sample Description :
- (i) Discipline : Chemical Testing
(Biological Testing.
Chemical testing)
- (ii) Group : Pollution and Environment
(Water/ Pollution and Environment
/ Atmospheric Pollution/ Soil and
Hazardous Waste)
- (iii) Sub Group : Waste water
(Surface water/ Ground water/ Drinking water/
Wastewater / Effluent/ Ambient Air / Stack/ Soil
and Hazardous Waste)
8. Analysis Starting Date-Analysis Completion Date : 27.09.2024 – 04.10.2024
9. If uncertainty is desired by Customer : No
10. Analysis Results :
(Attach separate sheet if necessary)

Sl. No.	Parameter, Unit	Standards/Regulatory Limits *	Test Method	Water Samples Collected from M/S VISA Steel Ltd.			
				Others/Sep - 24/WW/1652	Others/Sep - 24/WW/1653	Others/Sep - 24/WW/1654	Others/Sep - 24/WW/1655
				Drain discharge leading to outside near culvert No.1	Drain discharge leading to outside near culvert No.2	Drain discharge leading to outside near culvert No.3	Water sample collected from culvert No 4
Results							
1.	Oil & Grease, mg//L	10,max	5520 B, APHA, 23 rd Edn., 2017	1.2	0.8	1.4	1.8
2.	Phenolic Compound as Phenol(mg/L)	1.0,max	5530 B followed by C or D, APHA, 23 rd Edn., 2017	1.481	1.526	1.367	1.458
3.	Cyanide(CN ⁻) mg/L	0.2,max	4500- CN ⁻ -C & 4500- CN ⁻ -F, APHA, 23 rd Edn., 2017	0.315	0.323	0.332	0.305

* General standards for discharge of Environmental Pollutants, Schedule VI , G.S.R. 422(E) dated 19.05.1993
Applicable for Sl. No. (Others/Sep - 24/WW/1652 to Others/Sep - 24/WW/1655)

11. Deviation from Test Method , if any :
12. If Sampling Conducted by the Central Laboratory, Yes/ No. - No
If Yes,

(a) Date of Sampling :
(c) Name of Sampler with Designation :

(b) Method Used* :

-----End of Test Report-----

Leatna
5.10.2024
Authorised Signatory
(Water/wastewater)

(Dr (Mrs) Usharani Patnaik, Addl. Chief Env. Scientist)

M. Niranjan Mallick
5/10/24
Board Analyst
(Mr. Niranjan Mallick, Chief Env. Scientist)

Note :

- (i) The results stated above relate only to the items tested.
(ii) This report shall not be reproduced in full or in part without written approval from the in-charge of the Central Laboratory.
(iii) The laboratory is not responsible for the authenticity of photocopied Test Reports.
(iv) The Test Item will not be retained for more than 15 days from the date of issue of Test Report except in case as required by applicable Regulation.
- Head Office: State Pollution Control Board, Odisha, Paribesh Bhawan, A/118, Nilakanthnagar, Unit-VIII, Bhubaneswar -751 012,
FAX 2562822/2560955, TEL: 2564033/2563294 EPABX: 2561909/2562847, E-mail: paribesh1@ospcbboard.org Website: www.ospcbboard.org



EPABX : 2561909/2562847
 Email : paribesh1@ospcboard.org
 Website : www.ospcboard.org

STATE POLLUTION CONTROL BOARD, ODISHA

(Forest, Environment & Climate Change Department, Govt. of Odisha)

Paribesh Bhawan, A/118, Nilakanthanagar, Unit-VIII

Bhubaneswar - 751012

No. 16338 IND/I/CON/ 5008

Date 09.10.2024

By Speed Post & E-Mail

vsl@visasteel.com

SHOW CAUSE NOTICE U/S. 21 & 31A OF THE AIR (PCP) ACT, 1981 & U/S. 25 & 33A OF WATER (PCP) ACT, 1974 AND AMENDMENTS

THEREUNDER

WHEREAS, you are operating an integrated steel plant for operation of Captive power plant (CPP): 75MW (50 MW WHRB+25 MW CFBC), Ferro Chrome plant (FAP Unit-1 &2): 5x16.5 MVA (1,50,000 TPA), Recovered ferro chrome (Metal recovery plant-2 of capacity 30 TPH) - 27 TPD, Recovered Ferro chrome (Harsco metal recovery plant 40 TPH) - 20T PD in the name & style of **M/s. Visa Steel Ltd.** At: Kalinganagar Industrial Complex. At/PO- Jakhapura. Dist- Jajpur with consent of the Board valid up to 31.03.2025, subject to strict compliance to consent conditions;

