

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
O.A. No. 622 of 2024**

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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Radhalakshmi R

SAMAGRA LAW
Advocate for Respondent No. 90
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New Delhi – 110020
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Contact No. +91- 9654611805

DATE: 27.05.2025
PLACE: New Delhi

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
O.A. No. 622 of 2024**

IN THE MATTER OF:

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...Respondents

**OBJECTIONS BY RESPONDENT NO. 90 (M/S EOC POLYMERS INDIA
PVT. LTD.) TO THE JOINT COMMITTEE REPORT BY HSPCB
DATED 03.01.2025.**

MOST RESPECTFULLY SHOWETH:

1. The instant Original Application has been filed alleging various mismanagement and pollution caused by the Common Effluent Treatment Plants (CETPs) Barhi, Sonipat resulting in direct discharge of untreated and toxic industrial effluent by the CETP into Drain No. 6 and on to the open land. The Applicant has sought recovery of EC from HSIIDC Barhi, prosecution of said corporation's officers, increase and upgradation of the CETP's capacity to treat the Industrial effluents of Bahri Industrial area.
2. In view of the allegations raised in the OA, this Hon'ble Tribunal was pleased to issue Notice vide Order dated 28.05.2024. This Hon'ble Tribunal constituted a Joint Committee comprising of representative of Member Secretary, Central Pollution Control Board (CPCB) and representative of Member Secretary, HSPCB (coordinating agency). The Joint Committee was given the following directions:
 - i. to ascertain the correct position in respect of direct discharge of effluents by the industries in Drain No. 6, capacity, capacity

utilization and performance of the CETP and effluents received by said CETP.

- ii. ascertain Primary Effluent Treatment Plant (PETP) standards prescribed to the member units. The Committee was directed to collect the samples from discharge point of CETP and Drain No. 6 and also from the point where Drain No. 6 enters Delhi and meets River Yamuna through Najafgarh drain and get the samples analysis done.
 - iii. examine the compliance by each of the industrial units in respect of discharge of effluent in that industrial area.
3. In pursuance thereof, joint inspections were carried out and an interim report dated 17.09.2024 was filed and subsequently a final Joint Committee Report dated 03.01.2025 has been submitted by HSPCB. In the said report the Joint Committee has observed, albeit erroneously, that the answering Respondent's unit is non-compliant w.r.t deviation in discharge norms and dilution. This Hon'ble Tribunal pursuant to the aforesaid report, vide Order dated 08.01.2025 has impleaded the answering Respondent along with 112 other units.
 4. Vide Order dated 27.02.2025, this Hon'ble Tribunal granted liberty to the impleaded Respondents to file its Reply/ Objections to the said Report. Accordingly, the present objection to the Report dated 03.01.2025 of the Joint Committee is being filed in compliance with the directions and liberty granted by this Hon'ble Tribunal.
 5. At the outset, the answering Respondent denies and disputes all the observations and recommendations of the Joint Committee made in its Report dated 03.01.2025 as baseless and factually incorrect, as if traversed seriatim, and no observation/ recommendation would be deemed to be admitted for want of a specific denial.

OBJECTION TO THE JOINT COMMITTEE REPORT

6. Pursuant to the inspection conducted on 08.08.2024 and based on the erroneous and inconclusive findings, the HSPCB issued Show Cause Notices to various industries including the answering Respondent vide letter dated 16.09.2024, for closure under Water Act, 1974 and revocation of consent under both, Water Act, 1974 and Air Act, 1974. The answering Respondent duly replied to the aforesaid SCN in a time bound manner vide reply dated 11.10.2024. It is pertinent to note that the said revocation is proposed to be undertaken even under the Air Act, 1974 when the SCN is devoid of any allegations/violations under the said Act. Copy of the SCN dated 16.09.2024 issued by HSPCB and the reply dated 11.10.2024 are annexed herewith as **ANNEXURE R-1** and **ANNEXURE R-2** respectively.

Copy of CTO and CTE of the answering Respondent unit are also annexed herewith as **ANNEXURE R-3** and **ANNEXURE R-4** respectively.

7. The finding of the Joint Committee that the answering Respondent's unit is non-compliant w.r.t deviation in discharge norms and suspected dilution is based on incomplete information and without due consideration to the industry specific operation of the answering Respondent's units, as evident by the follows submissions:
 - i. The inspection report records non-availability of permission for extraction of ground water and Authorization for Hazardous Waste Disposal issued under Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 by SPCB. It is submitted that the HWRA has issued permission for groundwater extraction to the answering Respondent which is valid from 07.02.2024 till 07.02.2025. The answering Respondent has also applied for the renewal of said permission in a time bound manner on 06.12.2024 which is currently

pending before the HWRA. Furthermore, the unit has been granted the Authorization under Hazardous Waste Disposal issued under Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 which is valid from 01.04.2023 to 31.03.2028. The unit has been duly complying with the conditions of the aforesaid permission and Authorization as stipulated therein. Copy of the HWRA permission for groundwater extraction, Application for renewal of ground water extraction and the Authorization under Hazardous Waste Disposal issued under Hazardous and other Wastes (Management & Transboundary Movement) Rules, 2016 are annexed herewith as **ANNEXURE R-5** to **ANNEXURE R-7** respectively.

- ii. The observation by the Joint Committee that the current PETP system is not adequate to achieve the prescribed norms are vague and ambiguous. The aforesaid observation has not taken into consideration the reply dated 11.10.2024 submitted by the answering Respondent to the SCN whereby it has been clearly established that all the parameters are within the prescribed discharge norms in view of the report of the NABL approved lab.
- iii. It is submitted that the answering Respondent maintains proper data and logbooks of production, freshwater consumption, effluent generation and effluent discharge, solid waste generation. It is assured that any logbook discrepancy was only temporary and is not reflective of habitual or intentional non-compliance.
- iv. The report attributes the temporary non-functioning of the Electricity meter at PETP toward the non-compliance of the answering Respondent's unit. It is common knowledge that during the functioning of an industry, breakdown of equipment is to be expected and is a part of said functioning. The time taken for replacement, repair and/or maintenance of said equipment cannot be considered to the detriment of

the answering Respondent. However, it is stated that a new Electricity meter at PETP has already been installed and is presently operational. Photograph of the operational Electricity meter at PETP is annexed herewith as **ANNEXURE R-8**.

- v. The finding of the Joint Committee under Sr. no 22 with respect to the dilution of effluents is baseless and erroneous as the same is not supported by any evidence and is thus misplaced.
8. It is respectfully submitted that the answering Respondent is fully committed to the continued compliance of all the applicable Environmental norms and towards that endeavour has undertaken the following measures:
- i. Installed and replaced primary and secondary sedimentation tanks, as well as carbon and multigrade filters.
 - ii. Enhanced the biological treatment facility for better wastewater treatment efficiency.
 - iii. Increased the capacity of the wastewater collection tank to improve overall ETP performance.
 - iv. Conducted multiple treatability studies with an external lab to explore different chemical treatment methods for further COD reduction.
 - v. Optimized the chemical treatment process by selecting more effective chemicals, leading to further improved COD reduction.
 - vi. Appointed additional competent person to manage the ETP and additional training undergone by the existing ETP operator for efficacious operation of the same. Currently, the facility operates in two shifts with two skilled personnel.
9. With respect to the recommendations/suggestions of the Joint Committee:
- i. Recommendation No.1-Notwithstanding the Reply dated 11.10.2024 submitted by the answering Respondent to the SCN whereby it has been clearly established that all the parameters are within the prescribed discharge norms, the additional measures undertaken by the

answering Respondent as detailed above, adequately addresses the issue of efficient treatment of high COD effluent to achieve the desired CETP inlet norms.

- ii. Recommendation No. 2-The answering Respondent maintains proper data and logbooks of production, freshwater consumption, effluent generation and effluent discharge, solid waste generation, the same may be verified accordingly.
- iii. Recommendation No. 3 - A new Electricity meter at PETP has already been installed and is presently operational as stated herein above.

