

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**CENTRAL ZONE BENCH, BHOPAL,****ORIGINAL APPLICATION NO. 119/2025****IN THE MATTER OF:****GAURAV SAXENA****.....APPLICANT**

VERSUS

STATE OF M.P. & ORS.**.....RESPONDENT****INDEX**

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Date: 10.12.2025

Place: Bhopal

Submitted by MPPCB: -

through Counsel



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JOINT COMMITTEE REPORT IN ORIGINAL APPLICATION NO. 119/2025 OF GAURAV SAXENA V/S STATE OF MADHYA PRADESH & ORS.

1. That, Hon'ble NGT issued following instructions on dated 26.08.2025 in the matter of OA 119/2025 (CZ) Gaurav Saxena V/s State of Madhya Pradesh & Ors.: -

“1. Issue raised in this application is violation of the Environment (Protection) Act, 1986, Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981. The contention of the Learned Counsel for the applicant are that the Respondent/PPs are deliberately operating on Diesel and solid fuel like Briquette Bio-mass based Boilers, for operations which is not under the schedule of Action Plan made by Respondent/ MPPCB after detailed direction passed by Hon'ble NGT (PB) New Delhi, in OA no. 681/2018 dated 08.10.2018 by the authorities with regard to air pollution Non Attainment City in India such as Bhopal. The action Plan of MPPCB for controlling air pollution in Bhopal is to ensure clean fuel for commercial purposes within city limit is evident from Annexure A-2, but the Respondent Board while allowing the operation malafidly by ignoring to its own action plan, which is illegal and not admissible under law, also as per the direction of this Hon'ble Tribunal. So immediate remedial actions and cognizance should be taken for this unlawful act taking place in connivance with the authorities. The Respondent/PP use bio mass of Briquette as fuel in boilers, which is not permissible. The Briquette, according to Collins dictionary, is a small brick made of compressed Coal Dust,

Saw Dust, Charcoal etc used as Fuel in Boiler for converting water into steam, which in this matter, is used as a raw material for the operation. Biomass briquettes traditionally available are nothing but compressed stubble of crops. Respondent No.4, Central Pollution Control Board who is responsible for activities with regard to air pollution & have documented rules, conditions, reports and guidelines but unfortunately nothing concrete on the ground has been done to implement such rules or guidelines. The functioning of Respondent/PPs with use of solid fuel, briquette or Diesel in the heart of the city where Inter-state Bus Station, Rani Kamlapati Railway Station, Hospitals Kasturba Gandhi Hospital, many commercial units in Maharan Pratap Nagar which is just hundred meters away from the alleged Unit Factory being run by the Respondents. This leads to deterioration of Air quality, as evident from the poor AQI of the abovementioned area. It is pertinent to mention that, these areas are so much polluted that dust and particulate matters causes frequent irritation to the eye and have dangerous impact on the health of the citizens. Therefore, the direction is liable to be issued to stop the use of briquette, solid biomass fuel or Diesel boilers immediately in the interest of environment and its ecology.

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5. We deem it just and proper to call a report on the matter in issue, in present application, from a Joint Committee consisting of:

- i. One representative from the Director, Central Pollution Control Board, Paryavaran Parisar, Arera Colony, Bhopal(M.P.)*

(ii) One representative from the Collector Bhopal (M.P.)

(iii) One representative from the Member Secretary, State Pollution Control Board, Bhopal (M.P.)

6. The Committee is directed to visit the site and submit the factual and action taken report within six weeks. The State PCB will be the nodal agency for coordination and logistic support.

2. In compliance with the order of the Hon'ble National Green Tribunal dated 26.08.2025, the concerned departments were informed, and a Joint Committee was constituted with the following members: -

S. No	Name of Department	Name of Committee Member
1.	Representative from the Director, Central Pollution Control Board, Paryavaran Parisar, Arera Colony, Bhopal(M.P.)	Dr. Anoop Chaturvedi, Scientist-C, Central Pollution Control Board, Regional Directorate, Bhopal.
2.	Representative from the Collector Bhopal (M.P.)	Mr. Pramod Srivastava, RI, Tehsil-Kolar, Bhopal.
3.	Representative from the Member Secretary, State Pollution Control Board, Bhopal (M.P.).	1. Mr. Jainaindra Chandel, Chemist, RO, MPPCB, Bhopal. 2. Ms. Prakamya Tiwari, AE, RO, MPPCB, Bhopal.

3. That, in compliance to the order of Hon'ble NGT dated 26.08.2025, the joint committee reviewed the order passed by the Hon'ble NGT and discussed the issues raised in the order to proceed for the inspection. The main issue raised

as per the order of Hon'ble NGT is Respondent/PPs operating on Diesel and solid fuel like Briquette Bio-mass based Boilers, for operations which leads to deterioration of air quality.

4. FIELD OBSERVATIONS:

The Joint committee members have conducted field visits on dated 24.11.2025, 28.11.2025 and 02.11.2025 to the following locations in Bhopal mentioned in the petitions to verify the factual status on the allegations raised by the applicant and collect the information: -

- a) Bhopal Sahakari Dugdha Sangh Maryadit
- b) Bharat Heavy Electrical Limited
- c) Narmada Milk and Milk Product
- d) Peoples Medical College & Research Centre

The Geographical locations, photographs and visual observations were recorded during inspection. During inspections, Mr. Rajdeep Singh, ALO, Central Pollution Control Board, Regional Directorate, Bhopal were present as well. The Photographs taken during inspection are enclosed as **Annexure-1**. Also, the geographical locations are measured using mobile based application and duly marked on Google Earth Map. The marked google earth imagery is enclosed as **Annexure-2**.

5. That, Joint Committee visited the units mentioned above to assess the compliance status, fuel used and air pollution control devices installed. To assess the performance of air pollution control devices, the stack monitoring work also carried out for all the particulate matter (PM) emissions. The visual observations noted unit-wise along with the details of the unit are as under: -

5.1. BHOPAL SAHAKARI DUGDHA SANGH MARYADIT

- 5.1.1. The inspection of unit Bhopal Sahakari Dugdha Sangh Maryadit was conducted by the Joint Committee on dated 24.11.2025. The

representative of the unit Mr. Amit Saxena, Incharge Engineer and Mr. Ajay Sirohi, GM, Plant Operation were present during the inspection.

- 5.1.2. Bhopal Sahakari Dugdh Sangh Maryadit is located at Habibganj, Tehsil Huzur, District Bhopal, Madhya Pradesh. The geographical location of the site is latitude 23°13'34.58"N and longitude 77°26'25.98"E.
- 5.1.3. The unit covers approximately 9.50 acres. It is located about 90 m northeast of Rani Kamlapati Railway Station and 100m southwest of ISBT. The nearest residential colony lies about 160 m west of the premises.
- 5.1.4. The dairy unit handles milk chilling, processing, production, and marketing of milk and milk products. Raw milk is collected from producers and brought to the plant through insulated tankers. At the plant, milk is pasteurized and separated for packaging and for making fermented and indigenous products. The plant also has Butter and Ghee manufacturing facilities of 5 MT/day each.
- 5.1.5. The unit has installed 5 TPH bio-briquette-based boiler to meet the steam requirement. The boiler operates 20 hours per day, consuming about 10 tonnes/day of biomass briquettes and generating 0.30–0.40 tonnes of ash per day. The bio mass briquettes are stored in a shed near the boiler area.
- 5.1.6. The unit has installed Multi cyclone arrangement before the Air Pre heater. Air pre heater (APH) is also installed to utilize the heat of flue gas and also to arrest the dust particles going after the multi cyclone. There is also Primary Bag Filter with 210 bags installed after the APH and the secondary bag filter with 168 bags is

- installed in parallel for redundancy and in case primary bag filter is in maintenance then secondary is operational.
- 5.1.7. The Stack with height of 30 meter is provided by the unit for exhaust of emissions along with platform, porthole and ladder for emission monitoring.
- 5.1.8. Ash is stored in an underground pit with a water-sprinkler quenching system to maintain moisture. The pit has a 7-day ash-holding capacity. Once filled, ash is lifted using a pulley-based mechanical system for loading into trolleys.
- 5.1.9. As per the information received from M/s Subons Solutions LLP vide letter dated 09.12.2025, the unit has agreement for the disposal of the ash with M/s Mahakal Group. A copy of the letter along with ash loading and distribution agreement is enclosed as **Annexure-3**.
- 5.1.10. The Bhopal Sahakari Dugdh Sangh Maryadit has Consent to Operate valid up to 28.02.2029 under the Water (Prevention & Control of Pollution) Act,1974 and the Air (Prevention & Control of Pollution) Act,1981, obtained from the Madhya Pradesh Pollution Control Board.
- 5.1.11. The unit has installed the OCEMS to monitor the PM emission remotely and during the visit, it was found operational and its data transmitted to MPPCB portal.
- 5.1.12. The stack monitoring was carried out on dated 24.11.2025 at the boiler of the unit Bhopal Sahakari Dugdh Sangh Maryadit located at Habibganj, Tehsil Huzur, District Bhopal. During monitoring, the boiler was operated on its full capacity and using bio-briquette as fuel. As per the result of the stack emission monitoring,

particulate matter (PM) concentration is measured 27.18 mg/Nm³ compare to the 25 mg/Nm³ given in air consent. The air quality analysis report is enclosed as **Annexure-4**.

5.2. BHARAT HEAVY ELECTRICAL LIMITED, BHOPAL

- 5.2.1. The inspection of unit Bharat Heavy Electrical Limited was conducted by the Joint Committee on dated 24.11.2025. The representatives of the unit Mr. Anoop Kumar, Senior Engineer and Mr. Rohit Jain, Manager, Boiler Operations were present during the inspection.
- 5.2.2. Bharat Heavy Electrical Limited (BHEL) is located at Piplani, Tehsil Huzur, District Bhopal, Madhya Pradesh. The geographical location of the site is latitude 23°14'19.58"N and longitude 77°27'34.70"E.
- 5.2.3. The unit covers an area of approximately 4500 acres. It is basically an engineering industry. Plantation has been developed throughout and around the premises. The nearest residential colony is located approximately 300 meters to the north of the unit.
- 5.2.4. The boiler section is located on the south-west side of the premises. The facility is equipped with two boilers. Previously, both the boilers were Furnace oil (FO) based but the unit has switched over to clean fuel-PNG based boilers. Currently, boilers are not being operated using FO.
- 5.2.5. Now, the facility is equipped with two PNG-based boilers, each having a capacity of 12 MT/hour and operating at 14 kg/cm².
- 5.2.6. The gas supply is sourced from M/s Think Gas through two lines, operating at 30 bar and 4 bar pressure, respectively.

5.2.7. As per the information provided by BHEL through its letter dated 03.12.2025, the BHEL Bhopal unit has commenced the use of PNG for boiler operations. PNG supply began on 17.11.2025 from M/s Think Gas, and the boiler is currently under commissioning. This transition to PNG is being implemented in line with NCAP guidelines. A copy of the letter is enclosed as **Annexure-5**.

5.3. NARMADA MILK AND MILK PRODUCT

- 5.3.1. The inspection of unit Narmada Milk and Milk Product was conducted by the Joint Committee on dated 28.11.2025. The representative of the unit Mr. Manohar Gupta were present during the inspection.
- 5.3.2. Narmada Milk and Milk Product is located at Govindpura Industrial Area, Tehsil Huzur, District Bhopal, Madhya Pradesh. The geographical location of the site is latitude 23°16'5.17"N and longitude 77°26'16.38"E.
- 5.3.3. The unit is located inside Govindpura Industrial Area. The dairy unit handles milk chilling, processing and marketing of milk and milk products. Raw milk is collected from producers and brought to the plant through insulated tankers. At the plant, milk is pasteurized and separated for packaging and for making fermented products.
- 5.3.4. The unit has installed 1 TPH agro-based boiler to meet the steam requirement. The boiler operates 12-14 hours per day, consuming about approximately 2 tonnes/day of bio-briquettes generating approximately 0.10 of ash per day. The bio-briquettes are stored in a shed near the boiler area.

- 5.3.5. The unit has installed cyclone arrangement and also Bag Filter with 76 bags of polyester installed as air pollution control devices.
- 5.3.6. The Stack with height of 30 meter is provided by the unit for exhaust of emissions along with platform, porthole and ladder for emission monitoring.
- 5.3.7. Ash is stored in an underground pit and lifted using a pulley-based mechanical system for loading into trolleys.
- 5.3.8. As per the information provided by the representative of the plant, the ash is taken by M/s Sunder Building Material Suppliers & Scrap. A copy of the receipts along with logbook records of ash was shown to the Joint Committee and the same is enclosed as **Annexure-6**.
- 5.3.9. The Narmada Milk and Milk Product has Consent to Operate valid up to 29.06.2027 under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, obtained from the Madhya Pradesh Pollution Control Board.
- 5.3.10. The stack monitoring was carried out on dated 28.11.2025 at the boiler of the unit Narmada Milk and Milk Product located at Govinpura Industrial Area, Tehsil Huzur, District Bhopal. During monitoring, the boiler was operated on its full capacity and using bio-briquette as fuel. As per the result of the stack emission monitoring, PM concentration is measure as 28.87 mg/Nm³, which is within the prescribed limit. The air quality analysis report is enclosed as **Annexure-7**.

