

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, NEW DELHI

Appeal No. 47 of 2024

National Fertilizers Limited

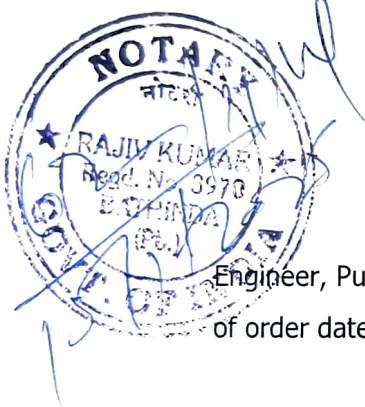
--Applicant

Versus

Punjab Pollution Control Board and Others

--Respondents

In Re: Appeal under section 16(g) read with section 18 of the National Green Tribunal Act, 2010 assailing the order bearing no.412 dated 09.10.2024 passed by the Punjab Pollution Control Board.



Reply by way of affidavit of Er. Ramandeep Sidhu, Environmental Engineer, Punjab Pollution Control Board, Regional Office, Bathinda, in compliance of order dated 08.01.2025.

I, the above-named deponent, do hereby, solemnly affirm and state as under:

Respectfully Showeth:

1. That briefly submitted, the Appellant has filed the above-mentioned appeal under Section 16(g) read with Section 18 of the National Green Tribunal Act, 2010 challenging order no. 412 dated 09.10.2024 passed by the Punjab Pollution Control Board whereby environmental compensation of Rs.11,88,00,000/- has been imposed on the appellant for violating the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and degrading and damaging the environment.

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

2. That reply by way of an affidavit dated 03.01.2025 of the deponent Environmental Engineer, Punjab Pollution Control Board, Regional Office, Bathinda has been filed in the above-mentioned case in compliance to order dated 05.12.2024 of the Hon'ble National Green Tribunal.
3. That in view of some inconsistency found in the authorization issued by the Board on 03.10.2024 under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, the counsel of the Board has been allowed by this Hon'ble Tribunal vide order dated 08.01.2025 to seek clarification on this aspect and also to demonstrate as to on what basis compensation was computed and whether it was disclosed to the appellant or not.
4. That in compliance to order dated 08.01.2025, it is submitted that the Board has granted authorization dated 04.10.2023 under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 to M/s National Fertilizers Ltd, Bathinda valid from 03.10.2023 to 31.03.2024 with regard to the difference in the date of signature of the Environmental Engineer on 04.10.2023 and the date of issuance on 03.10.2023 valid upto 31.03.2024, it is submitted that the document relating to the grant of authorization has been prepared online at the level of the Assistant Environmental Engineer and is then forwarded online for signature of the higher officer namely the Environmental Engineer. Because of this reason the date of digital signature of the Environmental Engineer has been mentioned as 04.10.2024.

It is further clarified that in the authorization dated 04.10.2023 granted to M/s National Fertilizers Ltd, 09 specific conditions were imposed and in specific condition no. 5 the date 31.03.2023 has been inadvertently recorded due to typing mistake whereas, the actual date which has to be mentioned in the document was 31.03.2024. The date 31.03.2023 as written in specific condition no.5 may kindly be read as 31.03.2024. Unconditional apology is tendered in this regard before this Hon'ble Tribunal.



Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.



5. That it is relevant to mention here that the Board has earlier issued show cause notice vide letter no. PBIP/PPCB/1965/1 dated 31.08.2023 to M/s National Fertilizers Ltd, Bathinda for refusal of authorization applied under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and given an opportunity to show cause in writing as to why the proposed action shall not be taken. A copy of the show cause notice dated 31.08.2023 is enclosed as **Annexure-A**. In reply to the show cause notice, the M/s National Fertilizers Ltd vide letter dated 19.09.2023 has informed that at present about 38257.11MT of carbon is lying in carbon Ponds. The total quantity is expected to be lifted within a period of three years from the start of lifting work. About 6400 MT is expected to be lifted on half-yearly basis. A copy of reply dated 19.09.2023 of M/s National Fertilizers Ltd is enclosed as **Annexure-B**. In view of the reply given by M/s National Fertilizers Ltd, the Board has imposed a specific condition no. 5 in the authorization granted on 04.10.2023 to the effect that the industry shall ensure lifting of at-least 6400MT of HW Cat. 18.2 i.e. carbon slurry by 31.3.2023 and shall completely lift the stored HW Cat. 18.2 i.e. carbon slurry @ 38257.11 MT by 30.09.2026. The date 31.03.2023 has inadvertently been written due to typing mistake and the same may kindly be read as 31.03.2024. A copy of authorization is enclosed as **Annexure-C**.
6. That with regard to the calculation of Environmental Compensation in the present case, it is respectfully submitted that in the matter of Original Application No. 804/2017 (Earlier O.A. No. 36/2012) With M.A. No. 1302/2018 in Interlocutory Application No. 63 in W. P. (C) No. 657/199; Rajiv Narayan & another Versus Union of India & others with the Research Foundation for Science, Technology and Natural Resource Policy Versus Union of India and others, the Hon'ble National Green Tribunal, Principal Bench, New Delhi directed the Central Pollution Control Board, vide orders dated 12.04.2019, to determine the scale of compensation to be recovered for violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. The Central Pollution Control




Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

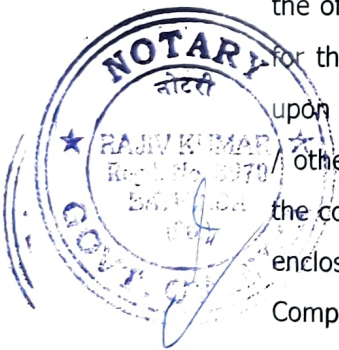
Board has accordingly prepared the methodology for calculating financial penalty and compensation for various violations of the provisions of the HOWM Rules, 2016, in cases of the facilities requiring authorization under the said Rules, 2016.

