

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 411 OF 2025**

IN THE MATTER OF:

Indrajeet

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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Respondent No. 4

Through:

Divya Jain
D/1876/2005

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**REPLY ON BEHALF OF RESPONDENT NO. 4 TO THE FINAL
JOINT COMMITTEE REPORT DATED 05.01.2026**

MOST RESPECTFULLY SHOWETH:

1. This brief reply is being filed on behalf of Respondent no. 4, *Indian Oil Corporation Limited*, which has set up an Ethanol Plant at Panipat, in respect of which the subject Complaint has been filed.

PRELIMINARY SUBMISSIONS

2. On 10.08.2022, Respondent No. 4 unveiled first of its kind and Asia's first 2G Ethanol Bio-Refinery ('Plant') at Panipat, Haryana, which converts rice straw to Ethanol. The said facility has been designed to produce about 30 million litres of Ethanol annually using 2,00,000 tonnes of paddy straw as feedstock, addressing the issue of stubble burning in the region which has been identified as a major health hazard at NCR region.
3. The said 2 lakh tonnes of rice straw, which is used as feedstock in the said plant, is collected from 89,000 farmers in the vicinity of the Plant.

The procurement of such agricultural residue has not only directly enhanced farmers' income but has also substantially mitigated air pollution by curbing the practice of stubble burning in paddy fields. Further, biomass logistics have created additional economic activity in the area.

4. Importantly, the Plant has helped in addressing the major challenge of stubble burning related pollution by eliminating around 320,000 MT of CO₂ every year, which is equivalent to replacing nearly 63,000 cars on road annually.
5. It is also pertinent to note that the Plant involves first commercial plant based on the indigenous technology of M/S Praj Industries limited. The Plant is a Zero Liquid Discharge ('ZLD') facility, ensuring that no treated or untreated effluent is discharged outside the Plant boundary, in strict compliance with applicable environmental norms.
6. Nevertheless, in the specific condition No. 2 of the Consent to Operate ('CTO') granted by Haryana State Pollution Control Board ('HSPCB'), which is valid till 30.09.2026, the Plant is permitted to discharge rainwater into Drain No. 2 to sustain the Plant's operation during heavy rain. Further, permission has also been obtained from Irrigation Department for discharging rainwater into Drain No. 2, which confirms that the area of the Plant falls within the catchment area of Drain No. 2: RD No. 27600/R (date of permission 26.12.2022). The drain along with the Plant boundary wall has been constructed for the disposal of the surface runoff from the catchment of the permanent road outside the Plant boundary. There is no connection from the Plant to this

drain. A copy of the permission letter dated 26.12.2022 is annexed herewith as **ANNEXURE - 1**.

7. Before advertng to the Committee Report on merits, it is pertinent to note that the Applicant had lodged a complaint on the CM Grievance Redressal System on 15.05.2025. Pursuant thereto, the Regional Officer ('RO'), HSPCB, Panipat, along with the complainant, conducted an inspection of the Plant on 04.06.2025, following which a show cause notice dated 05.06.2025 was issued to Respondent No. 4. The said show cause notice was duly replied to on 20.06.2025. Upon consideration of the compliances submitted by the project proponent on 12.06.2025 and 20.06.2025, the RO, HSPCB, Panipat submitted an Action Taken Report ('ATR'), which was duly signed by the Applicant on the CM Window Portal on 09.09.2025, expressly recording his satisfaction with the action taken.

Consequently, the Member Secretary, HSPCB recommended disposal of the complaint, and the same stood closed on 30.09.2025. A copy of each of the complaint dated 15.05.2025 filed before CM Grievance Redressal System and Action Taken Report dated 09.09.2025 is annexed herewith as **ANNEXURE - 2 (COLLY)**.

8. While Respondent No. 4 was working with the authorities and the Applicant to investigate and address the concern raised in CM Grievance Redressal System, the Applicant herein preferred the present complaint on 08.08.2025 and did not inform this Hon'ble Tribunal that his concerns were properly investigated and addressed to the satisfaction of the concerned authorities and the Applicant.

PARA WISE REPLY

The para-wise reply is limited in scope and Respondent No. 4 reserves it's right to file a detailed and comprehensive para-wise reply at an appropriate stage, if so required.

It is further submitted that Respondent No. 4 denies all the averments, submissions and statements made in the Complaint and in Final Report dated 05.01.2026 submitted by the Joint Committee, save and except, to the extent specifically admitted hereinafter.

1. The contents of paragraph 1.0. are a matter of fact and warrants no response.
2. The contents of paragraph 2.1.(i) to 2.1.(vi) are a matter of fact and warrants no response. It is however submitted that no information was provided by respondent no. 4 on 05.01.2026.
3. The contents of paragraph 2.2.(i) and paragraph 2.2.(ii) are a matter of fact and warrants no response.
4. The contents of paragraph 2.2.(iii) are a matter of fact. It is respectfully submitted that while the Environment Clearance ('EC') mentions treatment of 1,000 m³/day of effluent, the Plant has been designed with an effluent treatment capacity of 1,440 m³/day.

It is submitted that the Sludge/Solid Management Plan forms an integral part of the Environment Impact Assessment ('EIA') Report of the plant. The said plan was prepared by an agency duly accredited and

approved by the Ministry of Environment, Forest and Climate Change ('MoEF&CC'). On the basis of the said EIA Report and the Sludge/Solid Management Plan contained therein, the EC for the Plant was granted by the MoEF&CC. That pursuant to and in accordance with the said EC, the CTO was thereafter duly granted by HSPCB. A copy of the relevant part of the Environmental Assessment Report is annexed herewith as **ANNEXURE -3**.

