

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 373 OF 2022

**IN THE MATTER OF:**

SUMIT SAINI

...APPLICANT

VERSUS

HARYANA STATE POLLUTION  
CONTROL BOARD & ORS.

...RESPONDENTS

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Filed by:



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Filed on: 29.07.2024

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**OBJECTIONS ON BEHALF OF RESPONDENT NO.5  
PROJECT PROPONENT M/S. SPS BIO-CHEM PRIVATE  
LIMITED TO THE REPORT DATED 20.07.2024 FILED BY  
HARYANA STATE POLLUTION CONTROL BOARD**

**MOST RESPECTFULLY SHOWETH:**

1. That the present objections and verifications are being filed to the Site Inspection Report carried out by Haryana State Pollution Control Board (hereinafter referred to as 'HSPCB') on 18.07.2024, wherein certain observations have been made, most of which cannot be construed as violation of environmental norms.
2. It is relevant to mention that the answering respondent herein is working towards the protection of environment, sustainable development, generation of alternate source for energy for reducing dependence on fossil fuels and reducing carbon footprint. In furtherance of the initiative of the Government of India, for Sustainable Alternative Towards Affordable Transportation launched by the Ministry of Petroleum and Natural Gas, Government of India in October 2018, answering respondent has set up a plant for effective disposal and conversion of residue of sugar producing industry (i.e. Press Mud) and cow dung into Compressed Bio Gas (CBG) alongwith production of Fermentation Organic Manure (FOM) and LFOM to be entirely utilized as manure in organic farming and not discharging any water as waste. Answering respondent is taking all steps to ensure that there is no adverse impact on the environment and rather it is contributing to the environmental cause by generation of clean green energy from waste, which is the need of the hour.
3. The response on behalf of answering respondent No.5 to the observations of HSPCB in its report dated 20.07.2024 are as follows:

- A. **Whether the heaps of press mud are covered by one layer of lingo-cellulocis biomass (Rice straw) and one layer of Tarpaulin,**
- I. Report states that “*during Inspection, it was found that the unit has not covered heaps of press mud completely by tarpaulin layer as half of the Raw Material Storage area was found open and exposed in open environment.*”
4. It is submitted that the heaps of press mud are covered by tarpaulin layer at all times. However, part of storage area is open during the time that the raw material is shifted/ carried from the storage area to the pre-feeding tank of the digesters. This is during the day, to facilitate transportation of raw material. However, after completion of feeding of the digester at the end of the day, the entire area including the access point to the raw material is again closed by tarpaulin.
5. It is relevant to mention that even as per the Site Inspection Report, it is not a situation where the heaps of press mud are completely open. Report categorically states that the press mud is not completely covered by tarpaulin. During the day when the inspection took place, it was time for feeding of raw material to the digester, transportation of raw material was taking place and hence, the press mud could not have been covered in its entirety. A copy of the photographs showing coverage of heaps of press mud after the feeding operations are over, is attached as **Annexure A-1 (Colly)**.
- II. Report states that “*the unit has also not covered heaps of press mud with layer of Rice Straw at Raw Material Storage Area.*”
6. That press mud cannot be covered with the layer of Rice Straw as the basic design of the plant does not support paddy straw as feed. The plant design is based on utilization of only press mud and cow dung as the feed for decomposition. Covering the heaps of press mud with Rice Straw will entail that the rice straw also gets mixed with press mud and is fed into the digester, which cannot be processed by the current plant.
7. Initially, the answering respondent had thought that rice straw could be used as an additional layer of covering, but the same had problems.

Answering respondent had also approached the expert consultant namely M/s. Star Projects Renewal Resources Private Limited for review and technical consultancy regarding use of rice straw in the existing plant design. The expert consultant, vide their expert opinion dated 30.04.2024, observed as follows:

“Upon thorough review, we observed that your plant’s existing infrastructure and design are not optimized for the utilization of paddy straw. The current set up does not accommodate the unique requirements for the handling, processing, and storage of paddy straw, which could lead to operational inefficiencies and potential complications.”

