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BEFORE HON'BLE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI

OA No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

Applicant

Versus

State of Haryana & Ors.

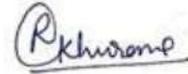
Respondent(s)

INDEX

Sr. No.	Particular	Page No.
1.	ACTION PLAN AND PROGRESS ACHIEVED IN COMPLIANCE OF ORDER DATED 08.01.2025	1-12

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PRINCIPAL BENCH**

**Original Application No. 622/ 2024**

**In the matter of:-**

**Varun Gulati**

**Applicant**

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**State of Haryana & Ors.**

**Respondent(s)**

**ACTION PLAN AND PROGRESS ACHIEVED IN  
COMPLIANCE OF ORDER DATED 08.01.2025**

**Most Respectfully Showeth:**

1. The Hon'ble Green Tribunal, vide orders date 08.01.2025, inter alia passed the following orders:-

*"7. State of Haryana through Secretary (Environment) shall file time bound action plan in consultation with HSIIDC after studying Recommendations of the Joint Committee (under para 10, page 183-189). However, we clarify at this stage, that we have not expressed our consent to the recommendations except that compliance as mandated under Water Act has to be ensured. Haryana PCB shall file action taken as per Water Act against erring industries and CETPs".*

Further the Hon'ble Green Tribunal after perusing the report of the JointCommittee, given the observations as per orders dated 08.01.2025 reproducing as under:-

*“4. On perusal of the Report of the Joint Committee, we also found following deficiencies and violations;*

*(i) Out of 136 effluent generating industries, 113 industries monitored indicates that, Primary Effluent Treatment Plants (PETPs) are not operated properly and there are apprehensions on dilution of effluents.*

*(ii) Effluents from Member Units of CETPs are by-passing effluents into storm water systems.*

*(iii) Industries do not have Permissions for ground water extraction.*

*(iv) Haryana State Industrial Development Corporation (HSIIDC) has made dual system for conveyance of storm water to the two CETPs as well as to Drain No 6 which should not be acceptable in terms of mixing storm water with industrial effluents.*

*(v) Other deficiencies observed relates to not installing flow meters at fresh water source, PETP inlets and outlets and not handling of sludge generated by PETPs.*

*(vi) Both the CETPs (16 and 10 MLD) are underutilised and are non-compliant. Further, CETP of 16 MLD is being operated without CTO.”*

2. That the Barhi Industrial Area, spanning over an area of 1255 acres, is divided into three phases i.e. Phase-I (275.25 acres), Phase-II (332.95 acres) and Phase-III (646.86 acres). The industrial area comprises of 253 nos. of industries under Red, Orange and Green category as per CPCB categorization of industries, of different sectors mainly textile, food processing, electroplating & chemicals, etc. Out of these 253 units, 136 nos. Units are effluent generating units and such effluent generating units consist 74 nos. units which are engaged in dyeing/washing of yarn/printing of fabric/washing of garments. Presently, industrial area has two functional CETPs of capacity 16 MLD & 10 MLD installed in Phase-III for treatment of effluent mixed with sewage generated in all three phases. The Barhi industrial area has been established and maintained by Haryana State Industrial and Infrastructure Development Corporation (HSIIDC) including the 16 MLD and 10MLD CETPs meant for treatment of mixed effluent generated from the industries in the Barhi industrial area. The Haryana State Pollution Control Board vide orders dated 18.01.2019, prescribed the inlet water quality standards for CETP to be achieved by individuals constituent industry/unit discharging its effluent in the CETP (mg/l except pH). The such prescribed standards for industrial area HSIIDC Barhi are as under:-

pH	TDS/FDS	TSS	BOD	COD	Oil & Grease
6.0-9.0	2100	1500	500	1500	15

The trade effluent generating industries in the Barhi industrial area have installed the Primary Effluent Treatment Plant (PETP) to achieve the above standards before discharge into CETP.