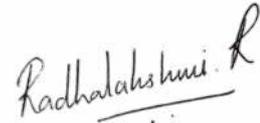
10. In view of the above-mentioned submissions, the observations of the Joint Committee are unsustainable. It is submitted that the answering Respondent has carried out its operations within the sanctioned parameters and in accordance with the environmental norms.
11. The answering Respondent submits that necessary measures are already in place, ensuring ongoing compliance with all applicable environmental laws. Further, in accordance with the established industry practice, the Primary Treatment Plant (PETP) outlet of industries directly corresponds to the CETP inlet, once the effluent meets inlet standards as submitted herein, the answering Respondent ought not to be unjustly penalized for any inefficiency attributed to the CETP which is beyond the answering Respondent's control.
12. It is evident from the above that the observations and recommendations contained in the Joint Committee Report are based on a misappreciation of facts and therefore, cannot be relied upon by this Hon'ble Tribunal. Consequently, it is requested that this Hon'ble Tribunal be pleased to order a fresh inspection of the establishment, to ascertain the aforesaid facts.

13. The answering Respondent craves liberty to file additional Reply/submissions, if required, during the course of the proceedings and in the interest of justice.



RESPONDENT NO. 90

THROUGH



SAMAGRA LAW

Advocate for Respondent No. 90

38, Okhla Phase-III

New Delhi – 110020

Email ID: radhalakshmi@samagralaw.com

Contact No. +91- 9654611805

DATE: 27.05.2025

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...Respondents

AFFIDAVIT

I, Ritesh Chincholkar, S/o Sh. Ashok Chincholkar, aged about 36 years, authorized representative of the Respondent No. 90, office at Plot No. 474A and 474B, HSIIDC Industrial Estate, Phase 1, Barhi District, Sonapat, Haryana-131101, do hereby solemnly affirm and state as under:

1. I am duly authorised to file the present objections on behalf of Respondent No. 90 i.e. M/s EOC Polymers India Pvt. Ltd. vide Authority Letter dated 31.03.2022. I am fully conversant with the facts and circumstances of the case and hence, competent to swear this affidavit.



2. I have read and understood the contents of the accompanying objections and state that the contents thereof have been drafted under my instructions and that the same are true and correct to the best of my knowledge and belief, based on the records maintained by Respondent No. 90 in its regular course of business.

4061
26/5/24

3. I say that the Annexures to the accompanying objections are true and correct to the best of my knowledge.


DEPONENT

VERIFICATION:

Verified at Sonipat on this ...26.... day of May, 2025, that the contents of the above affidavit are true and correct to the best of my knowledge and no part of it is false and nothing material has been concealed therefrom.



[Signature]
DEPONENT

4061
26.5

ATTESTED
[Signature]
NOTARY
Ganaur Dist. Sonapat



HARYANA STATE POLLUTION CONTROL BOARD

Plot No. 1, Sector-15, Part-II, Sonipat
Ph. - 0130-2236119, E-mail ID: - hspcbrosr@gmail.com

ANNEXURE R-1

10



No. HSPCB/SR/2024/ 1315
To

Dated: 16/09/2024

M/s EOC Polymers India Pvt. Ltd., (Code - 80802)
Plot No. 474A & 474B, HSIIDC Industrial Estate,
Barhi Phase-I, Sonipat

Sub: Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021.

Whereas, the unit was inspected by the concerned Field Officer Sh. Anil Kumar, Sc-B alongwith CPCB team on 08.08.2024 in reference of NGT case and the unit is involved in process of Latex Compound and Adhesive XSBR Latex having CTO valid upto 31.03.2028.

Whereas, sample from the inlet and outlet of ETP of the unit was collected in the presence of representative of the unit and sent to Board's lab at Faridabad.

Whereas as per Analysis Report No. 1074 dt. 16.08.2024 received from the Board's Laboratory at Faridabad, the result of outlet of ETP of the unit has been found exceeding the prescribed limits as per detail given below:-

Sr. No.	Parameter Name	Result Mg/l	Limit Mg/l
1.	BOD	650	500
2.	COD	9760	1400
3.	TDS	3730	2100

Whereas, from the above it is evident that you are discharging effluents beyond the prescribed limits and violating the provision of Section 24 of Water Act, 1974.

Therefore, you are hereby directed to show cause & explain within **15 days** as to why closure action may not be taken against your unit u/s 33-A Water (Prevention and Control of Pollution) Act, 1974, prosecution action under section 43/44 of Water (Prevention and Control of Pollution) Act, 1974 and revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 besides initiation of legal action under the Acts for non-compliance of the relevant provisions of Environmental Acts/Rules/Laws.

In case you fail to reply/comply with the deficiencies mentioned above within above mentioned stipulated time period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant closure action against your unit under relevant Acts/ Rules besides initiation of legal action under the relevant Acts/Rules without giving any further notice.

Whereas, for the above said violations you are liable to pay the Environmental Compensation in terms of the directions of Board issued letter no. HSPCB/PLG/2021/2343-2350 dated 22.12.2021 as assessed by the Board as per methodology defined therein.

DA/Copy of Analysis Report.

Endst. No. HSPCB/SR/2024/

Dated:


Regional Officer,
Sonapat Region.

A copy of the above is forwarded to the Chairman, HSPCB, Panchkula for information, please.

1
Regional Officer,
Sonapat Region.



**PREVENT
POLLUTION**



TC-11158

FORM J
(See Rule 36)

Report No.:-1074

Dated - August 16, 2024

I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 08th day of August, 2024 from Sh. Anil Kumar, Sc-'B', Sonlpat, HSPCB & Smt. Garima Dublish, RA-III, CPCB, a sample of liquid trade effluent of Code - C0802, collected on 08.08.2024 from the Inlet & Outlet of ETP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 08/08/2024 to 16/08/2024 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of ETP	Outlet of ETP	Prescribed Limits	Test Method
1.	pH Value at 25°C	8.29	8.86	6.0-9.0	APHA 4500 H ⁺ B (24 th Edition 2023)
2.	Conductivity μ S/cm at 25°C	9720	6780	-----	APHA 2510 B (24 th Edition 2023)
3.	Total Suspended Solids mg/l	350	120	1500	APHA 2540 - D (24 th Edition 2023)
4.	B.O.D.(5 Days at 20 ^o C) mg/l	1300	650	500	APHA 5210-C (24 th Edition 2023)
5.	Chemical Oxygen Demand mg/l	12780	9760	1400	APHA 5220-B (24 th Edition 2023)
6.	Oil & Grease mg/l	25.8	7.4	10	APHA 5520-B (24 th Edition 2023)
7.	Total Dissolved Solids mg/l	5350	3730	2100	APHA 2540-C (24 th Edition 2023)

BDL* = Below Detection Limit

DL** = Detection Limit

The condition of the seals, fastening and container on receipt was as follow:

Container had its seals found intact in order; slip on the container had the signature of the representative of the industry and the board representative.

Signed this on **16th day of August, 2024**

Haryana State Pollution Control Board Laboratory,
Sector-16 A, Faridabad

Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Sonlpat

Endst. No. HSPCB/LAB/F/2024/ 5494

Dated: 16/8/24.

This test report relate only to the particular sample submitted for testing



**PREVENT
POLLUTION**

FORM J
(See Rule 36)

Report No.:-1074

Dated - August 16, 2024

I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 08th day of August, 2024 from Sh. Anil Kumar, Sc-'B', Sonipat, HSPCB & Smt. Garima Dublsh, RA-III, CPCB, a sample of liquid trade effluent of Code - C0802, collected on 08.08.2024 from the Inlet & Outlet of ETP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 08/08/2024 to 16/08/2024 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of ETP	Outlet of ETP	Prescribed Limits	Test Method
1.	Colour	Greyish	Hazy	-----	----
2.	Odour	Bad	Almost Odourless	-----	----
3.	Zinc as Zn mg/l	4.19	ND	3	3120-Zn ICP-OES Method (APHA 24 th Edition 2023)
4.	Iron as Fe mg/l	3.55	ND	3	3120-Fe ICP-OES Method (APHA 24 th Edition 2023)
5.	SAR	23.79	12.86	26	APHA 3500-Na B. Flame Emission Photometric Method 24 th Edition 2023
6.	Ammonical Nitrogen as N mg/l	24.76	3.12	50	APHA 4500-N 24 th Edition 2023
7.	Phenolic Compounds as C ₆ H ₅ OH mg/l	2.12	0.16	1	IS 3025 (Part-43) Sec 1-2022
8.	Total Chromium as Cr mg/l	1.45	ND	2	3120-Cr ICP-OES (APHA 24 th Edition 2023)

The condition of the seals, fastening and container on receipt was as follow:

Container had its seals found intact in order; slip on the container had the signature of the representative of the industry and the board representative.