7. That the Environmental Compensation has been computed in accordance with the methodology evolved by the Central Pollution Control Board as explained in paragraph 05 above and the same is demonstrated herein below in tabular form

Particulars	Values	
EC	Q x ERF x R	
Q	39600	Observed quantity in tonne of hazardous waste
ERF	0.1	Waste found store beyond the stipulated time period.
R	30000	Environmental Compensation Factor, which may be taken as 30,000
EC	39600 x 0.1 x 30000 = 11,88,00,000/-	

8. That the above calculation has been approved by the internal committee of the officers of the Board constituted by the Punjab Pollution Control Board for the purpose to verify the Environmental Compensation to be imposed upon the defaulting industrial unit / urban local body / health care facilities / other establishments. The minutes of the meeting dated 07.10.2024 of the committee constituted by the Board for the purpose aforementioned is enclosed as **Annexure-D** wherein the calculation of Environmental Compensation relating to M/s National Fertilizers Ltd, Bathinda is mentioned at serial no. 4 of the document.

9. That it is pertinent to mention here that it is clearly mentioned in paragraph 12 and 13 of the order bearing no.412 dated 09.10.2024 whereby Environmental Compensation of Rs. 11,88,00,000/- was imposed

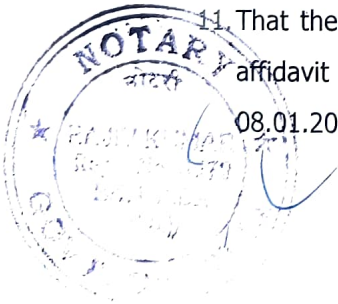


Rajiv Kumar
 Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.

upon the appellant M/s National Fertilizers Ltd, Bathinda by the Board that the Environmental Compensation has been calculated on the basis of the methodology of the Central Pollution Control Board evolved in the case in Original Application No. 804/2017 (Earlier O.A. No. 36/2012) With M.A. No. 1302/2018 in Interlocutory Application No. 63 in W. P. (C) No. 657/199; Rajiv Narayan & another Versus Union of India & others with the Research Foundation for Science, Technology and Natural Resource Policy Versus Union of India and others in compliance to the orders 12.04.2019 of the Hon'ble National Green Tribunal. The order no. 412 dated 09.10.2024 was duly communicated by the Board to M/s National Fertilizers Ltd vide letter no.4315 dated 09.10.2024 and a copy of the same is enclosed herewith as **Annexure-E**.

10. That it is relevant to mention here that the Board has granted authorization to M/s National Fertilizers Ltd, Bathinda under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 from time to time for the disposal of hazardous waste including hazardous waste of category 18.2 (Carbon residue) in order to enable the industrial unit to dispose of the hazardous waste to authorized recycler. In the absence of grant of authorization, the industry may plead that they are not able to dispose of the hazardous waste due to non-grant of the authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

11. That the deponent may kindly be allowed to place on record the present affidavit containing the clarifications in compliance to order dated 08.01.2025.



Date: 15-01-2025

Place: Bathinda

Deponent

(Ramandeep Sidhu)
Environmental Engineer,
Punjab Pollution Control Board,
Regional Office, Bathinda

Verification:

I, the deponent above named, do hereby verify and state that the contents of the above affidavit are true and correct to the best of my knowledge and belief, as derived from the official record. No part of the above affidavit is false and nothing material has been concealed there from.

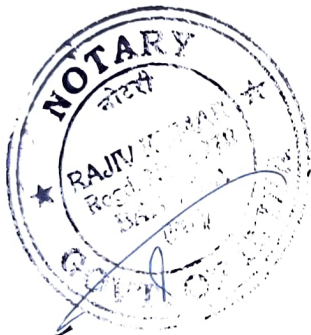
Deponent



**(Ramandeep Sidhu)
Environmental Engineer,
Punjab Pollution Control Board,
Regional Office, Bathinda**

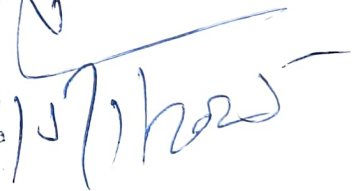
Date: 15-01-2025

Place: Bathinda



This Document/Affidavit
entered in my Notrial Register
at Sr. No.....Register No.....
Date.....
Notary

ATTESTED
RAJIV KUMAR
Advocate & Notary
Appointed by Govt. of India
Distt. Courts, Bathinda (Pb)



I know the Deponent/Executant
and He/She has signed/Initialed
before me in presence of
1st witness
1st witness
15/1/2025
P.P.C.B., R.O., Bathinda
PAC, Bathinda.



Punjab Bureau of Invest Promotions

Punjab Pollution Control Board Cell
Udyog Bhawan, Sector 17, Chandigarh

No. PBIP/PPCB/1965/1

Dated: 31/08/2023.

To

M/s National Fertilizers Ltd,
Sibian Road,
Bathinda.

Sub: Show cause notice for the refusal of authorization applied under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

Whereas, it is mandatory on part of the industry to obtain the authorization of the Board for handling of hazardous waste (s) under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 framed under the Environment (Protection) Act, 1986.

And whereas, it is also mandatory on the part of the industry, generating hazardous waste to provide adequate and appropriate facilities for the storage and disposal of hazardous waste (s) generated by it.

And whereas, the industry was granted fresh authorization under the provision of the HWM Rules, 2016 vide no. HWM/Fresh/BTI/2022/18344665 dated 17.06.2022 valid upto 31.03.2023, for the generation, storage and disposal of Category 5.1-Used or spent oil @ 25 T/Annum, 18.1-Spent catalyst @ 108 T/Annum and category 18.2-Carbon residue @ 39600 T/Annum, subject to certain conditions as mentioned therein.

And whereas, the industry has now applied for fresh authorization for generation, storage, disposal and transportation of Category 5.1-Used or spent oil @ 25 T/Annum, 18.1-Spent catalyst @ 108 T/Annum and 18.2-Carbon residue @ 39600 T/Annum and newly added category 29.2- Sludge containing residual pesticides.

