

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 985/2019

In Re: Water Pollution by Tanneries at Jajmau, Kanpur, Uttar Pradesh

WITH

Original Application No. 986/2019

**In Re: Water Pollution at Rania, Kanpur Dehat & Rakhi Mandi, Kanpur
Nagar, Uttar Pradesh**

WITH

Original Application No. 528/2023

**News report published in Dainik Jagran dated 14.08.2023 "highlights a
growing concern regarding industrial pollution in the Godhrauli village"**

INTERIM REPORT

Dated: 26.11.2024



Through

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Executive Summary

The Hon'ble Tribunal, vide order dated 14.08.2024 in OANo. 985/2019 with OANo. 986/2019 and OA No. 528/ 2023, directed Advocate Katyayni, to visit certain districts in the State of Uttar Pradesh. The effective para of the order is as follows:

“...7. Learned Amicus Curiae has sought permission to visit the affected area and collect the information and submit her own assessment before the Tribunal. Regional Officer, CPCB, Lucknow will facilitate the visit of Amicus and District Magistrates, Kanpur Dehat, Kanpur Nagar and Fatehpur will extend full cooperation to the Amicus during the visit and ensure her safety and security.”

In compliance of the above-mentioned order, Districts Kanpur Nagar, Kanpur Dehat and Fatehpur (over 19 locations) were visited by the amicus along with the officers from CPCB, UP PCB, UP Jal Nigam and CMO office.

Samples were collected and submitted for testing by the experts from CPCB, Lucknow office namely:

1. Sh. Arvind Kumar, Scientist C, CPCB, RD Lucknow
2. Sh. Lalji Verma, Research Associate-II, CPCB, RD Lucknow
3. Sh. Ravinder Singh, Senior Research Fellow, CPCB, RD Lucknow

Common environmental issues observed in the above noted 3 Districts:

1. Municipal Solid Waste
2. Plastic Waste
3. Choked drains
4. Surface water pollution (in Rivers)
5. Ground water contamination
6. Soil contamination (especially Kanpur Dehat & Fatehpur)
7. Non- operational STP (Kanpur Nagar)
8. Lack of STPs and sewer network (Kanpur Dehat & Fatehpur)
9. Health concerns and need for better medical infrastructure
10. Construction on chemical/ hazardously contaminated sites
11. Clean Drinking water
12. Foul odour from sewers, drains and river

Each of the three districts has its own unique set of issues. For example, Kanpur Nagar had non-operational STPs, while Kanpur Dehat and Fatehpur had none at all. Similar to this, there was an urgent problem in Kanpur Dehat and Fatehpur with active chromium pollution of the soil and ground water that needed to be addressed right away. Photographs and a detailed discussion of district-specific difficulties are provided below:

Samples of soil and groundwater were collected by CPCB team from the following location in Kanpur Nagar:

S.N.	Sampling Details	Lat Long
1.	Golaghat drain at confluence point with Gangaji at Golaghat	26.465486,80.375493
2.	Handpump sample at Golaghat (120 feet depth)	26.465245,80.375067
3.	Sampling of outlet and Sludge at Bingawa STP	26.36785,80.317297
4.	Ground water at Rakhi Mandi Juhi Baburiya from borewell (depth 220 feet)	26.445478,80.32581
5.	Ground water from house no. 1/3 Rakhi Mandi Juhi Baburiya from borewell (depth 200 feet, new boring)	26.445163,80.325217
6.	Silt sample at Makan no 1/3 Rakhi Mandi Juhi Baburiya from newly bored borewell (depth 200 feet)	26.445163,80.325217
7.	Ground Water samples Rakhi Mandi Afeem Kothi from borewell 120 feet depth	26.453623,80.33445
8.	Ground Water samples from Jaggu baba dham Mandir Rakhi Mandi Afeem Kothi from handpump 120 feet depth	26.454635,80.333887
9.	STP Jajmau- 130 MLD & 43 MLD (Inlet, Outlet and Sludge Sampling) 36 MLD CETP Jajmau (Currently operating as STP)	26.417332,80.418795
10.	20 MLD CETP Jajmau Outlet	26.41473,80.425503
11.	Irrigation Channel/ canal at Jajmau	26.413548,80.42645

Samples of soil and groundwater were collected by CPCB team from the following location in Kanpur Dehat:

