

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**NEW DELHI**

OA NO. 269/2024

In the matter of

SANAVVAR

Applicant

versus

State of UP & Ors

Respondents

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New Delhi
16.12.2024

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**ADDITIONAL REPORT ON BEHALF OF AMICUS CURIE IN
COMPLIANCE OF ORDER DATED 21.11.2024**

1. That this Hon'ble Tribunal has passed the order dated 21.11.2024, relevant portion of which is reproduced below:

"1. Learned Amicus Curiae has submitted status report in respect of the concerned industries of the proponents and in many of these proponents adverse observations have been made due to violations found in the functioning of their units.

x

x

4. Learned Amicus Curiae may also submit additional report in respect of the industries which are not covered in the report already filed."

2. That in compliance of order dated 21.11.2024, the undersigned visited the Units on 07.12.2024.
3. That the officers namely Ms. Sandhya Sharma, JE and Mr Diwakar, JRF from the UPPCB assisted the undersigned during the visit. The status report with respect to the industries visited by undersigned on 07.12.2024 is as follows:

M/s Shri Jee Reclaiming Mills Pvt. Ltd.

4. That the said Unit is Tyre Pyrolysis Unit and was found closed and without operation. Unit was stated to be without electricity connection and used to run on DG sets. The photographs from the site shows spread of black ash, tyre waste and black oil all around the Unit. Three boilers stated to be of capacity of 10, 8 and 10 TPD by representative/Guard of the unit, were found lying non-functional. The tin shade of the Unit was found shattered and falling from roof. Further there was foul smell inside the Unit. And there was no ETP found in the premises.











Ash all around has potential for spread of fugitive dust emissions 




Shattered roof shows heavy emissions and non-maintenance in the past.







Abandoning of site is causing damage of environment with oil mixed with water  lying everywhere.

M/s Dev Enterprises

5. The Unit is a Tyre Pyrolysis Unit and was found closed. It was opened by caretaker after persuasion by the UPPCB Official. Tyre scrap and waste was found lying at Unit. One borewell was also found.







←
borewell

M/s Shri Bankey Bihari Enterprises

6. The Unit is Tyre Pyrolysis Unit and was found in operation with labour working and loading the Boilers and Trucks unloading the waste Tyres. Two Boilers/reactors of 10 TPD each were found in operation. PLC was found installed. On inquiry it was revealed that there was no fix time for running of reactors. ETP was found without flowmeter and no log book maintained regarding effluent data. No stack monitoring sensor was found. No log book found maintained regarding total amount of production and waste generation. Labourers were found loading the Reactor but were without safety gear and masks. Labourers were covered with black ash all over the body.














Surface below the Oil Tanks found earth mixed with Oil lying for a long time. 













Ash/black carbon lying all across the unit. ↑ ↓







The larger area of the Unit was having tyre scrape.







Labourers working without safety equipment, mask, headgear etc.







Liquid waste water was found at opposite side of the
M/s Shri Bankey Bihari Enterprises