Signed this on **16th day of August, 2024**

Haryana State Pollution Control Board Laboratory,
Sector-16 A, Faridabad

Narender Hooda
Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Sonipat

Endst. No. HSPCB/LAB/F/2024/ 5494

Dated: 16/8/24,

This test report relate only to the particular sample submitted for testing



To

**The Regional Officer
 Haryana State Pollution Control Board
 Sonapat**

Subject:- Reply to Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021.

Respected Sir,

With reference to your letter no. HSPCB/SR/2024/1315 dt. 16.09.2024, it is stated that we agree that the unit is involved in process of dyeing of Latex Compound and Adhesive XSBR Latex and the unit was inspected by the Sh. Anil Kumar, Sc-B alongwith CPCB team on 08.08.2024 in reference of NGT case. The unit has obtained CTO and it is valid upto 31.03.2028 and they collected the sample from the inlet and outlet of ETP of the unit and after that sampling reports stated that result of outlet of ETP has been found exceeding the prescribed limits i.e.

Sr. No.	Parameter Name	Result Mg/l	Limit Mg/l
1.	BOD	650	500
2.	COD	9760	1400
3.	TDS	3730	2100

Sir, it is clarified that there was rise in parameters due to the non-availability of skilled ETP operator on the day of inspection. The non- skilled operator was operating the ETP. Secondly, we have made overralling of the ETP and the MBBR tank has been made clean, the filter media has also been changed and the aeration diffuser has been installed. Moreover, we have made self-testing from NABL approved lab and the report were found in the prescribed limits vide report no WWW/0924/28104 dt 28.09.2024 (photocopy enclosed).

Sr. No.	Parameter Name	Result Mg/l	Limit Mg/l
1.	BOD	25.3	500
2.	COD	87.7	1400
3.	TDS	1559	2100

Furthermore, the ETP is now functioning well, and we have also enclosed the photographs of ETP. We have also deposited water testing fee amounting to Rs 4500 /- Dt 08.10.24 and the bank guarantee amounting to Rs 400,000 /- Dt.08.10.24 Even after this any compliance has been left over then kindly let us know to fulfil the same in stipulated time period.

08/10/24	State Pollution Board Office	HDFCR52024100850308910	08/10/24	4,04,500
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We have presented our true statements above and we will try our best to take due care to the environment. We request you to conduct a re-visit and re-sampling in the unit for collecting the samples for analysis and we assure to not repeat the same.

Thank you

Yours faithfully

For EOC Polymers India Pvt. Ltd.

Name: Ritesh Chincholkar

Mobile No ; 8980289898

Designation: Sr. Plant Manager

No. HSPCB/SR/2024/ 1315
To

Dated: 16/09/2024

M/s EOC Polymers India Pvt. Ltd., (Code - 80802)
Plot No. 474A & 474B, HSIIDC Industrial Estate,
Barhi Phase-I, Sonapat

Sub: Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021.

Whereas, the unit was inspected by the concerned Field Officer Sh. Anil Kumar, Sc-B alongwith CPCB team on 08.08.2024 in reference of NGT case and the unit is involved in process of Latex Compound and Adhesive XSBR Latex having CTO valid upto 31.03.2028.

Whereas, sample from the inlet and outlet of ETP of the unit was collected in the presence of representative of the unit and sent to Board's lab at Faridabad.

Whereas as per Analysis Report No. 1074 dt. 16.08.2024 received from the Board's Laboratory at Faridabad, the result of outlet of ETP of the unit has been found exceeding the prescribed limits as per detail given below:-

Sr. No.	Parameter Name	Result Mg/l	Limit Mg/l
1.	BOD	650	500
2.	COD	9760	1400
3.	TDS	3730	2100

Whereas, from the above it is evident that you are discharging effluents beyond the prescribed limits and violating the provision of Section 24 of Water Act, 1974.

Therefore, you are hereby directed to show cause & explain within **15 days** as to why closure action may not be taken against your unit u/s 33-A Water (Prevention and Control of Pollution) Act, 1974, prosecution action under section 43/44 of Water (Prevention and Control of Pollution) Act, 1974 and revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 besides initiation of legal action under the Acts for non-compliance of the relevant provisions of Environmental Acts/Rules/Laws.

In case you fail to reply/comply with the deficiencies mentioned above within above mentioned stipulated time period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant closure action against your unit under relevant Acts/ Rules besides initiation of legal action under the relevant Acts/Rules without giving any further notice.

Whereas, for the above said violations you are liable to pay the Environmental Compensation in terms of the directions of Board issued letter no. HSPCB/PLG/2021/2343-2350 dated 22.12.2021 as assessed by the Board as per methodology defined therein.

DA/Copy of Analysis Report.

Endst. No. HSPCB/SR/2024/

Dated:

 16/9/24
Regional Officer,
Sonapat Region.

A copy of the above is forwarded to the Chairman, HSPCB, Panchkula for information, please.

1
Regional Officer,
Sonapat Region.



**PREVENT
POLLUTION**

FORM J
(See Rule 36)

Report No.:-1074

Dated - August 16, 2024

I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 08th day of August, 2024 from Sh. Anil Kumar, Sc-'B', Sonipat, HSPCB & Smt. Garima Dublish, RA-III, CPCB, a sample of liquid trade effluent of Code - C0802, collected on 08.08.2024 from the Inlet & Outlet of ETP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 08/08/2024 to 16/08/2024 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of ETP	Outlet of ETP	Prescribed Limits	Test Method
1.	Colour	Greyish	Hazy	-----	----
2.	Odour	Bad	Almost Odourless	-----	----
3.	Zinc as Zn mg/l	4.19	ND	3	3120-Zn ICP-OES Method (APHA 24 th Edition 2023)
4.	Iron as Fe mg/l	3.55	ND	3	3120-Fe ICP-OES Method (APHA 24 th Edition 2023)
5.	SAR	23.79	12.86	26	APHA 3500-Na B. Flame Emission Photometric Method 24 th Edition 2023
6.	Ammonical Nitrogen as N mg/l	24.76	3.12	50	APHA 4500-N 24 th Edition 2023
7.	Phenolic Compounds as C ₆ H ₅ OH mg/l	2.12	0.16	1	IS 3025 (Part-43) Sec 1-2022
8.	Total Chromium as Cr mg/l	1.45	ND	2	3120-Cr ICP-OES (APHA 24 th Edition 2023)

The condition of the seals, fastening and container on receipt was as follow:

Container had its seals found intact in order; slip on the container had the signature of the representative of the industry and the board representative.

Signed this on **16th day of August, 2024**

Haryana State Pollution Control Board Laboratory,
Sector-16 A, Faridabad

Narender Hooda
Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Sonipat

Endst. No. HSPCB/LAB/F/2024/ 5494

Dated: 16/8/24.