S.N.	Sampling Details	Lat Long
Rania Dump site visit		
1.	Soil sample near Dump site Rania, Khanchandpur (left side of road)	26.403044,80.046669
2.	Soil sample at Dump site Rania (Right side of road)	26.403243,80.04666
3.	Ash sample at dump site (right side)	26.403547,80.046742
4.	Soil Sample at dump site (back side)	26.403365,80.048268
5.	Soil sample at dump site (Mid)	26.40419,80.047137
6.	Ground water sample from bore well at M/s Natraj Polyplast Pvt. Ltd (40 feet depth) near dump site Rania	26.405415,80.046454
7.	Ground water sample from bore well at M/s V D Paper and Graphics Industries near dump site Rania (160 feet depth)	26.405047,80.045689
Khanchandpur village visit		
8.	Handpump (Ground Water) sample at Khanchandpur (100 feet depth)	26.39427,80.049343
9.	Handpump (Ground Water) sample at Khanchandpur (120 feet depth)	26.395552,80.05059
10.	Ash sample dumped at Khanchandpur village	26.392839,80.052177
Noon river sampling		
11.	Water Sample at Noon River, near toll plaza, Rania	26.386392,80.020397
Hazardous waste management site visit at Khumbhi Kanpur Dehat		
12.	Ground water sample at M/s U.P. Waste Management Project, Khumbhi, Kanpur Dehat (Downstream)	26.359013,79.8681
13.	Ground water sample at M/s U.P. Waste Management Project, Khumbhi, Kanpur Dehat (Upstream)	26.363208,79.863454
14.	Ground water sample at M/s Bharat Oil & Waste Management Pvt. Ltd. Khumbhi, Kanpur Dehat (Downstream)	26.36386,79.86327
15.	Ground water sample at M/s Bharat Oil & Waste Management Pvt. Ltd. Khumbhi, Kanpur Dehat (Upstream)	26.364395,79.865362

Samples of soil and groundwater were collected by CPCB team from the following location in Fatehpur:

S.N.	Sampling Details	Lat Long
Soil and ground water sampling near M/s MLMP Food Pvt. Ltd. Godhrauli, Fatehpur		
1.	Soil sample near M/s MLMP Food Pvt. Ltd. Godhrauli, Fatehpur (on NH)	26.13889,80.576808
2.	Ground water sample near M/s MLMP Food Pvt. Ltd. Godhrauli, Fatehpur (on NH)	26.138945,80.576887
Soil and ground water sampling at Gadrauli village, Fatehpur and nearby area		
3.	Ground water sample from Handpump of Shri. Virendra at Godhrauli village (120 feet depth)	26.150103,80.565683
4.	Ground water sample from Handpump near Shitla Mata Mandir at Godhrauli village (120 feet depth)	26.150012,80.566918
5.	Soil Sample near Pond Shitla Mata Mandir at Godhrauli village	26.150031,80.567117
6.	Soil Sample at Ambuj Khera Marg	26.146061,80.568192
7.	Soil Sample near railway line at Ambuj Khera Marg	26.14002,80.565722
8.	Waste sample at Mid of Baniya khera dumpsite Godhrauli (near Railway line)	26.139006,80.562804
9.	Waste sample at back side on Baniya khera dumpsite Godhrauli (near Railway line)	26.139643,80.562343
10.	Ground water sample from borewell (100 feet depth) at Ashapur Medical College, (under construction)	26.194292,80.550763
11.	Ground water sample from borewell (150 feet depth) at Flour mill, Abhaypur (under construction)	26.195663,80.553335

THE OBSERVATION OF THE AMICUS ALONG WITH PHOTOGRAPHS ARE AS FOLLOWS:

1. District Kanpur Nagar

Date of visit: 17.11.2024 & 18.11.2024

Rivers: Gangaji, Pandu

Number of Drains: 31

Number of STPs: 7

Number of TSDF: Rooma

Landfill site: Sanigawa village

a) Atal Ghat, Nawabganj, Kanpur

Both locals and visitors frequent the ghat, one of the city's most well-known tourist destinations. The ghat was littered with religious oblations and solid trash.





Image 1 & 2: Atal Ghat, Nawabganj, Kanpur

b) JK Cancer Hospital

JK Cancer Hospital is a state-run medical centre that treats cancer patients and serves both Kanpur Nagar and the surrounding areas.