5.4. PEOPLES MEDICAL COLLEGE & RESEARCH CENTRE

- 5.4.1. The inspection of Peoples Medical College Incinerator was conducted by the Joint Committee on dated 28.11.2025 and 02.12.2025. The representative of the unit Mr. Amol Muhane, Manager Incinerator, Mr. Praveen Verma, Incharge were present during the inspection.
- 5.4.2. Peoples Medical College Incinerator is located at Bhanpur Road, Tehsil Huzur, District Bhopal, Madhya Pradesh. The geographical location of the site is latitude 23°17'47.60"N and longitude 77°25'18.86"E.
- 5.4.3. The Peoples Hospital, Bhanpur was established in the year 2002. It is a medical college and research institute with a bed strength of 1100. As informed by the representatives, approximately 80–90 kg of yellow category waste is generated per day, which is treated through the incinerator.
- 5.4.4. The committee visited the unit on 28.11.2025 to verify the facts and allegations made in the petition. The committee observed that the unit has a double-chambered incinerator of 50 kg capacity, operated using diesel as fuel. As mentioned above, approximately 80–90 kg of waste is generated daily, and for its disposal the unit operates the incinerator for 3–4 hours. As per the diesel consumption logbook, approximately 40–45 liters of diesel are consumed per day. The consumption depends upon the matrix of waste received; if the waste contains high moisture, diesel consumption increases.
- 5.4.5. The committee decided to monitor the stack emissions for particulate matter (PM). However, due to non-availability of waste

and an electrical fault in the incinerator, monitoring could not be completed on the same day. Accordingly, the committee decided to revisit the unit for stack monitoring. The committee again visited the unit on 02.12.2025 and performed the stack emission monitoring. The unit has installed the double chamber incinerator and during monitoring temperature in primary and secondary chamber was observed 865⁰C and 1080⁰C against the standard of 850⁰C and 1050⁰C. To control emissions, the unit has installed a Venturi scrubber, which was found to be functional.

- 5.4.6. The stack monitoring was carried out on dated 02.12.2025 at the incinerator of the unit M/s Peoples Hospital, Bhanpur, Tehsil Huzur, District Bhopal. During monitoring, the incinerator was operated on its full capacity and using diesel as fuel. As per the result of the stack emission monitoring, the result of PM is within the prescribed limits as per the consent conditions of MPPCB. The air quality analysis report is enclosed as **Annexure-8**.
- 5.4.7. The unit has valid consent up to 31.12.2027 under Water (Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981 and Authorization under Bio-Medical Waste Management Rules, 2016. The hospital has captive incinerator for the treatment of bio-medical waste generated during treatment and research activities. The unit has installed an OCEMS system to monitor temperature and other primary pollutants remotely and during the visit, it was found operational and its data transmitted to MPPCB portal.

6. PREVIOUS LEGAL NGT CASE IN THE SIMILAR TYPE OF MATTER:

It is humbly submitted before the Hon'ble Tribunal that the similar type of matter has been disposed of on dated 01.08.2024 by the Hon'ble NGT in an OA 177 / 2023(CZ) "Shayam Mohan Richhariya Vs.State of M. P. & Ors." regarding the use of bio briquette as fuel by Bhopal Sahakari Dugdh Sangh Maryadit. The matter was taken up by Tribunal and constituted a committee consisting members of the CPCB and the State PCB and directed to submit the factual and action taken report and based on the joint committee report and reply filed by the respondents, Hon'ble NGT disposed of the case. The copy of the order is enclosed as **Annexure-9**. The major operative part of the order dated 01.08.2024 is as below:

12. *The Bio-Mass Briquette is a compressed form of agricultural waste/residue which is Carbon Neutral in comparison to LPG, which produces approximately 1660 grams Of Carbon per Kg. NGT in plethora of matters has shown concerns against Crop Residue Burning and therefore these Bio-Mass Briquettes are highly conducive towards environment and is one of the way towards promoting Green Energy (Carbon Neutral) in open market.*
13. *It is further submitted that Bio-Mass Ash is totally different from Fly-Ash. It is more of organic in nature and cannot be compared to Coal Based Fly-Ash. The average production of Bio-Mass Ash is approx. 800 Kgs. Per day and currently, the same is being stored, so that once a reasonable quantity of Bio-Mass Ash is available, the same can be used for Organic Manure and can be supplied to the farmers again. In a way, Bio-Mass Ash is recyclable in nature and one of its kind as the same has no hazardous impact in the environment/soil/ the contractor M/s. Subons Solutions LLP has even procured a Work Order from Bihar Government regarding such conversion of Bio-Mass Ash into Organic Manure, copy of which is annexed along with the written arguments for consideration of the Tribunal.*

14. Further contention of the respondent is that BMC has also issued NOC to the respondent for establishment of bio-mass briquette based steam boiler.
15. During the course of hearing it is admitted fact that the briquette is permitted according to the notification issued by the MoEF&CC. Accordingly, the Learned Counsel for the Applicant has submitted that since the energy use is permitted energy and more environment friendly thus, there are no violations.
16. In view of the above facts, the report submitted by the Joint Committee there are no violations and thus, no further action is required by this Tribunal.
17. The Original Application No. 177/2023 along with I.A. No. 35/2024 stands disposed of accordingly."

7. CONCLUSION:

In view of the above, the facts mentioned in the petition are partially consistent with the actual conditions observed by the committee during the site visit. Based on the analysis results of stack emission, it can be concluded that the values are within the limit as given in consent and so far, no public complaints have been received in this regard.

8. RECOMMENDATIONS OF JOINT COMMITTEE:

On the basis of the above observations made during inspection of the Committee, the following recommendations are submitted for further improvement:

- 8.1. The Peoples Hospital may explore the possibility of alternate fuel i.e. LPG or PNG for incinerator operation and ensure the periodic maintenance of air pollution control device installed.
- 8.2. M/s Bhopal Dugdh Sangh and M/s Narmada Milk and Milk Products should maintain proper records for utilized boiler ash.

8.3. M/s BHEL has switchover the fuel from Furnace oil to PNG hence no further action is required in this regard, however other consent condition shall be complying.

अनूप चतुर्वेदी

Dr. Anoop Chaturvedi
Scientist-C, Central Pollution Control
Board, Regional Directorate, Bhopal

10/12/2025

Mr. Pramod Srivastava
RI, Tehsil-Kolar, Bhopal

10/12/25

Jainendra Chandel
Chemist, RO, MPPCB, Bhopal

Prakamya Tiwari

Prakamya Tiwari
AE, RO, MPPCB, Bhopal

Inspection Photographs
in OA 119/2025

Bhopal Sahakari Dugdha Sangh Maryadit – dated 24.11.2025









Google Earth Imagery in OA 119-2025







601, C WING AMPEL HEIGHTS, BAWADIYA KALAN BHOPAL MADHYA PRADESH, 462026
Reg. Add: 306, Foundation Towers, Sector 11, CBD Belapur, Navi Mumbai, Maharashtra.-400614

To,

**The Regional officer
Madhya Pradesh Pollution control Board
Parya varan Pari shar E-5 Arera Colony Bhopal**



Subject: - Information regarding ash handling management/This is in reference to the inspection done by NGT committee on dated 24-11-2025 of boiler and was asked to submit the details of ash management. The details of agreement between SUBONS SOLUTIONS LLP AND MAHAKAL GROUP OF INSUDTURES for disposing the ash is annexed with the letter for your king perusal.



Singh

AEM
16
02/12/2025

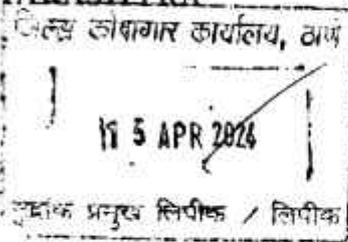
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Contact number: +91-8898057122 Email Address: subonsolutions@gmail.com



महाराष्ट्र MAHARASHTRA

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97AA 898678



ASH LOADING & DISTRIBUTION AGREEMENT

Between

M/s Subons Solutions LLP
and

M/s Mahakal Group

This Agreement is executed on this 1st day of September 2024 By and Between

1. M/s Subons Solutions LLP, a Limited Liability Partnership registered under the LLP Act, 2008, having its registered office at Office No. 306, Plot No. 20, Sector 11, 3rd Floor, Foundation Tower, Navi Mumbai, Thane. (hereinafter referred to as "Subons Solutions" or "First Party", which term shall include its partners, successors, and permitted assigns)

AND

2. M/s Mahakal Group, having its office at Village Rampura Khurd, Tes. Samsabad, Distt. Vidisha (M.P.) 464001 (hereinafter referred to as "Mahakal Group" or "Second Party", which term shall include its partners, successors, and permitted assigns)

For MAHAKAL GROUP OF INDUSTRIES

For SUBONS SOLUTIONS LLP

[Signature]
Proprietor

[Signature]
Director



8. Termination

- 8.1 Either Party may terminate this Agreement by giving 30 days' prior written notice.
- 8.2 Upon termination, Mahakal Group shall cease lifting ash immediately, and all logs/records shall be settled.

9. Governing Law & Jurisdiction

- 9.1 Any dispute before going to the court shall be mutually settled.
- 9.2 However, this Agreement shall be governed by and interpreted in accordance with the laws of India.
- 9.3 Any dispute shall be subject to the exclusive jurisdiction of the courts at Bhopal< Madhya Pradesh.

10. Miscellaneous

- 10.1 Any modification to this Agreement shall be made only through written consent signed by both Parties.
- 10.2 This Agreement represents the entire understanding between the Parties and supersedes all prior oral/written discussions.

IN WITNESS WHEREOF

The Parties hereto have executed this Agreement on the date first written above.

For M/s Subons Solutions LLP

Name: Rajeev Ranjan Singh
 Designation: Designated Partner
 Signature: [Handwritten Signature]
 Date: 01/09/2024
 Director



For SUBONS SOLUTIONS LLP

[Handwritten Signature]
 Director

For M/s Mahakal Group

Name: Neeraj Agarwal
 Designation: Director
 Signature: [Handwritten Signature]
 Date: 01/09/2024

For MAHAKAL GROUP OF INDUSTRIES

[Handwritten Signature]
 Proprietor

2. Duration of Agreement

- 2.1 This Agreement shall commence on 1st September 2024.
- 2.2 It shall remain valid for three (3) years, until 31st August 2027, unless terminated earlier as per this Agreement.
- 2.3 Upon expiry, it may be renewed upon mutually agreed terms, recorded in writing.

3. Responsibilities of Subons Solutions LLP

- 3.1 To load the ash into Mahakal Group's vehicles at no cost.
- 3.2 To ensure that the ash is solely derived from biomass briquette combustion.
- 3.3 To make ash available at designated loading points within the boiler facility during mutually agreed time slots.
- 3.4 To maintain daily or periodic logs of ash quantities handed over.

4. Responsibilities of Mahakal Group

- 4.1 To arrange suitable vehicles for lifting and transporting ash at appropriate intervals based on vehicle capacity.
- 4.2 To ensure that ash is distributed free of any charge to farmers and is not sold, bartered, or commercially exploited.
- 4.3 To maintain a distribution record and share the same with Subons Solutions upon request.
- 4.4 To ensure that loading schedules are adhered to, so that ash does not accumulate beyond manageable limits.

5. No Financial Consideration

- 5.1 Subons Solutions shall not charge Mahakal Group for ash loading.
- 5.2 Mahakal Group shall not charge any farmer or beneficiary for the ash.
- 5.3 No Party shall claim any compensation, reimbursement, or monetary benefit from the other Party under this Agreement.

6. Safety and Compliance

- 6.1 Both Parties shall comply with applicable environmental, safety, and transportation regulations.
- 6.2 Mahakal Group shall ensure safe handling and transportation of ash.
- 6.3 Subons Solutions shall provide safe access and follow internal safety guidelines during loading operations.

7. Indemnity

- 7.1 Each Party agrees to indemnify and hold harmless the other Party against any claims, damages, losses, or liabilities arising from its own negligence, breach of this Agreement, or improper handling of ash.

For MAHAKAL GROUP OF INDUSTRIES


Proprietor



For SUBONS SOLUTIONS LLP



Director

shall include its successors, representatives, and assigns) M/S Subons Solutions and M/s Mahakal Group are collectively referred to as the "Parties", and individually as a "Party."