This test report relate only to the particular sample submitted for testing



**PREVENT
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TC-11158

FORM J
(See Rule 36)

Report No.:-1074

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I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 08th day of August, 2024 from Sh. Anil Kumar, Sc-'B', Sonipat, HSPCB & Smt. Garima Dublish, RA-III, CPCB, a sample of liquid trade effluent of Code - C0802, collected on 08.08.2024 from the Inlet & Outlet of ETP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 08/08/2024 to 16/08/2024 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of ETP	Outlet of ETP	Prescribed Limits	Test Method
1.	pH Value at 25°C	8.29	8.86	6.0-9.0	APHA 4500 H ⁺ B (24 th Edition 2023)
2.	Conductivity μ S/cm at 25°C	9720	6780	-----	APHA 2510 B (24 th Edition 2023)
3.	Total Suspended Solids mg/l	350	120	1500	APHA 2540 - D (24 th Edition 2023)
4.	B.O.D.(5 Days at 20 ^o C) mg/l	1300	650	500	APHA 5210-C (24 th Edition 2023)
5.	Chemical Oxygen Demand mg/l	12780	9760	1400	APHA 5220-B (24 th Edition 2023)
6.	Oil & Grease mg/l	25.8	7.4	10	APHA 5520-B (24 th Edition 2023)
7.	Total Dissolved Solids mg/l	5350	3730	2100	APHA 2540-C (24 th Edition 2023)

BDL* = Below Detection Limit

DL** = Detection Limit

The condition of the seals, fastening and container on receipt was as follow:

Container had its seals found intact in order; slip on the container had the signature of the representative of the industry and the board representative.

Signed this on **16th day of August, 2024**

Haryana State Pollution Control Board Laboratory,
Sector-16 A, Faridabad

Narender Hooda
Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Sonipat

Endst. No. HSPCB/LAB/F/2024/ 5494

Dated: 16/8/24.

This test report relate only to the particular sample submitted for testing



HARYANA STATE POLLUTION CONTROL BOARD

Star Complex, Opp. General Hospital, Delhi Road,
Sonapat Ph. 0130-2236119(O) Email:-

hspcbrosr@gmail.com

E-mail: hspcb@hry.nic.in



No. HSPCB/Consent/ : 329991023SONCTO32489123

Dated:16/02/2023

To.

M/s :EOC Polymers India Pvt. Ltd.

Plot No 474 A 474B

Subject: Grant of consent to operate to M/s EOC Polymers India Pvt. Ltd..

Please refer to your application no. 32489123 received on dated 2023-01-05 in regional office Sonapat. With reference to your above application for consent to operate, M/s EOC Polymers India Pvt. Ltd. is here by granted consent as per following specification/Terms and conditions.

Consent Under	BOTH
Period of consent	01/04/2023 - 31/03/2028
Industry Type	Inorganic chemical compounds such as chlorides/sulphates/suphites/nitriates/oxides/ flourides/stearates of metals/cations
Category	ORANGE
Investment(In Lakh)	5741.0
Total Land Area(Sq. meter)	18000.0
Total Builtup Area(Sq. meter)	10600.0
Quantity of effluent	
1. Trade	20.0 KL/Day
2. Domestic	3.0 KL/Day
Number of outlets	2.0
Mode of discharge	
1. Domestic	Into HSIIDC sewer leading to CETP
2. Trade	Into HSIIDC sewer after treatment leading to CETP
Domestic Effluent Parameters	
1. NA	
Trade Effluent Parameters	
1. BOD	500 mg/l
2. COD	1400 mg/l
3. TSS	1500 mg/l
4. pH	5.5-9.0
5. O&G	15 mg/l
6. Iron as Fe	3 mg/l
7. Zinc as Zn	5 mg/l

Number of stacks	2
Height of stack	
1. Boiler	31 meters
2. Dust Collector	20 meters
Emission parameters	
1. SPM	80 mg/m ³
2. NOX	50 mg/m ³
3. SOX	50 mg/m ³
Product Details	
1. XSBR Latex	110 Metric Tonnes/day
2. Latex Compound And Adhesive	60 Metric Tonnes/day
Capacity of boiler	
1. Steam boiler 1	4.0 Ton/hr
2. Steam boiler 2	2.0 Ton/hr
Type of Furnace	
1. NA	
Type of Fuel	
1. PNG	1800 SCM
Raw Material Details	
high solid latex	5 Metric Tonnes/Day
seed latex	2 Metric Tonnes/Day
DM water	20 Metric Tonnes/Day
Biocide	0.01 Metric Tonnes/Day
Butadine	6 Metric Tonnes/Day
Natural latex	8 Metric Tonnes/Day
Caustic soda	1 Metric Tonnes/Day
Thickner	1 Metric Tonnes/Day
Surfactant	1 Metric Tonnes/Day
Acrylic Acid	0.5 Metric Tonnes/Day
Soap	Metric Tonnes/Day
Styrene	8 Metric Tonnes/Day
Sodium Pyrophosphate	0.2 Metric Tonnes/Day
Anitfoam	0.5 Metric Tonnes/Day
Ammonia	1 Metric Tonnes/Day
TDDM	1 Metric Tonnes/Day
PVA	4 Metric Tonnes/Day
Ammonium Persulphate	0.2 Metric Tonnes/Day
Acitade	0.02 Metric Tonnes/Day
itaconic acid solution	0.5 Metric Tonnes/Day
additives	1 Metric Tonnes/Day
fumaric solution	0.4 Metric Tonnes/Day
China Clay	1 Metric Tonnes/Day

Calcium carbonate powder	20 Metric Tonnes/Day
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*Regional Officer, Sonipat
Haryana State Pollution Control Board.*

Terms and conditions

1. The applicants shall maintain good house keeping both within factory and in the premises. All hose pipelines valves, storage tanks etc. shall be leak proof. In plant allowable pollutants levels, if specified by State Board should be met strictly.
2. The applicant/company shall comply with and carry out directive/orders issued by the Board in this consent order at all subsequent times without negligence of his /its part. The applicant/company shall be liable for such legal action against him as per provision of the law/act in case of violation of any order/directives. Issued at any time and or non compliance of the terms and conditions of his consent order.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. If due to any technological improvement or otherwise this Board is of opinion that all or any of the conditions referred to above required variation (including the change of any control equipment either in whole or in part) this Board shall after giving the applicant an opportunity of being heard vary all or such condition and there upon the applicant shall be bound to comply with the conditions so varied.
6. The industry shall provide adequate arrangement for fighting the accidental leakages, discharge of any pollutants gas/liquids from the vessels, mechanical equipment etc. which are likely to cause environment pollution.
7. The industry shall comply noise pollution (Regulation and control) Rules, 2000.
8. The industry shall comply all the direction/Rules/Instructions as may be issued by the MOEF/CPCB/HSPCB from time to time.
9. The industry shall ensure that various characteristics of the effluents remain within the tolerance limits as specified in EPA Standard and as amended from time to time and at no time the concentration of any characteristics should exceed these limits for discharge.
10. The industry would immediately submit the revised application to the Board in the event of any change in the raw material in process, mode of treatment/discharge of effluent. In case of change of process at any stage during the consent period, the industry shall submit fresh consent application alongwith the consent to operate fee, if found due, which may be on any account and that shall be paid by the industry and the industry would immediately submit the consent application to the Board in the event of any change during the year in the raw material, quantity, quality of the effluent, mode of discharge, treatment facilities etc.
11. The officer/official of the Board shall reserve the right to access for the inspection of the industry in connection with the various process and the treatment facilities. The consent to operate is subject to review by the Board at any time.
12. Permissible limits for any pollutants mentioned in the consent to operate order should not exceed the concentration permitted in the effluent by the Board.

13. The industry shall pay the balance fee, in case it is found due from the industry at any time later on.

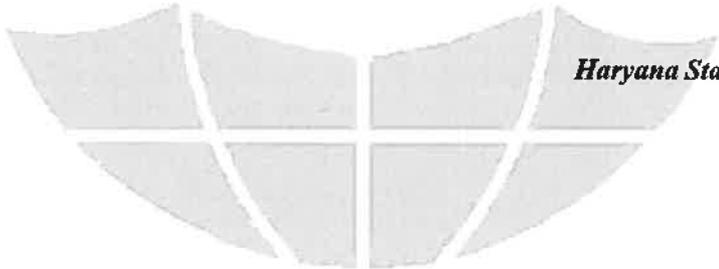
14. If the industry fails to adhere to any of the conditions of this consent to operate order, the consent to operate so granted shall automatically lapse.

15. If the industry is closed temporarily at its own, they shall inform the Board and obtain permission before restart of the unit.