The hospital's infrastructure is inadequate and it lacks basic amenities. The intensive care unit was closed, and the facility's equipment was outdated. The hospital most likely lacks a heavy metal testing system.



Image 2 & 3: JK cancer hospital and ward



c) Gola Ghat drain

Gangaji receives the drain's direct discharge. Sewage and solid trash, including plastic, were clogging the drain. The RO, UPPCB, Mr. Amit Mishra, informed us that this drain was undergoing bioremediation. But the sewer smelled foul and appeared to be full with filth.



Image 4: sewerage (Gola ghat drain) along with municipal solid waste discharging into Gangaji.

d) STP Bingawa

With a capacity of 210 MLD, Bingawa STP empties into the Pandu River. During the visit, it was discovered to be malfunctioning and to have foam and a stench on the outlet discharge. Both the outlet discharge and the sludge were sampled. It became clear that even the chlorination was not being done on a regular basis after looking through the log book. Both Jal Nigam and PCB personnel responded to an inquiry by stating that EC had been imposed and that FIR had been filed against the proponent company, M/s KRMB Ltd. Even though sludge was observed being disposed of on the property, it was told that it was transferred to the Sanigawa landfill.

This STP receives all of the COD drain's flow. Nevertheless, it was seen that there was a liquid discharge into the drain (after diversion) at the tapping location. This suggested that the COD drain might be partially tapped, allowing some effluent to enter the River Pandu directly.



Image 6: outlet point of the STP (After chlorination)



Image 7: STP outlet laden with foam



Image 8: Sludge deposited within the premises of the STP



Image 9: COD drain



Image 10: pumping point of the COD drain (into Bingawa STP)



Image 11: discharge found in the COD drain post pumping station

f) Juhi Baburia, Rakhi Mandi

From Juhi Baburiya, the team took samples of groundwater from borewells. Residents complained of a drinking water issue in these highly populated neighbourhoods with clogged sewer pipes.



Image 12: Juhi baburiya choked sewage lines

g) Rakhi Mandi, Afeem kothi

Old blood reports taken from Afeem Kothi Rakhi Mandi (by the Committee in 2019), had reported that some patients had mercury and chromium in their blood. Dr. Mohd. Asif and his team regrettably informed that due to a lack of infrastructure for heavy metal testing, the public health center was unable to perform another sampling. In Afeem Kothi Rakhi Mandi, the team gathered groundwater samples for testing from borewell.

After speaking with one of the patients/victims, it became clear that she had headaches, respiratory issues, and skin issues. Her spouse unexpectedly died a few years ago (for unspecified circumstances), and she believed he was possessed (there may have been a neurological problem)



Image 13: Rakhi Mandi, Afeem Kothi (Shrimati Ram Rati, patient)

g) STP Jajmau

The capacity of the STP at Jajmau is 130 MLD and 43 MLD. 43 MLD STP was not operational and is undergoing repair and improvement (currently operated by proponent M/s KRMB pvt ltd). Additionally, there is a 36 MLD CETP on the property that has been transformed into a STP. The CPCB team has gathered sludge samples as well as discharge samples from the inlet and outlet. Both STPs were clearly not in acceptable operating condition based on the color, odor, and froth of the STP outlet output. Additionally, the sludge was being gathered on the STP grounds. However, the Jal Nigam has approved the disposal of the waste to the Sanigawa landfill. The new 20 MLD CETP receives the final treated discharge from both STPs (that is mixed with treated tannery effluent and discharged into the irrigational canal)



Time: 18-11-2024 16:57
Note: STP 130 MLD KANPUR

Powered by NoteCam

Image 14: inlet of Jajmau STP 130 MLD showing tannery waste



Image 15: tannery waste skimmed out from the inlet at Jajmau STP



Image 16: outlet of 130 MLD STP (after chlorination)



Image 17- Outlet of 36 MLD STP (previously CETP)



Image 18: sludge collected at the STP 130 MLD



Image 19: dried sludge bed near the STP area

h) CETP Jajmau

In August 2024, a new CETP with a 20 MLD capacity in Jajmau and put into service. CETP receives only 10–12 MLD of effluent from tanneries as of now. It states that it can handle all the effluent from 350 tanneries, of which 260 or more are now in operation. According to its common chrome recovery unit (3* 300 KLD), chromium is collected or submitted by tanneries. Before the final treated effluent is discharged into the irrigation canal, it is combined with the treated sewage from Jajmau STP, and eventually all this mixed wastewater meets Gangaji near Jana village (especially during monsoon season).