And whereas, while processing the application, the industry was asked through clarification dated 20.07.2023, to submit reply to the following observations amongst observations:

- a) The industry has attached annual return (Form-IV) for the FY 2021-22 & 2022-23 and perusal of the same reveals that the industry had stored HW Cat. 18.2 i.e. Carbon Slurry @ 39,600 MT as on 31.03.2022 and 38,257.11 MT as on 31.03.2023. The industry has mentioned in the annual return that it has got lifted hazardous waste of category 18.2 @ 1342.89 MT in the year 2022-23 to M/s Shubham Sales Co., Rohtak, whereas, it has only submitted manifest for lifting of 9.11 MT of carbon slurry to the said actual user on 12.16.2022.

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

And whereas, from the above, it is evident that the industry has failed to comply with the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

And whereas, the matter was considered by the competent authority and it has been proposed to refuse the application applied for obtaining authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, after affording an opportunity of show cause due to abovementioned reasons.

As such, you are, hereby, afforded an opportunity to show cause in writing within 10 days, to explain as to why the proposed action under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 should not be taken, failing which it will be presumed that project proponent has nothing to say and the Board shall go ahead to take the proposed action under the said Acts without giving any further notice/opportunity.

Environmental Engineer (PBIP)
for Chief Environmental Engineer (PBIP)

Endst. No. _____

Dated _____

A copy of the above is forwarded to the Environmental Engineer, Punjab Pollution Control Board, Regional Office, Bathinda for information and to pursue the project proponent to submit the reply to the aforesaid notice.

Environmental Engineer (PBIP)
for Chief Environmental Engineer (PBIP)

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

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नेशनल फर्टिलाइजर्स लिमिटेड
(भारतसरकारकाउपक्रम)



NATIONAL FERTILIZERS LIMITED

(A Govt. of India Undertaking)



Bathinda Unit: Sibian Road, Bathinda - 151003 (Punjab)

Ph.: 0164-2270220, 2760200

Fax: 0164-2270463

Date: 19-09-2023

एन एफ एल
NFL

No. NFB/LAB/PPCB/2023

To

Environmental Engineer,
Regional Office,
Punjab Pollution Control Board,
District Administration Complex, Bathinda.



11/11/2023
22/11/2023
नवीं डाक
हाउस: सिडिया
21/9/23

Subject: Show Cause Notice for the refusal of Authorization applied under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

Respected Sir,

This has reference to our previous letter no. NFB/AB/PPCB/2023 dated 08.09.2023 on the subject.

The lifting plan for carbon slurry has been chalked out considering that out of 365 days in a year, there will be only about 245 workable days owing to seasonal variations viz rainy season, dense fog, extreme weather conditions etc. During the said period, the lifting of carbon will remain restricted. Considering the same, the lifting of carbon is expected to be completed within a span of three years.

At present about 38257.11 MT of carbon is lying in carbon Ponds. The total quantity is expected to be lifted within a period of three years from the start of lifting work. About 6400 MT is expected to be lifted on half-yearly basis.

Keeping the above in view, it is requested to grant the authorization for Generation, Collection, Storage and Disposal of Hazardous waste under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

NFL has always been committed to a clean, green and pollution-free environment.

Thanking You.

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

Yours sincerely,

(For and on behalf of
National Fertilizers Ltd)

cm (Lab)

कॉरपोरेट कार्यालय: ए-11, सेक्टर-24, नोएडा-201301 (उ.प्र.), दूरभाष : 0120-2412383, फैक्स : 0120-2412384

Corporate Office : A-11, Sector - 24, Noida - 201301 (UP), Tel: 0120-2412383, Fax: 0120 - 2412384

पंजीकृत कार्यालय: स्कोप कॉम्प्लेक्स कोर-III, 7, इन्स्टिट्यूशनल एरिया, लोधी रोड, नई दिल्ली- 110003, दूरभाष: 011-24361252, फैक्स: 011-24361553
Regd. Office : Scope Complex Core - III, 7, Institutional Area, Lodhi Road, New Delhi - 110003, Tel: 011-24361252, Fax: 011-24361553

CIN : L74899DL1974GO1007417 Website: <http://www.nationalfertilizers.com> @nationalfertilizers



PUNJAB POLLUTION CONTROL BOARD

Invest Punjab, PBIP, Udyog Bhawan, Sector 17, Chandigarh.

Website:- www.ppcb.gov.in



Office Dispatch No :

Registered/Speed Post

Date:

Industry Registration ID : R12BT143363

Application No : 21184122

To,
V K GOYAL
NATIONAL FERTILIZERS LIMITED
BATHINDA,PUNJAB-151003

Subject: Fresh Authorization for operating a facility for Collection, Generation, Storage, Disposal, of Hazardous Wastes as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 .

V K GOYAL of M/s national fertilizers ltd is hereby granted an authorisation based on the enclosed signed inspection report for Collection, Generation, Storage, Disposal, on the premises situated at Sibian road, Bathinda, Bathinda-151003

1. Particulars of Authorization granted to the Industry

Authorization No	HWM/Fresh/BTI/2023/21184122
Date of issue :	03/10/2023
Date of expiry :	31/03/2024
Authorization Type :	Fresh

2. Particulars of the Industry

Name & Designation of the Applicant	V K GOYAL, (EXECUTIVE DIRECTOR)
Address of Industrial premises	M/s national fertilizers ltd , Sibian road, Bathinda,Bathinda-151003
Capital Investment of the Industry	148986.0 lakhs
Category of Industry	Red
Type of Industry	1052-Fertilizer (basic) (excluding formulation)
Scale of the Industry	Large
Office District	Bathinda


 Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.