16. The industry shall comply all the Directions/ Rules/Instructions issued from time to time by the Board.

Specific Conditions :

1. Unit will run and maintain it's ETP/APCM properly and maintain the Log Book for energy consumption of ETP/APCM and chemicals used daily for the ETP. 2. That the unit shall keep all the parameters within the prescribed limits and shall comply with all the Norms and Rules as prescribed in the Act. 3. That the unit will adopt cleaner technology thereby reducing pollution load. 4. That the unit will provide inter locking arrangement of DG set with ETP/APCM and shall have separate D.G. set to ensure regular and effective running of pollution control devices. 5. That the unit will not discharge any untreated effluent inside and outside its premises. 6. Unit will provide separate flow meter at Inlet/ Outlet of STP/ETP for which separate log book will be maintained if required. 7. That the unit will not add any air polluting process/ machinery and also not to add any process which increases the water pollution load. 8. That the unit will comply with all the provisions of Hazardous Waste Rules and submit return under HWM Rules on yearly basis. 9. That the CTO so granted shall become invalid in case of violation of any of the above / any law of the land. 10. Unit will apply for consent to operate for further period 90 days before expiry of this consent otherwise penalty will be imposed as per policy.



**Regional Officer, Sonipat
Haryana State Pollution Control Board.**


HARYANA STATE POLLUTION CONTROL BOARD


**Star Complex, Opp. General Hospital, Delhi Road,
Sonapat Ph. 0130-2236119(O) Email:-
hspcbrosr@gmail.com**

Website: www.hrocmms.nic.in E-Mail - hspcbho@gmail.com

Telephone No.: 0172-2577870-73

No. HSPCB/Consent/ : 329991020SONCTE7776067

Dated:17/08/2020

To.

M/s : EOC Polymers India Pvt. Ltd.

Plot No 474 A 474B

SONIPAT

131001

Sub. : Grant of consent to Establish to M/s EOC Polymers India Pvt. Ltd.

Please refer to your application no. 7776067 received on dated 2020-07-27 in regional office Sonipat.

With reference to your above application for consent to establish, M/s EOC Polymers India Pvt. Ltd. is here by granted consent as per following specification/Terms and conditions.

Consent Under	AIR/WATER
Period of consent	17/08/2020 - 16/08/2025
Industry Type	Inorganic chemical compounds such as chlorides/sulphates/suphites/nitriates/oxides/ flourides/stearates of metals/cations
Category	ORANGE
Investment(In Lakh)	5741.0
Total Land Area (Sq. meter)	0.0
Total Builtup Area (Sq. meter)	0.0
Quantity of effluent	
1. Trade	20.0 KL/Day
2. Domestic	2.0 KL/Day
Number of outlets	2.0
Mode of discharge	
1. Domestic	sewer
2. Trade	sewer
Permissible Domestic Effluent Parameters	
1. NA	
Permissible Trade Effluent Parameters	
1. BOD	500 mg/l
2. COD	1400 mg/l
3. TSS	1500 mg/l

Number of stacks	3
Height of stack	
1. Attached to boiler	30 metre
2. DG Set 500 KVA	14 mtrs
3. DG set 162 KVA	14 mtrs
Permissible Emission parameters	
1. SPM	800 mg/m ³
Capacity of boiler	
1. Boiler	4.0 Ton/hr
Type of Furnace	
1. NA	
Type of Fuel	
1. Gas	KL/day

Regional Officer, Sonipat

Haryana State Pollution Control Board.

Terms and conditions

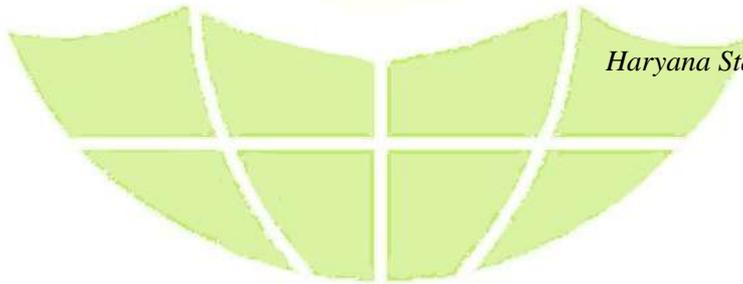
1. The industry has declared that the quantity of effluent shall be KL/Day i.e 0KL/Day for Trade Effluent, 0 KL/Day for Cooling, 0 KL/Day for Domestic and the same should not exceed .
2. The above 'Consent to Establish' is valid for 60 months from the date of its issue to be extended for another one year at the discretion of the Board or till the time the unit starts its trial production whichever is earlier. The unit will have to set up the plant and obtain consent during this period.
3. The officer/official of the Board shall have the right to access and inspection of the industry in connection with the various processes and the treatment facilities being provided simultaneously with the construction of building/machinery. The effluent should conform the effluent standards as applicable
4. That necessary arrangement shall be made by the industry for the control of Air Pollution before commissioning the plant. The emitted pollutants will meet the emission and other standards as laid/will be prescribed by the Board from time to time.
5. The applicant will obtain consent under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21/22 of the Air (Prevention & Control of Pollution) Act, 1981 as amended to-date-even before starting trial production
6. The above Consent to Establish is further subject to the conditions that the unit complies with all the laws/rules/decisions and competent directions of the Board/Government and its functionaries in all respects before commissioning of the operation and during its actual working strictly.
7. No in-process or post-process objectionable emission or the effluent will be allowed, if the scheme furnished by the unit turns out to be defective in any actual experience
8. The Electricity Department will give only temporary connection and permanent connection to the unit will be given after verifying the consent granted by the Board, both under Water Act and Air Act.
9. Unit will raise the stack height of DG Set/Boiler as per Board's norms.
10. Unit will maintain proper logbook of Water meter/sub meter before/after commissioning.

11. That in the case of an industry or any other process the activity is located in an area approved and that in case the activity is sited in an residential or institutional or commercial or agricultural area, the necessary permission for siting such industry and process in an residential or institutional or commercial or agricultural area or controlled area under Town and Country Planning laws CLU or Municipal laws has to be obtained from the competent Authority in law permitting this deviation and be submitted in original with the request for consent to operate.
12. That there is no discharge directly or indirectly from the unit or the process into any interstate river or Yamuna River or River Ghaggar.
13. That the industry or the unit concerned is not sited within any prohibited distances according to the Environmental Laws and Rules, Notification, Orders and Policies of Central Pollution control Board and Haryana State Pollution Control Board.
14. That of the unit is discharging its sewage or trade effluent into the public sewer meant to receive trade effluent from industries etc. then the permission of the Competent Authority owing and operating such public sewer giving permission letter to his unit shall be submitted at time of consent to operate.
15. That if at any time, there is adverse report from any adjoining neighbor or any other aggrieved party or Municipal Committee or Zila Parishad or any other public body against the unit's pollution; the Consent to Establish so granted shall be revoked.
16. That all the financial dues required under the rules and policies of the Board have been deposited in full by the unit for this Consent to Establish.
17. In case of change of name from previous Consent to Establish granted, fresh Consent to Establish fee shall be levied.
18. Industry should adopt water conservation measures to ensure minimum consumption of water in their Process. Ground water based proposals of new industries should get clearance from Central Ground Water Authority for scientific development of previous resource.
19. That the unit will take all other clearances from concerned agencies, whenever required.
20. That the unit will not change its process without the prior permission of the Board.
21. That the Consent to Establish so granted will be invalid, if the unit falls in Aravali Area or non conforming area.
22. That the unit will comply with the Hazardous Waste Management Rules and will also make the non-leachate pit for storage of Hazardous waste and will undertake not to dispose off the same except for pit in their own premises or with the authorized disposal authority.
23. That the unit will submit an undertaking that it will comply with all the specific and general conditions as imposed in the above Consent to Establish within 30 days failing which Consent to Establish will be revoked.
24. That unit will obtain EIA from MoEF, if required at any stage.
25. In case of unit does not comply with the above conditions within the stipulated period, Consent to Establish will be revoked.
26. That unit will obtain consent to operate from the board before the start of product activity.