M/s ASV Reclaiming LLP

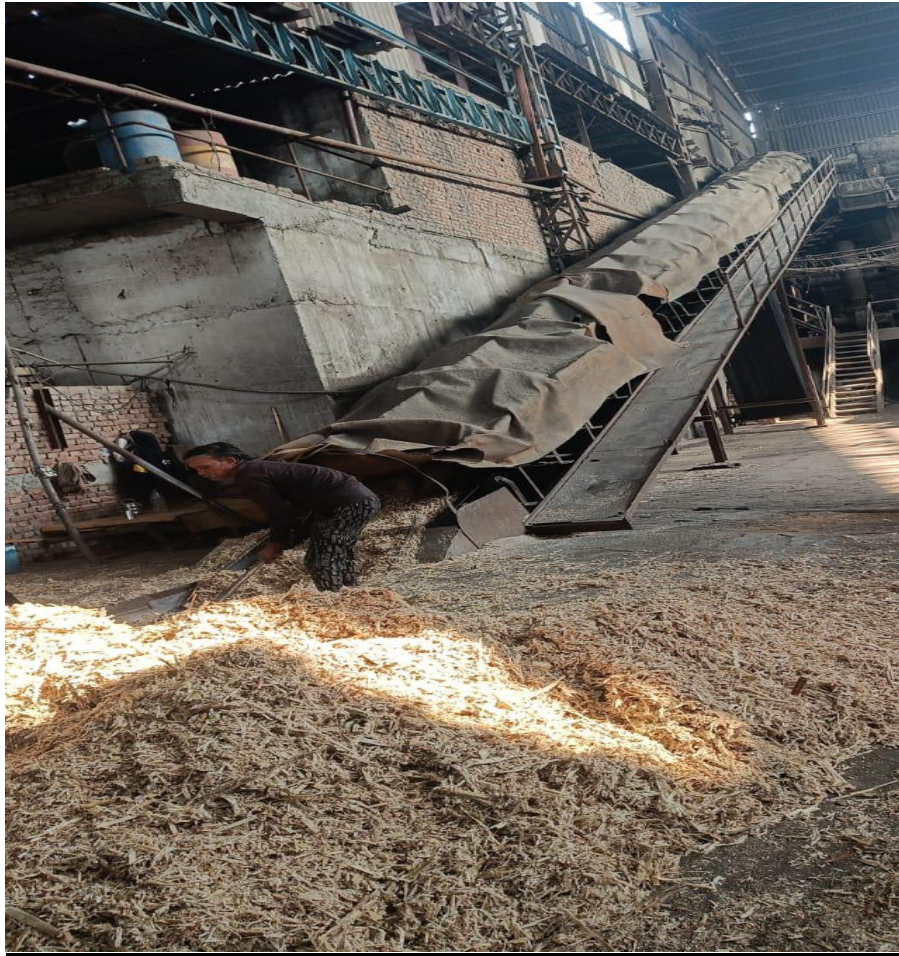
The Unit is Tyre Pyrolysis Unit found lying closed and locked from inside which was not opened.



M/s Shakti Kraft & Tissues

7. Unit was previously visited on 15.11.2024 at evening. Unit was visited on 07.12.2024 also during daytime. Unit was found in operation during the visit. 1 Boiler of 150 TPD was found in operation with only SPM monitoring at stack. The SPM level was found 55 mg/m³. Unit was stated to be ZLD unit with sedicell of 90 KLD. The Unit uses bagass as fuel for the boiler. The boiler was stated to be fitted with wet scrubber and multicyclone filter.













The Unit is having Biomass Gasifier



The Unit is establishing a coal based Boiler adjacent to the existing unit.

M/s Al-Noor Exports

8. The Unit is meat processing industry and was found lying closed.













9. In open land opposite to M/s Al-Noor Exports, Ash in slurry form and other waste was found dumped





Hanumat Paper Mill

10. The Unit was found in operation. Unit was stated to be ZLD and bio mass fuel based. The Unit is having Boiler. The boiler has wet scrubber and multicyclone filter technology, as stated by factory's representative. The Bag filter system is stated to be in pipeline and purchase Order placed for it.







The water was continuously leaking from the wet scrubber system and being collected on the ground.






↑ Ash mixed with earth was lying across Unit and in huge quantity at one place.





Solid Waste mixed with ash was also found in huge quantity in the Unit. 