It is submitted that the sludge generated is microorganisms-based biological sludge. The said sludge arises from various biological treatment processes carried out for treating the process condensate generated from the evaporation section of the Plant. The collected sludge is subjected to dewatering in a decanter unit to increase the suspended solids concentration. It is stated that the extraneous matter in the form of sand, clay, stones, and grit, which enters the system along with rice straw, are removed in the wet washing unit as mud. Such extraneous matters are then separated through classification and collected separately. Since this material originates from agricultural fields, it is utilized for land application.

Further, dewatered sludge/mud is further dried in sludge pit storage, having capacity of 1200 M³, which is constructed with an RCC floor and RCC retaining walls, and is thereafter utilized for land application. It is submitted that, to meet future requirements, one additional sludge pit having a capacity of 396 m³ has been constructed by Respondent No.4, for effective sludge management. A photograph of the said additional sludge storage pit is annexed herewith as **ANNEXURE -4**.

It is stated that a total of 18 rainwater harvesting pits have been developed in the Plant to collect and utilize rainwater from the rooftops. A photograph of one of the rainwater harvesting pit developed at the Plant is annexed herewith as **ANNEXURE - 5**.

5. The contents of paragraph 2.2.(iv) and paragraph 2.2.(vii) are a matter of fact and warrants no response.
6. The contents of paragraph 2.2.(viii)(a) are wrong and denied. It is submitted that the trade effluent generated at the plant is treated through the Process Condensate Treatment Plant ('PCTP') and is not discharged into the storm water drain. The statement that "*storm water drains shown by the Unit inside the premises also carry trade effluent*", is incorrect. It is submitted that each individual unit is provided with dedicated effluent collection pits, from which the effluent is pumped to the Solid-Liquid Separation ('SLS') system and thereafter, conveyed to the lagoon tank for further treatment. The storm water that may come into contact with biomass dust or biomass spillages on the plant surface is collected through the storm water drainage system and directed to the storm water pond. Such collected storm water is subsequently routed to the PCTP for treatment.
7. The contents of paragraph 2.2.(viii)(b) are wrong and denied. It is respectfully submitted that the colour observed in the water is attributable only to spillage of biomass and biomass dust of agricultural origin and is non-toxic in nature. There is no discharge of trade effluent, contaminated wastewater, or hazardous substances into the storm water drainage system.

In accordance with the conditions stipulated under the CTO, the storm water drainage system is segregated from the effluent conveyance system. Any storm water that may come into contact with biomass or biomass dust within the Plant premises is collected in the storm water pond and routed to the PCTP for appropriate treatment. No untreated or coloured water is discharged outside the Plant premises, and the Plant is operated in full compliance with the applicable CTO conditions.

8. The contents of paragraph 2.2.(viii)(c) are wrong and denied. It is respectfully submitted that the allegation is incorrect. It is stated that the storm water drains and process wastewater drains are segregated and independently designed. Photographs of each of the storm water drain and process water drain is annexed herewith as **ANNEXURE – 6 (Colly.)**.

The process wastewater generated from various sections of the Plant is collected in dedicated collection pits provided at each individual section. The collected process wastewater is then pumped to the SLS system and thereafter, conveyed to the lagoon tank for further treatment in the water treatment plant. It is submitted that storm water is conveyed through a separate storm water drainage network and does not mix with process wastewater at any stage. Accordingly, there is no contamination of storm water due to process wastewater, and the drainage system is operated in compliance with the CTO conditions.

9. The contents of paragraph 2.2.(viii)(d) are wrong and denied. It is respectfully submitted that storm water drains and process wastewater drains are segregated and independently designed, as explained in the

above reply to point no.(c). It is submitted that the process wastewater is collected separately through dedicated collection pits provided at individual sections of the unit and is conveyed to the SLS system and lagoon tank for treatment. However, the present Plant being first-of-its-kind facility, is presently under stabilization and the feed processing and overall Plant processing is significantly low. Under the present operating mechanism, and as a conservative environmental safeguard, any storm water that may be generated within the plant premises is collected and routed for treatment through the PCTP, thereby ensuring that no untreated water is discharged outside the plant boundary.

It is pertinent to note that as per the CTO conditions, the maximum possible storm water generation during rainfall is 2,350 m³ per day. The present Plant is provided with two intermediate collection facilities having a combined storage capacity of approximately 4,250 m³, comprising a storm water pond of 3,470 m³ capacity and a PCTP collection tank of 777 m³ capacity. This combined capacity is adequate to safely accommodate the maximum anticipated storm water generated in a day. Further, the actual rainfall-related storm water generation has been well below 2,350 m³ per day.

Additionally, since the Plant is operating at a very low capacity, the process condensate generation is also significantly lower than the design capacity of 1,440 m³ per day. Accordingly, till date, the Plant has been able to effectively collect, treat, and reuse all generated storm water and process effluent within the process system itself, in full compliance with the CTO conditions.

10. The contents of paragraph 2.2.(viii)(e) are wrong and denied. It is categorically denied that there exists any provision for discharge of untreated wastewater or contaminated storm water into Drain No. 2 leading to river Yamuna. The said allegation is factually incorrect and is based on an incorrect understanding and misinterpretation of the actual system configuration. The requirement referred to was approved under the CTO issued by HSPCB exclusively for discharge of excess storm water during extreme rainfall events, after meeting the prescribed conditions. The line in question was temporarily utilized during the construction phase solely for the discharge of hydro-tested water generated during tank installation activities. It is submitted that upon completion of construction, the said line has been physically disconnected and permanently capped at the outlet fall point, rendering it non-operational.