Specific Conditions

Other Conditions :

1. That CTE is granted for manufacturing Latex compound and XSBR Latex capacity 60 MT/day and 40 MT/day respectively.
2. That effluent generation from your unit will be 20 KLD of trade effluent and 2 KLD of domestic effluent.
3. That your unit will install 3 stacks connected to one PNG fired boiler of capacity 4 Ton and other two to DG set provided by the unit.
4. That your unit will not use pet coke and furnace oil as fuel.
5. That unit will obtain permission form CGWA for extraction ground water for industrial use.
6. That your unit will comply with the direction issued by Government of India vide letter no. 10-158/NWR/Court case/NGT/OA No.639/18-215 dated 27.03.20019 to install shallow water Piezometers/Ground water level and quality monitoring stations by the industries inside the premises and nearby for periodical monitoring (Pre and post mansoon) of ground quality in consultation with CGWA.
7. That your unit will obtain consent to operate from the Board before start of production activity for your project.
8. That the unit will provide separate energy meter, flow meter at the inlet and outlet of ETP.
9. That the unit will provide flow meter at the source of water supply and will maintain the log book for the same.
10. That the unit will provide energy meter on its APCM.
11. That the unit will maintain the log book of ETP and APCM installed by the unit.
12. That the unit will adopt cleaner technology thereby reducing pollution load of unit.
13. That the unit will not made any expansion without prior permission of the Board.
14. That the unit will made agreement with GEPIL for disposal of hazardous waste generated by the unit.
15. That total investment of your plant is 57 crore.
16. That the unit will deposit the balance consent fee as per schedule, if any.
17. That the unit will install DG set of capacity 500 and 162 KVA with canopy as submitted in application form.
18. That the unit will obtain consent to operate from the board before start of production activity.
19. That the CTE so granted will become invalid in case of violation of any of the condition.
20. That CTE is valid for the period of rent agreement made by your unit for the present site, if any and will be revoked in case of violation of any law of land.
21. That the unit will comply with the direction issued by the HSPCB/CPCB/NGT/MoEFF&CC time to time.



Bhupinder Singh Digitally signed by Bhupinder Singh
Date: 2020.08.17 09:44:54 +0700
Regional Officer, Sonipat

Haryana State Pollution Control Board.

4149



हरियाणा सरकार
हरियाणा जल संसाधन प्राधिकरण
Government of Haryana
Haryana Water Resources Authority

ANNEXURE R-5

PERMISSION CERTIFICATE FOR GROUND WATER EXTRACTION

Project Name:	EOC POLYMERS INDIA PVT LTD							
Project Address:	PLOT NO. 474 A B HSIIDC BARHI SONIPAT							
Village/MC:	Bari	Tehsil:			Ganaur			
District:	SONIPAT	State:			Haryana			
Pin Code:	--							
Communication Address:	PLOT NO. 474 A B HSIIDC BARHI SONIPAT							
Address Regional Office:	Rear Building, 3rd Floor, HSVP, Sector-6, Panchkula							
1. NOC No.:	HWRA/NOC/IND/R/2024/934							
2. Application No.:	HWRA/IND/R/2024/1670	3. Category:	Industry					
4. Project Status:	Renew	5. NOC Type:	Renew					
6. Ground Water Extraction Permitted:								
Ground Water For	m3/day	m3/year	Valid From		Valid Upto			
Fresh Water	84.00	30660.00	07/02/2024		07/02/2025			
Total	84.00	30660.00	--		--			
7. Details of Ground Water Extraction:	Total Existing No.:1				Total Proposed No.:0			
	DW	DCB	BW	TW	DW	DCB	BW	TW
Abstraction Structure*	--	--	1	--	--	--	--	--
*DW - Dug Well;DCB - Dug cum Bore Well;BW - Bore Well;TW - Tube Well;DWLR - Digital Water Level Recorder								
8. Quantum of ground water recharge(m3/year)	--							
9. Number of Piezometers (Observation wells) to be constructed/ monitored & Monitoring mechanism	No. of Piezometers			Monitoring Mechanism				
	0			Manual	DWLR	Telemetry		
			0	0	0	0		

* Terms & conditions are at the back of this page.



Note: This is computer generated certificate, it can be validated by scanning QR code.

Validity of this NOC shall be subject to compliance of the following mandatory conditions

This NOC for abstraction of ground water, shall be subject to the following terms and conditions



1. NOC is granted to the applicant on the condition that local government water supply agencies are not able to supply the desired quantity of water. In case of supply of water from local agency the applicant shall immediately inform HWRA and reduce the abstraction of ground water accordingly.
2. The applicant shall adopt latest water efficient technologies to reduce dependence on ground water resources by 20% in three years. Compliance report in this regard shall be submitted yearly. The proof of reduction of dependence on ground water shall also be submitted half yearly i.e., at the time of deposit of water abstraction charges of the second quarter.
3. The applicant abstracting ground water between 100-500 kld shall undertake self-annual water audit and those abstracting ground water more than 500 kld shall undertake water audit through organisations authorised by Government of India or HWRA and submit audit reports at the time of renewal of the NOC.
4. Construction of observation well(s) (piezometer)(s) within the premises and installation of appropriate water level monitoring mechanism shall be mandatory for industries drawing or proposing to draw more than 500 kld of ground water and Monitoring of water level shall be done by project proponent. The piezometer (observation well) shall be constructed at a minimum distance of 25 m from the production well. Depth and aquifer zone tapped in the piezometer shall be the same as that of the pumping well wells Detailed guidelines for design and construction of piezometer is given on the portal. Monthly water level data shall be submitted to the HRWA through the web portal on quarterly basis.
5. The applicant with red category industries as per Haryana State Pollution Control Board shall store the harvested rainwater in surface storage tanks for use in the industry and shall not use the harvested rainwater to recharge ground water, further the applicants under this category shall ensure wellhead protection measures to prevent ground water pollution and will inform the compliance within 3 months.
6. Injection of treated/untreated wastewater/effluents into aquifer system is strictly prohibited.
7. The applicant drawing ground water in safe, semi-critical and critical assessment units shall be required to pay ground water abstraction charges on quarterly basis, applicable as per Tables 5.3A.
8. The applicant drawing ground water in over-exploited assessment units shall be liable to pay ground water restoration charges on quarterly basis, applicable as per Tables 5.3 B.
9. All the tube wells/ground water abstraction structures permitted shall be fixed with digital electromagnetic/ultrasonic water meters, by the industry at its own cost with telemetry system and monthly ground water abstraction data shall be recorded in a logbook. Compliance to this condition shall be reported within one month from the date of issue of this letter. Daily water meter readings to be recorded in a dedicated register and shall be submitted on the web portal to HWRA on quarterly basis or through centralized mechanism evolved by HWRA. The geotag photos of all the flow meters/water meters showing date and coordinates be uploaded on the portal for calculation of quarterly tariff. Without geotagged photos not showing date and coordinates will not be entertained.
10. The applicant, as per approved proposal, shall implement rainwater harvesting and ground water recharge measures within three months from the date of issuance of this NOC and undertake periodic maintenance of recharge structures. Photographs (with geo tag only) of the recharge structures etc. and compliance of completion of construction of the same along with copy of NOC shall be furnished immediately to the Haryana Water Resources Authority for verification, on the Email ID of the Authority (compliance - hwra@hry.gov.in)
11. The ground water chemical quality shall be monitored twice in a year during pre & post- monsoon period.
12. The monthly ground water level monitoring data in respect of piezometer shall be submitted quarterly to the Haryana Water Resources Authority on regular basis.
13. The applicant shall ensure proper recycling and reuse, including use for green belt, of wastewater after adequate treatment.
14. In case of renewal, application shall be submitted online within 90 days before the expiry of this NOC and abstraction of ground water, after expiry of NOC shall be illegal and liable for legal action as per law.
15. The applicant shall seek prior permissions from HWRA for any increase in daily quantum of groundwater abstraction (i.e. more than the permitted limit in the NOC).
16. Where the applicant granted NOC for abstraction of saline water and the existing well(s) is/are yielding fresh water, the same shall be sealed and new tube well(s) tapping saline water shall be constructed within 3 months of the issuance of NOC or from the date of seal of the fresh water tube well, as the case may be. The applicant shall be also ensuring safe disposal of saline residue, if any.
17. The applicant shall comply with the provisions of the Haryana Water Resources (Conservation, Regulation and Management) Authority Act, 2020, Rules, regulations, guidelines and directions issued thereunder. Non-compliance of these provisions shall be liable for the penalty as per the provisions of the Act, rules and regulations, guidelines and directions issued thereunder.
18. The applicant shall ensure the 100% reuse for non potable usage of self generated waste water after due treatment. He shall also ensure to reuse for non potable usage the Treated Waste Water (other than self generated) as per application and NOC terms & conditions
19. Since, this NOC has been issued on the basis of self-assessment by the applicant and without any site inspection, hence the Authority may inspect the site/unit and documents at any time. In case any material difference is found in the information submitted and the site conditions or documents, the Authority may suspend the NOC granted immediately and may revoke or modify the NOC after giving a notice to the applicant.
20. This NOC is subject to prevailing State Government rules/law of Courts orders related to construction of tube well, ground water withdrawal, construction of recharge or conservation structure/discharge of effluents or any such matters as applicable.
21. The applicant shall comply with the directions/conditions/instructions issued by any Court of law related to the matters concerned with the Authority.
22. The applicant shall report self-compliance duly signed by authorized person along with authorization letter by e-mail to Haryana Water Resources Authority quarterly as well as yearly basis after the issuance of NOC.
23. This NOC does not absolve the applicant of his obligation/requirement to obtain the necessary approvals from the statutory and administrative Authorities/Departments.
24. The issuance of this NOC does not imply that other statutory or administrative clearances shall necessarily be granted to the applicant by the concerned authorities. The concerned Authorities shall act as per their own procedure.
25. The applicant shall immediately inform the HWRA, if any change in the information provided by the applicant in the application form for seeking NOC.
26. This NOC shall not absolve the applicant from any penalty/punishment/environment compensation, which may have been imposed or may be imposed, for abstraction of groundwater during such period, before the issuance of this NOC.
27. In case of non-payment or delayed payment of ground water abstraction/restoration charges, a penal interest @ 18% shall be charged.
28. The necessary compliance shall be submitted to the Authority on the web portal of the Authority i.e. www.hwra.org.in or on the email id compliance-hwra@hry.gov.in.
29. In case validity period of the CTE/CTO expires during currency period of the NOC, then it will be responsibility of the project proponent to get it renewed well in time & submit renewed CTE/CTO within month after renewal of CTE/CTO by HSPCB, to HWRA. If the CTE/CTO has been suspended or rejected, project proponent is required to intimate the same to HWRA within a week of such rejection or suspension.
30. Applicant to comply IS:10500:2012 standards before use of abstracted ground water for drinking & domestic purposes.
- 31.