A copy of Report, dated 30.04.2024, issued by M/s. Star Projects Renewal Resources Private Limited, is attached as **Annexure A-2**. Hence, use of rice straw for covering the press mud is not feasible and therefore the answering respondent is not in violation of any environmental norms.

III. Report states that *“The unit has not provided any solution for covering of complete Raw Material Storage area which can sustain in rainy season and during fast winds. Tarpaulin layer is not sufficient to sustain during rainy season and fast winds.”*

8. It is respectfully submitted that answering respondent is undertaking steps for covering of raw material storage area in the most effective and environment friendly manner. However, the answering respondent is also open to any of the suggestion that may be made by HSPCB that could be taken in this regard. Even during rainy season and fast winds, the area is duly covered with sufficient material to keep the tarpaulin in place.

**B. Whether sprayer system has been installed in RMS area for spraying chemical for making the environment odor less and**

IV. Report states that *“during Inspection, it was found that the unit has not provided any automatic sprayer system for control of foul smell at the Raw Material Storage Area. Instead, unit has provided manual spraying system for spraying of chemicals at RMS area.”*

9. It is relevant to mention that the present observation by HSPCB cannot be construed as a violation since it has been categorically stated that the unit is providing manual spraying system at the raw material storage area. The unit has been manually spraying the raw material storage area, at fixed interval of time, with organic spray to control foul smell. Installation of automatic system on the crane was not found effective in view of huge gap between the height of the crane and the raw material. This led to the spray being carried away and not falling on the press mud. Hence, manual spraying of the area is being undertaken by the answering respondent.
- V. Report states that *“during inspection mild foul smell was observed at site.”*
10. There is no foul smell in the entire area of the unit except, if observed from very close distance near the heaps of raw material, which is inevitable. Other areas of the plant also do not have foul smell. Report does not state clearly as to which area the observation pertains to.
- C. Whether plantation of trees which are eco-friendly to this kind of environment of press mud storage has been done.**
- VI. Report states that *“unit has done plantation in layers across the boundary of the unit, boundary of the RMS area. Further the plantation is done by planting saplings of native species and these saplings are of different height/sizes ranging from 3 feet to 10 feet with a fair rate of survival.”*
11. That HSPCB has recognized and accepted that plantation has been done in layers not only across the boundary of units but also around the boundary of RMS area. Report also categorically states that further plantation is being done by answering respondent. Native species of plants ranging from 3 feet to 10 feet in height have been planted with a fair rate of survival. Undertaking sufficient plantation cannot be considered as a violation of environmental norms by any standards. Hence, there is no default on the part of answering respondent on this account. A copy of photographs showing extensive plantation already undertaken and fresh plantation being done are attached as **Annexure A-3 (Colly)**.

12. That the answering respondent has already given the samples of its products Fermented Organic Manure (FOM) and Liquid Fermented Organic Manure (LFOM) for testing with ICAR- Indian Agricultural Research Institute on 18.07.2024, which has been duly acknowledged vide their letter dated 19.07.2024, a copy of which is attached as **Annexure A-4**. Report of analysis is awaited and as per the said letter is expected on 08.08.2024, which the answering respondent shall place for kind consideration of this Hon'ble Tribunal. It is also sought to be clarified that press mud is nothing else except sugarcane out of which juice has been extracted. Hence, it cannot contain any metal or ingredient other than that present in the sugarcane, which is a staple human consumption item.
13. It is therefore respectfully submitted that the Project Proponent is infact helping in tackling the problem of environment pollution by utilizing press mud for generation of clean fuel for automobiles and organic manure for farmers. Raw material being used and stored is organic. Answering respondent is being diligent in its actions.

In view of the above, it is most respectfully submitted that the answering respondent is not violating any environmental norms. The Hon'ble Tribunal may kindly be pleased to dismiss the present Application qua answering respondent no. 5, Project Proponent namely M/s SPS Bio-Chem Pvt. Ltd. Answering respondent undertakes to abide by all the terms and conditions as may be prescribed by the authorities and shall always remain committed to work in the interest of and for the protection of environment.

