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IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

Original Application No. 221/2025

News Item titled "Gurugram: 3rd Bandhwari fire in April spark concerns of foul play" appearing in The Hindustan Times dates 22.04.2025.

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Filed By:

Date: 15.12.2025

Madhav

(MADHAV SINHAL)

Counsel for deponent

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

Original Application No. 221/2025

News Item titled "Gurugram: 3rd Bandhwari fire in April spark concerns of foul play" appearing in The Hindustan Times dates 22.04.2025.

**Reply by way of affidavit of Akansha Tanwar,
Regional Officer on behalf of Respondent No. 2
i.e. Haryana State Pollution Control Board in
compliance of order dated 07.05.2025**

I, Akansha Tanwar, Regional Officer, Haryana State Pollution Control Board, Gurgaon North, do hereby solemnly affirm and state as under:

1. That Hon'ble NGT vide its Order dated 07.05.2025 impleaded the Haryana State Pollution Control Board (hereinafter referred as HSPCB) as Respondent No. 2 in the instant matter.
2. That the Original Application has been registered suo moto on the basis of the News Item titled "Gurugram: 3rd Bandhwari fire in April Spark concerns of foul play 'appearing in the Hindustan times dated 22.04.2025".
3. That, the Solid Waste Management Rules, 2016 has been notified by Ministry of Environment, Forest & Climate Change with the objective of ensuring safe & scientific solid waste management across the country. The duties and responsibilities of various authorities have been comprehensively defined in the said rules.
4. That, as per Rule (11) (1) (d) of the SWM Rules, 2016, the Secretary, Urban Development Department (UDD) of the respective State Government – in this case Haryana State UDD is maintained to ensure implementation of provisions of these rules by concerned local authorities of Gurugram.
5. That, as per Rule 15 of the said Rules, the local authorities in this case Gurugram is entrusted with the primary responsibility of collection, segregation, transportation, storage and treatment of municipal solid waste, maintenance and operation of the solid waste processing sites and dumpsite etc. in compliance with provisions of these Rules.
6. The answering respondent has asked for Action Plan and remedial measures at site being taken by the MCG to prevent such incidents & to handle such cases and to submit compliance of CPCB guidelines dated 26.05.2022. The MCG vide letter dated 05.09.2025, has reported



Sr. No.	Direction	Reply
1.	<p>Disposal of Waste:- Fresh waste not to be disposed at the dumpsite where bio-remediation is being undertaken. Organic waste from slaughter house, fish market etc., industrial waste not to be disposed at the dumpsite. It is to be further ensured that industrial waste/E-waste/lithium batter is not dumped at the site. Waste that is being unloaded at the site should be examined visually for potential fire sources when located, should be neutralized with cover material immediately. Emergency tipping area to be provided to set aside from the immediate working area where incoming loads of material known to be on fire or suspected of being can be deposited, inspected and dealt with. Adequate compacting of waste to be done to minimize formation of air or methane pockets which can lead to surface fire at site.</p>	<p>Waste being dumped at site is being examined for identification of potential fire hazard and only MSW is being dumped at SLF site. Industrial waste such as lithium battery, chemicals and other hazardous waste is not allowed at SLF. Regularly adequate compacting of waste to be done to minimize formation of air or methane pockets which can lead to surface fire at site.</p>
2.	<p>Monitoring of Dumpsite:- Methane Gas Detectors to be installed at site so that area with high methane concentration can be identified and preventive actions be undertaken. Further, temperature at windrows to be monitored with non-contact infrared thermometer (as used for monitoring human body temperature under COVID circumstances) and records be maintained for any major deviations. The temperature is to be taken in the range of 35C to 59C. Treated leachate/water to be sprayed on the waste when rise in temperature is observed at the bio remediation site. Suitable mechanism to be in place.</p>	<ul style="list-style-type: none"> • 4 nos. of portable methane gas detectors have been installed at landfill site and are being monitored regularly by MCG. • The temperature of windrows is being monitored through 2 portable infrared thermometers. • Leachate and water has been sprayed by using the pumps and spray gun to maintain temperature. • It is submitted that whole the landfill has been covered with CCTV Camera (29 Nos.). The CCTV are connected to the