WHEREAS

1. M/s Subons Solutions LLP is in the steam selling business. They install and operate biomass briquette fired boiler for its client on BOOT basis (Build Own Operate and Transfer) and thereby reducing the client's cost of steam and providing uninterrupted supply of steam.
2. M/s Subons Solutions LLP operates, maintains, and supplies steam from a biomass briquette-fired boiler of 5 TPH capacity, located at **Bhopal Dugdh Sangh Sahakari Maryadit Bhopal Dairy Plant, Habibganj, Bhopal, Bhopal, Madhya Pradesh, 462024.**
3. The dairy's steam demand is variable in the dairy, and the total steam generated is less than 40 MT per day.
4. The corresponding biomass ash generated is approximately 500 kg per day.
5. The ash possesses soil-enhancing properties and can improve agricultural productivity for farmers.
6. Mahakal group is in the business of manufacturing and supplying biomass briquette and has good network with farmers.
7. Mahakal group takes the biomass for its briquette manufacturing facility from different farmers.
8. Mahakal Group has agreed to lift, transport, and distribute the ash to farmers within its operational area free of cost, and Subons Solutions agrees to load the ash into the vehicles arranged by Mahakal Group starting 1st September 2024.
9. The Parties desire to enter into this Agreement to record their responsibilities and mutual understanding.

NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

1. **Scope of Work**
 - 1.1 M/s Subons Solutions shall load the biomass ash generated from the biomass briquette-fired boiler into the vehicles sent by Mahakal Group
 - 1.2 Mahakal Group shall lift, transport, and distribute the ash to farmers in its area free of any cost.
 - 1.3 The approximate quantity of ash available for lifting is 500 kg per day, subject to variations in steam generation.
 - 1.4 M/s Mahakal Group has agreed to lift the total quantity of ash generated from the boiler for onward distribution to its network of farmers.
 - 1.4 Ash lifting shall be done in intervals depending upon the carrying capacity of vehicles arranged by Mahakal Group.
 - 1.5 Both Parties agree that the ash will be used only for agricultural purposes.

For MAHAKAL GROUP OF INDUSTRIES

Proprietor



For SUBONS SOLUTIONS LLP

Rajeev Ranjan Singh

Director

जोडपत्र - १ / फक्त प्रतिज्ञापत्रासाठी

मुद्रांक वकील नोंदणी अनु. क्र. दिनांक

मुद्रांक विकत घेणा-याचे नाव

रहिवासी पत्ता

मुद्रांक विकत घेणा-याची / हस्ते सही

मुद्रांक विकत घेणा-याची व विकत घेणे टिकण.

राजे स्टॅम्प व्हॉल्यूम, मुद्रांक क्र. 5१, पोस्टात सेक्टर,

सेक्टर-१-अ, सी.पी.टी. विभाग, नवी मुंबई-४००६१४

(सौ.डी.बी.राणे)

परवाना क्र. १२०१०४१

ज्या व्यक्तीसाठी वकील नोंदणी मुद्रांक खरेदी करणे त्याची त्याच्या कारणासाठी
मुद्रांक खरेदी केल्यापासून नवी मुंबई न्याय विभागाने बंधनकारक आहे.

18 APR 2024

18 APR 2024



		Department of Finance , Government of Madhya Pradesh Acknowledgement Receipt for Online Tax Payment to M.P. State Government			
TIN (Tax payment Identification Number) / Enrollment / Registration No.					
Depositor/Dealer Name		MANOHAR LAL AGRAWAL			
Address		S/o NANNULAL, GRAM RAMPURA KHUR, TEHSIL SHAMSHABAD, Vidisha, Madhya Pradesh - 464111			
District selected for Payment		Vidisha			
Unique Registration Number (URN)		MPTURN030320250010984			
Department and Office Name		Revenue , TEHSIL SHAMSHABAD			
Challan Payment Period		2024-2025			
Purpose Details					
CRN	Assessment/ Concerning Period	Head of Account	Challan Identification Number (CIN)	Challan No.	Amount(Rs.)
MPT002903032025005982	2024-04-01 to 2025-03-31	0029-00-101-0007 (Land Revenue / Tax - Land revenue received from converted land)	SBIN0006159002903032025508687	051/9999999/0029/03/25/014265	8820.00
Total Amount(in figures)		8,820.00			
Total Amount(in words)		Eight Thousand Eight Hundred Twenty Rupees Only			
Name and Code of the Bank		STATE BANK OF INDIA (2)			
Bank Reference Number		IK00DJRLZ3			
Scroll No		50867			
Scroll Date		03/03/2025			
Date of Transaction / Time of Transaction (HH24:mm:ss)		03/03/2025 15:50:09			
Transaction Status		Success			

State 1945 **जलकर/प्रकाश कर/संपत्ति कर/स्वच्छता कर व अन्य कर की रसीद**

कार्यालय ग्राम पंचायत

विधिगा

जे. नीरज अग्रवाल

क्रमांक

मध्याह्न ग्रुप ऑफ इंडस्ट्रीज

दिनांक 25/09/25

श्री

पिता

पता

मोहल्ला

मकान नं.

ग्राम विधिगा

विवरण	जलकर	प्रकाश कर	संपत्ति कर	स्वच्छता कर	अन्य कर	कुल योग
पिछले माह / वर्ष का बकाया			2000/-		1000/-	3000/-
नोटिस फीस						
चालू माह						
कुल						3000/-

सचिव

ग्राम पंचायत विधिगा

सध्याह्न ग्रुप ऑफ इंडस्ट्रीज

जयप्रकाश नटेल

ग्राम पंचायत विधिगा

जयप्रकाश नटेल

कुल रुपये

तीन हजार २९



Department of Finance , Government of Madhya Pradesh
Acknowledgement Receipt for Online Tax Payment
to M.P. State Government



TIN (Tax payment Identification Number) / Enrollment / Registration No.	
Depositor/Dealer Name	MANOHAR LAL AGRAWAL
Address	S/o NANNULAL, GRAM RAMPURA KHUR, TEHSIL SHAMSHABAD, Vidisha, Madhya Pradesh - 464111
District selected for Payment	Vidisha
Unique Registration Number (URN)	MPTURN030320250011141
Department and Office Name	Revenue , TEHSIL SHAMSHABAD
Challan Payment Period	2024-2025

Purpose Details

CRN	Assessment/ Concerning Period	Head of Account	Challan Identification Number (CIN)	Challan No.	Amount(Rs.)
MPT002903032025006060	2024-04-01 to 2025-03-31	0029-00-101-0007 (Land Revenue / Tax - Land revenue received from converted land)	SBIN0006159002903032025509835	051/9999999/0029/03/25/014351	4107.00

Total Amount(In figures)	4,107.00
Total Amount(In words)	Four Thousand One Hundred Seven Rupees Only
Name and Code of the Bank	STATE BANK OF INDIA (2)
Bank Reference Number	IK0DDJRRF8
Scroll No	50981
Scroll Date	03/03/2025
Date of Transaction / Time of Transaction (HH24:mm:ss)	03/03/2025 15:54:14
Transaction Status	Success



Madhya Pradesh Pollution Control Board Central Laboratory



Paryawaran Parisar, E-5, Arera Colony, Bhopal -462016 (M.P.)

TC-8568

Tel : 0755-2466191; E.mail : cl_mppcb@rediffmail.com; Web : www.mppcb.mp.gov.in

Test Report

Annexure-4

Report Number:- 52

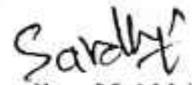
Issue No. 5/0

Issue Date: 09/11/2025

Sample From:- Regional Office, M.P. Pollution Control Board, Bhopal	Sample Description:- Sample of Stack Emission Monitoring Biomass based Boiler (5TPH) of M/s Bhopal Sahakari Dugdh Sangh Maryadit Habibganj Bhopal.
Reference No.3626 Bhopal, dated 25/11/2025	Sampling By CL/Customer:- Regional Office, M.P. Pollution Control Board, Bhopal
Date of Sampling:-24/11/2025	Date of Receipt:- 25/11/2025
Analysis Start Date:- 25/11/2025 Analysis End Date:- 26/11/2025	Sampler UID:- Not applicable
Environmental Condition:- Cloudy	Sample Condition:- As Per Protocol

S. No.	Parameter's	Unit	Sampling Protocol and Test Method	Results
1.	Particulate Matter	(mg./Nm ³)	IS-11255 (Part1) :1985 Reaffirmed 2019	27.18

- Remark:**
1. No statutory liability accepted for samples not collected by M.P.P.C.B.
 2. The results relate only to the items tested
 3. The report shall not be reproduced except in full without permission of Incharge Central Laboratory, MP, Pollution Control Board, Bhopal
 4. Applicable if details submitted by the monitoring agency.


(Dr.Sandhya Mokhle)
Authorized Signatory
Scientist

End of report

 Central Laboratory MPPCB Bhopal
page 1 of 1



भारत हेवी इलेक्ट्रिकल्स लिमिटेड, भोपाल
(भारत सरकार का उपक्रम)
Bharat Heavy Electricals Limited, Bhopal
(A Govt. of India undertaking)
सत्कृष्टता की ओर अग्रसर
"Marching Towards Business Excellence"



पत्र क्रमांक: बी.एच.ई.एल/एचएसई/प्र. नि. बो/2025-26

दिनांक: 03.12.2025

- संदर्भ: 1. 2628/क्षेका/प्रनिबो/2024 भोपाल दिनांक-19.11.2024
2. 887/क्षेका/प्रनिबो/फाइल क्र. भोपाल दिनांक-04.04.2025

सेवा मे,

श्रीमान क्षेत्रीय अधिकारी

मध्य प्रदेश प्रदूषण नियंत्रण बोर्ड, भोपाल

विषय: बी.एच.ई.एल की भोपाल इकाई में क्लीन फ्युल (PNG) के उपयोग की जानकारी हेतु:

महोदय,

उपरोक्त पत्रांक एवं विषय के संदर्भ में, बी एच ई एल की भोपाल इकाई में क्लीन फ्युल (PNG) की सप्लाई दिनांक 17.11.2025 से मेसर्स थिंक गैस के द्वारा पाइप लाइन से की जा रही है और अभी बॉयलर में कमीशनिशिंग स्टेज में उपयोग हो रही है। क्लीन फ्युल (PNG) का उपयोग नेशनल क्लीन एयर प्रोग्राम के अनुपालन हेतु किया जा रहा है।

आप की सादर जानकारी हेतु प्रेषित ।

सादर धन्यवाद ,

प्रमुख (एच.एस.ई.)

SARAJI SUHANE
SARAJI SUHANE
SARAJI SUHANE
SARAJI SUHANE

भोपाल : 462022, दूरभाष : 2500100 (7 लाईन्स), फैक्स : 0755 - 2500425, तार : भारतइलेक
Bhopal : 462022, Phone : 2500100 (7 Lines), Fax : 0755 - 2500425, Gram : BHARATELEC
WEB SITE ADDRESS : www.bhelbhopal.com

संजीवन कार्यालय बी.एच.ई.एल. हाउस, सीरी फोर्ट नई दिल्ली - 110049

Regd. Office: BHEL House, Sri Fort, New Delhi - 110049
WEB SITE ADDRESS: www.bhel.com

SUNDER BUILDING MATERIAL SUPPLIERS & SCRAP

Shop No.14, Chhatameel, Lambakheda, Berasia Road Dist. Bhopal | 7898723844

S.No. 02

Date 30/09/25

Name श्री गणेश मिशन 2018 मिशन श्री गणेश मिशन 2

S.No.	Particulars	Qty.	Rate	Amount
1-	ASH	2783	-	-
Total				0
IGST %				0
SGST %				0
CGST %				0
G. Total				

► E.&O.E.
► All Subject to Bhopal Jurisdiction

For: SUNDER BUILDING MATERIAL
SUPPLIERS & SCRAP

SUNDER BUILDING MATERIAL SUPPLIERS & SCRAP

Shop No.14, Chhatameel, Lambakheda, Berasia Road Dist. Bhopal | 7898723844

S.No. 010

Date 31/10/25

Name

मि.डी. बि.के. एच. एच. बि.के. बि.के. बि.के. बि.के. बि.के. - 2

S.No.	Particulars	Qty.	Rate	Amount
1-	ASH	2817	-	-
Total				-
IGST %				-
SGST %				
CGST %				
G. Total				

- E.&O.E.
- All Subject to Bhopal Jurisdiction

For:  SUNDER BUILDING MATERIAL
SUPPLIERS & SCRAP



GENERAL GATE PASS

**NARMADA MILK & MILK
PRODUCT'S UNIT- II, BHOPAL**

Plot No.-103, Sector-I, Industrial area, Govindpura Bhopal

No. : 4451

Date: 31/10/25

To, SUNDEx BUILDING material.

Goods Throught

Vehicle No. 19P042L9256 Time 16:10

No.	Description	A.U.	Quantity	Remarks
①	Boiler Rakad	—	2817 Kg	

Signature of P.M.

Sign. of Security

Sign. of Admin

Security Store

114



GENERAL GATE PASS

**NARMADA MILK & MILK
PRODUCT'S UNIT- II, BHOPAL**

Plot No.-103, Sector-I, Industrial area, Govindpura Bhopal

No. : 4453

Date: 30/09/25

To, SUNDEx BUILDING material SUPPLIERS

Goods Throught

Vehicle No. 19P042L9256 Time 14:30

No.	Description	A.U.	Quantity	Remarks
①	Boiler Rakad	—	2783 Kg	

Signature of P.M.