It is stated that at present, there is no functional or operable connection between the collection tank and Drain No. 2. It is stated that any suggestion that the line "*may be* connected at any time" is speculative and untenable. The present plant follows a zero-discharge practice during normal operations, and all storm water and process wastewater generated within the plant premises is collected, treated, and reused within the process system itself, in strict compliance with the CTO conditions. It is asserted that no valve, pump, or operational arrangement presently exists that would enable discharge of untreated wastewater to Drain No. 2.

11. The contents of paragraph 2.2.(viii)(f) are wrong and denied. It is categorically denied that the Plant had been discharging untreated

wastewater into Drain No. 2 and thereafter stopped the same only after intervention of the Hon'ble NGT. It is restated that the provision referred to was made exclusively for discharge of storm water during extreme rainfall events, strictly in accordance with the CTO granted by HSPCB. The said line was never intended, designed, or used for discharge of untreated process wastewater. It is reiterated that the line was temporarily utilized during the construction phase solely for disposal of hydro-tested water during tank installation and upon completion of construction, the line was physically disconnected and permanently capped at the outlet fall point and is presently non-operational.

12. The contents of paragraph 2.2.(viii)(g) are wrong and denied. The allegation that the Plant cannot be termed as a ZLD facility is factually incorrect and misconceived. It is stated that the Plant is operating strictly in ZLD mode, as mandated under the EC granted by MoEF&CC and the CTO granted by HSPCB. At present, no storm water or process wastewater is discharged outside the plant premises. It is submitted that as the present the Plant is in the stabilization phase and is presently processing very low feed and hence, all storm water generated is conservatively routed to the PCTP for treatment and reuse.

It is submitted that as per CTO, the maximum possible storm water generation is 2,350 m³/day. The Plant is provided with two intermediate collection facilities having a combined capacity of approximately 4,250 m³, comprising a storm water pond of 3,470 m³ and a PCTP collection tank of 777 m³, which is adequate to safely manage storm water under present operating conditions. Accordingly, the allegation that storm

water is discharged from a contaminated collection tank is invalid. It is stated that the Respondent No.4, in any event, is diligently undertaking all proactive and preventive measures as enumerated in paragraph 16 to ensure strict adherence to applicable norms and safeguards.

13. The contents of paragraph 2.2.(viii)(h) are wrong and denied. The inference drawn in the para under reply is based on a hypothetical and incorrect assumption that the Plant simultaneously operates at full design capacity and experiences maximum possible rainfall on a continuous basis. It is submitted that the Plant is presently under stabilization and is operating at significantly lower than design capacity. Therefore, the generation of process condensate is well below the design capacity of 1,440 m³/day.

Further, it be noted that the actual rainfall experienced is well below the maximum permissible storm water quantity of 2,350 m³/day stipulated under the CTO. A copy of the rainfall data of Panipat (Haryana) as per IMD (Indian Metrological Department) for the period Jan 2023-September 2025 is annexed herewith as **Annexure- 7**.

Hence, the combined storage capacity of approximately 4,250 m³ is sufficient to manage the actual storm water and process condensate generated under present operating conditions.

It is pertinent to note that till date, the Plant has successfully collected, treated, and reused 100% of the storm water and process wastewater generated within the premises, and water, let alone, any untreated wastewater or contaminated storm water has never been discharged into Drain No. 2 or into river Yamuna. It is stated that the

allegation that the Plant has “no option” but to discharge untreated wastewater is speculative, hypothetical, and contrary to actual operational practice. It is reiterated that Respondent No. 4, as a matter of abundant caution, is diligently undertaking all preventive and corrective measures detailed in paragraph 16 to ensure that no untreated effluent is discharged into the River Yamuna.

14. The contents of paragraph 2.2.(viii)(i) are wrong and denied. The allegation that the Plant has neither prepared nor implemented a Sludge Management Plan is factually incorrect. It is submitted that the Sludge/Solid Waste Management Plan forms an integral part of the EIA Report of the plant, which was prepared by a MoEF&CC-approved agency. Based on the said EIA Report, the Environmental Clearance for the Plant was granted by MoEF&CC, and thereafter the CTO was duly granted by HSPCB.

It is stated that the sludge generated at the plant is microorganism-based biological sludge, arising from various biological treatment processes undertaken for treating process condensate generated from the evaporation section of the Plant. The collected sludge is subjected to dewatering in a decanter unit to increase suspended solids concentration. The extraneous matter in the form of sand, clay, stones, and grit entering along with rice straw is removed in the wet washing unit as mud, separated through classification, and collected separately. Since this material originates from agricultural fields, it is utilized for land application.

The dewatered sludge/mud is stored in a designated sludge storage pit of 1,200 m³ capacity which is constructed on an RCC floor with RCC retaining walls, thereby preventing any leachate generation or ingress into storm water drains. Further, to cater to future requirements, one additional sludge storage pit of 396 m³ capacity has also been constructed. The provision of concrete flooring at locations observed during the Joint Committee visit further demonstrates Respondent No.4's proactive and compliant approach towards environmental safeguards.