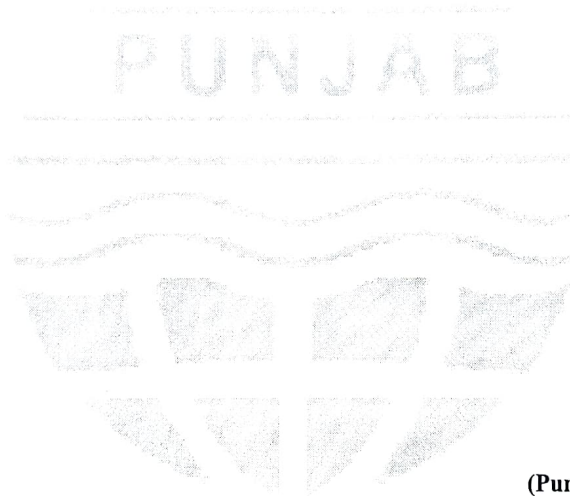
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M/s national fertilizers ltd ,Sibian road,Bathinda,Bathinda,151003

3. Particulars of Wastes

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 (ton/annum)
Schedule I 5.1-Used or spent oil	Generation , Collection , Storage , Disposal	25 T/Annum
Schedule I 18.1-Spent catalyst	Generation , Collection , Storage , Disposal	105 T/Annum
Schedule I 18.2-Carbon residue	Generation , Collection , Storage , Disposal	39600 T/Annum
Schedule I 29.2-Sludge containing residual pesticides	Generation , Collection , Storage , Disposal	0.66 T/Annum

4. The authorisation is subject to the general and specific conditions as appended with the Authorization.



04/10/2023

(Kamal Singla)
Environmental Engineer

For & on behalf
of

(Punjab Pollution Control Board)

Endst. No.:

Dated:

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

1. Senior Environmental Engineer, Zonal Office, Bathinda.
2. Environmental Engineer, Regional Office, Bathinda.

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

04/10/2023

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M/s national fertilizers ltd ,Sibian road,Bathinda,Bathinda,151003

(Kamal Singla)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)



Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

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M/s national fertilizers ltd .Sibian road.Bathinda.Bathinda.151003

TERMS AND CONDITIONS

A. GENERAL CONDITIONS

1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
2. The authorisation 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 authorisation.
4. Any unauthorised change in personnel, equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of his authorisation.
5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation 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 ¹/₂ Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty ¹/₂.
7. It is the duty of the authorised person to take prior permission of the State Pollution Control Board to close down the facility.
8. The imported hazardous and other wastes shall be fully insured for transit as well as for any accidental occurrence and its clean-up operation.
9. The record of consumption and fate of the imported hazardous and other wastes shall be maintained.
10. The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorisation.
11. The importer or exporter shall bear the cost of import or export and mitigation of damages if any.
12. An application for the renewal of an authorisation shall be made as laid down under these Rules.
13. Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or Central Pollution Control Board from time to time.
14. Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

B. SPECIFIC CONDITIONS



Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

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M/s national fertilizers ltd ,Sibian road,Bathinda,Bathinda,151003

- 1) The industry shall not generate/ store/ collect/ dispose any other category of hazardous waste from its premise, except the category of hazardous waste(s) for which it has been granted this authorisation under the HWM Rules, 2016.
- 2) The industry shall install online display board (digital type) in accordance with the Board's letter no. 17852-65 dated 14.08.2020 within one month (if not already provided) and submit compliance to the Board within 7 days, thereafter.
- 3) The industry shall dispose of its generated hazardous waste category 29.2 to the Common Hazardous Waste Treatment & Disposal Facility as per provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, under proper manifest and shall maintain proper record in this regard, at all times.
- 4) The industry shall dispose of its hazardous waste category 5.1, 18.1 & 18.2 to the authorized unit / recycler/ utilizer (actual user) having valid Registration Certificate-cum-Pass Book from respective State Pollution Control Board / Central Pollution Control Board and valid authorization of the State Board under the said Rules and 'consents to operate' under the Water (Prevention & Control of Pollution) Act, 1974 & the Air (Prevention & Control of Pollution) Act, 1981 and authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, under proper manifest and shall maintain proper record in this regard, at all times.
- 5) The industry shall ensure lifting of at-least 6400MT of HW Cat. 18.2 i.e. carbon slurry by 31.3.2023 and shall completely lift the stored HW Cat. 18.2 i.e. carbon slurry @ 38257.11 MT by 30.09.2026.
- 6) The industry shall store its hazardous wastes generated from different manufacturing activities/ otherwise, within its premises in an environmentally sound manner as per provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
- 7) The industry shall ensure regular lifting of hazardous waste and also ensure that the quantity of hazardous waste generated per year shall not be stored beyond 90 days (extendable upto 180 days) in its premises at any time.
- 8) The industry shall handle the hazardous waste(s) strictly in accordance with the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and guidelines issued by Central Pollution Control Board / Ministry of Environment & Forests and Climate Change, New Delhi.
- 9) In case, the industry fails to comply with the above conditions of authorization as well as provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and/or any other environmental law applicable to the industry and Rules, Circulars & Directions issued by the Board from time to time, the Board shall be constrained to take action against the industry under the provisions of the Pollution Control Laws.



04/10/2023

(Kamal Singla)
Environmental Engineer

For & on behalf

of

(Punjab Pollution Control Board)


Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.

Sub: Minutes of meeting dated 07.10.2024 of committee constituted to verify Environmental Compensation to be imposed on defaulting industrial units / ULBs / HCFs and other establishments.

The meeting of committee constituted to verify Environmental Compensation to be imposed on defaulting industrial units / ULBs / HCFs and other establishments as per cases received from Zonal Offices was held on 07.10.2024.

The following officers were present:

1. Er. Gursharan Dass Garg, Senior Environmental Engineer (HQ-1)
2. Er. Harinder Singh, Environmental Engineer (HQ-1/2)

During meeting, the following cases were analyzed:

1. M/s Municipal Council Maloud, Ludhiana (E-office File no.: 246299)

Municipal Council, Maloud was issued notice for revocation of consent to operate under Water (Prevention & Control of Pollution) Act, 1974 along with imposition of EC with an opportunity of personal hearing before Chairman of the Board on 23.11.2023, wherein it was decided that the Environmental Engineer, Regional Office shall calculate the amount of tentative Environmental Compensation to be imposed on the Municipal Council for its past violations and put to the Competent Authority.