Sign. of Security

Sign. of Admin

Security Store

Naxmadana 115
[ASH Record]

No. Oct 25

Date: / /

Date	of Bal kgs.	Qty Received	Total kgs	Qty Dispatching	Balance kgs
01/10/25	0	90	90	0	90
2/10/25	90	85	175	0	175
03/10/25	175	90	265	0	265
04/10/25	265	88	353	0	353
05/10/25	353	95	448	0	448
06/10/25	448	86	534	0	534
07/10/25	534	90	624	0	624
08/10/25	624	88	712	0	712
09/10/25	712	105	817	0	817
10/10/25	817	90	907	0	907
11/10/25	907	90	997	0	997
12/10/25	997	88	1085	0	1085
13/10/25	1085	95	1180	0	1180
14/10/25	1180	85	1265	0	1265
15/10/25	1265	100	1365	0	1365
16/10/25	1365	85	1450	0	1450
17/10/25	1450	88	1538	0	1538
18/10/25	1538	85	1623	0	1623
19/10/25	1623	100	1723	0	1723
20/10/25	1723	94	1817	0	1817
21/10/25	1817	100	1917	6	1917
22/10/25	1917	95	2012	0	2012
23/10/25	2012	80	2092	0	2092
24/10/25	2092	85	2177	0	2177
25/10/25	2177	90	2267	0	2267
26/10/25	2267	88	2355	0	2355
27/10/25	2355	95	2450	0	2450
28/10/25	2450	90	2540	0	2540
29/10/25	2540	102	2642	0	2642
30/10/25	2642	90	2732	0	2732
31/10/25	2732	85	2817	2817	0



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Madhya Pradesh Pollution Control Board
Central Laboratory

Annexure-7



Paryawaran Parisar, E-5, Arera Colony, Bhopal -462016 (M.P.)

TC-8568

Tel : 0755-2466191; E.mail : cl_mppcb@rediffmail.com; Web : www.mppcb.mp.gov.in

Test Report

Issue No. 571

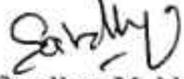
Issue Date: 09/12/2025

Report Number:- 55

Sample From:- Regional Office, M.P. Pollution Control Board, Bhopal	Sample Description:- Sample of Stack Emission Monitoring Biomass based Boiler of M/s Narmada Milk & Milk Products Bhopal.
Reference No.3738 Bhopal, dated 01/12/2025	Sampling By CL/Customer:- Regional Office, M.P. Pollution Control Board, Bhopal
Date of Sampling:-28/11/2025	Date of Receipt:- 01/12/2025
Analysis Start Date:- 01/12/2025 Analysis End Date:- 02/12/2025	Sampler UID:- Not applicable
Environmental Condition:- Sunny	Sample Condition:- As Per Protocol

S. No.	Parameter's	Unit	Sampling Protocol and Test Method	Results
1.	Particulate Matter	(mg /Nm ³)	IS-11255 (Part1) :1985 Reaffirmed 2019	28.87

- Remark:**
1. No statutory liability accepted for samples not collected by M.P.P.C.B.
 2. The results relate only to the items tested
 3. The report shall not be reproduced except in full without permission of Incharge Central Laboratory, MP, Pollution Control Board, Bhopal
 4. Applicable if details submitted by the monitoring agency.


(Dr.Sandhya Mokhe)
Authorized Signatory
Scientist

End of report

Central Laboratory MPPCB Bhopal
page 1 of 1



Madhya Pradesh Pollution Control Board
Central Laboratory



Paryawaran Parisar, E-5, Arera Colony, Bhopal -462016 (M.P.)

Tel : 0755-2466191; E.mail : cl_mppcb@rediffmail.com; Web : www.mppcb.mp.gov.in

Test Report

Report Number:- 57

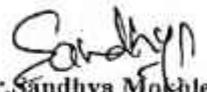
Issue No. 505

Issue Date: 08/12/2025

Sample From:- Regional Office, M.P. Pollution Control Board, Bhopal	Sample Description:- Sample of Stack Emission Monitoring Bio Medial Waste Treatment Facility incinerator (Diesel Based) of M/s Peoples Medical College and Research Centre Bhanpur, Bhopal
Reference No.3759 Bhopal, dated 04/12/2025	Sampling By GL/Customer:- Regional Office, M.P. Pollution Control Board, Bhopal
Date of Sampling:-02/12/2025	Date of Receipt:- 04/12/2025
Analysis Start Date:- 04/12/2025 Analysis End Date:- 05/12/2025	Sampler UID:- Not applicable
Environmental Condition:- Clear	Sample Condition:- As Per Protocol

S. No.	Parameter's	Unit	Sampling Protocol and Test Method	Results
1.	Particulate Matter	(mg /Nm ³)	IS-11255 (Part1) :1985 Reaffirmed 2019	26.41

- Remark:**
1. No statutory liability accepted for samples not collected by M.P.P.C.B.
 2. The results relate only to the items tested
 3. The report shall not be reproduced except in full without permission of Incharge Central Laboratory, MP, Pollution Control Board, Bhopal
 4. Applicable if details submitted by the monitoring agency.


(Dr. Sandhya Mokhe)
Authorized Signatory
Scientist

Central Laboratory MPPCB Bhopal
⊗ page 1 of 1

End of report

Item No. 09

**BEFORE THE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE BENCH, BHOPAL**
(Through Video Conferencing)
Original Application No. 177/2023(CZ)
(I.A.No.35/2024)

Shayam Mohan Richhariya

Applicant(s)

Vs.

State of M. P. & Ors.

Respondent(s)

Date of Hearing: 01.08.2024

**CORAM: HON'BLE MR. JUSTICE SHEO KUMAR SINGH, JUDICIAL MEMBER
HON'BLE DR. A SENTHIL VEL, EXPERT MEMBER**

For Applicant(s):

Mr. Dharamvir Sharma, Adv.

For Respondent(s):

Mr. Prashant Sthapak, Adv.
Mr. Rohit Sharma, Adv.
Mr. Prashant M. Harne, Adv.
(with Mr. Mehul Bhardwaj, Adv.)
Ms. Parul Bhadoria, Adv.
Mr. Om Shankar Shrivastava, Adv.

ORDER

1. The grievance of the applicant is compliance of the Air (Prevention and Control of Pollution) Act, 1981 by respondent no. 6, unit of Bhopal Sahkari Dugdh Sangh Maryadit which is in a red category plant operating in close proximity of ISBT, Rani Kamalapati Railway Station, School, Colleges, Hospital and Residential areas at Habib Ganj and processing the milk plant. The project proponent has invited tender for steam-based/design, supply, installation, operation and

- maintenance for 5 MT per hour expendable up to 13 MTPH Solid Multi-Fuel Fired Bio-Mass Boiler for Dairy Plant, which is against the action plan made by the Madhya Pradesh Pollution Control Board.
2. It is alleged that use of briquette, solid fuel if allowed in the middle of the city may lead to having adverse effect on the human health in the city.
 3. The matter was taken up by this Tribunal on 11.12.2023 and a committee consisting members of the CPCB and the State PCB was constituted with direction to submit the factual and action taken report. in compliance thereof, the joint committee submitted the report. Notices were issued to the respondents, who have filed the reply.
 4. The submission of the learned counsel for the CPCB are that under Section 18 (1)(b) of Air (Prevention of Control of Pollution) Act, 1981 and Section 22 the State PCB has been authorized to take necessary action in-case of violation. The members of the joint committee in compliance of the order filed the report with the following facts :-

A. "Introduction and location of M/s Bhopal Sahakari Dugdh Sangh Dairy Plant, Bhopal:-

1. *Bhopal Sahakari Dugdh Sangh Maryadit, affiliated to MP State Cooperative Dairy Federation, Bhopal is in existence since 1977. It covers 11 districts and deals with 22 Milk Chilling Centres in its area of operation. The main Dairy plant of 4.00 lakh liters per day capacity is located at*

Habibganj, Bhopal. It was established in 1981.

- 2. The plant is located approx 90 meters away on North – East side of Rani Kamplapati railway station and approx 100 meters away on South – West of ISBT. This is a state government organization.*
- 3. The nearest residential colony is approx 160 meters away on west side from the plant. The plant area is approx 9.50 Acres.*
- 4. The urban dairy development covers creation and strengthening of necessary infrastructure relating to milk Chilling, processing, manufacture and marketing of milk & milk products. As informed, Raw milk is collected from milk producers. Milk so collected is transferred through insulated milk tankers to the milk processing plant. At processing plant this milk is pasteurized, Homogenise and separated which further used for milk packing and other indigenous and fermented milk product making. Presently, besides dairy plant, the milk union has Butter and Ghee manufacturing facility of 5 MT/day each.*
- 5. Two existing Boilers of capacity 3 Ton each run by LPG (Liquid Petroleum Gas) are installed to meet out plant steam requirement. Where one boiler runs 20 hr in a day and other boiler is for backup which generally used at the time of maintenance/shutdown of another boiler. As informed, the consumption of LPG is approx. 1.9 MT/day and bio briquettes will be approx. 36 MT/day.*
- 6. A DG of capacity 400 KVA is installed to meet out the sudden breakdown or power cut from MPEB (Madhya*

Pradesh Electricity Board).

7. *The waste water generated from cleaning of equipments transferred to ETP (Effluent Treatment Plant) of capacity 600 KLD. Daily 4 Lakh Litre of waste water treated out of which 2 Lakh Litre treated water supplied to Indian Railway for their platform and wagon cleaning and rest 2 Lakh Litre of water is used in plant gardens, Green belts, Platform cleaning, vehicles outer body washing etc.*

B. Layout of the Plant:

- *The plant layout is enclosed. The various units of the plant are marked on the layout plan.*
- *The main milk processing unit is located on the west side of the plant premises.*
- *The boiler house is located on the North – West quadrant of the plant premises. There are two boiler houses adjacent to each other. One is old boiler house having LPG gas based boiler and another is new boiler house of 5 TPH capacity based on bio briquette fuel.*
- *The new boiler house is located approx 180 meters from Railway line and approx 120 meters from Road.*
- *The Effluent Treatment plant of 600 KLD capacity located on North – East quadrant of the plant premises.*
- *The plant is surrounded by thick green plantation all around.*
- *The internal roads and drains are made of cement concrete.*

C. Waste water and Solid waste management:

- *Water source are BMC and two bore wells located within the premises. The plant has an agreement with Water Resources Department Regarding water extraction of 225 Cum/day. The agreement is valid up to 12/05/2026. Plant has not taken permission from Central Ground*

Water Authority.

- *The total quantity of water consumed is 580 KLD i.e., 40 KLD being for domestic purpose and 540 KLD being industrial purpose.*
- *The total quantity of waste water generated is 254 KLD i.e., 22 KLD from domestic and 232 KLD from industrial waste water.*
- *The waste water is discharged into ETP. The plant has installed ETP system of capacity 600 KLD consisting of Clarifier, Equalization Tank, Aeration Tank, Sludge Drying Bed, UASB, Treated water collection tank. The treated waste water is utilized for gardening to platform washing within premises. Thick green plantation is provided in and around the premises.*
- *Approx 2.00 lacs liter treated waste water is supplied to Rani Kamplapati Railway Station through pipe.*
- *The source of Hazardous Waste is used/ spent oil generated about 0.01 MT/year, empty barrels/containers contaminated with hazardous chemicals generated about 15 MT/year, PVC/Plastic Waste generated about 8 MT/year. This Hazardous Waste is disposed of at TSDF Pithampur/ authorized recycler.*

D. Background and Specific Issues in this matter:-

- *The grievance of the applicant is compliance of the Air (Prevention and Control of Pollution) Act, 1981 by respondent no. 6, unit of Bhopal Sahkari Dugdh Sangh Maryadit which is in a red category plant operating in close proximity of ISBT, Rani Kamalapati Railway*

Station, School, Colleges, Hospital and Residential areas at Habib Ganj and processing the milk plant. The project proponent has invited tender for steam-based/design, supply, installation, operation and maintenance for 5 MT per hour expendable up to 13 MTPH Solid Multi-Fuel Fired Bio-Mass Boiler for Dairy Plant, which is against the action plan made by the Madhya Pradesh Pollution Control Board.

- It is alleged that use of briquette, solid fuel if allowed in the middle of the city may lead to having adverse effect on the human health in the city.
- A substantial question of environmental rules and compliance of the law and directions are involved in this petition.