15. That the suggestion made in paragraph 3.0.(i) is unwarranted & misconceived. It is categorically stated that there does not exist any arrangement for discharge of untreated wastewater into Drain No. 2. It is submitted that the stipulation referred to was approved under the CTO issued by HSPCB, solely for discharge of storm water during extreme rainfall events, and after obtaining necessary permission from the Irrigation Department. The said provision was never intended, designed, or used for discharge of untreated process wastewater. It is reiterated that the line was temporarily utilized during the construction phase only for discharge of hydro-tested water during tank installation activities. The said line has since been physically disconnected and permanently capped at the outlet fall point, rendering it non-operational. Accordingly, there is presently no arrangement available for discharge of untreated wastewater into Drain No. 2. Photographs showing physical disconnection of lines and blocking of internal channel are annexed herewith as **Annexure-8 (Colly)**.

However, safeguards for any need of the drain in future, in terms of the approvals of the same, have been enumerated in the following para.

16. That the suggestion made in paragraph 3.0.(ii) is unwarranted & flawed. It is reiterated that storm water discharge into Drain No. 2 was permitted under the CTO issued by HSPCB and corresponding approval of the Irrigation Department, and such permission has never been misused for discharge of untreated wastewater or contaminated storm water.

Nevertheless, to further strengthen segregation and in anticipation of higher-capacity operations, the unit has undertaken /is undertaking additional engineering measures for positive segregation of storm water and contaminated water, as detailed below:

- a) Blocking of internal channels at seven (7) identified locations to prevent cross-flow.
- b) Reversing flow directions at selected locations to route uncontaminated water to storm water drains and contaminated water to process drains.
- c) Providing partitioning within the existing storm water pond for segregated storage of storm water and contaminated water, with separate inlet channels.
- d) Treating channels in contamination-prone areas (boiler, wet washing, PT section, SLS) as process water channels.

- e) Creation of an additional collection pit near the wet washing section for biomass-laden storm water, routed to SLS / lagoon tank for reprocessing.
- f) Provision of dedicated pumping systems for storm water and contaminated water handling.
- g) To ensure continuous compliance and transparency, an OCEMS online analyser shall be installed at the storm water discharge line to Drain No. 2 and integrated with HSPCB and CPCB online portals.

It is submitted that upon completion of the above measures, there will be no possibility of mixing of storm water and spillage of any kind at any stage. While works mentioned at Para a) stand completed, works under Para b), c), d), e) and f) are underway at war footing and it is being arranged that they shall be completed by end of March 2026. It is submitted that the works under Para g) are in progress and work orders have been issued.

17. That the suggestion made in paragraph 3.0.(iii) is misguided. The allegation that the Plant has not prepared or implemented a Sludge Management Plan is factually incorrect. It is submitted that the Sludge/Solid Waste Management Plan is an integral part of the approved EIA Report, prepared by a MoEF&CC-approved agency, based on which the Environmental Clearance for the Plant was granted

by MoEF&CC. Subsequently, the CTO was issued by HSPCB after due scrutiny. The sludge generated is microorganism-based biological sludge, arising from biological treatment of process condensate from the evaporation section. The sludge is dewatered in a solid-liquid separation system to increase suspended solids concentration. It is stated that the extraneous matter (sand/clay/stones/grit) entering along with rice straw are removed in the wet washing unit, separated through classification, and utilized for land application, as the same originates from agricultural fields.

It is stated that the dewatered sludge/mud is stored in a designated sludge pit of 1,200m³ capacity, constructed with an RCC floor and RCC retaining walls prevents leachate ingress. Additionally, one more sludge pit of 396 m³ capacity has been constructed to meet future requirements.

18. The suggestion made in paragraph 3.0.(iv) in as much as it suggests that the Plant should not be allowed to use storm water drain for recharging the ground water is unwarranted. The said suggestion has been made on assumptions and is unsupported by any evidence. It is stated that the storm water generated from Plant areas is not used for groundwater recharge and only clean roof-top rainwater is diverted to rainwater harvesting pits, ensuring that there is no possibility of contamination or mixing of storm water with recharge water. It is stated that in compliance with EC conditions, the Plant has constructed 18 rainwater harvesting pits, which exclusively collect roof-top rainwater.
19. It is stated that though the recommendation made in para 3.0(v) is addressed to Respondent No.2, however, it is submitted that the Plant

is operating strictly in ZLD mode, with no discharge of process wastewater or contaminated storm water outside the plant premises.

20. In response to the suggestion made in para 3.0(vi) it is stated that the Plant has already implemented robust preventive measures to protect groundwater and surface water. As stated above, only roof-top rainwater is diverted to rainwater harvesting pits, while storm water and process water are separately collected and treated. That adequate containment, RCC-lined storage, and controlled handling systems are in place, eliminating any possibility of contamination. Accordingly, there is no impact on groundwater or surface water due to the operation of the Plant, and no remediation requirement presently arises.

It is imperative to submit here that not only the Plant is subjected to periodic external audits/ inspection by Respondent No.2/CPCB but also, six monthly environmental compliance reports are also submitted to MoEF&CC with a copy to Respondent No.2. Interestingly, never has any deviation being noted by the Central Pollution Control Board in its inspections through external agencies of "*Gross Polluting Agencies*". It is humbly submitted that never has any report, by any committee internal or external, has ever reported any contaminated water discharge from the Plant.

Additionally, permission for discharging rainwater into Drain-2 has been obtained from the Irrigation Department, which confirms that the area of the 2G Ethanol plant falls within the catchment area of Drain-2. The drain along the plant's boundary wall has been constructed for the disposal of surface runoff from the catchment of the permanent road outside the plant boundary.