3. That the Joint Committee has inspected 74 nos. of textile units and 39 nos. of other industrial units. Out of 74 nos. textile industries, 69 nos. textile industries found non-complying in the respect of stipulated discharge norms (24 nos.), dilution (43 nos.), bypassing of untreated effluent (01 no.) and non-operational PETP (01 no.). Out of 39 nos. other industries, 25 nos. industries found non-complying in the respect of stipulated discharge norms (06 nos.), dilution (10 nos.), bypassing of untreated effluent (01 no.) and non-operational PETP (08 no.).
4. That, the Joint Committee has also collected the inlet and outlet sample of 16 MLD & 10 MLD CETPs. As per the analysis report the 10 MLD CETP discharge found non complying in respect of BOD i.e. 33 mg/l against the discharge norms of 30 mg/l and in respect of TDS i.e. 2208 mg/l against the discharge norms of 2100 mg/l. The discharge was within prescribed norms for heavy metal and other monitoring parameters as per the

laboratory report. Further, as per the analysis report the 16 MLD CETP discharge found non complying in respect of BOD i.e. 94 mg/l against the discharge norms of 30 mg/l. However, the discharge was within prescribed norms for heavy metal and other monitoring parameters as per the laboratory report.

5. That Steps taken and proposed to be taken by HSIIDC (Action Plan) is mentioned in its objections dated 28.05.2025. HSIIDC separately submitted Action Plan vide letter dated 28.05.2025. Action Taken Report w.r.t. deficiencies and violations observed in Joint Committee Report and submissions/objections of HSIIDC, is submitted as under :-

(i) The Haryana State Pollution Control Board (HSPCB) has closed and sealed 06 nos. industries named as under :-

- M/s Rexolene India Manufacturing Pvt. Ltd. P.N. 473E, Phase-II, HSIIDC, Industrial Estate Barhi, Sonapat, Haryana.
- M/s Ansh Beverages Pvt. Ltd. Plot-39, Ph-1, HSIIDC, Barhi, Sonipat, Haryana
- M/s Madni Textile Mills Pvt Ltd Plot No 387-388, Phase 1 HSIIDC Barhi Sonapat
- M/s Shree Krishna Buttons Pvt. Ltd. Plot no. 29, HSIIDC, Phase-I, Barhi, Sonipat

- M/s Savi Texfab Pvt. Ltd. Plot no 544 ph-2 HSIIDC Barhi Sonipat
- M/s Jai Mata Plastic Plot No 453, HSIIDC Ph-I, Barhi Sonipat, Haryana

Apart from the above closure action is under process against another 02 nos. non complying units. As per the policy of the Haryana State Pollution Control Board, 35 nos. of units wherein discharge standards were found in exceedance of prescribed inlet standards for CETP, opted for re-sampling after depositing the performance security alongwith satisfactory feasibility report of PETP. The other units wherein dilution was reported in the discharge, have also requested for re verification of their PETPs as they have requested the same alongwith the performance security and feasibility report of PETP from the technical institutes such as Delhi Technological University, Shahbad Daultpur, Main Bawana Road, Delhi-110042, Punjab Engineering College, Sector-12, Chandigarh, Maharshi Dayanand University, Rohtak, DCRUST, Murthal, Sonipat, J.C. Bose University of Science & Technology, YMCA, Sector-6, Mathura Road, Faridabad, Haryana-121006 etc.

(ii) The HSIIDC had laid down the storm water pipeline in the industrial area to cater the storm/rain water, however as evident from the site inspection and from the storm water drain sample

carried out by the Joint Committee, some industrial units have illegal connection in the storm water drain. All the units in the industrial area have been directed to immediately remove all such connection in the storm water drain. The most of the unit replied and submitted undertaking that either they don't have such connection or now has been removed. Such action by the industries also supported by the HSIIDC that significantly less effluent is reaching in the storm water drain. Further the HSIIDC has submitted that all the effluent discharge point into the storm water drain has been disconnected.