Filed by:



(ANUBHA AGRAWAL)

Counsel for the Respondent No. 5

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**AFFIDAVIT**

I, Rohit Singla, S/o Shri Sat Paul Singla, Director of M/s SPS Bio-Chem Private Limited, Registered Office at: SCO 85-86, Sector 12, Panchkula, Haryana - 134112, do hereby solemnly affirm on oath and state as under:-

1. That I am the Director of Respondent No.5 Project Proponent M/s SPS Bio-Chem Private Limited and as such competent to swear and affirm this affidavit.
2. That I have read over and understood the contents of accompanying Objections and state that the facts stated therein are true and correct to my knowledge and belief.

The annexures annexed to the application are true copies of their respective originals.

*Rohit Singla*  
DEPONENT

VERIFICATION:

I, the deponent above named deponent hereby verify that the contents of paras 1 and 3 of my above affidavit are true and correct to my knowledge & belief, no part of it is false and nothing material has been concealed therefrom.

Verified at Panchkula on the 29<sup>th</sup> day of July, 2024.

*Rohit Singla*  
DEPONENT

29 JUL 2024









**STAR PROJECTS RENEWABLE RESOURCES PVT LTD**

Waste to Green Energy Projects

CIN: U40107MH2022PTC379244

ANNEXURE A-2

Date: 30 Apr 2024

To,

SPS BIO-CHEM Private Limited

Village Damla, (Yamuna Nagar) Haryana

**Subject: Technical Analysis on Alternative Raw Materials for the CBG plant at Damla**

We would like to thank you for the opportunity to give the technical advice regarding the exploration of alternative raw materials for your plant, originally designed considering Press Mud 200 TPD and addition of 8% Paddy Straw. Our recent visit provided us with valuable insights into your current operations and plant design.

Upon thorough review, we observed that your plant's existing infrastructure and design are not optimized for the utilization of paddy straw. The current setup does not accommodate the unique requirements for the handling, processing, and storage of paddy straw, which could lead to operational inefficiencies and potential complications.

Given these findings, we recommend that paddy straw not be considered as a raw material at this time. Incorporating paddy straw would necessitate significant modifications to your plant's design and operational procedures, which may not be cost-effective or feasible under the current circumstances. Technically it can form scum in the top floating layer of digesters which will hamper the gas production.

Our team is committed to assisting you in identifying suitable alternative raw materials that align with your plant's capabilities and strategic goals. We would be happy to discuss other options that might better fit your operational framework and provide a comprehensive plan for their integration.

Please let us know a convenient time for us to further discuss potential alternatives to streamline the operations.

Regards

STAR PROJECTS RENEWABLE RESOURCES PRIVATE LIMITED

Corporate office: 801, New Gurukripa CHS, Ramwadi, Naupada, Thane (West)-400602, Maharashtra

*LET US DO NOT WASTE OUR WASTE*

ANNEXURE A-3 (Colly)

















सूक्ष्म जीव 985 ज्ञान संभाग ANNEXURE A-4 18  
भा.कृ.अनु.प.-भारतीय कृषि अनुसंधान संस्थान, नई दिल्ली-110012  
DIVISION OF MICROBIOLOGY  
ICAR-Indian Agricultural Research Institute, New Delhi-110012



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**Dr. Livleen Shukla**  
Principal Scientist

To  
M/s SPS Bio-Chem Pvt Ltd  
Village-Damla, Distt Yamunanagar, Haryana

19/07/2024

Subject Analysis of FOM and LFOM.....reg

Dear Sir

We acknowledge the receipt of the following samples for analysis of their Physical, Chemical and Biological parameters as per FCO -1985 amended in 2023 norms:

Date of sampling: 18/07/2024

Samples collected under sampling protocol by the party

1. Fermented Organic Manure (FOM)-1.360 kg solid
2. Liquid Fermented Organic Manure (LFOM)-1.240 Litre

Parameters Requested for Analysis:

1. pH
2. EC
3. Total Organic Carbon
4. Total Nitrogen
5. Total Potassium
6. Total Phosphorus
7. Heavy Metals such as Zn, Cu, As, Cd, Cr, Ni, Hg, Pb and Fe
8. Colour and Bulk Density
9. BOD (5days)
10. COD 11. Fungal Pathogens

Estimated Date for results: 02/08/2024

Thanking you

Dr Livleen Shukla