

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, AT NEW DELHI
ORIGINAL APPLICATION NO. 738 OF 2018**

IN THE MATTER OF:

SATPAL SINGH & ORS. ...APPLICANT(S)

VERSUS

INDIAN OIL CORPORATION LIMITED,
PANIPAT REFINERY ...RESPONDENT

N.D.O.H. 19.03.2021

**BRIEF SUBMISSIONS ON THE STEPS TAKEN BY THE
RESPONDENT FOR RESTORATION OF ENVIRONMENT AND
PUBLIC HEALTH IN THE SURROUNDING AREA**

(PAGES 1664 TO 1670)

ANKUR SOOD

ADVOCATE FOR THE RESPONDENT

A-19, (L.G.F.), PAMPOSH ENCLAVE

GREATER KAILASH -1

NEW DELHI - 110048

MOBILE NO. 9810088832

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Through:-



Ankur Sood

D/485/2007

Advocates for the Respondent

A-19, (L.G.F.), Pamposh Enclave
Greater Kailash-1, New Delhi -110048

Email –ankur.sood@soodandco.com

Ph No. 9810088832

Place: New Delhi

Dated: 18.03.2021

1664

**BEFORE THE NATIONAL GREEN TRIBUNAL
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RESPONDENT FOR RESTORATION OF ENVIRONMENT AND
PUBLIC HEALTH IN THE SURROUNDING AREA**

MOST RESPECTFULLY SHOWETH:

1. The Respondent's status of compliance and the steps taken by it for restoration of the environment and public health in the surrounding area is set out below:

No.	Recommendations of the Joint Committee and Members of the Joint Committee	Latest Status of compliance
1	To stop illegal discharge into the Thirana drain.	Complied
2	The unit needs to make arrangement to cover all open potential sources of VOCs emissions in effluent treatment plant and recovery of VOCs after carrying out the study regarding VOC emitting potential/ study of different components of effluent treatment plant.	Under Progress will be completed by May'21.

3	<p>State Government may further get the study done w.r.t to plan for restoration of ground water quality based on the usage schedule of the ground water in Panipat area, in consultation with district administration, State pollution control board and other concerned departments, to ensure ill effects of contaminated ground water on the health of local people. The cost of restoration would be finalized after appropriate study for restoration of ground water quality based on the usage schedule of the ground water in</p> <p>Panipat area by State Govt. As proposed in report of CGWB Engineering feasibility of dewatering and refilling of aquifers, as proposed in the report of CGWB, shall be relooked for its environmental implications</p>	Complied.
4	<p>IOCL may be directed to provide safe drinking water to nearby villages affected by Drinking Water quality issues till the restoration of the ground water quality.</p>	Complied.
5	<p>Extensive rainwater harvesting may be more sustainable solution to restore the quality of ground water. Panipat on an average receives 600mm of rain annually.</p> <p>If the same can be harvested in an efficient way, the same can prove to restore the quality of groundwater in lesser time and cost with no further environment implication.</p>	Complied

6	Green Belt Development is another sustainable solution to the Environmental Issues over the decades. Yearly targets and monitoring of them can give long term sustainable solutions. The action to be taken by the IOCL should be monitored quarterly, quantitatively and qualitatively by the District Administration and State Pollution Control Board.	Complied
7	Water stored in multiple lagoons/ponds inside the plant should be treated and recycled before lining the lagoons to make these lagoons impervious as mandated in CTO dated 25.07.2019	Complied Storm Water Pond C lining job completed.
8	No untreated water will be stored in the lagoon/ponds except in the tanks which are components of the effluent treatment plant	Complied
9	The state PCB has given revised consent, subject to certain conditions, but even in the latest report the state PCB has suggested further remedial measures.	Complied

2. The Respondent respectfully submits that despite serious challenges arising from the COVID-19 pandemic and the consequent lockdowns all over country, it has substantially complied with all the requirements in terms of the directions of the Hon'ble NGT and the Joint Committee constituted by the Hon'ble NGT.
3. The Respondent respectfully states that it remains fully committed to maintaining all environmental safeguards and shall duly comply with all directions issued by the Hon'ble NGT.