ANNEXURE R-6

Government of Haryana
Haryana Water Resources Authority
Applications for Renewal of Permission to Extract Ground Water for Industrial use

Application No: HWRA/IND/R/2024/3011 (Application Received Fee Paid)

HWRA Previous NOC No: HWRA/NOC/IND/R/2024/934 [Download](#)

valid upto : 07/02/2025

HWRA Previous Application No: HWRA/IND/R/2024/1670 [Download](#)

I. General Information:		
Application Type Category/ Type of Application:		
(i)	Name of Applicant:	RITESH ASHOKRAO CHINCHOLKAR
	ID Proof Type	Aadhaar
	ID Proof no	XXXXXXXX1040
	Id Proof Document	Download
(ii)	Designation of Applicant:	PLANT MANAGER
	Authorization Letter in the name of RITESH ASHOKRAO CHINCHOLKAR (applicant)	
(iii)	Name of Industry:	EOC POLYMERS INDIA PVT LTD
(iv)	Registration number of Industry:	543/SIA/IMO/2007
(v)	Location Details of the Industrial Unit	
	Industrial Unit Address	PLOT NO. 474 A B HSIIDC BARHI SONIPAT
	State:	Haryana
	District:	SONIPAT
	Tehsil:	Ganaur
	Block:	GANAUR
	Village/MC:	Bari
	Region:	over-exploited over-exploited
(vi)	Correspondence Address	
	Complete Postal Address	PLOT NO. 474 A B HSIIDC BARHI SONIPAT
	Mobile Number:	8980289898
	E-Mail of Industry:	RITESH.CHINCHOLKAR@EOCGROUP.COM
(vii)	Salient Features of the Industrial Activity:	
	Type of Industry	Rubber
	Industry fall under	Previous: Large New : Large
	Is Water Intensive	No
	Purpose of Abstraction	Other Use - industrial purpose
	Groundwater utilization for	Existing Industry
	Whether present industrial activity commenced after 23.12.2020	No
	Whether there is expansion of this industry Unit after 23.12.2020 involving increase in water requirement	No
	Consent to Operate	Download
	CTO/CTE Number :	32489123
	Issue Date :	16/02/2023

	Validity Period of Consent to Operate	From : 1 Apr 2023	To : 31 Mar 2028
	Large industry/ MSME certificate/ proof	Download	
	Description : PLASTIC AND SYNHETIC RUBBER		
(viii)	Land use details of the existing/proposed Industrial unit premises		
	Ownership of the land(Enclose documents of ownership)	Download	
	Latitude	Longitude	
		29.105502	77.041305
	Location Map	Download	
	Total Land area(in sq m)		18000.00
	Rooftop area of buildings/sheds(in sq m)		10600.00
	Road/paved area(in sq m)		0.00
	Green belt area(in sq m)		2219.00
	Open Land (in sq m)		5181.00
	Source of availability of surface water for Industrial use, if any	No	
	Townships/villages within 2 km radius of the Industrial unit	Yes	BARHI
2)	Detail of water requirement/ recycled water usage : (Please enclose flow chart of activities and requirement of water at each stage)		
	Flow Chart of activities and requirement of water	Download	
	Water Balance Chart with water requirement at each Stage.		Download
	Affidavit for Non/Partial supply of water from local government water supply agency (in case of ground water requirement less than 10 KLD)		Download
	NOC/Certificate for non/ partial supply of fresh water/ treated waste from the local government water supply agency		Download
	Quality of groundwater	Fresh Water	Fresh Water
	Name of NABL(Under Valid Certificate)	ITS TESTING LABORATORY	
	Upload test report of groundwater quality from NABL accredited lab	Pre-monsoon	Post-monsoon
		Download	Download
	Whether any change in Groundwater Requirement	No	
	If yes, then reason & justification for change in ground water requirement along with supporting documents, if any.		Download
		Existing	Revised
(i)	Total water required(in m3/day)	175.00	175.00 Download
a.	Ground Water required(in m3/day)	84.00	84.00
b.	Recycled Water usage(in m3/day)	10.00	10.00
c.	Proposed/existing water supply from any agency(in m3/day)	81.00	81.00

(ii) Breakup of Water Requirement and Usage:						
	Activity	Existing Requirement (m3/day)	Revised Requirement (m3/day)	No. of Operational Days in a Year	Annual Requirement (m3/year)	
a.	Industrial Activity	161.00	161.00	365	58765.00	
b.	Residential / Domestic	4.00	4.00	365	1460.00	
c.	Greenbelt Development / Environment Maintenance	0.00	0.00	365	0.00	
d.	Other Use	10.00	10.00	365	3650.00	
e.	Grand Total	175.00	175.00		63875.00	

	Source of recycled water	ETP
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(iii) Breakup of Recycled Water Usage:				
		(m3/day)	(Days)	(m3/year)
	(a) Total Waste Water Generated:	25.00	365	9125.00
	(b) Quantity of Treated Water Available	24.00	365	8760.00
	i). Reuse in Industrial Activity:	10.00	365	3650.00
	ii). Reuse in Green Belt Development:	0.00	0	0.00
	iii). Any other use	0.00	0	0.00
	(c) Total Treated Water Utilized:	10.00		3650.00
	(d) Quantity and mode of disposal of unutilised effluent:	14.00	HSIIDC SEWER	