	Installation of CCTV camera at site and provision of fencing and frequent patrolling to be done for checking unauthorized entry at dumpsite.	central servers of ICCC (GMDA) where the work is being monitored by MCG. Additionally, 20 high mast lights have been installed at site to illuminate the site during night operations. The landfill is secured with 3 gated entrances and boundary ball.
3.	<p>Arrangements for Fire Extinguishing:-</p> <p>Arrangements for adequate storage of sand/chemical fire extinguishing Medias such as foam or powder at site to be made to douse fire in case a fire incident is reported. Usage of water for dousing fire to be avoided. Isolation and allowing rapid natural burnout or something with soil to be done for dousing dumpsite fires. Dedicated fire tenders (preferable chemical extinguishing media) and adequate fire safety measures are to be deputed, specifically during summer season when dumpsites fire is more likely to take place. All mobile equipment or vehicles should be fitted with fire extinguisher and spark arrester.</p>	<ul style="list-style-type: none"> • 2 Nos. of fire tenders have been deployed 24X7 at the landfill site so as to mitigate any fire incident. • Furthermore, 26 handheld fire extinguishers and 50 fireball have been provided. • Thermal sensor camera have also been installed at landfill to monitor fire. • Fire tenders are available round the clock.
4.	<p>Health & Safety of Workers:-</p> <p>Fire protection measures and safety equipment to be provided to all workers at the site and checked before entry to the dumpsite. Workers to be trained for detection of fire and necessary action to be taken in case of fire. Periodic training of workers be conducted in safe handling of Waste, PPE's, Health & Safety issues etc.</p>	<ul style="list-style-type: none"> • PPE kits are provided by the agency of bio-remediation to their labour working at Bhandwari. The same is checked periodically by officials of MCG for necessary compliance. The labour is trained periodically for safe handling of waste.
5.	<p>Mock Drills & Safety audits:-</p> <p>Periodic mock drills to be conducted to prevent fire accidents at dumpsite. Quarterly, Fire Safety and Hazardous Emissions Audits to be conducted</p>	<ul style="list-style-type: none"> • Periodic mock drills are been done time to time aware staff as well as workers of landfill site.



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Copy of letter dated 05.09.2025 of MCG is being annexed as **Annexure-R/1.**

7. That Directions No. 91 dated 03.06.2025 under Section 12 of Commission for Air Quality Management in NCR and Adjoining Areas Act, 2021 was issued by CAQM for prevention and control of fire in Sanitary Landfill Sites, Dumpsites and open Municipal Solid Waste/Bio-mass burning in Delhi-NCR- reg. Accordingly, MCG was asked to submit the compliance of same. The MCG has submitted compliance of CAQM Direction No. 91, which is annexed as **Annexure R/2.**
8. That HSPCB has imposed Environmental Compensation of Rs. 6.60 Crores against Municipal Corporation, Gurugram @ 10 Lakh per month since April, 2020 to September 2025 in compliance of order(s) passed by this Hon'ble Tribunal in OA No. 606/2018 for the non-compliance of Solid Waste Management Rules, 2016 at Landfill site at Bandhwari and Municipal Corporation, Gurugram has deposited Environmental Compensation of Rs. 6.30 Crore.
9. That HSPCB has filed prosecution case against Municipal Corporation, Gurugram before Hon'ble District & Session Court vide Case No. COMA/125/2025 under EP Act and Case No. COMA/458/2024 under Water (Prevention & Control of Pollution) Act, 1974 & Air (Prevention & Control of Pollution) Act, 1981 and case is listed for notice to accuse for 10.02.2026 & 05.06.2026 respectively before District & Session Court, Gurugram.
10. That no fire incidents have been reported at the site after April, 2025, if any non compliance observed in future, necessary action shall be taken against the Municipal Corporation, Gurugram. Recently, site in question was visited by team comprising of officers of HSPCB on 19.11.2025 and inspection report has been filed in OA No.172/2021, which is also listed on 16.12.2025.