Vide e-office file no. 246299, RO-1, Ludhiana and ZO-1, Ludhiana has submitted that STP, Maloud is continuously in violation from 25.01.2023 to 05.06.2024 and has calculated EC to be imposed for period 25.01.2023 to 05.06.2024. ZO-1, Ludhiana has forwarded following calculations after getting approval from Competent Authority vide note dated 05.08.2024:

Particulars	Values
EC	$PI \times N \times R \times S \times LF$
PI	80 Being Red Category
N	498 Last hearing on 25.01.2023 to 05.06.2024 (last sampling date)
R	250 As suggested by CPCB
S	0.5 Being small scale unit
LF	1 Population of Maloud is less than 1 lac
EC	$80 \times 498 \times 250 \times 0.5 \times 1 = 49,80,000/-$
Minimum EC	Rs. 5000/- per day For 498 days = $498 \times 5000 = \text{Rs. } 24,90,000/-$

Observations of the committee:

- RO-1, Ludhiana has taken period of violation from 25.01.2023 (last date of hearing) to 05.06.2024 (last sampling date). But, as per e-office file (E-246299), the last hearing was held on 23.11.2023, which is required to be rechecked. Moreover, as reported by RO-1 Ludhiana, the STP was found achieving prescribed standards on 27.06.2023, which falls during period of violation taken while calculating EC.
- As per office memorandum issued vide no. SEE (HQ-2)/F.No.208/2023/325 dated 14.09.2023, the Chairman, PPCB is the Competent Authority to finalize period for which the EC is to be imposed. But, in this case the Regional Office has not get finalized the time period (total no. of days) for imposition of EC from Chairman, PPCB.

Signature
Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

Signature

- Vide noting dated 11.09.2019, the Competent Authority of the Board has approved following formulae for imposition of EC on Local Body, where the STPs of the towns are not confirming to the prescribed standards:

$$EC = PI \times N \times R \times S \times LF$$

where, PI = 30, N = No. of days of violation, R = 250, S = (1.5 for MC, 1.0 for Class-A & Class-B MCs, 0.5 for Class-C MC/Nagar Panchayat), LF = as per criteria for industrial units

RO-1, Ludhiana / ZO-1, Ludhiana are required to recalculate EC as per above formulae after getting finalized period for which STP was not confirming to the prescribed standards, from Competent Authority.

- As per above observations, file may be sent back to ZO-1, Ludhiana to reprocess the case for imposition of EC.

2. M/s K. K. Alloys, Unit No.-II, Hadbast No. 228, Bilga Road, Sahnewal Khurd, Ludhiana (E-office File no.: 189490)

Vide E-office file no. 189490, RO-2, Ludhiana had earlier sent this case for verification of EC through ZO-1 Ludhiana intimating that the industry is small scale orange category unit. It was given personal hearing before Chairman of the Board w.r.t. notice to issue directions u/s 31-A of the Air (Prevention & Control of Pollution) Act, 1981 alongwith show cause notice for violation of provisions of the Hazardous and other Waste (Management & Transboundary Movement) Rules, 2016 as well as notice for imposition of Environmental Compensation (EC) on 25.09.2023. During hearing, it was decided that EE RO shall calculate the EC to be imposed to the industry for the damage caused by it to the Environment. The industry has also filed an appeal before Hon'ble Appellate Authority-cum-Secretary, Govt. to Punjab, Department of Science, Technology and Environment against the proceedings/orders dated 17.10.2023 passed by the Board. The Appellate Authority directed to visit the industry, verify the compliance of the observations observed during visit on 01.09.2023 and process the consent application on merit. Thereafter, the industry was visited by AEE, RO-2 Ludhiana on 07.11.2023 and electric connection of the industry was found disconnected and no violation was observed as per report submitted. Also, consents were granted to the industry upto 14.05.2024 alongwith restoration of electric connection upto that period.

In compliance to the decisions of hearing dated 25.09.2023 held before Chairman of the Board, RO-2 Ludhiana has calculated the EC for period 01.09.2023 to 07.11.2023, as under:

Particulars	Values	
EC	$PI \times N \times R \times S \times LF$	
PI	50	
N	68	Period of Violation: 01.09.2023 to 07.11.2023
R	250	
S	0.5	For small scale of industry
LF	1.25	As per criteria
EC	$50 \times 68 \times 250 \times 0.5 \times 1.25 = 5,31,250/-$	

The above case was discussed during meeting of EC verification committee held on 08.07.2024 and the case was referred back to ZO-1, Ludhiana with following observations:

- The decision for imposition of EC was taken during hearing held before Chairman of the Board on 25.09.2023. But, the industry has filed appeal before the Appellate Authority against the decisions. The RO / ZO has not clarified what decision has been taken by the Appellate Authority w.r.t. imposition of EC.


Environmental Engineer
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2. The time period for which the EC is proposed to be imposed has not been get approved from the Competent Authority. The RO has taken time period beyond date of hearing i.e. 25.09.2023, which also needs clarification.
3. The industry is a small scale orange category unit, but value of R has been taken 250, which is required to be rechecked.

Now, RO-1, Ludhiana has submitted following reply to the observations of committee and same was forwarded by ZO-1, Ludhiana after getting approval of Competent Authority vide note dated 02.09.2024:

1. The industry filed an appeal before the Appellate Authority to restore the electric connection to the industry against the decisions of the Board for issue of directions to PSPCL Authorities for disconnect the electricity connection u/s 31-A of Air Act, 1981 and further prayed that the operation of the impugned order/proceedings dated 17.10.2023 passed by the Board to stay. No copy of orders of Appellate Authority is available in the record file of this office. The matter was also discussed with SLO of the Board on 16.08.2024 and he stated that the Appellate Authority directed during hearing dated 06.11.2023 to the then EE, RO-2, Ludhiana to process the consent cases and restoration cases on merit immediately and no formal orders were issued in this regard.
2. The period of EC has been taken from the day of visit dated 01.09.2023 (on which violations were observed) to 07.11.2023 (till the comply with the violations).
3. It is submitted that R has been taken 250, in light of report of the CPCB In-house Committee on Methodology for Assessing Environmental Compensation which is re-produced as under:- "R is a factor in Rupees, which may be minimum of 100 and maximum of 500. It is suggested to consider R as 250, as the Environmental Compensation in cases of violation."