It is also pertinent to mentioned that HSIIDC has also provided the separate collection and pumping of storm water from the storm water drain. Such findings are also part of the Joint Committee report submitted before the Hon'ble NGT, the relevant part of the report is reproduced as under:-

***“4.2 Storm Water Management in Barhi Industrial Area***

*Separate network of underground conveyance system has been provided for collection & transportation of storm water from Phase-II & Phase-III to storm water pumping station located at Phase-III near CETPs. Separate network for collection & pumping of storm water from Phase-I has been provided for transferring to the main storm water pumping station located at Phase-III. Provision has been made by HSIIDC for transfer of storm water to both CETPs as well as to*

*Drain No. 6, based on the physical appearance of storm water, or if wastewater is observed in the storm water drain during dry days, which are defined as days without rainfall.”*

So even the untreated effluent from the storm water drain is being collected and treated through CETP and not discharged untreated in the drain No. 6. It reveals also from the monitoring of drain No. 6 carried out by the Joint Committee and as per annexure-V at page 121-122 of the Joint Committee report, the down stream sample (D8) of the Drain No. 6 found diluted w.r.t BOD i.e. 19 mg/l in comparison to up stream sample (D6) i.e. BOD 27 mg/l. At this point (D7) the out fall from CETP in Drain No. 6 was having 36 mg/l of BOD which reflects that any effluent discharged in storm water drain is also getting treated through CETP. Further the HSIIDC has submitted that all the effluent discharge point into the storm water drain has been disconnected.

(iii) Regarding the observation that industries don't have permission for ground water extraction, as per the reply submitted by the unit in response of the show cause notices issued by the HSPCB, it is submitted that 24 nos. of unit have valid HWRA permission, 46 nos. of units re-applied for HWRA permission as the existing permission get expired and 13 nos. units do not have the borewell. The information regarding the

remaining units is being collected with regard to HWRA permission and accordingly applicable action against the defaulting will be taken. It is pertinent to mention that recently the Deputy Commissioner, Sonipat has imposed the environmental compensation against the 23 nos. of units in Barhi industrial area for the past violations for ground water extraction.

(iv) The action taken and action plan may be read as submitted in above point no. i and ii.

(v) The most of the industries in their reply to the show cause notices issued by HSPCB has submitted that either they are already having flow meter for fresh water extraction at inlet and outlet of PETP or the same has been installed. The same are being verified at site and applicable action against the defaulting units will be taken.

(vi) The HSPCB is doing the monthly monitoring of the 16 MLD and 10 MLD CETPs in Barhi industrial area and the analysis reports outflow of these CETPs since January 2025, are reproduce as under :-

16 MLD CETP, HSIIDC Barhi												
Date of Monitoring	Report No. & date	Observed outlet effluent quality										
		pH	Condu ctivity	TSS	BO D	COD	Oil & Grease	TDS	Iron	Sulp hide	Amm onica I-N	Nickl e
Prescribed standards	discharged	6.0- 9.0	----	100	30	250	10	2100	3	2	--	3

# 5321

30-Jan-25	2303 dt. 7.2.2025	7.5 5	4820	121	58	388.5	6.4	2650	0.09	0.8	--	0.18
27-Feb-25	2519 dt. 7.3.2025	8.0 1	2250	65	35	200.5	BDL (DL=4)	1240	0.07	0.4	--	ND
31-03-2025	2722 dt. 7.4.2025	8.1 7	3290	80	37	220.1	BDL (DL=4)	1810	8.108	ND	--	0.007
28-04-2025	162 dt. 6.5.2025	7.5 7	2860	122	38	234.7	5.8	1580	1.094	ND	--	0.044
20-05-2025	273 dt. 28.5.2025	7.2 1	3180	205	58	299.1	6.4	1760	0.912	1.6	--	0.017
26-05-2025	289 dt. 6.6.2025	7.9 8	4850	140	29	152	5.8	2660	1.31	1.2	--	0.102
05-06-2025	340 dt. 17.6.2025	6.9 3	3090	125	36	185.4	6.4	1710	0.8	0.8	--	0.098
26-06-2025	446 dt. 8.7.2025	6.7 5	2830	140	48	304	7.8	1560	1.96	0.8	--	0.131
15-07-2025	633 dt. 25.7.2025	6.8 4	2980	38	14	56.3	BDL (DL=4)	1640	1.15	0.4	--	0.14
19-07-2025	712 dt. 1.8.2025	6.7 5	2820	130	35	283.3	BDL (DL=4)	1550	0.85	0.4	--	0.08
24-07-2025	835 dt. 7.8.2025	6.3 2	2620	85	26	173.1	BDL (DL=4)	1510	0.74	0.8	--	ND
01-08-2025	3246 dt. 20.8.2025	7.1 9	3204	90	28	160	6.5	1842	--	1.2	--	--