With respect to the housekeeping conditions of the plant areas depicted in Photographs Nos. 3, 4, 5, and 6 of the Committee's Interim Report, it is submitted that the observations have been promptly addressed and rectified even before submission of the Final Report. Necessary housekeeping measures were undertaken immediately, and the said areas have since been restored and maintained in a satisfactory condition. Compliance in this regard is duly evidenced by the latest photographs of the respective locations, the same are annexed herewith as **ANNEXURE – 9(Colly)**.

21. In the above facts and circumstances and further measures adopted pursuant to the Final Report, no further directions are necessary in the present matter. The Complain may please be disposed of accordingly.

Through:

Divya Jain
D/1876/2005

Respondent No. 4

General Manager (Health Safety & Environment & Process Safety Management)
पानीपत रिफ़ाइनरी (आई.ओ.सी.एल.) 132140
Panipat Refinery (I.O.C.L.) 132140

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Indrajeet

...Applicant

Versus

State of Haryana & Ors.

...Respondents

AFFIDAVIT

I, Jayant Kumar, S/o R.P Sharma, aged about 50 years, authorized representative of the Respondent No.4 having office of Panipat Refinery at Panipat Refinery and Petrochemical Complex, Baholi, Panipat, 132140, do hereby solemnly declare and affirm as under:

1. That I am presently working as General Manager (HSE & PSM) with the Respondent 4. I have been duly authorised by the Respondent No.4 and am fully acquainted with the facts and circumstances of the case, therefore, competent to swear and affirm this affidavit.
2. That the accompanying Reply on behalf of Respondent No.4 to the Final Joint Committee Report dated 05.01.2026 has been drafted by the counsel for the Respondent No.4 under my instructions and the facts stated therein are true and correct to the best of my knowledge and the records maintained by the Respondent No.4 in normal course of its business. The legal submissions made therein on the basis of the advised received.



3. The annexures filed along with the reply are true copies/printouts of their respective originals.

Jayant Kumar

DEPONENT

Jayant Kumar

मुख्य महसूल अधिकारी (स्वास्थ्य सुरक्षा एवं पर्यावरण और प्रक्रिया सुरक्षा प्रबंधन)
General Manager (Health Safety & Environment & Process Safety Management)

पानीपत रिफ़ाइनरी (आई.ओ.सी.एल.) 132140
Panipat Refinery (I.O.C.L.) 132140

VERIFICATION:-

Verified at Panipat on this _____ day of February, 2026. That the contents of my above affidavit are true and correct to my knowledge and no part of the same is false and nothing material has been concealed therefrom.

ATTESTED

Deepak

DEEPAK
OATH COMMISSIONER
Enrl. No. PH/8044/2022
Ch. No. 592, 3rd Floor,
New Building Complex,
Distt. Courts, Panipat

Jayant Kumar

DEPONENT

Jayant Kumar

मुख्य महसूल अधिकारी (स्वास्थ्य सुरक्षा एवं पर्यावरण और प्रक्रिया सुरक्षा प्रबंधन)
General Manager (Health Safety & Environment & Process Safety Management)

पानीपत रिफ़ाइनरी (आई.ओ.सी.एल.) 132140
Panipat Refinery (I.O.C.L.) 132140



S.No. 82
Certified that the above content was declared on
Oath affirmation before me, on this _____
day 18/02/26 at District Panipat
by Sh. Jayant Kumar
who is personally known to / or Identified
by Sh. Anshu Shek Bhatia who is personally
known to me. Certified further that the affidavit
has been read over and explained to the
declarant, who appeared to have fully understood
the same at the time of making thereof.

18 FEB 2026

सिंचाई एवं जल संसाधन विभाग, हरियाणा
कार्यालय:

कार्यकारी अभियन्ता,
पानीपत जल सेवाएं मण्डल,
गोहाना रोड, बिन्जोल, पानीपत

दूरभाष / CONTACT NO. - 01802650036,

हर बूंद संचय, हर खेत पानी



लोनिवि / PWD

IRRIGATION & WR DEPARTMENT, HARYANA

OFFICE:
EXECUTIVE ENGINEER,
PANIPAT WATER SERVICES DIVISION,
GOHANA ROAD, BINJHOL, PANIPAT

ई-मेल / E-mail:- xen-panipat.irr@hry.gov.in

No.11668-69/7R

Dated:-26.12.2022

To

Sh. V. Srinivas,
Dy. General Manager (Project),
Panipat Refinery (IOCL)-132140.

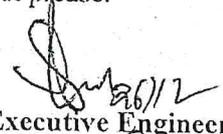
Sub: - Permission for discharging storm water (Rain Water) into Drain No. 2 (D-2).

Ref: Your office letter No. PR/2G/Irrigation/2022/03 dated 01.07.2022 & No. PR/2G/Irrigation/2022/01 dated 28.06.2022.

Please refer your above referred letters vide which the permission for discharging storm water of the area of 2G Ethanol Plant and Refinery premises in to Main Drain No. 2 is requested.

In this regard, it is intimated that as per your Plan, the falling/pouring point for discharging of storm water of 2G Ethanol Plant and Refinery premises will be at RD 27600/R and RD 33400/R of Main Drain No. 2 respectively. However, the area of 2G Ethanol Plant and Refinery premises are already covered under the catchment area of Main Drain No. 2 and hence, there is no need of separate permission for the same. But the falling/ pouring point area should be safe & sound against erosion and if any loss occurred, the same will be borne by IOCL and I&WRD will not responsible for the same.

This is for your information and further necessary action at the earliest please.


Executive Engineer

CC: - SDO/Panipat W/S Sub Division, Panipat for information & directed to look in to the matter for pouring/ falling point structure and it should be ensured that there should be no erosion during discharging the storm water.