E. Factual status Report of the major issues raised in The petition:-

Major Issue raised in the Petition	Reply
The grievance of the applicant is compliance of the Air (Prevention and Control of Pollution) Act, 1981 by respondent no. 6, unit of Bhopal Sahkari Dugdh Sangh Maryadit which is in a red category plant operating in close proximity of ISBT, Rani Kamalapati Railway Station, School, Colleges, Hospital and Residential areas at Habib Ganj and processing the milk plant. The project proponent has invited tender for steam-based/design, supply, installation, operation and maintenance for 5 MT per hour expendable up to 13 MTPH Solid Multi-Fuel Fired Bio-Mass Boiler for Dairy Plant, which	<p>M/s Bhopal Sahakari Dugdh Sangh Maryadit (Bhopal Dairy Plant) is Red- Medium Category industry as per the Consent to Operate under section 25 of Water Act, 1974 and under section 21 of Air Act, 1981 issued by MPPCB dated 07.02.2022 which is valid up to 31.07.2026.</p> <p>Unit has authorization under Hazardous & Other Wastes (Management and Transboundary Movement) Rules, 2016 which is valid upto 31.01.2027.</p> <p>The unit has done Steam Purchase Agreement on 21.03.2023 with</p>

<p><i>is against the action plan made by the Madhya Pradesh Pollution Control Board.</i></p>	<p><i>M/s Subons Solutions LLP, 306, Foundation Tower, Sector-11, CBD Belapur, Navi Mumbai for supplying steam to dairy plant by doing operation and Maintenance of 10 years solid fuel multi fuel fired Boiler on Built, Own, Operate and Transfer (BOOT) basis to be constructed at the dairy premises which will be owned by the unit but will be subsequently transferred to unit after 10 years.</i></p> <p><i>In this regard, M/s Bhopal Sahakari Dugdh Sangh Maryadit (Bhopal Dairy Plant) has obtained Consent to Establish under section 25 of Water Act, 1974 and under section 21 of Air Act, 1981 issued by MPPCB dated 14.07.2023 which is valid upto 30.06.2028 for setting of 5 Ton/Hour Steam Boiler and associated pollution control facility.</i></p> <p><i>M/s Subons Solutions LLP has installed the Boiler of 5 Ton/Hour as observed during the inspection on 15.01.2024. M/s Subons Solutions LLP would start operating the boiler upon obtaining Consent to Operate to be issued by MPPCB. CCA Compliance Report dated 14.07.2023 submitted to MPPCB is enclosed.</i></p> <p><i>As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied. Therefore, Boiler with adequate air pollution control device is not against the action plan made by Madhya Pradesh Pollution Control Board.</i></p>
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	<p><i>In this regard, joint committee Stack monitoring of the Boiler carried out by MPPCB RO Bhopal and CPCB RD Bhopal for verifying the adequacy of air pollution control devices of the Boiler.</i></p>
<p><i>That, the act of Respondent No 6 / BSDSM / PP is clear violation of environmental rules by circumventing the liability casted upon the PP to the third party. In the present case CTE is applied by the Respondent/ BSDSM whereas, third party being engaged to install, operate, maintain and supply of the steam generated from briquette solid fuel with all environment liabilities. Surprisingly, this is precondition for establishment of Briquette Bio-mass Boiler to shift the liability in case of any untoward incident occur by operation of solid multi-fuel fired Bio-mass Boiler in the midst of human population, Rani Kamlapati Railway Station, ISBT, hospitals, School and colleges, which establishments is within the radius of 200 meters from the PP unit. The cause of action further arouses when RTI information received on dated 06.10.2023, when copy of Action Plan for control of Air Pollution in non-attainment city of MP is prepared by MPPCB is annexed and marked.</i></p>	<p><i>Directorate of Boilers, Government of Madhya Pradesh, Bhopal has issued Provisional Order under section 9 of Boiler Act, 1923 on 01.01.2024 which is valid up to 30.06.2024.</i></p> <p><i>As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied. Therefore, Boiler with adequate air pollution control device is not against the action plan made by Madhya Pradesh Pollution Control Board.</i></p>
<p><i>That, the Respondent No-6/PP has deliberately misguided the approving authorities about the fact of operation of solid fuel Briquette Bio-mass based Boiler for milk processing which is not under the schedule of Action Plan made by Respondent/ MPPCB after detailed direction passed</i></p>	<p><i>As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied. Therefore, Boiler with adequate air pollution control device is not against the action plan made by Madhya Pradesh Pollution Control</i></p>

<p><i>by NGT (PB) New Delhi, in OA no. 681/2018 dated 08.10.2018 by the authorities with regard to air pollution Non-Attainment City in India such as Bhopal. The action Plan of MPPCB for controlling air pollution in Bhopal is to ensure clean-fuel for commercial purposes, but the respondent Board while allowing the same is ignoring to its own action plan is serious and this Tribunal can take the cognigence to this unlawful act in connivance with the authorities.</i></p>	<p><i>Board.</i></p>
<p><i>That, the applicant has received other information through RTI with regard to Expansion of Consent to Establish ("CTE") issued to the Respondent's industry on dated 6th July 2023. The Site inspection report reveals that on an application by the project proponent for the installation of another Boiler based on Bio-Mass based Briquette. The Boiler shall be installed near the existing another Boiler in open available space with 30 meters stack height is proposed having consumption of Bio-mass 5 Metric ton MT) per hour. Although another 1600 kg/per day consumption of LPG is being used by the project proponent for meeting its existing requirements. The sample report at Para-F indicates the use of furnace Oil of 4800 Kgs/month along with LPG is used for milk processing by the industry. However, This Tribunal has already passed an order on dated 05.07.2016 that use of furnace oil is impermissible. Further Bio- mass Ash along with</i></p>	<p><i>Unit has 02 boilers each of 3 Ton/Hour steam generation capacities which are operational by LPG. Unit has done agreement with HPCL for supply of commercial LPG through cylinder and latest bill of LPG supply is enclosed.</i></p> <p><i>Unit has submitted Fly Ash Management Plan which is enclosed.</i></p> <p><i>As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied.</i></p> <p><i>Therefore, Boiler with adequate air pollution control device is not against the action plan made by Madhya Pradesh Pollution Control Board.</i></p>

<p><i>other solid wastes discharged by the operation of this industry on account of use of Briquette Bio-mass Boiler which is as per agreement the fuel commodity. Which is not permissible as per National Clean Air Programme (NCAP). Copy of CTE issued for expansion and installation of Boiler based on solid Bio mass based briquette is annexed.</i></p>	
<p><i>That, as per the inspection report conducted by respondent/MPPCB on 06.07.2023 the boiler will use bio-mass of Briquette which will be consumed at rate of 5 MT Per/hour. The Briquette, according to Collins dictionary, is a small brick made of compressed Coal Dust, Saw Dust, Charcoal etc used as Fuel in Boiler for converting water into steam, which in this matter, is used as a raw material for the operation. Biomass briquettes traditionally available are nothing but compressed stubble of crops. Central pollution Control Board is also responsible for such activities with regard to air pollution have documented rules, conditions, reports and guidelines but unfortunately nothing concrete on the ground.</i></p>	<p><i>Bio-mass fuel may be operated for designed boiler with adequate Air Pollution Control Devices (APCD). Air pollution control devices details enclosed.</i></p> <p><i>Measures and implementation for arresting/minimizing the particulate emission and ash generation management and other measures taken by M/s Subons Solutions LLP as suggested by MPPCB:</i></p> <ol style="list-style-type: none"> <i>1. Multi cyclone arrangement having two towers each of dia-910 mm, lenth-3000 mm is installed before the Air Pre heater.</i> <i>2. Air pre heater (APH) is also installed to utilize the heat of flue gas and also to arrest the dust particles going after the multi cyclone.</i> <i>3. Primary Bag Filter with 210 bags is installed after the APH to further arrest the dust particles if any after APH. The secondary bag filter is installed for redundancy and is in parallel with 168 bags. In case primary bag filter is in maintenance then secondary is operational.</i> <i>4. Stack with height of 30 meter is provided by the unit for exhaust</i>

	<p>of emissions. Stack with Platform, Porthole and Easy ladder is provided for emission monitoring.</p> <p>5. Ash Management- As per fly ash management plan of the unit, the ash collected in boiler bed, air pre heater, cyclone and bag filter shall be conveyed to Ash Storage Pit which is underground. Ash pit has a holding capacity of 7 days of ash generation. The ash will directly go into the Underground Ash Storage Pit. Once it is filled, it is lifted and conveyed with the help of pulley and mechanical system for loading on to a trolley. The trolley used for transportation of ash will be fully covered.</p> <p>6. Online monitoring system is installed to measure the particulate emission on continuous basis. Online PTZ Camera is installed to see and record the particulate emission on continuous basis.</p>
<p><i>That, earlier too in another case titled as Dr. Shailender Kumar Modi V/s Bhopal Sahkari Dugdh Sangh Maryadit 2 Others OA No 45/2016 wherein this Tribunal has passed a detailed order with respect to the use of fuel by the respondent unit. This Tribunal has found serious environmental violation of this unit including use of furnace oil as fuel found to be impermissible. Effluent discharge was also found while course of hearing against this unit. Copy of the order passed on dated 05.07.2016 by this Tribunal is annexed.</i></p>	<p>Unit has 02 boilers each of 3 Ton/Hour steam generation capacities which are operational by LPG. Unit has done agreement with HPCL for supply of commercial LPG through cylinder and latest bill of LPG supply is enclosed.</p> <p>During the inspection on 15.01.2024, it was observed by the joint inspection team that the overflow of the sludge drying beds of the ETP is flowing outside the premises which is a violation of the Consent to Operate under Water Act, 1974 issued by MPPCB. The overflow of sludge drying beds measured as 25.64 litre/minute. The sample of the discharging</p>

	<p><i>effluent has been collected by MPPCB.</i></p> <p><i>MPPCB has issued notice vide dated 15.01.2024 to M/s Bhopal Dugdh Sangh, Dairy Plant regarding the overflow of the sludge drying beds of the ETP is flowing outside the premises. In reference to the notice dated 15/01/2024 of MPPCB, unit vide letter dated 25/01/2024 submitted the reply and informed that the points of notices are complied and photographs are submitted. The committee inspected the compliance on dated 02/02/2024, 12/02/2024 and on dated 29/02/2024 and found that the discharge is stopped and housekeeping is improved.</i></p> <p><i>The sample of the overflow of the sludge drying beds of the ETP is flowing outside the premises has been collected by MPPCB on dated 15/01/2024. Sample analysis report by MPPCB is enclosed.</i></p>
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S. N.	Parameter	Analysis Result	Limit as per consent
1.	pH	7.42	5.5-9.0
2.	Suspended Solid	250	100
3.	BOD	120	30
4.	COD	871.2	250
5.	Oil & Grease	12	10
6.	TDS	800	2100
7.	Chloride	119.96	1000

*Note: All values are in mg/l except pH.
As per report the parameters of SS, BOD, COD, Oil & Grease are not under the limit as per consent.
Flow chart of Effluent Treatment Plant of the unit is enclosed.*

That, it's hard to realise the fact that, city of Bhopal has already faced the worst industrial disaster on the midnight horror of 3rd December 1984, when a thin plume of white vapor began streaming from high structure. Caught by the wind, it became a haze and blew downwards to mingle with smoke coming from somewhere nearer the ground. A dense fog formed, nudged by the wind, it rolled across the road and into alleys on the other side resultantly those within the vicinity woke coughing, their eyes and mouths on fire immediately killing of thousands of people and causing significant morbidity and premature death for many thousands more. Bhopal has hardly recovered from the world's largest

As observed during the inspection, the plant is a biomass briquettes based boiler provided with adequate Air Pollution Control Device.

<p><i>industrial disaster of the century. Thousand resultantly died and more than half a million were injured. In the year since, as more people died of their injuries and illnesses caused by inhaling by the gas. The death toll has risen above 20,000. The principle of Precaution strictly applies to avoid such untoward incidents anymore. Therefore, the instant petition is filed on the strong footing of Precautionary Principle which is envisioned by lawmakers while framing National Green Tribunal Act, 2010.</i></p>	
<p><i>That, Dust Pollution has become a major issue in the City of Bhopal and this is constituting for sickness due to inhaling polluted air. The importance of Clean Air can be adjudged from the point of being Fundamental Right under article 21 Right to live in a clean and healthy Environment. If this is not checked at the right time then situation of place like Delhi NCR can be seen particularly during winter season where Air Quality Index (AQI) is above 600 ppm spread over entire region. This situation is alarming as in Bhopal also AQI is above 250 ppm in the daily records. The recent newspaper articles are annexed for kind perusal of this tribunal whereof rise of AQI and downwards trend of mercury in winter is especially dangerous, impacting the elderly and younger people. The copy of newspapers cutting and recent reporting are jointly attached and annexed</i></p>	<p><i>Bio-mass fuel may be operated for designed boiler with adequate Air Pollution Control Devices.</i></p> <p><i>Measures and implementation for arresting/minimizing the particulate emission and ash generation management and other measures taken by M/s Subons Solutions LLP as suggested by MPPCB:</i></p> <ol style="list-style-type: none"> <i>1. Multi cyclone arrangement having two towers each of dia- 910 mm, lenth- 3000 mm is installed before the Air Pre heater.</i> <i>2. Air pre heater (APH) is also installed to utilize the heat of flue gas and also to arrest the dust particles going after the multi cyclone.</i> <i>3. Primary Bag Filter with 210 bags is installed after the APH to further arrest the dust particles if any after APH. The secondary bag filter is installed for redundancy and is in parallel with 168 bags. In case</i>