In light of the above submission, it is respectfully submitted that this answering Respondent i.e. HSPCB, shall abide by any order (s) or direction (s) passed by this Hon'ble Tribunal in the instant OA and render justice.

Abanish
Deponent

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Verification:



Verified at Gurugram on 15th day of December, 2025 that contents of the Para No. 1 to 10 are true and correct to the best of my knowledge as per information derived from the official record. Nothing material has been concealed therein.


Deponent

ATTESTED

Advocate & Notary Public
Distt. Gurugram, Haryana
15/12/25

From

Joint Commissioner - SBM
 Municipal Corporation
 Gurugram

ANNEXURE R/1

To

Regional Officer
 Gurugram Region (N)
 Haryana State Pollution Control Board

Memo No. JC-SBM/MCG/2025/345

Dated :- 05.09.2025

Subject :-

Reply regarding Compliance of Hon'ble NGT, PB Order dated 07.05.2025 in the matter of News Item titled "Gurugram 3rd Bandhwari fire in April Spark concerns of foul play appearing in the Hindustan Times dated 22.04.2025"

Ref :-

HSPCB/GRN/2025/1503 dated 04.08.2025 & HSPCB/GRN/2025/1511 dated 05.08.2025.

On the subject cited above it is submitted that the Municipal Corporation Gurugram is complying with the direction of Hon'ble NGT order dated 16.12.2024 (Para No. 17) in Original Application No. 492/2024 titled as News item titled "NCR sees second landfill fire in 3 days this time in Bandhwari" appearing in The Times of India dates 24.04.2024 and compliance of CPCB guidelines dated 26.05.2022, taking prompt action to extinguish any burning incidents at the Bandhwari Solid Waste Plant. Additionally, all possible preventive measures are being implemented to avoid the occurrence of such incidents, as detailed below:

The following interim measures to be implemented on priority till the time On-site/Off-site Emergency Plans are prepared and implemented.

Sr. No.	Direction	Reply
1	Disposal of Waste:- Fresh waste not to be disposed at the dumpsite where bio-remediation is being undertaken. Organic waste from slaughter house, fish market etc., industrial waste not to be disposed at the dumpsite. It is to be further ensured that industrial waste / E-waste / lithium battery is not dumped at the site. Waste that is being unloaded at the site should be examined visually for potential	Waste being dumped at site is being examined for identification of potential fire hazard and only MSW is being dumped at SLF site. Industrial waste such as lithium battery, Chemicals and other Hazardous waste is not allowed at SLF. Regularly adequate compacting of waste to be done to minimize formation of air or methane pockets which can lead to

[Signature]
 J.E

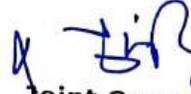
	<p>fire sources when located, should be neutralized with cover material immediately. Emergency tipping area to be provided to set aside from the immediate working area where incoming loads of material known to be on fire or suspected of being so can be deposited, inspected and dealt with. Adequate compacting of waste to be done to minimize formation of air or methane pockets which can lead to subsurface fire at site.</p>
<p>2 Monitoring at dumpsites: - Methane Gas Detectorsto be installed at site so that area with high methane concentration can be identified and preventive actions be undertaken. Further temperature at windrows to be monitored with non-contact infrared thermometer (as used for monitoring human body temperature under COVID circumstances) and records be maintained for any major deviations. The temperature is to be in the range of 35°C to 59°C. Treated leachate/ water to be sprayed on the waste when rise in temperature is observed at the bioremediation site. Suitable mechanism to be in place. Installation of CCTV cameras at the site and provision of fencing & frequent patrolling to be done for checking unauthorized entry at dumpsite.</p>	<p>subsurface fire at site.</p> <ul style="list-style-type: none"> • 4 nos. of portable methene gas detectors have been installed at landfill site and are being monitored regularly by MCG. • The temperature of windrows is being monitored through 2 portable infrared thermometers. • Leachate and water has been sprayed by using the pumps and spray gun to maintain the temperature. • It is submitted that whole the Land fill has been covered with CCTV Camera (29 Nos.). The CCTV are connected to the central servers of ICCG (GMDA) where the work is being monitored by MCG. Additionally, 20 high mast lights have been installed at site to illuminate the site during night operations. The land fill is secured with 3 gated