10/4/25, 12:49 PM

CMWINDOW: स्थिति जानकारी प्रपत्र / STATUS QUERY FORM

CMWINDOW Track Grievance
 सीएमविंडो शिकायत की जानकारी


CM Grievances Redressal System

आपके शिकायत की स्थिति / Your Grievance Status

शिकायत संख्या/Registration No.	CMOFF/N/2025/049254
शिकायतकर्ता का नाम / Name of Complainant	INDERJEET
Grievance Relates To	
प्राप्त कर्ता / Received By	
प्राप्ति तिथि / Received On	15-05-2025
वर्तमान में मामला / Case Presently with	
वर्तमान स्थिति / Current Status	मामले का निपटारा
मामले की वर्तमान प्रहस्तन / Case Presently Handled By:	
अधिकारी का नाम / Officer Name	
पदनाम / Designation	
पता / Address	

Action Date	Description	Sent By	Case Presently Dealt	Action Taken Report Attachment / Remarks
30-09-2025	Case Disposed Off	Chief Minister Office	Chief Minister Office	Reason : Disposal after satisfaction As per ATR uploaded on 09.09.2025 of the Administrative Secretary, Environment Department.
29-09-2025	ATR Sent	Administrative Secretary Environment	Chief Minister Office	As per report submitted by the SEE, the said complaint may be disposed off, please.
26-09-2025	ATR Sent	Pollution Control Board	Administrative Secretary Environment	As per report submitted by the SEE, the said complaint may be disposed off, please.
25-09-2025	ATR Sent	Member Secretary PCB	Pollution Control Board	As per report submitted by the SEE, the said complaint may be disposed off, please.
15-09-2025	ATR Sent	Head Office Panipat	Member Secretary PCB	As per the comments of RO, the unit was inspected by concerned field officer alongwith IOCL Officials in presence of complainant Inderjeet on 04/06/2025 and following deficiencies were found during inspection: 1. There was seepage of water from the boundary wall of 2G Ethanol Plant leading to open channel adjoining to the 2G Ethanol plant wall. 2. Water was found accumulated near Gate No.2 and other locations inside the plant area, showing poor housekeeping by the unit. IOCL has submitted compliance of deficiencies vide letter Ref.No.PRPC/HSE/2G/SCN/2025/01 dated 12/06/2025.

ADDITIONAL MARKING DETAILS **REMINDER DETAILS**

Action Date Description Sent By Case Presently Dealt Action Taken Report Attachment / Remarks

OLD ACTION HISTORY(CASE BEFORE REOPENED)

From To Date Remarks Sent Back Date Sent Back Remarks

SEND BACK REMARKS DETAILS

CM Window Action Taken Report (ATR)-FINAL REPLY	
1. CM window grievance No.	CM OFF/N/2025/049254 Date of Registration: 15.05.2025
2. Grievance Details	Category: Pollution from 26 Ethanol Plant. Specifications:
3. Citizen Contact Details	Name:- Indrajit Address: VPO - Dadlana, Panipat Mobile: 8813801700 Alternate contact number:
By which medium was the citizen contacted or summoned?	
1. Registered Post/Phone & SMS:	Phone
4. Interim Report on the Enquiry (By the Investigating Officer)	Date of Enquiry: 04/08/2025 and 12/09/2025 Findings by Investigating Officer/Enquiry Officer:
5. Is the matter Sub-judice? Yes/No	Court Name: Date of Next Hearing:
If Yes, Case No.:	Title:
(Attach a copy of Stay Order, if any)	Legal provisions (Law):
6. Final Report on the Enquiry (By the Investigating or Reporting Officer)- Action taken with Dates and Details:	Date of Commencement of proceedings: Date of concluding the proceedings (Date on which proceedings were concluded) Photos to be attached herewith if site visit conducted: Details on Action Taken: The seepage of water from the boundary wall of 26 Ethanol 7 water accumulated were drain no. 2. Show course were closed to the unit. The unit submitted compliance of the observation on 12.06.2025. Complainant is satisfied with action taken.
7. Citizen Satisfaction	Whether citizen satisfied by proposed solution? Yes/No Required Action has been Taken Signature of citizen. (Name of Citizen)
Eminent Citizen (EC) Verification	Name of EC: Date/dates when EC was approached for the case. Whether Citizen was counseled in the presence of the EC?: Yes/No Comments of EC (if any): Signature of citizen. (Name of Citizen)
8. Comments of the DC (Optional)/Nodal Officer of Department (Optional)	Signature of the DC/Nodal Officer (Deptt.) (Optional)



required in a systematic manner otherwise it will add into the contamination of land. The sewage will be treated properly and garbage if any shall be disposed utilized to make a composts to avoid the impact of these pollutant on the land.