For this initiative, NMCG is the Nodal agency.



Image 20: Outlet of the 20 MLD CETP Jajmau

i) Agricultural canal

The agricultural canal is a few kilometers long, and before ultimately discharging into Gangaji, it traverses through some villages and farmlands. The CETP and STP at Jajmau dispose their wastewater and mixed-treated effluent to this canal. It is said that for most time of the year the canal water doesn't reach Gangaji, as it's used dry by the farmers. But during monsoon season, it flows into Gangaji.

Water samples have been taken from the canal by the CPCB experts for assessment.



Image 21: Agricultural/ Irrigation canal, Jajmau

2. District Kanpur Dehat

Date of visit: 19.11.2024

Rivers: Rind, Sengar, Noon, Yamuna

Number of Drains:

Number of STPs: None

Number of CETP: None

Number of TSDF: 2

a) Rania (chromium dump site)

The team went to the Kanpur Dehat, Rania, excavated chromium waste site (north of NH-2 near khanchandpur village which is approximately 3 kms west of rania town). The entire area, including the road next to it, was glowing green or yellow. The plot was not even covered and lacked a boundary wall or fencing. On the excavated location, where a good amount of chromium was still present, animals and birds were observed. Rain water has also accumulated at the site in which birds could be seen. Surprisingly, chromium accumulation in the earth was also seen in a large area surrounding the dump site (with colored soil). The bright green color of the water samples that the CPCB team took from the grounds of two units suggested that the groundwater was contaminated due to leaching from the dump site. For sampling, the team also gathered ash and soil.

The RO, PCB Kanpur Dehat Mr. Manoj K Chaurasia has informed (provided a list) that there are 59 red category, 91 orange, 126 green (operational) industries situated at Raipur, Rania industrial area to Jainpur industrial area.



Image 21: Chromium deposition on other side of the road (left of the excavated site)



Image 22: deposits of chromium still lying in the area.



Image 23: Water has collected in the excavated site



Image 24: Chromium contamination in the nearby areas



Image 26: Ash collected from the site



Image 27: Borewell water sampling (green color groundwater) from nearby unit



Image 28: Impact of chromium in soil & groundwater on the buildings

b) Khandchandpur village

The team went to Khanchadpur village, which has three sections: Chauhanpurva, Yadavpurva, and Palanpurva. We met with Dr. AK Singh, the CMO for Kanpur dehat, and his team of physicians, which included ACO Dr. SL Verma, Dr. Vishal Bhasin, and Dr. Rakesh. They had collected new blood and serum samples (via CSIR-IITR Lucknow) and turned in a report on 14 November 24. Some individuals have chromium and mercury, according to the report (chromium was very high in a few cases, while mercury was within guidelines). Smt. Ram Shree, one of the patients described her health problems, including a headache, fever, and respiratory condition. She is a follow-up instance of bronchial asthma, according to the experts.

Samples of groundwater were taken by the CPCB team from two handpumps (designated dangerous but not sealed). We discovered after conducting additional research in the community that people are still using contaminated water and are not receiving an appropriate quantity.

Mr. Manoj K Chaurasia, the RO-PCB Kanpur Dehat, and his staff assisted us. He told us that the people fiercely opposed any attempts to seal or disassemble the handpumps.

The majority of Kanpur Dehat's locations, including Khandchandpur hamlet, lacked an adequate sewage disposal infrastructure. The village's modest sewage lines were overflowing and accumulating waste water in ponds and vacant land. The same applied to MSW disposal.

We saw a lot of ash laying around and illegally put on agricultural land during our tour, both inside and outside the village. CPCB collected a sample of the same.



Image 29: Team interacting with a patient with high chromium



Image 30: contaminated handpump



Image 31: villagers using contaminated handpumps for bathing



Image 32: waste water and solid waste being collected on vacant village land



Image 33: Ash dumped on agricultural land by industries



Image 35: Ash dumped and used for land filling

c) Noon River

This river is undoubtedly one of the contaminants and a tributary of Yamunaji. The river has a small channel and no ecological flow. The fact that this was a river seemed hard to believe. The river is filthy and has an offensive stench, and no flood plain zoning has been done.