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		entrances and boundary wall.
3	<p>Arrangements for Fire Extinguishing:</p> <ul style="list-style-type: none"> - Arrangements for adequate storage of sand / chemical fire extinguishing Medias such as foam or powder at site to be made to douse fire in case a fire incident is reported. Usage of water for dousing fire to be avoided. Isolation and allowing rapid natural burnout or smothering with soil to be done for dousing dumpsite fires. Dedicated fire tenders (preferably chemical extinguishing media) and adequate fire safety measures are to be deputed, specifically during summer season when dumpsites fire is more likely to take place. All mobile equipment or vehicles should be fitted with fire extinguisher and spark arrester. 	<ul style="list-style-type: none"> • 2 nos. of fire tenders have been deployed 24x7 at the landfill site so as to mitigate any fire incident. • Furthermore, 26 handheld fire extinguishers & 50 fireball have been provided. • Thermal sensor camara have also been installed at landfill to monitor fire. • Fire tenders are available round the clock.
4	<p>Health & Safety of Workers:</p> <ul style="list-style-type: none"> - Fire protection measures and safety equipment to be provided to all workers at the site and checked before entry to the dumpsite. Workers to be trained for detection of fire and necessary action to be taken in case of fire. Periodic training of workers be conducted in safe handling of Waste, PPE's, Health & Safety issues etc 	<ul style="list-style-type: none"> • PPE kits are provided by the agency of bio-remediation to their labour working at Bhandwari. The same is checked periodically by officials of MCG for necessary compliance. The labour is trained periodically for safe handling of waste.
4	<p>Mock Drills & safety audits:</p> <ul style="list-style-type: none"> - Periodic mock drills to be conducted to prevent fire accidents at dumpsites. Quarterly, Fire Safety and Hazardous Emissions Audits to be conducted. 	<ul style="list-style-type: none"> • Periodic mock drills are been done time to time to aware staff as well as workers of land fill sites.



In future, the Municipal Corporation Gurugram (MCG) will ensure that no burning incidents occur at the Bandhwari Solid Waste Management Plant.

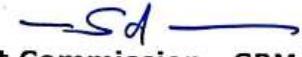

05/09/2025
Joint Commissioner - SBM
Municipal Corporation
Gurugram

Endst. No. JC - SBM/MCG/2025/346

Dated :- 05.09.2025

A copy of above is forwarded to the following for information and necessary action please.

1. W/ Commissioner, Municipal Corporation Gurugram
2. Additional Commissioner – III, Municipal Corporation Gurugram


Joint Commission - SBM
Municipal Corporation
Gurugram

Action Taken Report/Data on Direction No. 91**Part I:****Compliance regarding management of the fresh generation of MSW - prevention of fire incidents through open burning of MSW/Biomass:**

1. Name of the Municipal Corporation : Municipal Corporation Gurugram
2. Name of the District : Gurugram
3. Name of Nodal and Contact No. : Sh. Ravinder Yadav, No. 0124-2977651
4. Email ID : grap@mcg.gov.in
5. Name of the State/ UT : Haryana