AND WHEREAS, you were directed under section 31A of the Air (PCP) Act, 1981 & U/S. 33A of Water (PCP) Act, 1974 vide Board's letter no. 12540 dt. 08.08.2024 to take appropriate corrective steps to remove certain lapses which were observed during inspection of your unit conducted by the officials of Regional Office, Kalinganagar on 24.07.2024 and to furnish action taken report;

AND WHEREAS, you have furnished your compliance report vide your letter dt. 22.08.2024 indicating the corrective steps taken by you;

AND WHEREAS, you were directed under section 31A of the Air (PCP) Act, 1981 & U/S. 33A of Water (PCP) Act, 1974 vide letter no. 13170 dt. 20.08.2024 to furnish action taken report along with time line within 15 days for completion of certain jobs against the lapses observed during inspection of your unit by the Board officials on 06.08.2024, failing which appropriate action shall be taken against your industry without giving any further opportunity;

AND WHEREAS, you have submitted your compliance report vide your letter dated 04.09.2024 indicating the corrective steps taken by you with time line ;

AND WHEREAS, several complaints have been received by the Board alleging continuous discharge of untreated waste water from your factory premises;

AND WHEREAS, your unit was again inspected by the officials of the Regional Office, SPC Board, Kalinganagar on 26.09.2024 to verify the fact (copy of IR along with analysis report is enclosed). From the inspection report following non-compliances were observed;

1. Run off water from the plant was getting discharged to outside through culvert 1, 2 & 3 and the characteristics of run off water is not confirming to the prescribed standard of the Board w. r. t. phenolic compounds and cyanide;
2. The characteristics of discharge of effluent at Culvert-4 also contained phenolic compounds and Cyanide exceeding the prescribed of the board;
3. In spite of repeated directions issued to your unit and allowing sufficient time with an objective to prevent the problems of pollution, the quality of runoff water discharged to outside was found to be not meeting the prescribed standard of the Board thereby confirming the allegations against your unit causing the problems of pollution . The issue assumes more significance because of presence of Phenolic compound and Cyanide in the discharge;

AND WHEREAS, above observations amount to violations to the Consent to operate conditions, directions issued from time to time and provisions of section 25/26 of the Water (PCP) Act, 1974 and Section 21 of the Air (PCP) Act, 1981 and rules framed there under and liable for appropriate action ;

NOW, THEREFORE, you are directed to show cause under Section 21 & 31A of the Air (PCP) Act, 1981 and Section 25 & 33A of the Water (PCP) Act, 1974 and as amended thereafter and Rules framed there under within 15 (fifteen) days from the date of issue of this notice as to why consent to operate granted up to 31.03.2025 in favour of your unit shall not be revoked and appropriate action including direction of closure shall not be issued. In case your explanation is not received within the stipulated time period or the explanation is found to be not satisfactory, appropriate action as deemed proper shall be taken against your industry

Encl : As above


MEMBER SECRETARY

To

**The Director,
M/s. Visa Steel Ltd.,
At- Kalinga Nagar Industrial Complex,
Jakhapura, Jajpur - 755026**

Memo No. 16339 /Dt. 09.10.2024 (By Speed Post/E-mail)

Copy forwarded to the Regional Officer, State Pollution Control Board, **Kalinga Nagar** for information and necessary action.


CHIEF ENV. ENGINEER





Sankar Pani <sankarprasadpani@gmail.com>

Supplementary affidavit on behalf of applicant in OA 19 of 2019 NGT EZ.

1 message

Sankar Pani <sankarprasadpani@gmail.com>

Mon, Oct 21, 2024 at 8:17 PM

To: pbanerjeebihani@gmail.com, Office Vsalegal <office@vsalegal.in>, Surendra Kumar <surendra_kr15@rediffmail.com>, Anamika Pandey <legumjure@gmail.com>

Dear Sir/Madam, please find the attachment.

--

Sankar Prasad Pani, Environment Lawyer
National Green Tribunal Kolkata & Orissa Highcourt
Res-Plot No 2132/4814(B), Nageswar Tangi,
Bhubaneswar, 751002
Cell- 9437279278
Skype- sankar.pani

**SUPPLIMENTARY AFFIDAVIT 14-10-2024.pdf**

886K