	<p>primary bag filter is in maintenance then secondary is operational.</p> <p>4. Stack with height of 30 meter is provided by the unit for exhaust of emissions. Stack with Platform, Porthole and Easy ladder is provided for emission monitoring.</p> <p>5. Ash Management- As per fly ash management plan of the unit, the ash collected in boiler bed, air pre heater, cyclone and bag filter shall be conveyed to Ash Storage Pit which is underground. Ash pit has a holding capacity of 7 days of ash generation. The ash will directly go into the Underground Ash Storage Pit. Once it is filled, it is lifted and conveyed with the help of pulley and mechanical system for loading on to a trolley. The trolley used for transportation of ash will be fully covered.</p> <p>Online monitoring system is installed to measure the particulate emission on continuous basis. Online PTZ Camera is installed to see and record the particulate emission on continuous basis.</p>
<p>That, the office of Municipal Corporation Bhopal surprisingly allowing such activities of the Respondent no-6, unit whereas, prohibiting the use of solid fuel by hotels, restaurants and dhabas. The respondent / BMC has recently started issuing notices in compliance of OA no. 142/2023 in "Pratik Bhosle Vs. State of Madhya Pradesh" to prohibit using wood/charcoal as fuel by hotels and restaurants in the city area. This expresses the deep concern of the State</p>	<p>As per Action Plan submitted by MPPCB for Non-attainment city i.e. Bhopal, Only LPG is being promoted for use in the eateries, restaurants & domestic purposes of the city. Industry has to provide adequate Air Pollution Control Devices for using bio-mass in the boiler.</p>

<p><i>Government with respect to controlling the Air ambient standard of the Non- attainment City Bhopal. This type of double standard on one hand allowing 5 Metric Tonnes Per Hour of solid fuel by one unit and prohibiting restaurants using small quantity of solid fuel per day. Copy of letter issued by the office of Deputy Commissioner of Bhopal Municipal Corporation for compliance of order in OA no. 142/2023 is attached for kind perusal of this Tribunal.</i></p>	
<p><i>That, it's pertinent to mention here that, Central government launched National Clean Air Program (NCAP) as a long term, time bound national level strategy to tackle the air pollution problem across the country in a comprehensive manner with targets to achieve 20% to 30% reduction in particulate matter concentration by 2024 keeping 2017 as a base year for the comparison of the concentration. Under NCAP, 122 non-attainment cities have been identified across the country, based on air quality data from 2014-2018. Bhopal, is one of those cities amongst the list of non- attainment cities. The use of Briquette as fuel in the midst of city in such close proximity of Rani Kamlapati Railway Station, ISBT, Hospital, School & College and BHEL & Railway Residential Colony shall have farfetched, adverse impact on citizen, therefore no such activities under operation of boiler-based Briquette fuel should be allowed in the interest of the human</i></p>	<p><i>As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied. Therefore, Boiler with adequate air pollution control device is not against the action plan made by Madhya Pradesh Pollution Control Board.</i></p>

<p><i>Environment. The copy of Press Release of NCAP by Ministry of Urban Affairs is annexed.</i></p>									
<p><i>That, the NGT (Principal Bench) New Delhi in case no. OA 681/2018, Vide its order dated 08.10.2018, directed all the state and Union territories with non - attainment cities must prepare appropriate Action Plan within 2 months aimed at bringing the standards of air quality within the prescribed norms within 6 months of the date of finalization of the Action Plan.</i></p> <p><i>The copy of the order passed by this Tribunal on dated 08.10.2018 is attached for kind perusal of this Tribunal annexed .</i></p>	<p><i>Action Plan of Non-attainment city Bhopal has been prepared by MPPCB.</i></p>								
<p><i>That, the liquid waste is originated from the various section of the plants such as bottling plant, cheese plant, butter plant, condensed milk plant, dried milk plant, and ice cream plant. However, it is mandatory condition of installation of Effluent treatment Plant to treat the waste washed water up to the standard prescribed by State Pollution Control Board, Respondent no-2, but the respondent unit discharging effluents outside the premises without any proper treatment.</i></p>	<p><i>MPPCB has issued notice vide dated 15.01.2024 to M/s Bhopal Dugdha Sangh, Dairy Plant regarding the overflow of the sludge drying beds of the ETP is flowing outside the premises. In reference to the notice dated 15/01/2024 of MPPCB, unit vide letter dated 25/01/2024 submitted the reply and informed that the points of notices are complied and photographs are submitted. The committee inspected the compliance on dated 02/02/2024, 12/02/2024 and on dated 29/02/2024 and found that the discharge is stopped and housekeeping is improved.</i></p> <p><i>The sample of the overflow of the sludge drying beds of the ETP is flowing outside the premises has been collected by MPPCB. Sample analysis report by MPPCB is enclosed.</i></p>								
<table border="1" style="margin-left: auto; margin-right: 0; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Sl.</th> <th style="width: 20%;">Paramet</th> <th style="width: 30%;">Analysis</th> <th style="width: 10%;">Limit</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Sl.	Paramet	Analysis	Limit				
Sl.	Paramet	Analysis	Limit						

No.	er	Result	as per consent
1.	pH	7.42	5.5-9.0
2.	Suspended	250	100
3.	Solid		
4.	BOD	120	30
5.	COD	871.2	250
6.	Oil & Grease	12	10

*Note: All values are in mg/l except pH.
As per report the parameters of SS, BOD, COD, Oil & Grease are not under the limit as per consent.
Flow chart of Effluent Treatment Plant of the unit is enclosed.*

That, in view of the Supreme Court and this Tribunal's various directions and orders passed in many cases, shall have no fruitful result if such solid briquette bio-mass fuel is allowed to continue having cumulative impact on environment. The action of respondents, more particularly the Madhya Pradesh Pollution Control Board is without application of mind and without adhering to the orders and directions passed in various judgments and NCAP guidelines acted and issued CTE to the respondent Unit is challenged on the following amongst other grounds: -

As per Action Plan submitted by MPPCB for Non-attainment city i.e. Bhopal, Only LPG is being promoted for use in the eateries, restaurants & domestic purposes of the city. Industry has to provide adequate Air Pollution Control Devices for using bio- mass in the boiler.

That, the applicant is deeply concern about the city air environment, thereby filing the

As per the objective of NCAP it include all the aspects, including health, the economy, technological

<p><i>instant case without prejudice amongst other grounds which are as follows: It is alleged that use of briquette, solid fuel if allowed in the middle of the city may lead to having adverse effect on the human health in the city. A substantial question of environmental rules and compliance of the law and directions are involved in this petition.</i></p>	<p><i>advancements, and the feasibility to implement the suggested solutions. The Action Plan under NCAP submitted by MPPCB and approved by CPCB for Non-attainment city i.e. Bhopal, Only LPG is being promoted for use in the eateries, restaurants & domestic purposes of the city. Boiler has provided adequate Air Pollution Control Devices for using bio- mass in the boiler, which will operate within consented limits as issued by MPPCB under Air Prevention and Control of Pollution Act, 1981.</i></p> <p><i>As per MoEF&CC, Govt. of India gazette notification dated 16.05.2023, for 2 ton/hour to less than 10 ton/hour capacity agro-based boiler, PM emission is prescribed as 250 mg/NM3. MPPCB has stringed the limit to 25 mg/ NM3 in its Consent to Establish issued to the unit.</i></p>
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F. Introduction of Steam Boiler of 5 Ton/Hr Capacity (Based on Bio Briquettes as fuel) :-

A new steam boiler of 5 Ton/Hr capacity based on bio Briquettes as fuel is installed in the premises of by M/s Subons Solutions, Mumbai on M/s Bhopal Sahakari Dugdth Sangh Maryadit (Bhopal Dairy Plant) by M/s Subons Solution, Mumbai w.r.t. their agreement dated 21.03.2023. M/s Bhopal Sahakari Dugdth Sangh Maryadit (Bhopal Dairy Plant) has obtained Consent to Establish for the boiler from MPPCB on 14.07.2023.

A biomass briquette boiler operates on the principle of biomass combustion, where biomass briquettes are burned to generate heat. The combustion process involves the release of energy stored in the briquettes, producing hot gases and ash. The generated heat is then

used to produce steam or hot water for various industrial, commercial applications.

- The biomass briquette manufactured in the briquette plant is transported at the boiler place of operation and is stored in briquette storage area.*
- The biomass briquette is then fed into the furnace by belt conveyor. The belt conveyor takes the briquette to a Silo from where the briquette is slowly pushed in the furnace by screw conveyor.*
- The briquette fed into the furnace is then burnt with the help of FD fan and ID fan. The ID fan pulls the hot gases to different water tubes and then finally to chimney.*
- Steam is generated in the steam drum. From the steam drum the steam is supplied to the dairy by steam header in between to control and safer operation of the boiler.*
- The hot gases pass through the water tubes, steam drum, Multi cyclone, APH (Air Pre Heater), Bag Filter and then finally to air from Chimney of 30 meters.*
- In between, the heat is recovered by water tubes, steam drum and APH and the particulate matter is arrested by Multi Cyclone, APH, Bag Filter*

Air Pollution Control Devices installed for Steam Boiler of 5 Ton/Hr Capacity :-

Measures and implementation for arresting/minimizing the particulate emission and ash generation management and other measures as suggested by MPPCB:

1. Multi cyclone is installed before the Air Preheater.
2. Air pre heater (APH) is also installed to utilize the heat of flue gas and also to arrest the dust particles going after the multi cyclone.
3. Bag Filter is installed after the APH to further arrest the dust particles if any after APH. The number of bags in the primary bag filter are 210. The secondary bag filter is installed for redundancy and is in parallel with 168. In case primary bag filter is in maintenance then secondary is operational.
4. Ash Management- As informed, the ash collected in boiler bed, air pre heater, cyclone and bag filter shall be conveyed to Ash Storage Pit which is underground pit where there will be water sprinkle quenching system so that ash is wet all the time. Ash pit has a holding capacity of 7 days of ash generation. The ash will directly go into in the Underground Ash Storage Pit. Once it is filled, it is lifted and conveyed with the help of pulley and mechanical system for loading on to a trolley. The trolley used for transportation of ash will be fully covered.
5. Online monitoring system is installed to measure the particulate emission on continuous basis. Online PTZ camera is installed to see and record the particulate emission on continuous basis.
6. Blow down water – It is sent to a concrete storage tank for further use in plantation.
7. Softener water – It is taken from dairy.

The steam generation in the dairy is fluctuating and depends upon the process requirement. When the product is manufactured, then only it requires 3 MT per hour steam, while most of the day the flow rate is below 2 MT per hour or even less. The rate of briquette feeding per hour and steam generation per hour depends upon the consumption of steam by the dairy per hour. The total steam generation in the dairy is around 40 MT per day which converts to 10-12 MT of biomass briquette and 700-900 kg of ash per day. The ash will be handled as per Ash Management Plan submitted by the unit.

Storage and feeding – As informed, the biomass briquette will be stored beside the feeding area and will be covered by tarpoline. A shed will be built for briquette storage. The fuel storage area will be having a storage capacity of 7 days. The biomass briquette will be conveyed by covered belt conveyor which will feed a Silo installed for onward feeding in the boiler furnace with the help of screw conveyor.

Experimental Study cum monitoring of biomass based boiler of M/s Bhopal Sahakari Dugdha Sangh Maryadit (Bhopal Dairy Plant), Habibganj, Tehsil- Hujur, Dist-Bhopal, Madhya Pradesh- 462024:-

The monitoring of emission before Air Pollution Control Devices for actual emission by bio-briquettes and after Air Pollution Control Devices to check emission discharge as per the limit of the boiler as per Consent to Establish. Total 03 monitoring before APCB and after APCD was carried out by the joint team.

Emission Analysis

To analyze the emission from boiler, an experimental study was conducted to assess the emissions from burning of Bio-mass Briquettes in the boiler. The port hole for sampling was made in the duct before installed APCD. In the study monitoring was performed for the parameters- particulate matter (PM) and

gaseous pollutant (NO_x, SO₂, VOC).

Material and Method

The methodology involves three steps. At the start, combustion chamber of the boiler was emptied completely and then blank readings were taken for the designated parameters for background corrections to get the exact value of emissions. The combustion chamber was charged with Bio-mass Briquettes and emissions were monitored for the calculated period of time respectively. A constant air to fuel ratio was maintained in both the cases to ensure complete combustion of fuels.

The emissions from combustion are not constant throughout the burning process and may vary with time. Therefore, to obtain data that cover the entire burning cycle integrated sampling was done. Sampling was done twice during the combustion- at the start of the combustion when desired steam pressure was reached and near the end of the burning cycle.

A typical sampling configuration was used including a sampling probe, a filter holder, a pump and impingers with absorbing media for SO₂, NO_x. A pre-weighed desiccated glass fiber thimble was used for PM.

Results

In this study, monitoring was conducted for PM, SO₂, NO_x, and VOC, before and after Air Pollution Control Device.