Land Environment (Operation phase)

The potential sources of land or soil pollution could be the thin slop, which generates after the distillation process. The associated impacts identified during the operation phase are summarized below:

- Ash from the Boiler
- Sludge from fermentation and ETP

Table 4.5 Solid waste Management

ITEM	UNIT	VALUE	SOURCE	DISPOSAL
Solid Effluent				
Mud	TPD	8 - 9	Wet Washing	The extraneous matter in the form of sand/clay/stones/grit coming along with the Rice Straw will be removed in Wet Washing unit as a mud. It is separated by classification and collected in trucks/tractor trolleys. As this extraneous matter is coming from the farms it will be sent back to same farms for land application
Dewatered Sludge	TPD	4.5 - 8.5	Process Condensate Treatment Plant	Sludge is nothing but microorganisms based biological sludge. The sludge is generated from different biological processes carried out to treat Process Condensate coming from Evaporation Section of 2G Ethanol Plant. The collected sludge is subjected to dewatering action in solid/liquid separation unit to increase the suspended solid concentration. This sludge is then sent to farms as manure
Ash	TPD	120 - 130	Boiler	Ash from the boiler is collected and conveyed into silo for the storage. This ash will be transported to Cement or Brick Manufacturing Unit by means of covered trucks. The ash analysis is shared to Ultra Tech Cement, Shree Cement, Ambuja Cement, Nirman Cement and under discussion. The logistics will be planned to avoid any stoppage of



IndianOil

Environmental Impact Assessment Report for Proposed Environmental Clearance Ligno-Cellulosic 2G Ethanol Plant at
ed Terminal, Refinery Road, Panipat-132140 District Panipat, Haryana

				the plant.
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Mitigation Measures:

- The plant will implement zero level discharge concept. The treated water will be recycled in the process. Therefore, there will not be any negative impact on soil.
- Boiler ash will be sold to the brick/cement-manufacturing unit.
- The fermented sludge and sludge from ETP will be used as manure for the green belt.
- Lignin rich cake - Separated from the Solid Liquid Separation and is used as a boiler fuel along with supplementary fuel.
- Other hazardous solid wastes will be sent to authorized recycler or vender.
- Thus, the solid waste generated from the plant will be insignificant.

It is envisaged that there will not be any major impacts on land environment during the operation phase as most of the effluent generated shall be reused in the process.

4.5 Noise Environment (Construction Phase)

Predicted noise pollution sources and its impacts during the construction phase:

- Operation of construction machineries, equipment and associated mechanical works will generate the noise.
- Noise from Vehicular movement.
- Noise level will be in the range of 70-85 dB(A) at receptor point from the associated work of construction. This generation will be of temporary nature and limited up to project boundary. The exposure of workers to noise of high decibel may cause hearing loss or other occupational health hazards.

Noise pollution during construction phase is temporary and restricted to project boundary only.

Mitigation Measures:

- Noise from Vehicular movement will be within the limit by implementing the policy of maintenance of Vehicles and PUC.
- Transportation of construction machinery or raw material shall be allowed only during daytime to reduce the impacts of increased noise
- The construction equipment / machineries shall be turned off when not in use
- Loud horn of vehicles will not be allowed at project area. Regular maintenance & lubrication of construction equipment & machineries will be undertaken to reduce the noise generation.
- Adequate Personal Protective Equipment (PPEs) like ear muff, ear plug, hand gloves, gum boots etc. will be provided to worker which helps to prevent occupation health problems.



Newly Constructed additional
Sludge Storage Pit



ANNEXURE-6 (COLLY)