Observations of the committee:

- RO-2 Ludhiana has sent reply to the observations through ZO-1 Ludhiana after getting approval from Competent Authority vide note dated 02.09.2024.
- As per noting dated 11.09.2019 approved by the Competent Authority, the value of R for small scale orange category industries is required to be taken as 50.
- The values of PI, S and LF are in order.
- Considering above, the calculation of EC comes out as under:

Particulars	Values
EC	$PI \times N \times R \times S \times LF$
PI	50 -
N	68 Period of Violation: 01.09.2023 to 07.11.2023
R	50 As per noting dated 11.09.2019 approved by Competent Authority
S	0.5 For small scale of industry
LF	1.25 As per criteria
EC	$50 \times 68 \times 50 \times 0.5 \times 1.25 = 1,06,250/-$
Minimum EC	Rs. 5000/- per day For 68 days = $68 \times 5000 = \text{Rs. } 3,40,000/-$


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Regional Office, Bathinda.

- Submitted for approval for imposing EC amounting to **Rs. 3,40,000/-**



3. M/s Cargo Motors Private Limited, Malikpur Chowk, Pathankot (E-office File no.: 247445)

Service Station was issued notice to issue directions u/s 33-A of Water Act, 1974 and u/s 31-A of Air Act, 1981 with an opportunity of personal hearing before Chairman of the Board on 19.03.2024, wherein it was decided that notice u/s 33-A of Water Act, 1974 be issued to colony for the imposition of Environmental Compensation and Regional office shall calculate the amount of EC and get it approved from the EC Committee.

Vide e-office file no. 247445, RO Hoshiarpur has calculated the EC and ZO, Amritsar has sent the case for EC verification as under:

Particulars	Values	
EC	PI x N x R x S x LF	
PI	50	Orange Category
N	240	Date of violation observed 10.04.2023 to date of verification 06.12.2023
R	250	-
S	0.5	-
LF	1	-
EC	50 x 240 x 250 x 0.5 x 1 = 15,00,000/-	

Observations of the committee:

- As per office memorandum issued vide no. SEE (HQ-2)/F.No.208/2023/325 dated 14.09.2023, the Chairman, PPCB is the Competent Authority to finalize period for which the EC is to be imposed. But, in this case the Regional Office has not get finalized the time period (total no. of days) for imposition of EC from Chairman, PPCB.
- Procedure of imposition of EC has not been followed in this case as the unit is required to be issued notice with an opportunity of personal hearing before the Chairman of the Board.
- The value of PI and N will be decided in view of above two points.
- As per noting dated 11.09.2019 approved by the Competent Authority, the value of R for small scale orange category industries is required to be taken as 50.
- In view of above, committee recommends that the file may be referred back to ZO, Amritsar with request to recalculate EC after adopting proper procedure for imposition of EC issued vide no. SEE (HQ-2)/F.No.208/2023/325 dated 14.09.2023.

4. M/s National Fertilizers Ltd., Sibian Road, Bathinda (E-office File no.: 249048)


The industry was issued notice u/s 5 of Environment (Protection) Act, 1986 for violation of the provisions of Hazardous and other Wastes (Management and Transboundary movement) Rule, 2016 with an opportunity of personal hearing before the Chairman of the Board on 05.09.2024, wherein, it was decided that Environmental Engineer, Regional Office, Bathinda shall process the matter regarding calculation carried out for imposition of Environmental Compensation upon the industry in accordance with the law for unjustified continued storage of carbon slurry by the industry and also inaction / delay on their part in disposal thereof, within 07 days and shall send the same for verification to the committee constituted by the Board in the matter. Subsequently, the Board shall issue orders for imposition of Environmental Compensation to the industry for causing environmental damage.

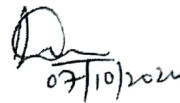
Vide e-office file no. 249048, RO Bathinda has calculated the EC and ZO Bathinda has sent the case for EC verification as under:

Particulars	Values	
EC	$Q \times \text{ERF} \times R$	
Q	39600	Observed quantity in tonne of hazardous waste
ERF	0.1	Waste found store beyond the stipulated time period
R	30000	Environmental Compensation Factor, which may be taken as 30,000
EC	$39600 \times 0.1 \times 30000 = 11,88,00,000/-$	

Observations of the committee:

- The calculations of EC done by RO Bathinda and forwarded by ZO Bathinda seems to be in order.
- Submitted for approval for imposing EC amounting to **Rs. 11,88,00,000/-**


 Er. Harinder Singh
 (EE HQ-1/2)


 Er. Gursharan Dass Garg,
 (SEE HQ-1)


 Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.


PUNJAB POLLUTION CONTROL BOARD

Zonal Office, Street No. 12, Power House Road, Bathinda


LIFE
 Lifestyle for
 Environment

 No: 4315
Registered

 Dated: 9.10.2024

To

 M/s National Fertilizers Ltd.,
 Sivian Road, Bathinda.

Subject: Imposition of Environmental Compensation (EC) – order thereof.

Please refer to the subject cited above.

2. It is intimated that the Competent Authority of the Board has passed an order bearing no. 412 dated 09.10.2024, thereby imposing environmental compensation amounting to Rs. 11.88 Crores (Eleven Crores Eighty-Eight Lakhs only) for degrading & damaging the environment and violating the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 alongwith the direction to deposit the said environmental compensation with the office of the Board, within 15 days from the date of receipt of the order.

3. Please find enclosed herewith a copy of order no. 412 dated 09.10.2024 for necessary compliance.

DA/- as above

 Environmental Engineer,
 For Chairman, PPCB

 Date 9.10.2024

 Endst. No. 4316/17

A copy of the above alongwith the order bearing no. 412 dated 09.10.2024 issued for imposition of environmental compensation upon M/s National Fertilizers Limited, Sivian Road, Bathinda is forwarded to the following for information & necessary action please;

1. Chief Environmental Engineer, Punjab Pollution Control Board, Bathinda.
2. Environmental Engineer, Punjab Pollution Control Board, Regional Office, Bathinda.