Sr. No.	Actions	Action Taken
1.	Estimated total waste generated per day (TPD)	Approx. 1500 TPD
2.	Percentage of waste Segregated at Source (%)	30% of Waste Segregated via BWGs.
3.	Actual total waste collected per day (TPD)	Approx. 1500 TPD
4.	Total amount of Horticulture waste generated (TPD)	25-30 TPD (Approx.)
5.	Amount of Horticulture waste Processed (TPD)	10-12 TPD (Approx.)
6.	Number of BWGs	2185
7.	Quantity of total waste generated by BWGs (tons)	130 TPD (Approx.)
8.	Quantity of biodegradable waste generated by BWGs (tons)	50 TPD (Approx.)
9.	Total number of RWA's and colonies in the jurisdiction	494
10.	Number of RWA's and colonies processing waste (Zero waste colonies)	372
11.	Number of composting/segregation units at RWA	177

12.	Number of IEC activities done	228
13.	Number of beneficiary are benefited by the IEC activities	Approx. 10000-15000
14.	Number of Garbage Vulnerable Points (A)	108
15.	Number of New Garbage Vulnerable Points Identified (B)	98
	Number of Garbage Vulnerable Points (A+B)	206
16.	Number of inspections taken out at GVPs	2 No. Personnel deployed at every GVP's. Garbage collection from GVP's is done daily.
17.	Number of enforcement teams deployed	93 Inspection team deployed for inspection.
18.	Number of open fire incidences identified by ULB directly or indirectly From Jan 2025 to till date	340
19.	Number of open fire incidences mitigated by ULB From Jan 2025 to till date	340
20.	Number of complaints received on open burning of Municipal Solid Waste/Biomass during the period From Jan 2025 to till date	331
21.	Number of Complaints addressed regarding open MSW/ biomass burning From Jan 2025 to till date	331
22.	Total number of cases where challans were issued against violators From Jan 2025 to till date	41
23.	Total number of Criminal Cases registered	Nil

Part – II**Compliance regarding management of legacy waste at Sanitary Landfill Sites and Dumpsites - prevention of fire incidents:**

1. Name of Landfill/Dumpsite : Bandhwari Landfill Site
2. Name of the Urban Local Body : Municipal Corporation Gurugram
3. Name and contact of Nodal person : Sh. Ravinder Yadav, No. 0124-2977651

Sr. No.	Actions	Action Taken
1.	Area of the landfill/dumpsite	Approx 30 Acre
2.	Location Coordinates: Latitude	28.403882
3.	Longitude	77.174106
4.	Amount of waste (Legacy+Fresh) to be liquidated (LMT)	Approx 36.28 Lakh MT waste has been Liquidated till
5.	Timeline for Liquidation of Legacy waste	Feb 2028
6.	Number of CH4 sensors installed	4 Nos of portable CH4 Sensors has been installed
7.	Number of CH4 working	All are working
8.	Average value of CH4 concentration (mg/m3)	In this regard average value depends waste composition , age of waste and environmental conditions.
9.	Number of Temperature sensors installed	02 Nos.
10.	Number of Temperature sensors working	02 Nos.
11.	Maximum Temperature recorded at site (Celsius)	44
12.	Number of CCTVs Installed	29 Nos
13.	Number of CCTVs working	24 Nos are working
14.	Number of fire tenders	In this regard in summer session 2 Nos of Fire tenders are deployed round the clock
15.	Number of mock drills carried out	Mock Drills are conducted time to Time for aware public as well as working staff at Landfill.
16.	Number of fire incidents reported in Sanitary landfill sites/Dump sites (June to October 2025)	No fire incident reported
17.	Number of fires extinguished within 24 hrs at such Sanitary landfill sites/ dumpsites(June to October 2025)	No fire incident reported

Note:

- Compliance on management of fresh MSW generation—measures for prevention of fire incidents due to open burning of MSW/biomass shall be provided by every ULB (Municipal Corporation and Municipal Council) in the district.
- Compliance on management of legacy waste at sanitary landfill sites and dumpsites—measures for prevention of fire incidents shall be provided for each landfill or dumpsite falling under the jurisdiction of the concerned ULB.
- In case no landfill or dumpsite exists within the jurisdiction, the response shall be recorded as Nil.