The emission concentration of PM, before APCD ranged between 109.4 to 173.5 mg/NM³ with an average concentration of 140.63 mg/NM³. While, after APCD, PM was calculated as ranged between 15.1 and 16.9 mg/NM³ having an average concentration of 16.23 mg/NM³. Values of PM after APCD are within prescribed limit as per Consent to Establish. Average value of PM before APCD was 140.63 mg/NM³ and it reduced to 16.23 mg/NM³ after APCD. The overall percentage reduction in the particulate matter (PM) before and after APCD in Sample no 1 is

84.55%, Sample no 2 is 91.29% and Sample no 3 is 87.98%.

SO₂ principally originates from the combustion of Sulphur in the fuel source. The emission concentration of SO₂ before and after APCD was calculated as below detective limit (BDL).

NO_x emissions depend primarily on fuel type and thermal conditions. The emission concentration of NO_x before APCD ranged between 88 to 104 mg/NM³ with an average of 96 mg/NM³ and 82 to 98 mg/NM³, after APCD with an average 91.33 mg/NM³ of respectively.

During the monitoring, the feeding rate of bio-mass briquettes was approximate 493 Kg/ hour.

The concentration of VOC before and after APCD was calculated as below detective limit (BDL). Stack Monitoring Analysis Report is enclosed.

Stack Monitoring Results Date of Sample taken - 29.02.2024

<u>Before APCD</u>				
<i>Date and Sample</i>	<i>PM (mg/Nm³)</i>	<i>SO₂ (mg/Nm³)</i>	<i>NO_x (mg/Nm³)</i>	<i>VOC (ppm)</i>
<i>29.02.2023, Sample-1</i>	109.4	BDL	96	BDL
<i>29.02.2023, Sample-2</i>	173.5	BDL	88	BDL
<i>29.02.2023, Sample-3</i>	139.0	BDL	104	BDL
<u>After APCD</u>				
<i>Date and Sample</i>	<i>PM (mg/Nm³)</i>	<i>SO₂ (mg/Nm³)</i>	<i>NO_x (mg/Nm³)</i>	<i>VOC(ppm)</i>
<i>29.02.2023, Sample-1</i>	16.9	BDL	94	BDL
<i>29.02.2023, Sample-2</i>	15.1	BDL	82	BDL
<i>29.02.2023, Sample-3</i>	16.7	BDL	98	BDL
<i>Limit as per Consent to Establish</i>	25	-	-	-

Ambient Air Quality Monitoring

Ambient Air Quality Monitoring (AAQM): The Ambient Air Quality Monitoring has been carried out for the following 02 locations during 29–30.02.2024 for PM₁₀, PM_{2.5}, SO₂ and NO_x and the values are as under permissible limits of 24 hour

basis except PM_{2.5} limit Near Garden Area, butter making unit.

<i>Ambient Air Quality Monitoring</i> <i>Date of Sample taken on 29-30.02.2024</i> <i>Location- Near ETP Area</i>					
<i>Parameter→</i>	<i>SO₂</i>	<i>NO₂</i>	<i>PM_{2.5}</i>	<i>PM₁₀</i>	<i>Remarks</i>
<i>Concentration Range</i>	2.0	6.5	46.82	72.98	<i>Clear atmosphere</i>
<i>Standards as per CPCB (24Hrs. Basis)</i>	80	80	60	100	
<i>Note- All values of concentrations are in µg/m³ of air</i>					

<i>Ambient Air Quality Monitoring</i> <i>Date of Sample taken 29-30.02.2024</i> <i>Location- Near Garden Area, butter making unit</i>					
<i>Parameter→</i>	<i>SO₂</i>	<i>NO₂</i>	<i>PM_{2.5}</i>	<i>PM₁₀</i>	<i>Remarks</i>
<i>Concentration Range</i>	2.0	4.5	67.27	89.36	<i>Clear atmosphere</i>
<i>Standards as per CPCB (24Hrs. Basis)</i>	80	80	60	100	
<i>Note- All values of concentrations are in µg/m³ of air</i>					

The team conducted ambient air quality monitoring at two locations for 24 hours and fugitive emission monitoring near the boiler plant. Noise monitoring was carried out near plant to measure noise level.

Sample of bio-briquettes is taken for proximate and ultimate analysis. Fly ash sample is taken for organic and elemental analysis.

Fugitive emission monitoring was carried out at the following 01 location on 29.02.2024 and the monitored value is 95.11 µg/m³. The detailed analysis report is enclosed .

<i>Fugitive Emission Monitoring Results (Date : 29.02.2024)</i>	
<i>Locations</i>	<i>Monitoring Result (µg/m³)</i>
<i>Near Biomass Boiler</i>	95.11

Solid Fuel Analysis

Proximate & Ultimate Analysis of 'Bio-mass Briquettes':-

Biomass briquettes are a biofuel substitute made of biodegradable

green waste with lower emissions of greenhouses gases and carbon dioxide than traditional fuel sources.

The report of proximate and ultimate analysis of 'Bio-mass Briquettes' used in Boiler is enclosed.

Proximate analysis, ultimate analysis and calorific value are commonly used to characterize solid biomass fuels. The proximate analysis serves as a simple means for determining the behavior of a solid biomass fuel when it is heated. It determines the contents of moisture, volatile matter, ash and fixed carbon of the fuel. The amount of fixed carbon and volatile matter directly contribute to the heating value of the fuel. Fixed carbon acts as main heat generator during burning while high volatile matter leads to smoky flame and easy ignition of the fuel.

On the other hand, the main purpose of an ultimate analysis is to determine the elemental composition of the solid fuel substance. It deals basically with determination of Carbon, Hydrogen, Nitrogen, Oxygen and Sulfur percentage in the fuel. It is useful in determining the quantity of air required for combustion, the volume and composition of combustion gases. The calorific value of a fuel is a direct measure of the chemical energy stored in the fuel. The calorific value of fuel has dependence on carbon and hydrogen content of the fuel.

The basic energetic parameter characterizing biomass is its calorific value. The Gross Calorific Values (GCV) of the 'Bio-mass Briquettes' is 3790 Kcal/ Kg.

Moisture is another important parameter of any biomass fuel. When utilizing biomass as fuel, the high moisture content of the biomass affects strongly the combustion process as well as the heating value such as lowering the flame temperature and/or the boiler efficiency. The low flame temperature could result incomplete combustion and/or other operational problems. Therefore it is a very important parameter, which strongly influences the economies of the utilization of biofuel. Results for moisture content shows that Bio-mass Briquettes has moisture content as 11.61 %.

Ash content is the fraction in biomass that is composed of

incombustible components remained after a fuel is completely burned. However, the volatile content in fuel is a lesser-known property that depicts the fraction of the fuel that can readily volatilize (turn to gas) when heated to a high temperature. Bio-mass Briquettes contains 6.65 percentage of ash. Volatile matter fraction in Bio-mass Briquettes is 39.48%. Fixed carbon percent has direct relation with High Heating Value (HHV). Bio-mass Briquettes has 53.87% fixed carbon.

Proximate and Ultimate Analysis of Bio Briquette Fuel

Date of Sample taken -29.02.2024

S. No.	Parameters Analyzed	Unit	Test Method	Results
<i>Proximate Analysis</i>				
1	Ash	%	IS 1350 (Part I) 1984 RA 2019	6.65
2	Total Moisture	%	IS 1350 (Part I) 1984 RA 2019	11.61
3	Inherent Moisture	%	IS 1350 (Part I) 1984 RA 2019	3.88
4	Fixed Carbon	%	IS 1350 (Part I) 1984 RA 2019	53.87
3	Volatile matter	%	IS 1350 (Part I) 1984 RA 2019	39.48
4	Gross Calorific Value (GCV)	Kcal/ Kg	IS 1350 (Part II) 1970 RA 2017	3790
5	Silica SiO ₂	%	LAB/SOP	1.11
<i>Ultimate Analysis</i>				
5	Carbon (C)	%	IS: 1350 (Part-4/Sec-1) 1974	52.34
6	Hydrogen (H)	%	IS: 1350 (Part-4/Sec-1) 1974	2.48
7	Nitrogen (N)	%	IS: 1350 (Part-4/Sec-2) 1999	0.67
8	Sulfur (S)	%	IS: 1350 (Part-3) 1969	0.81
9	Oxygen (O)	%	IS: 1350 (Part-4/Sec-1) 1974	16.94

Ash Analysis

Ash content is the fraction in biomass that is composed of incombustible mineral material. Ash is present in the biomass in the form of certain inorganic compounds like Copper, Zinc, Iron, Manganese, Nickel etc.

The sample for ash of Bio-mass Briquettes was collected from the boiler after complete combustion under controlled conditions. The representative sample of ash was prepared and was analyzed by Central Laboratory, MPPCB. The detailed

result of elemental parameters analyzed in ash samples is enclosed.

**Report of Ash Analysis
(Bio Briquette Fuel)**

Date of Sample taken -29.02.2024

S. No.	Parameters Analysed	Unit	Test Method	Results
<i>Elemental Ash Analysis</i>				
1)	Iron (Fe)	mg/Kg	3111 B APHA, 23 RD Edition, 2017	9723
2)	Manganese (Mn)	mg/Kg		441
3)	Nickel (Ni)	mg/Kg		19.0
4)	Copper (Cu)	mg/Kg		30.1
5)	Zinc (Zn)	mg/Kg		58.0

Noise Monitoring Results, Date of Sample taken -29.02.2024

Noise level monitoring carried out in day and night time, 10 meter away from boiler. The results show that noise level is within prescribed limits of industrial area. The report is enclosed.

S. N.	Description of Sample	Date of Collection	Result in dB (A) Leq	CPCB Standard of Noise level dB (A) Leq for industrial Area
1	Noise monitoring near 10 meter away from boiler Day Time	29.02.2024	64	75
2	Noise monitoring near 10 meter away from boiler Night Time	29.02.2024	50.9	70

Observations of Inspection:-

1. M/s Bhopal Sahakari Dugdh Sangh Maryadit (Bhopal Dairy Plant) is Red Category industry as per the existing Consent to Operate under section 25 of Water Act, 1974 and under section 21 of Air Act, 1981 issued by MPPCB dated 07.02.2022 which is valid up to 31.07.2026.

2. Unit has authorization under Hazardous & Other Wastes (Management and Transboundary Movement) Rules, 2016 which is valid upto 31.01.2027.
3. Unit has 02 boilers each of 5 Ton/Hour steam generation capacities which are operational by LPG. Unit has done agreement with HPCL for supply of commercial LPG through cylinder and latest bill of LPG supply is enclosed.
4. The unit has done Steam Purchase Agreement on 21.03.2023 with M/s Subons Solutions LLP, 306, Foundation Tower, Sector-11, CBD Belapur, Navi Mumbai for supplying steam to dairy plant by doing operation and Maintenance of 10 years solid fuel multi fuel fired Boiler on Built, Own, Operate and Transfer (BOOT) basis to be constructed at the dairy premises which will be owned by the unit but will be subsequently transferred to unit after 10 years. In this regard, M/s Bhopal Sahakari Dugdh Sangh Maryadit (Bhopal Dairy Plant) has obtained Consent to establish under section 25 of Water Act, 1974 and under section 21 of Air Act, 1981 issued by MPPCB dated 14.07.2023 for 5 Ton/Hour Steam Boiler which is valid upto 30.06.2028.
5. Unit has submitted Ash Management Plan which is enclosed.
6. M/s Subons Solutions LLP has installed the Boiler of 5 Ton/Hour as observed during the inspection on 15.01.2024. M/s Subons Solutions LLP would start operating the boiler upon obtaining Consent to operate to be issued by MPPCB. CCA Compliance Report submitted to MPPCB is enclosed.
7. Directorate of Boilers, Government of Madhya Pradesh, Bhopal has issued Provisional Order under section 9 of Boiler Act, 1923 on 01.01.2024 which is valid up to 30.06.2024.
8. As per Bhopal Non attainment City Action Plan, the installation & operation of air pollution control devices in industries and ensuring emission standard in industries are to be complied. Therefore, Boiler with adequate air

pollution control device is not against the action plan made by Madhya Pradesh Pollution Control Board. In this regard, it is decided by the joint committee that Stack monitoring of the Boiler will be carried out by CPCB and MPPCB for verifying the adequacy of APCD of the Boiler.

9. *During the inspection on 15.01.2024, it was observed by the joint inspection team that the overflow of the sludge drying beds of the ETP is flowing outside the premises which is a violation of the Consent to Operate under Water Act, 1974 issued by MPPCB. The overflow of sludge drying beds measured as 25.64 litre/minute. The sample of the discharging effluent has been collected by MPPCB. The sample of the discharging effluent has been collected by MPPCB. MPPCB has issued notice vide dated 15.01.2024 to M/s Bhopal Dugdhd Sangh, Dairy Plant regarding overflow of sludge drying beds of ETP from its premises. In reference to the notice dated 15/01/2024 of MPPCB, unit vide letter dated 25/01/2024 submitted the reply and informed that the points of notices are complied and photographs are submitted. The committee inspected the compliance on dated 02/02/2024, 12/02/2024 and on dated 29/02/2024 and found that the discharge is stopped and housekeeping is improved. Flow chart of Effluent Treatment Plant of the unit is enclosed.*
10. *The sample of the discharging effluent has been collected by MPPCB. Sample analysis report by MPPCB is enclosed. As per report the parameters of SS, BOD, COD, Oil & Grease are not under the limit as per consent.*

<i>S. N.</i>	<i>Parameter</i>	<i>Analysis Result</i>	<i>Limit as per consent</i>
1.	<i>pH</i>	7.42	5.5-9.0
2.	<i>Suspended Solid</i>	250	100
3.	<i>BOD</i>	120	30
4.	<i>COD</i>	871.12	250
5.	<i>Oil & Grease</i>	12	10
6.	<i>TDS</i>	800	2100
7.	<i>Chloride</i>	119.96	1000

Note: All values are in mg/l except pH.