DA/- as above

 Environmental Engineer,
 For Chairman, PPCB


 Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.



ਪੰਜਾਬ ਪ੍ਰਦੂਸ਼ਣ ਕੰਟਰੋਲ ਬੋਰਡ
PUNJAB POLLUTION CONTROL BOARD

No. 412.....

Dated. 09/10/2024

Subject: Imposition of Environmental Compensation (EC) for violation of the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 upon M/s National Fertilizers Limited, Bathinda

Order

In order to protect and improve the environment and for prevention of hazards to human beings, other living creatures, plants and property and maintaining or resorting the wholesomeness of water and to preserve the quality of air, the Parliament of India had enacted the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and certain rules under the provisions of the Environment (Protection) Act, 1986 and all these Laws are collectively and severally being referred to as the Environmental Laws. The Punjab Pollution Control Board being the statutory regulatory authority is implementing the provisions of the above-mentioned statutes in the State of Punjab.

2) The Punjab Pollution Control Board being the statutory regulatory authority is continuously pursuing M/s National Fertilizers Ltd, Sivian Road, Bathinda who is engaged in the manufacturing of Urea and pesticides to comply with the provisions of various Environmental Laws and in this regard the officers of the Board are visiting and inspecting the project site from time to time in order to ensure the compliance of Law.

3) That Mr. Kaushal Kishore Vishwakarma, a labourer working with M/s National Fertilizers Ltd, Sivian Road, Bathinda has petitioned the Hon'ble National Green Tribunal complaining about violation of environmental norms by M/s National Fertilizers Ltd, Bathinda in handling of carbon and hazardous waste. The applicant prayed for taking appropriate steps for saving the lives of the laborers and protection and improvement of the environment. The letter petition was treated as Original Application No. 620 of 2022

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.

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by the Hon'ble National Green Tribunal titled as Kaushal Kishore Vishwakarma v/s State of Punjab and others.

4) The case involves the issue of storage and disposal of hazardous waste in violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.

5) The brief facts of the case which came to the fore after submission of the reply by NFL, Bathinda before the Hon'ble National Green Tribunal in OA No. 620 of 2022 are that NFL, Bathinda started the commercial production in the year 1979. The industry used Fuel Oil ("FO") / Low Sulphur Heavy Stock ("LSHS") as feedstock for the production of Urea from 1979 till November, 2012. The Plant was based on the partial oxidation of Fuel Oil by the Shell Gasification process with the help of oxygen and steam at 55 kg/cm² at a temperature of 1350 degrees Celsius. During the partial oxidation of Fuel Oil, which was an energy-intensive process, carbon was generated due to inevitable thermal cracking. The carbon so generated was removed from the raw gas by water and collected in a carbon separator called "Carbon Slurry", a mixture of carbon and water. As per the design, about 80% of the generated carbon was recycled back to the process in the form of carbon oil as feed through the carbon recovery unit, while the balance quantity was sent as Carbon Slurry to the separate designated brick-lined Carbon Slurry Ponds. In an endeavour to keep in pace with clean technology and with a commitment to sustainable development, the Plant were restructured in November, 2012. The feedstock was replaced from LSHS to Natural Gas, which not only reduced the specific energy per metric ton of urea, but also lowered the carbon footprint. The change of feedstock from Fuel Oil to Natural Gas also annulled the generation of carbon slurry as a by-product. As a result, there was no generation of carbon slurry at the Plant since 2012. It is stated that leftover carbon slurry amounting to approximately 53100 metric ton was stored in NFL, Bhatinda in the designated carbon slurry ponds. It was stated in the reply that the carbon slurry has been stored after following all the rules, regulations, guidelines and taking all necessary precautions.

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The reply filed by M/s National Fertilizers Ltd, Bathinda before the Hon'ble National Green Tribunal has revealed that huge quantity of carbon slurry, which was earlier considered to be a by-product of manufacturing of Fertilizer by NFL but now falls within the definition of hazardous waste under the said Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 is stored by NFL, Bathinda.

6) That it is relevant to mention here that in exercise of the powers conferred under the Environment (Protection) Act, 1986, the Ministry of Environment, Forest and Climate Change, Government of India has notified the Hazardous Waste (Management and Transboundary Movement) Rules, 2016 vide notification no. GSR no. 395 (E) dated 04.04.2016. Under the said rules, the carbon residue in production of nitrogenous and complex fertilizers has been categorized as "Hazardous Waste" under Category 18.2 of Schedule - I.

7) The Hon'ble National Green Tribunal has noticed in its order dated 08.01.2024 that despite unjustified continued storage of carbon slurry by NFL, Bathinda and also inaction/delay on their part in disposal thereof in accordance with mandatory statutory provisions, no action has been taken by the State Pollution Control Board for imposition of environmental compensation and also prosecution of the defaulting officers/officials. The Hon'ble National Green Tribunal has further directed the Punjab Pollution Control Board vide order dated 28.08.2024 to take further action for imposition of Environmental Compensation on NFL, Bathinda for past violations and recovery thereof in accordance with Law.

8) That it is relevant to brought on record that M/s National Fertilizers Ltd, Sivian Road, Bathinda was granted authorization by the Punjab Pollution Control Board under the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 on 03.10.2023 (valid upto 31.03.2024) for generation, collection, storage and disposal of hazardous waste including category 18.2 @ 39600 TPA, subject to one of the specific condition that the industry shall ensure lifting of at-least 6400 MT of hazardous waste of cat. 18.2 i.e. carbon slurry by 31.03.2023 and

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shall completely lift the stored hazardous waste of cat. 18.2 i.e. carbon slurry @ 38257.11 MT by 30.09.2026.