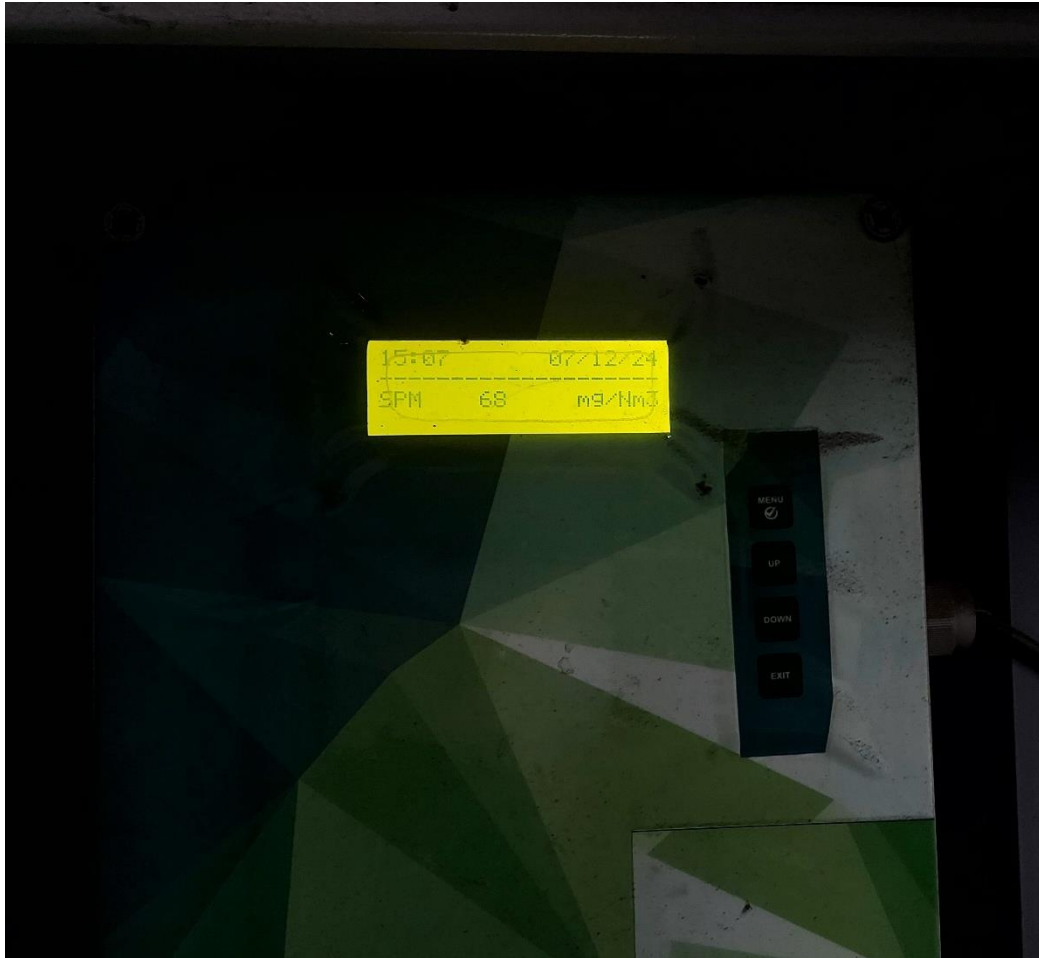
Fly ash was lying all around the Boiler suggesting improper disposal.








As long as the undersigned was there at the Unit, the chimney was continuously emitting the black smoke. The stack monitoring has only SPM indicator.



The reading showed SPM as 68 mg/Nm³.

The Unit was having ETP with flowmeter installed but the Tank was having heavy coagulated water as if stagnated for long period of time. 







The water was very low in the ETP tank. Condition of tank was not suggesting proper functioning.

Water in waste water in drain going up to ETP system was found static.





Genus Paper Mill

11. The Unit is not a ZLD Unit. It has ETP of 10000 KLD as stated by representative. Have flowmeter installed and releases the final discharge in the nearby Dhandera drain.