<b>10 MLD CETP, HSIIDC Barhi</b>												
Date of Monitoring	Report No. & date	Observed outlet effluent quality										
		pH	Conductivity	TSS	BO D	COD	Oil & Grease	TDS	Iron	Sulphide	Ammonical-N	Nickle
<b>Prescribed standards</b>	<b>discharged</b>	<b>6.0-9.0</b>	<b>----</b>	<b>100</b>	<b>30</b>	<b>250</b>	<b>10</b>	<b>2100</b>	<b>3</b>	<b>2</b>	<b>--</b>	<b>3</b>
30-01-2025	2304 dt. 7.2.2025	7.21	3920	67	52	274.08	5.8	2160	1.6	1.2	--	0.15
27-02-2025	2521 dt. 7.3.2025	7.61	2920	92	38	235.9	4.8	1610	0.52	0.8	--	ND
31-03-2025	2721 dt. 7.4.2025	7.08	2130	68	22	129.2	BDL (DL=4)	1170	0.575	0.4	--	0.004
28-04-2025	161 dt. 6.5.2025	7.52	3310	55	19	100	BDL (DL=4)	1820	175	0.8	--	0.027
26-05-2025	290 dt. 6.6.2025	7.11	2750	45	17	72	BDL (DL=4)	1510	0.304	1.2	--	0.03
19-06-2025	390 dt. 30.6.2025	6.89	3970	72	26	133.05	BDL (DL=4)	2390	0.286	0.8	--	ND
07-07-2025	528 dt. 17.7.2025	6.72	3090	65	24	125.9	BDL (DL=4)	1690	0.215	0.4	--	ND
19-07-2025	713 dt. 01.08.2025	6.93	2250	75	27	153.5	BDL (DL=4)	1240	0.116	0.8	--	ND

From the above table it is substantiated that 10 MLD CETP is meeting the prescribed discharge standards since March 2025, except June 2025 where the discharge standards were

exceeding with regard to TDS discharge standards. The 16 MLD CETP is also meeting the prescribed discharged standards since 15<sup>th</sup> July 2025, except one sample collected on dated 19<sup>th</sup> July 2025 which is exceeding with regard to BOD discharge standards.

The multiple efforts have been made by HSIIDC on 16 MLD CETP at Barhi since the matter taken up by the Hon'ble NGT. The some of the actions such as the new Dissolved Air Flotation (DAF)/ Oil & Grease Tank has been constructed with an investment of 77.99 Lacs which is effectively working, the diffuser membrane with the investment of Rs. 47.81 Lacs has been replaced. Further the work of installation of new inlet mechanical screen, replacement of filter media and other required maintenance has been undertaken by HSIIDC. Recently with the assistance of consultant taken on roll by HSIIDC, an operational assessment of 16 MLD CETP was carried out and HSIIDC is working on the suggestion made by such agency and HSIIDC is hopeful that in couple of months with the concerted and collaborative efforts 16 MLD CETP discharge standards will be stabilized within the prescribed discharge norms. The rest of the observations such as environmentally sound management CETP sludge and timely disposal through GEPIL has been directed to HSIIDC and they have assured about the same and disposal of Hazardous

sludge has been made through the Common Hazardous Waste Treatment and Disposal Facility (GEPIL) at Faridabad.

It is pertinent to mention that Rs. 2,52,00,000/- Environmental compensation has been imposed on 16 MLD CETP Barhi. Besides this, Rs. 1,20,00,000/- environmental compensation has also been proposed on 16 MLD and 10 MLD CETP Barhi to the Competent Authority of HSPCB. The prosecution for 16 MLD CETP for violating the discharge standards has also been filed before the Court of Chief Judicial Magistrate, Sonipat.

Present report w.r.t. steps taken by HSIIDC and action taken by HSPCB is submitted for the kind consideration of this Hon'ble Tribunal. It is undertaken to comply with the directions and submit further report as per directions passed by this Hon'ble Tribunal.

Dated: 23.08.2025

Place: Sonipat



Regional Officer,  
HSPCB, Sonipat