3. Details of existing and/ or proposed groundwater abstraction structures

(a) Groundwater Abstraction Structure-Existing

SNo.	Type/ Year of construction	Depth (meter)/ Diameter (mm)	Depth to water level (meters below ground level)	Discharge (m3 per hour)	Operational hours/ (day)/ days/year	Mode of lift	Horse Power of pump	Whether fitted with water meter or not
1	bore well/ 2007	111.00/ 228.00	60.00	45.00	1.86/ 365	1	15	Yes

Source of fresh water requirement being met uptill now

Affidavit duly attested by the Applicant regarding non-existence of tubewell

4. **Likely date of operation of proposed tubewell**

5. **Quantum of ground water recharge(m3/year)**

11581.00

6. **Water Efficient Technology will be adopted**

[Download](#)

7. **Valid Consent of operate issued by HSPCB(CTO)**

[Download](#)

8. **Compliance Report as per format (In case of NOC issued by HWRA, fill the compliance status against the link on the portal. Take the print out of Compliance Report so generated and attach here duly signed by the applicant)**

[Download](#)
[View Online compliance Report](#)

9.	Self-water audit report as per format for 100-500 KLD. Water audit report from accredited consultant for water requirement more than 500 KLD.	Download
10.	Affidavit for compliance, as per format.	Download
11.	Impact Assessment Report prepared by the accredited consultant : Submit IAR of existing / proposed groundwater withdrawal on the groundwater regime and socio-economic impacts report. Pro-forma for the report is given in Annexure IV of HWRA Guidelines dated 10.9.21. On top of the IAR, provide the Check List + Salient features of IAR, in the prescribed formats.	
12	i. Any Other Document/Information	Download
	ii. Any Other Document/Information	Download
	iii. Any Other Document/Information	Download
13.	I shall comply with all the terms and conditions of the Permission for renewal.	Yes

Self Declaration:-

- I hereby declare that all the documents prescribed in the application form have been uploaded and no blank / another / irrelevant documents have been uploaded against specified documents. I am also aware that any false/ wrong submission /uploading of document will lead to rejection of my application without any notice.
- I hereby certify that the contents of the above Application are true to the best of my knowledge and belief and that it conceals nothing and that no part of it is false. I understand that if any information furnished by me is found to be false, Haryana Ground Water Authority can take punitive action against me as per the extant rules. Further, I shall comply with all the terms and conditions of the permission/NOC to be granted by HWRA.

Date:

Place:

Signature of Applicant with Office Seal
(RITESH ASHOKRAO CHINCHOLKAR)
(PLANT MANAGER)

a) Information of payment for Application Fee

Total Amount				
Mode of Payment	Online			
Reference No.	Transaction No.	Date	Amount	Status
HRWA1012143015301348	N340243436359163	06/12/2024	12500	Success

b) Information of payment for Tarrif Fee

Total Amount			
Mode of Payment			



Haryana State Pollution Control Board
Star Complex, Opp. General Hospital, Delhi Road, Sonapat Ph. 0130-
2236119(O) Email:- hspcbrosr@gmail.com



No. :HWM/SON/2023/33974246

DT: 22/03/2023

To

M/s EOC Polymers India Pvt. Ltd.
 Plot No 474 A 474B
 Sonipat

Sub: Grant of Authorization under Hazardous and Other Wastes(Management & Transboundary Movement) Rules, 2016

- Reference of application:33974246 dated: 22/03/2023
- Ritesh Ashokrao Chincholkar of EOC Polymers India Pvt. Ltd. is hereby granted an authorization for generation, storage on the premises situated at Plot No 474 A 474B

HARYANA STATE
 Details of Authorization

S.No.	Name of process and Category of Hazardous Waste as per the Schedules I, II and III of these rules	Authorised mode of disposal or recycling or utilisation or co-processing, etc.	Quantity
1	Industrial operations using mineral/synthetic oil as lubricant in hydraulic systems or other applications, Used/spent oil	Through authorized recyclers	1.28 KL/Annum
2	Purification and treatment of exhaust air, water and waste water from the treatment plants (CETP's), Chemical sludge from waste water treatment	Through GEPIL	350.0 T/Annum
3	Production and/or industrial use of paints, pigments, lacquers, varnishes and inks , Process wastes, residues & sludges	Through GEPIL	350.0 T/Annum

- The authorization shall be valid for a period of 01/04/2023 to 31/03/2028
- The authorization is subject to the following general and specific conditions :-

- (i) **1. The unit will comply with provision of all applicable Acts/Rules/Direction of the Board/CPCB. 2. Unit will generate its manifest online for proper disposal of hazardous waste through GEPIL. 3. Unit will renew its agreement with GEPIL and unit will apply renewal of authorization within stipulated time period, please. 4. Unit will submit annual returns on prescribed format before 30th June as per HOWM Rules.**

Application no. :33974246

Industry id: 14SON629425

Date: 22/03/2023

**Regional Officer Sonipat
For Haryana State Pollution Control Board**

Conditions of Authorization:

1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
2. The authorization or its renewal shall be produced for inspection at the request of an officer authorised by the State Pollution Control Board.
3. The person authorised shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorization.
4. Any unauthorised change in personnel equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of this authorization.
5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorization is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time.
6. The person authorised shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty".
7. An application for the renewal of an authorization shall be made as laid down under these Rules.
8. Any other conditions for compliance as per the guidelines issued by the Ministry of Environment, Forest and Climate Changes or Central Pollution Control Board from time to time.
9. Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

VIRENDER
SINGH PUNJIA
Regional Officer Sonipat

Digitally signed by
VIRENDER SINGH PUNJIA
Date: 2023.03.22 16:42:05
+05'30'

For Haryana State Pollution Control Board



SI.No.: 34152053119
 IIn: 1A Or 5A RS485
 Acc. Class: CL 1.0

Conzerv
 EM6400

Schneider
 Electric



AM-9901

ETP
PANEL



LETTER OF AUTHORITY

I, Dharmendra Gangurde, s/o Digamber Gangurde, currently employed as Managing Director at EOC Polymers India Private Limited, registered office at 2nd Floor, AB-03, Safdarjung Enclave, New Delhi-110029 and having its corporate office/factory premises at Plot No.474 A&B, HSIIDC, Industrial Estate, Phase-1, Barhi, Distt. Sonapat (HR) 131101 ("Company"), do hereby authorize Mr. Ritesh Ashokrao Chincholkar, Sr. Plant Manager, EOC Polymers India Private Limited, to sign the statutory notice(s) including the demand notice under Section 8 of the Insolvency and Bankruptcy Code, 2016, engage advocates, institute and pursue the legal proceedings on behalf of the Company, before any court of Law, Tribunal or any other statutory authority wherever necessary and do all such things required to take the case to its logical conclusion.

The above authorization shall cease to exist upon cessation of employment or upon my revocation whichever is earlier.

Dated this 31st Day of March 2022.

For EOC Polymers India Private Limited

Managing Director

(Dharmendra Gangurde)
Managing Director
EOC Polymers India Private Limited

Accept.
For EOC Polymers India Pvt. Ltd.

Authorized Signatory

(Ritesh Ashokrao Chincholkar)
Sr. Plant Manager
EOC Polymers India Private Limited

Tuesday, May 27, 2025 at 7:25:56 PM India Standard Time

Subject: Advance service copy of Objections on behalf of Respondent No. 90 in O.A. No. 622/2024 titled as Varun Gulati v. State of Haryana & Ors.
Date: Tuesday, 27 May 2025 at 7:25:47 PM India Standard Time
From: Radhalakshmi
To: mansichahal104@gmail.com, jansewajanhit@gmail.com
CC: Nishant Menon, Jhum Jhum
Attachments: image001.png, image002.png, Final Objections Respondent No. 90_compressed.pdf

Sir/Ma'am,

Please find attached the objections filed on behalf of Respondent No. 90.

Kindly consider this as proof of service.

Best regards,
Radhalakshmi R.
Senior Associate



38, Okhla Phase-III, New Delhi- 110020

Mobile: [+91- 9654611805](tel:+91-9654611805) **E-mail:** radhalakshmi@samagralaw.com

Website: <https://samagralaw.com/>

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