With great difficulty and utmost courage, the CPCB team collected surface water sample from the river.



Image 36: Noon river near toll plaza

d) TSDF Kumbhi

The team visited TSDF sites at Kumbhi namely, M/s UP Waste management projects and M/s Bharat oil & waste management pvt ltd).

The CPCB collected samples from upstream and downstream of both the TSDF.



Image 37: Ramki TSDF landfill, the covered area is where stabilised Cr is dumped.



Image 38: huge ponds created to treat and stabilize Cr VI (with acids)



Image 39: treated landfill site at M/s UP Waste Mgt projects (including ash). This facility used leachate to spray on landfill etc.



Image 40: M/s Bharat oil landfill site with treated waste (for ash they were using some other facility). This facility has an ETP for treating and disposing leachate and tyre wash.

3. District Fatehpur

Date of visit: 20.11.2024

The district was a greater disbelief than Khanchandpur and Rania. There are numerous known and unknown sites where ash and chromium are discarded. Some locations have highways, units, homes, and even institutions built or in the process of being built atop chromium plume.

People in the village of Godhrauli have complained about a lack of water supplies, and the water is contaminated in several spots. Some residents also complained of skin problems, coughing, and breathing difficulties here.

Ash, chromium, soil, and ground water samples were gathered by the CPCB team from Godhrauli and Abhaypur villages, as well as from the premises of a closed plant on the National Highway called M/s MLMP food pvt ltd, Baniya Khera Road, and railway crossing fields.

Infact, in the premises of the unit with the board outside- M/s MLMP food pvt ltd, there seemed to be a large plume of chromium dumped and it was covered with mud/ earth. There was a cow tied in the unit.

We received assistance and information from the office of RO PCB Dr. SC Shukla and his team accompanied with the District forest officer and physicians from primary health facility.

a) M/s MLMP Food Pvt Ltd, NH 2

Date of visit: 20.11.2024

Traveling down the national highway to Godhrauli village. When we saw fluorescently colored acreage with leached fencing on the highway side, we abruptly stopped our car. We were informed of the unit's identity and closure upon inquiry. Samples were gathered by CPCB from outside the unit. Afterwards, RO PCB Dr. SC Shukla joined us and helped us enter the unit. It was a startling sight to enter since there was a sizable pile of what was likely chromium covered in dirt. Peeking from the plume were patches of vivid green/yellow that indicated chromium deposition. Samples were taken from the boring inside by the CPCB team.

According to a PCB officer, the unit is called *M/s Dumpyard Madhuchandra Techno complex pvt ltd*, and they have previously assessed the location and they have inspected the site on 04.05.2024 that total chromium was not detectable in the groundwater.

It was also informed by the officer of PCB that Notices were issued on 29.01.2024 to 4 units manufacturing basic chrome sulphate (M/s Madhuchandra Techno complex pvt ltd Fatehpur, M/s Associate chemical works Rahsupur, M/s Ashiana chemicals Rahsurpur and M/s Aasma chemicals Rahsurpur)

However, the environment and public health remain at risk because the contaminated regions have not yet been remediated.



Image 41: Chromium deposit outside M/s MLMP Food Pvt Ltd, NH 2



Image 42: Chromium deposit near the fence of M/s MLMP Food Pvt Ltd, NH 2



Image 43: Apparent cr plume covered with earth



Image 44: air polluting industry right across the NH near M/s MLMP Food Pvt Ltd, NH 2

b) Godhrauli village

In addition to having chromium dumps, the village is also dealing with a hygiene dilemma due to open Nalli that are clogged with solid waste, including plastic garbage, wastewater, and dirt.

The CPCB gathered soil samples and groundwater samples. We observed that the groundwater was vivid green when we collected it from a manual pump close to Sheetla Mata Mandir. After asking more questions, we discovered that there was a pond nearby and that the area had a chromium waste on which homes had been built.

Due to contamination and health concerns, handpumps were disassembled and sealed at a number of locations throughout the community. We learned that there was a lack of sufficient, clean drinking water (for other uses as well) after speaking with the inhabitants.

On interaction with some people regarding health issues, we were informed that most common complaints were cough, breathing problems, swelling of limbs and skin issues. We were informed that blood tests were conducted on 8 people (by CSIR- IITR on 03.10.24), where all 8 had chromium detected in their blood.