9) That considering the facts and circumstances of the case as well as the directions issued by the Hon'ble National Green Tribunal the Board has initiated the process for imposition of Environmental Compensation against NFL, Bathinda after the order dated 08.01.2024 was passed by the Hon'ble National Green Tribunal. Opportunity of hearing was given to NFL, Bathinda on 14.02.2024 for violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 with the issuance of notice vide letter no. 816 dated 12.02.2024. In continuation of the earlier action, notice to issue directions u/s 5 of the Environment (Protection) Act, 1986 for violation of the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 was issued to NFL, Bathinda by the Board vide letter no. 3876 dated 22.08.2024 with an opportunity of hearing before the Chairman of the Board on 02.09.2024. The hearing was postponed to 05.09.2024.

10) That hearing before the undersigned Chairman of the Board was attended on 05.09.2024 by the Smt. Sandhya Batra, DGM (TS) and Sh. Harmesh Lal Thandi (Senior Manager) on behalf of NFL, Bathinda. The officials of the industry submitted written reply to the notice issued by the Board and the reply was taken on record. The officials reiterated the same facts as mentioned in the written reply. After hearing the officials of the NFL, Bathinda, considering the background of the case as well as orders passed by the Hon'ble National Green Tribunal, it was decided by the undersigned Chairman that:

- a) Environmental Engineer, Regional Office, Bathinda shall process the matter regarding calculation carried out for imposition of Environmental Compensation upon the industry in accordance with the law for unjustified continued storage of carbon slurry by the industry and also inaction/delay on their part in disposal thereof, within 07 days and shall send the same for verification to the Committee constituted by the Board in the matter. Subsequently, the Board shall issue orders for Imposition of Environmental Compensation to the industry for causing environmental damage.

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- b) The industry shall also ensure to dispose of its entire hazardous waste of category 18.2 at the earliest possible shortest time by exploring all means available in compliance to the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and shall submit monthly report in the matter to the Regional Office, Bathinda of the Board.
- c) NFL, Bathinda is directed to give the names of the defaulting officers/officials responsible for unjustified continued storage of carbon slurry by the industry and also in action/delay on their part in disposal thereof, to the Regional Office, Bathinda of the Board, within 03 days.

The proceedings of hearing held on 05.09.2024 were conveyed to M/s National Fertilizers Ltd, Sivian Road, Bathinda as well as Environmental Engineer, Regional Office, Bathinda vide letter no. 4162-4163 dated 23.09.2024 by the Board for compliance.

11) That it is relevant to mention here that the Hon'ble Supreme Court of India has considered the Principles of Precaution, Sustainable development and Polluter Pay's and decided to strictly implement the same. The decisions so taken by the Hon'ble Supreme Court of India are summarized herein below:

- a) The concept of precautionary principle was considered in M.C Mehta versus Union of India and others and vide judgment dated 11.10.1996 and the Hon'ble Supreme Court of India held that the Precautionary Principle has been accepted as a part of the Law of the land.
- b) The concept of sustainable development was considered in M.C Mehta versus Union of India and others (1997) 2 SCC 353 and it was decided by the Hon'ble Supreme Court of India that the development is essential for the economy of the country but at the same time the environment and eco systems have to be protected.

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- c) The Hon'ble Supreme Court of India has also considered the concept of Polluter Pay's Principle in Indian Council for Enviro Legal Action and others v/s Union of India and others (1996) 3 SCC 212 para 16, Vellore Citizens Welfare Forum v/s Union of India (1996) 5 SCC 647 para 12-18 and held that Polluter Pay's Principle is accepted principle and part of environmental law of the country without even specific statute.

12) It is further relevant to mention here that the Hon'ble National Green Tribunal has also issued directions in several cases to impose environmental compensation on non-complying units and has been directing the Central Pollution Control Board, all the State Pollution Control Boards including the Punjab Pollution Control Board to implement Polluter Pay's Principle.

In the matter of Original Application No. 804/2017 (Earlier O.A. No. 36/2012) With M.A. No. 1302/2018 in Interlocutory Application No. 63 in W. P. (C) No. 657/199; Rajiv Narayan & another Versus Union of India & others With the Research Foundation for Science, Technology and Natural Resource Policy Versus Union of India and others, the Hon'ble National Green Tribunal, Principal Bench, New Delhi directed the Central Pollution Control Board, vide orders dated 12.04.2019, to determine the scale of compensation to be recovered for violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. The Central Pollution Control Board has accordingly prepared the methodology for calculating financial penalty and compensation for various violations of the provisions of the HOWM Rules, 2016, in cases of the facilities requiring authorization under the said Rules, 2016.

13) On examination of the entire facts of the case as has been recorded above, it is concluded by the Committee of officers (constituted by the Board for determination of EC on defaulting units) that the activities carried out by M/s National Fertilizers Limited, Bathinda, have caused environmental degradation/ damage by intentionally and deliberately violating the provisions of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Thus M/s National Fertilizers Limited,

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 Environmental Engineer
 Punjab Pollution Control Board
 Regional Office, Bathinda.



Bathinda has made itself liable for environmental compensation on the basis of the Principle of Precaution, Sustainable development and Polluter Pay's, which according to the methodology and scale evolved by the Central Pollution Control Board and adopted by the Punjab Pollution Control Board has been calculated to be Rupees 11,88,00,000/- (Eleven Crores Eighty-Eight Lakhs only).

14) Therefore, M/s National Fertilizers Limited, Bathinda through its Chief General Manager (Sh. Tarun Kumar Batra) is hereby directed to deposit an amount of Rs. 11,88,00,000/- (Eleven Crores Eighty-Eight Lakhs only) as environmental compensation with the office of the Punjab Pollution Control Board for degrading and damaging the environment as recorded above, within 15-days from the date of receipt of this order, failing which necessary action will be initiated for recovery of the amount of environmental compensation by adopting coercive measures.

15) Take notice that no further intimation or reminder will be issued or served by the Board in this regard after the lapse of stipulated period of 15-days. The Environmental Engineer, Punjab Pollution Control Board, Regional Office, Bathinda is directed to ensure compliance of directions issued by the Board.

Adarsh Pal Vig
Dr. (Prof.) Adarsh Pal Vig
Chairman

Environmental Engineer
Punjab Pollution Control Board
Regional Office, Bathinda.