ETP outlet reading 



Stated to be Inlet Flow meter



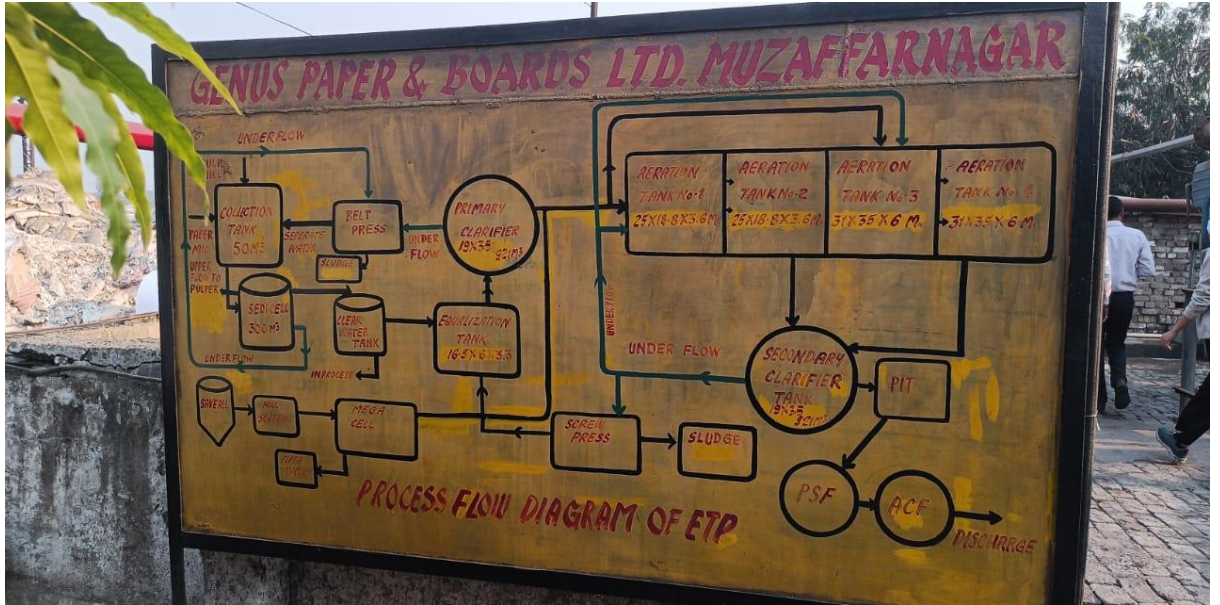


Stated to be Back Water Meter









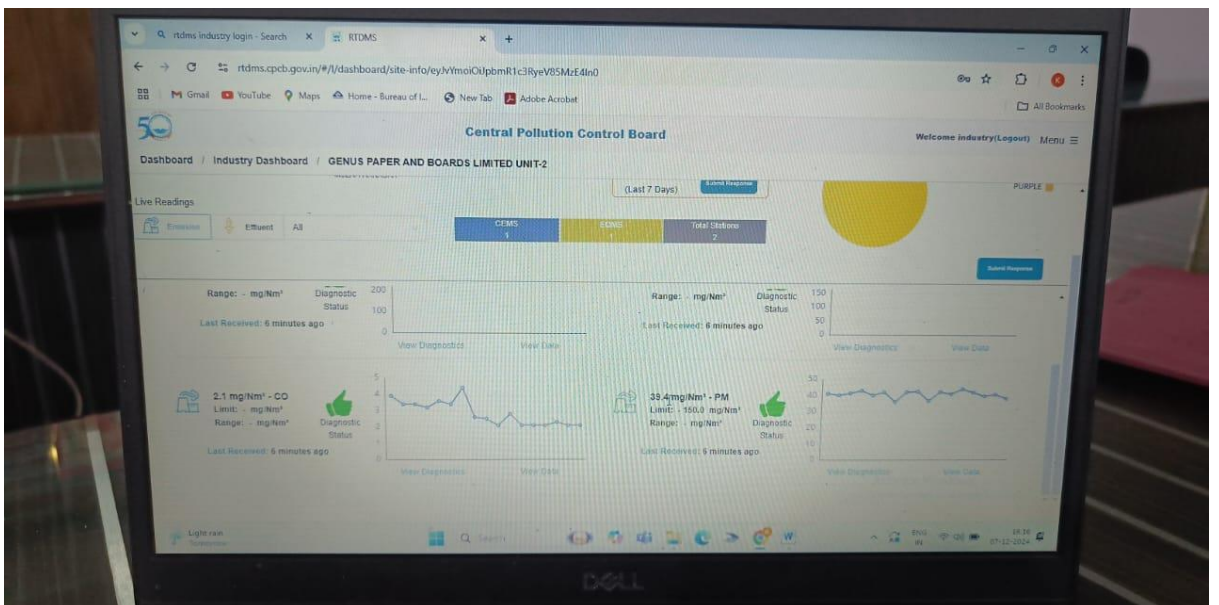
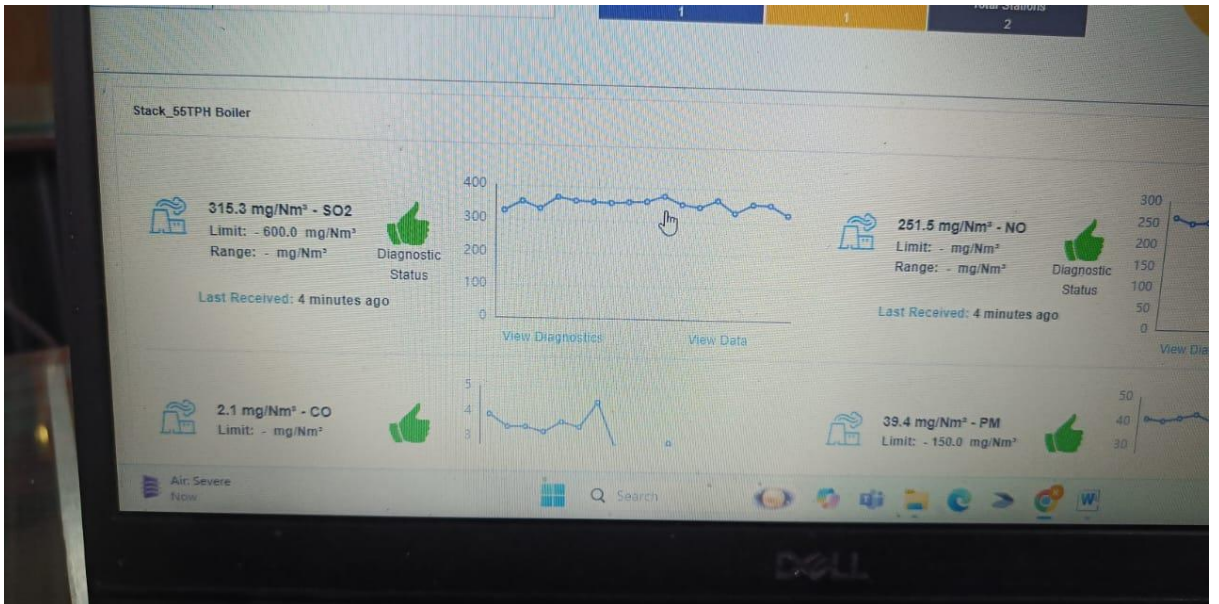


Sludge stated to be sold to Sri Krishna Paper Mill.



The Unit is having two Boiler. One of 55 TPH capacity which was found running. Other is old Boiler of 34 TPH stated to be lying unused for 8 years but is in the process of commissioning again. The second Boiler is at present stated to be on trial run by firing it many times in a day.

The fuel used for the Boiler is rice husk and coal.



As regards the disposal of fly ash, it was found lying all around the Boiler area in very large quantity and there was heaps of fly ash stated to be around 250 Tonnes.











M/s Disha Industries Pvt. Ltd.

The Unit is paper mill located on Jolly Road, Muzaffar Nagar. The Unit was found in operation.

One stack and Boiler being dismantled.







The old stack having black ash all around it in heaps.



The new Boiler was found running. It is being run on RDF as fuel. However, the RDF was not found to be good quality RDF and was rather appearing to be mixed with inert and soil and other waste. The moisture and Bad foul were observed therein.







The RDF was lying all around the Unit. And even waste water found near boiler of the Unit.



There was no monitoring of SO_x and NO_x and only SPM was monitored at the Stack.



It is most respectfully submitted that present report is filed giving factual scenario found during visits of the units visited. A note will be filed with suggestions separately on the basis of material on record including all reports, reply etc.



Rahul Khurana Adv
Amicus Curie

New Delhi
16.12.2024