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1667
आशीष भूषण
Ashish Bhushan
सुदामक (स्वास्थ्य, सुरक्षा एवं पर्यावरण)
General Manager (Health, Safety & Environment)
पानीपत रिफाइनरी एवं पेट्रोकेमिकल कॉम्प्लेक्स (आई.ओ.सी.एल.)
Panipat Refinery & Petrochemical Complex (IOCL)
पानीपत, Panipat-132140

RESPONDENT

Through:



Ankur Sood
Advocate for the Respondent
A-19, (L.G.F.), Pamposh Enclave
Greater Kailash – 1
New Delhi – 110048
Email – ankur.sood@soodandco.com
Ph. No. +011-26472637

Clerk
Mr. Sajid Ansari
Mobile No. 9871300587

Place: New Delhi
Dated: 18/3/21

1668

**BEFORE THE NATIONAL GREEN TRIBUNAL
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VERSUS

INDIAN OIL CORPORATION LIMITED,
PANIPAT REFINERY

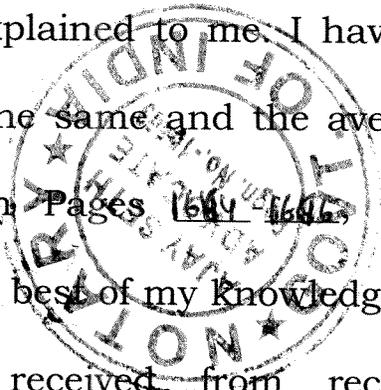
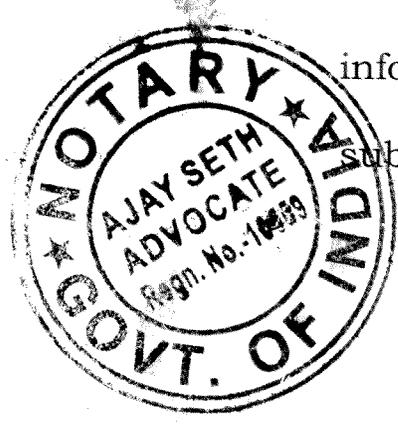
...RESPONDENT

AFFIDAVIT

I, Shri Ashish Bhusan, s/o Late I.B.P Thakur, aged about 46 years, residing at D-1408 Panipat Refinery Township do hereby solemnly affirm and declare as under:

1. That I am authorized representative of the Respondent, and duly authorized to sign, file the accompanying submissions and fully conversant with the facts and circumstances of the case, hence, competent to swear by the present affidavit.

2. I state that the contents of the accompanying submission have been explained to me. I have fully understood the contents of the same and the averments made in Paras 1 - 3 on Pages ~~1664 - 1665~~ therein are true and correct to the best of my knowledge and belief and that of information received from records and the legal submission made in the submission are based on the



legal advice received by me and believed to be true. Para 3 is the prayer to this Hon'ble Tribunal.

3. That annexures are either the original or the photocopies of their respective original.

[Signature]
I Identify the Person who has Signed/
Executed this Documents in my presence.

[Signature]
आशीष भूषण
Ashish Bhushan
संसाधक (स्वास्थ्य, सुरक्षा एवं पर्यावरण)
General Manager (Health, Safety & Environment)
पानीपत रिफाइनरी एवं पेट्रोकेमिकल कॉम्प्लेक्स (आई.ओ.सी.एल.)
Panipat Refinery & Petrochemical Complex (IOCL)
पानीपत, Panipat-132140

DEPONENT

VERIFICATION

Verified at NEW DELHI on this 18 day of MARCH, 2021 that the contents of the above affidavit are true and correct to the best of my knowledge, nor part of it is false and nothing material has been concealed therefrom.

[Signature]
आशीष भूषण
Ashish Bhushan
संसाधक (स्वास्थ्य, सुरक्षा एवं पर्यावरण)
General Manager (Health, Safety & Environment)
पानीपत रिफाइनरी एवं पेट्रोकेमिकल कॉम्प्लेक्स (आई.ओ.सी.एल.)
Panipat Refinery & Petrochemical Complex (IOCL)
पानीपत, Panipat-132140
DEPONENT



ATTESTED

NOTARY PUBLIC
DELHI (INDIA)

18 MAR 2021

1670



Ankur Sood <ankur.sood@soodandco.com>

Service of Brief Submissions on behalf of the Respondent, IOCL in the matter of O.A. 738/2018

1 message

Ankur Sood <ankur.sood@soodandco.com>
To: hspcbsee1@gmail.com, gautams2808@gmail.com

18 March 2021 at 12:58

Dear Sir

We are formally serving upon you the brief submissions being filed by the Respondent, IOCL in the matter of O.A. 738/2018 which is listed on 19.03.2021. Kindly consider this as formal service upon you.

1. HSPCB/Joint Committee - hspcbsee1@gmail.com
2. Petitioner Satpal Singh through Mr. Gautam Sharma, Advocate - gautams2808@gmail.com

With regards
Ankur Sood
Advocate for the Respondent (IOCL)

--
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 **Brief Submissions..PDF**
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