11. *All the effluent channels were observed open and has solid waste accumulated inside it.*
12. *Unit has not provided proper Stack height to the DG Set installed in the plant.*
13. *As per CPCB Final Document on Revised Classification of Industrial Sectors under Red, Orange, Green and White Categories (February 29, 2016), No Red category industries shall normally be permitted in the ecologically fragile area/protected area.*
14. *As per MoEF&CC Govt. of India, gazette notification dated 16.05.2024, for 2 ton/hour to less than 10 ton/hour capacity agro-based boiler, PM emission is prescribed as 250 mg/NM³. MPPCB has stringed the limit to 25 mg/NM³ in its Consent to Establish issued to the unit.*
15. *The unit has obtained permission by Nagar Nigam Bhopal for establishment of Biomass briquettes boiler.*

G. Action Taken:-

MPPCB has issued notice vide dated 15.01.2024 to M/s Bhopal Dugdh Sangh, Dairy Plant regarding the overflow of the sludge drying beds of the ETP is flowing outside the premises, improper housekeeping, waste water in drains inside premises and insufficient stack height of DG Set.

H. Recommendation:-

1. *An interlocking system should be installed in Boiler for conserving energy, avoiding potential damage, stack emissions and excessive temperature/ pressure.*
2. *Unit shall build a covered shed to store bio-fuel as raw material.*
3. *A fire extinguishing facility should be available inside and outside this covered shed and boiler area.*
4. *Management of fly ash should be done as per the fly ash management plan. Unit shall install water sprinkling system for wetting of fly ash.*

5. *Unit shall maintain an emergency management plan as per the provision of the Factory Act, 1948.*
 6. *Unit shall ensure connectivity of CSEMS (Continuous stack emission monitoring system)*
 7. *of Bio briquettes boiler stack with environmental surveillance centre, MPPCB, Bhopal for remote surveillance.*
 8. *Unit shall cover all the open effluent channels leading to ETP and shall dismantle the drain which was observed overflow of sludge drying beds of ETP outside the premises.*
 9. *Unit shall maintain zero liquid discharge condition as per the Consent to Operate issued by MPPCB.*
 10. *Unit shall provide proper stack (exhaust pipe) height attached to DG Set.*
 11. *Unit shall comply with the rules and regulations relating to health and safety aspects of workers and the environment. An audit by an authorized safety auditor should be carried out annually.*
 12. *Plant has to take permission from Central Ground Water Authority for its two bore wells located within the premises. The plant has an agreement with Water Resources Department regarding water extraction of 225 Cum/day which is valid up to 12/05/2026.*
 13. *Madhya Pradesh Pollution Control Board will visit the plant in every 3 month and will keep surveillance on the use of Bio-mass Briquettes in boiler for steam generation.*
 14. *Unit should ensure to comply with all the conditions as mentioned in the Consent to Establish issued by Madhya Pradesh Pollution Control Board."*
5. Learned counsel for the applicant has filed the objection and submitted that the conditions of environmental clearance has not been followed and that as per the ash management plan by respondent no. 6 /PP is using landfill of fly ash within the permissible premise which is dairy and food processing industry, in close proximity of Northern Railway Station.
 6. The submission of the learned counsel for the respondent no. 6 are that the Applicant is particularly against the Tender floated by the answering Respondent No. 6 for the steam based/design, supply, installation,

operation and maintenance for 5 MPPH Solid multi fueled fired Bio- mass boiler on built, over, operate and transfer basis for a period of 10 years for dairy plants established by the answering Respondent No.6. Needless to point out that the Tender in question to be challenged before the Tribunal is not a subject matter which can be dealt with the Tribunal but even otherwise, the same is barred by limitation as the Tender was floated on 09.01.2023 whereas, the instant Original Application has been filed in the month of November 2023 thereby any substantial question relating to environment and even a legal right relating to environment cannot be enforced after a passage of 6 months from the date of cause of action when first accrued.

7. It is further submitted that as a matter of fact the bio-mass briquettes are certainly compressed stubble approx and the use of same is fuel towards betterment of the environment and safeguarding the sustainable development which makes the entire case of the Applicant malicious.
8. Further submission of the respondent/PP are as follows :-

- i. *“That as a matter of fact, in India, biomass briquettes have been increasingly utilized in funeral ceremonies as an eco-friendly alternative to traditional wood-based cremations. These briquettes, typically made from agricultural waste like rice husks or sawdust, offer a sustainable solution by reducing deforestation and carbon emissions associated with wood burning. Additionally, on the contrary their use minimizes air pollution and mitigates the release of harmful chemicals into the atmosphere, thereby preserving environmental health. By opting for biomass briquettes in funeral rituals, communities contribute positively to environmental conservation efforts, aligning with sustainable practices while honoring cultural traditions.*

- ii. *That the alternates to Biomass Briquettes being used In boiler as fuels is using oil as fuel which is in fact a pollutant.*

So, this in fact is a replacement of that pollutant and it is used because it is considerably low in Greenhouse Gas submissions compared to what oil as a fuel would yield and it is in fact a cleaner fuel and therefore, world over is now being used to replace various fuel which are higher in yield of Greenhouse Gases.

iii. That furthermore, the Applicant in its Original Application contests the validity of the Consent to Establish (CTE) and Consent to Operate (CTO) granted to Respondent No.6, who is currently operating its unit. This challenge transforms the matter into an issue for appeal rather than an appropriate subject for an Original Application. Consequently, the Original Application in question becomes redundant.”

9. The submission of the learned counsel for the Municipal Corporation, Bhopal are to the fact that the use of dairy products or bio-mass is a matter to be considered by the Tribunal and in-case the method of energy.
10. Learned counsel for the respondent/PP has further submitted that the tender in question regarding operation of Bio-Mass Briquette Based Steam Boiler was given to M/s. Subons Solutions LLP, who was granted Consent To Establish on 14.07.2023 by Madhya Pradesh Pollution Control Board. Consequently on 19.03.2024, the MPPCB has issued Consent To Operate to the Bio-Mass Briquette Based Steam Boiler after carrying out thorough inspection of the Plant and ensuring that the conditions put forth in Consent To Establish have been duly met out before issuance of Consent To Operate.
11. In the instant case, the upper limits for P.M. were prescribed at 25 microgram per NM³ and as per the Continuous Online Monitoring Data installed at Bio-Mass Briquette Based Steam Boiler, the current level of P.M. is somewhere below microgram per NM. It is crystal clear that the usage of Bio-Mass Briquette Based Steam Boiler is not only extensively

environmentally sound, but is also far better than the Gas based boiler. Most importantly, the emission of SOX & NOX during usage of Bio- Mass Briquette Based Steam Boiler is almost negligible as compared to Gas Based Boiler. It is also highly relevant to point out here that there has been a substantial cost reduction in switching from Gas Based Boiler to Briquette Based Boiler in addition to the reduction of environmental hazardous.

12. The Bio-Mass Briquette is a compressed form of agricultural waste/residue which is Carbon Neutral in comparison to LPG, which produces approximately 1660 grams Of Carbon per Kg. NGT in plethora of matters has shown concerns against Crop Residue Burning and therefore these Bio-Mass Briquettes are highly conducive towards environment and is one of the way towards promoting Green Energy (Carbon Neutral) in open market.
13. It is further submitted that Bio-Mass Ash is totally different from Fly-Ash. It is more of organic in nature and cannot be compared to Coal Based Fly-Ash. The average production of Bio-Mass Ash is approx. 800 Kgs. Per day and currently, the same is being stored, so that once a reasonable quantity of Bio-Mass Ash is available, the same can be used for Organic Manure and can be supplied to the farmers again. In a way, Bio-Mass Ash is recyclable in nature and one of its kind as the same has no hazardous impact in the environment/soil/ the contractor M/s. Subons Solutions LLP has even procured a Work Order from Bihar Government regarding such conversion of Bio-Mass Ash into Organic Manure, copy of which is annexed along with the written arguments for consideration of the Tribunal.

14. Further contention of the respondent is that BMC has also issued NOC to the respondent for establishment of bio-mass briquette based steam boiler.
15. During the course of hearing it is admitted fact that the briquette is permitted according to the notification issued by the MoEF&CC. Accordingly, the Learned Counsel for the Applicant has submitted that since the energy use is permitted energy and more environment friendly thus, there are no violations.
16. In view of the above facts, the report submitted by the Joint Committee there are no violations and thus, no further action is required by this Tribunal.
17. The **Original Application No. 177/2023** along with **I.A. No. 35/2024** stands **disposed** of accordingly.

Sheo Kumar Singh, JM

Dr. A Senthil Vel, EM

01st August, 2024
O.A No. 177/2023(CZ)
PN

VAKALATNAMA
[Rule 4(1) of the Rules framed under Advocates Act, 1961]
BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

CENTRAL ZONE BENCH, BHOPAL,
ORIGINAL APPLICATION NO. 119/2025

IN THE MATTER OF:**GAURAV SAXENA****.....APPLICANT****VERSUS****STATE OF M.P. & ORS.****.....RESPONDENT**

I **Brajesh Sharma , Regional Officer Bhopal , MPPCB** named below do hereby appoint, engage, and authorize advocate(s) named below to appear, act and plead as aforesaid case proceedings which shall include application for restoration, setting aside of ex- party orders, corrections, modifications, review and recall of orders passed in these proceedings, in this court or any other court in which the same may be tried/ heard/proceeded and also in appellate. Revisional and executing court in respect of proceedings arising from this case/ proceedings as per agreed terms and conditions and authorize him/them to sign and file pleadings, appeals, cross objections, applications, affidavit or other documents as may be deemed necessary for the proper prosecution/defence of the case in all its stages and also agree to ratify and confirm act done by him/them as if done by me.

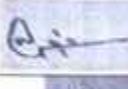
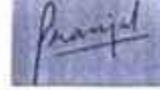
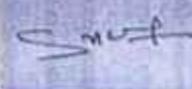
In witness whereof i/we do hereunto set my/our hand to the presents, the contents of which have been duly understood by me /us this **10.12.2025 at Bhopal.**

PARTICULARS OF EACH PARTY EXECUTING VAKALATNAMA

Name & Fathers Name	Registered Address	E-Mail Add & Telephone	Status in case	Signature
Brajesh Sharma , Regional Officer Bhopal , MPPCB	E5, Arera Colony Paryawaran Parisar Regional Office MPPCB Bhopal - 462016	9893002888 romppcb_bpl@rediff.co m	Officer-in- Charge	 Regional Officer

Accepted

M P Pollution Control Board

Name & Enrollment No.	Office Address	E-Mail Add.	Telephone	Full Signature
PARUL BHADORIA 1587-2012	Paryawaran Parisar, E-5 Arera Colony, Bhopal, 462016	parul.bhadoria04@gmail.com legalcell.pcb@mp.gov.in	8085977111	
MOHIT BUCH 1305/2017		legalcell.pcb@mp.gov.in	9685034578	
PRANJAL PANDEY MP 2881-2021		advocatepranjalpandey@gmail.com	9340657120	
SHIVAM DWIVEDI MP 3857-2023		advshivamdivedi20@gmail.com	8878471359	

Service of Joint committee Report in OA 119-2025 CZ Gaurav Saxena Vs State of Madhya Pradesh & Others

From : Legal Cell <legalcell.pcb@mp.gov.in> Wed, Dec 10, 2025 01:48 PM
Subject : Service of Joint committee Report in OA 119-2025 CZ Gaurav Saxena Vs State of Madhya Pradesh & Others  1 attachment
To : dharam advocate33 <dharam.advocate33@gmail.com>, PrincipalSecretary <psenvironment@mp.gov.in>, commoffice@bmconline.gov.in, G Thirumurthy, CPCB <thiru.cpcb@nic.in>, cmd@bhel.in, registrar@peoplesuniversity.edu.in, support@narmada.org.in, misbsds@gmail.com
Cc : parul bhadoria04 <parul.bhadoria04@gmail.com>, harnengt <harnengt@gmail.com>

Madam/Sir

Please find enclosed the Joint Committee Report on behalf of Madhya Pradesh Pollution Control Board (MPPCB) in compliance to order dated 26.08.2025 in OA 119/2025 (CZ) Gaurav Saxena Vs State of MP .

[This mail be considered as proof of service.](#)

Regards
Legal Section
MP PCB

 **JCR in OA 119-2025 dated 10.12.2025.pdf**
6 MB