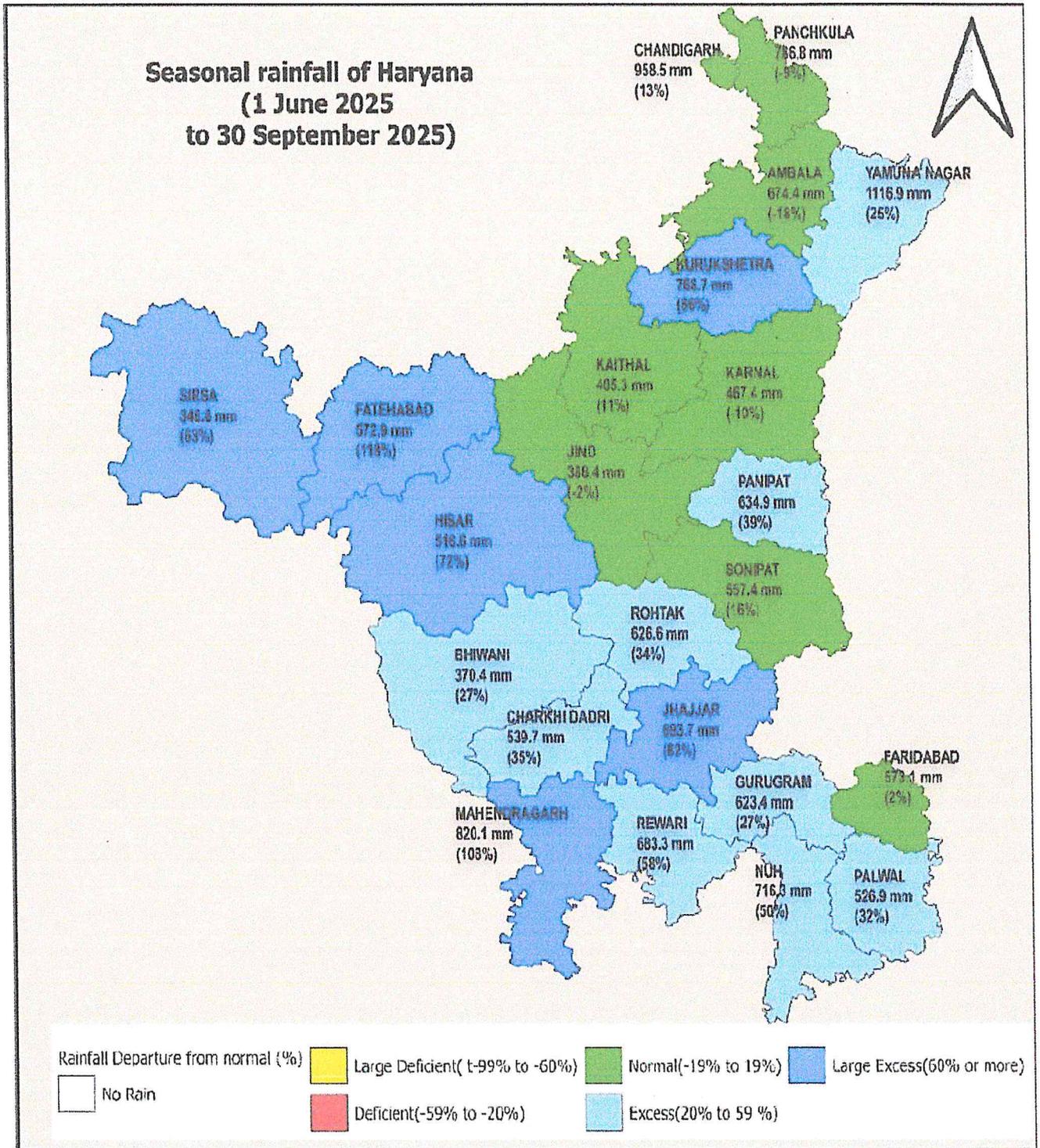
Process water drains



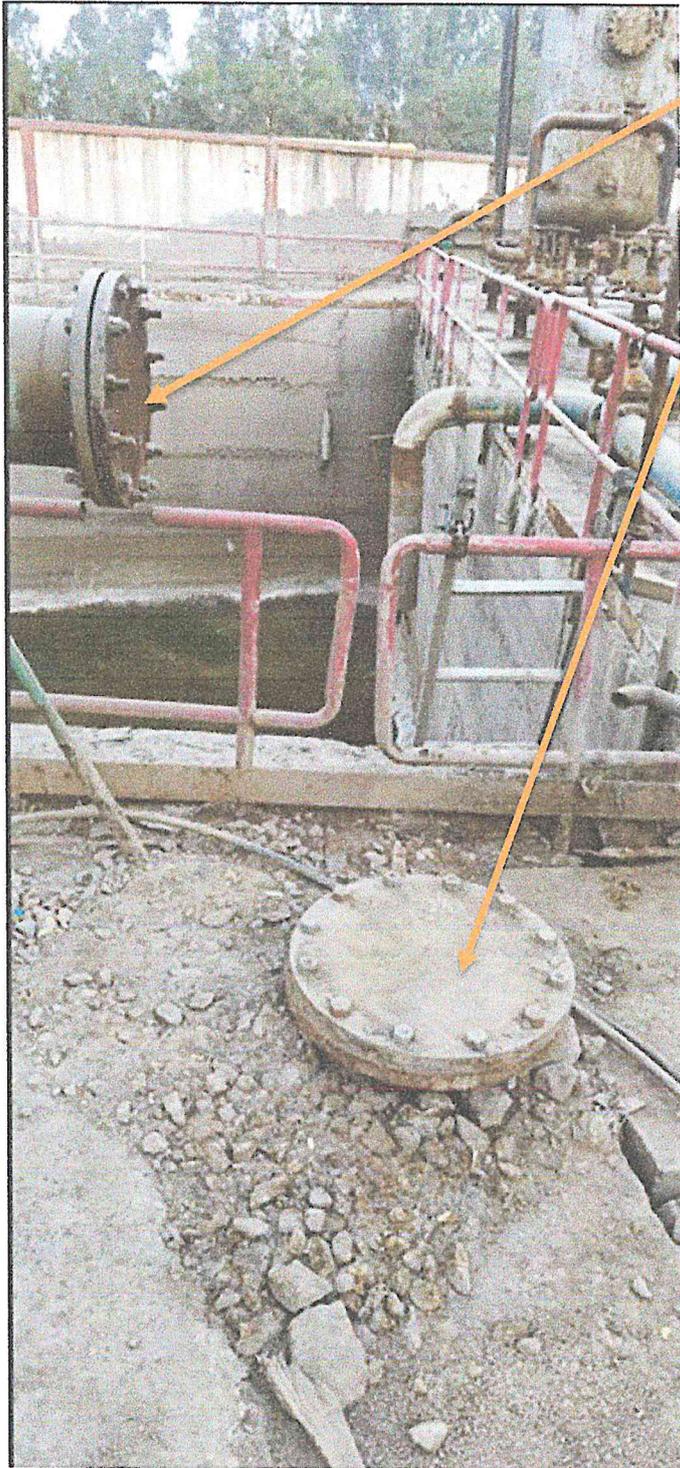
ANNEXURE-7

Rain fall data of Panipat (Haryana) as per IMD (Indian Metrological Department)

Monthly Rainfall (mm)- Panipat	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2023	11.0	0.0	38.0	29.4	33.8	165.7	291.9	36.7	20.6	7.5	3.5	3.2	Ref. IMD annual report
2024	0.0	18.0	17.3	1.8	15.0	59.9	0.0	0.0	0.0	0.0	0.0	0.0	Ref. IMD annual report
2025						634.9							Ref. IMD data 2025, IMD annual report not published yet,



ANNEXURE-8 (COLLY)



Physical disconnection of lines



**Blocking of
Internal
Channel**



Photograph no. 3 of the Committee's Interim Report



Photograph of Same Location after rectification



Photograph no. 4 of the Committee's Interim Report



Photograph of Same Location after rectification



Photograph no.5 of the Committee's Interim Report



Photograph of Same Location after rectification



Photograph no. 6 of the Committee's Interim Report



Photograph of Same Location after rectification