Image 45: choked Nalli at the entry of Godhrauli village



Image 46: Ash and chromium deposited land near water body (opposite to sheetla mata mandir)



Image 47: contaminated water sampling by CPCB

c) Baniya kheda road

From Godhrauli village, this path led to the railway crossing. On both sides of the road, we observed large areas of ground covered in chromium garbage. There are worries that the road may be constructed over top of the plume of chromium as well.

Along with the chromium, ash was also thrown on the side of the road and even on the village pathways. It appears that the industries have been carelessly disposing of dangerous materials in this area for many years.



Image 48: chromium plume lying on Baniya kheda road



Image 49: chromium near the road at Baniya kheda (appears as if road is also constructed on it)



Image 50: Chromium on road side at baniya kheda road



Image 51: Ash dumped on the village pathway (location is between baniya kheda road and railways crossing)

d) Railway crossing

It appears that a significant amount of chromium has been disposed of close to the railroad crossing for many years. In addition to solidifying, the plume may have collected and eroded in certain places. Leachate possibilities cannot be completely ruled out either. CPCB has collected soil samples from the site (no borewell was found nearby)



Image 52: Agricultural land near railway crossing where chromium has been dumped is enormous quantities in large area for years



Image 53: Agricultural field close to a railroad crossing where massive amounts of chromium have been deposited for years.

e) Abhaypur village

We discovered numerous locations on both sides of the road that were covered in chromium waste during our brief visit to the village of Abhaypur. Since the ground water had a fluorescence green/yellowish color, it also appeared to be polluted.

Two under construction projects were also seen in the area such as an educational institution and a flour (wheat) making unit. Unfortunately, both the construction site was quite close to the contaminated area and chances of its groundwater contamination seems notably high.

Groundwater and soil sample were collected by the CPCB members.



Image 54: construction site of educational institution near chromium dump



Image 55: groundwater sample taken from the above under construction site



Image 56- groundwater sample taken from outside the under construction flour factory (where the ground appeared bright green)



Image 57: the under construction flour factory (where the ground appeared bright green)

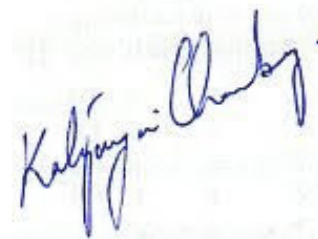
Recommendation

Urgent Action is required for safeguarding life and health of people in contaminated areas:

- a. Immediate medical camps for affected populations and blood/ serum sampling by CSIR-IITR, Lucknow.
- b. Inquiry on non-operation of STPs in Kanpur Nagar due and immediate resolution of the same. In case, remediation will take long time then some temporary action plan must be pursued to stop pollution of Gangaji and Pandu River (keeping in mind the Maha Kumbh also)
- c. Temporary remediation of sewage where the drains are yet to be tapped/ diverted to STPs.
- d. Mapping and identification of heavy metal (chromium and ash) contaminated sites at Kanpur Dehat, Kanpur nagar and Fatehpur. The people of affected areas must be provided with adequate water for life sustenance (which must include other chore than just drinking water)
- e. Sampling of soil, groundwater and surface water of contaminated areas in the 3 districts and formulation of a time bound Action Plan.
- f. River water monitoring: Water Quality Monitoring Index must include all biological, chemical, physical parameter for assessment of river health like FC, TC, pH, turbidity, electrical conductivity (EC), total dissolved solids (TDS), total alkalinity (TA), total hardness (TH) and calcium hardness (CaH), chemical oxygen demand (COD), biochemical oxygen demand (BOD), Pathogens, algae, chlorophyl count, bacteria, phytoplankton, dissolved oxygen (D.O.), sulphate (as SO_4^{2-}), nitrate (as NO_3) and chloride (Cl^-), fluoride, arsenic levels. Some heavy metals like Iron, Zinc, Cadmium, Mercury, Nickel, lead and Chromium. temperature, turbidity, light transmission, sechi disk transmission etc. Similarly, GWQI (ie Ground water quality Index) with detailed parameters must be undertaken.
- g. No further construction be allowed on areas/ sites that have chromium deposition under the ground.
- h. Amicus Curiae most humbly prays for grant of time for submitting final report alongwith CPCB lab- test reports.

AND FOR THIS ACT OF KINDNESS, THE ADVOCATE AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

Dated: 26/11/2024



Through
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