N.D.H.:17.04.2025

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

ORIGINAL APPLICATION NO. 47 OF 2024

IN THE MATTER OF:

GEN. SECRETARY INDUSTRAL
FOCAL POINT WEFLARE ASSOCIATION ….. APPLICANT

VERSUS

STATE OF PUNJAB & OTHERS …. RESPONDENTS

INDEX

S.NO.	PARTICULARS	PAGE NO.
1.	Reply on behalf of Respondent No.54, JBR Technologies Limited with affidavit	**1 – 8**
2.	**ANNEXURE R-1** A true copy of the GPS details of the lifting of the effluent from the six industries	**9 – 24**
3.	**ANNEXURE R-2** Photographs of the treatment process at the ZLD CETP of the answering Respondent	**25**
4.	**ANNEXURE R-3** A chart of the generated treated trade effluent providing the disposal during the year 2024	**26**

Place: New Delhi
Date: 15.04.2025

Filed by:-

(GAURAV AGARWAL)
Advocate for Respondent No.54
J.B.R. Technologies Ltd.

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**BEFORE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIAL BENCH NEW DELHI**

ORIGINAL APPLICATION NO.47 OF 2024

IN THE MATTER OF :

GEN. SECRETARY
INDUSTRIAL FOCAL POINT
WELFARE ASSOCIATION …APPLICANT

Vs.

STATE OF PUNJAB & OTHERS …RESPONDENTS

**REPLY ON BEHALF OF RESPONDENT NO.54,
JBR TECHNOLOGIES LIMITED**

1. That the instant Original Application was registered by exercising *suo-moto* jurisdiction by this Hon'ble Tribunal after taking cognizance of letter petition dated 12.08.2023 sent by the Applicant alleging that sewerage line was laid in Industrial Focal Point, Khanna, District Ludhiana, State of Punjab in the year 2016. Industrial effluent is sent to man made big well erected in near water supply line and from this well effluent is pumped out to submersible motors to main sewerage line of the city. However, the aforesaid effluent is overflowing causing damage to standing trees in the area concerned and to support it, certain photographs have been filed to show that overflowed water is covering number of trees standing in the area concerned.

2. That vide order dated 07.03.2024 this Hon'ble Tribunal constituted a joint committee to submit a factual report. The said joint committee submitted the factual report and on the basis of the samples taken on 15.04.2024 it was found that the industries were not complying. Hence, this Hon'ble Tribunal issue notices to all the defaulting units. The Tribunal also appointed an Amicus Curiae to assist the Tribunal.

3. That, thereafter, the State bodies as well as the industries filed their respective replies. A report was also filed by the Ld. Amicus dated 17.12.2024 wherein it was stated that 6 of the industries were sending their untreated trade effluent to the answering Respondent for treatment and disposal. Hence, this Hon'ble Tribunal issued notice to the answering Respondent to file its reply.

4. That answering Respondent, JBR Technologies Limited, have its registered office at 2680, Moti Nagar, Jain Colony, Ludhiana, Punjab. The answering Respondent was constituted/ incorporated on 12.12.2005 under the Companies Act, 1956 as Private Limited and later on was converted to limited company under the companies Act, 2013 on 16.01.2019 with CIN No. U90001PB2019PTC048934.

5. That the answering Respondent is a service industry engaged in the service of lifting, treatment and disposal of effluent produced by electroplating industries situated in

Ludhiana district, Jalandhar district, Amritsar district and other areas as per the directions and guidelines of Punjab Pollution Control Board.

6. That the answering Respondent have a Common Effluent Treatment Plant (CETP) with Zero Liquid Discharge System (ZLD) at D-260-261, Phase-8, Focal Point, Ludhiana, Punjab. The capacity of the CETP is 800 KLD for treatment of effluent produced as waste by electroplating, Chrome plating, Nickel plating, Zinc plating and other such allied industries.

7. That the plant of the answering Respondent is operated under the control of a SPV known as Ludhiana Effluent Treatment Society (LETS). The said LETS have 6 elected members and other members from the Govt. of Punjab departments with Director of industries and Commerce, Govt. of Punjab as Ex officio Chairman of LETS. Hence, the said plant is operated strictly in compliance of the government norms and guidelines abiding within the statutory provisions.

8. The answering Respondent collects the untreated trade effluent from the contracted industries through its dedicated vehicles having acid proof tanks. Each vehicle of the answering Respondent is provided with a submersible pump. The contracted industries have acid proof underground tanks, the dedicated vehicles of the answering Respondent though its submersible pumps

collects and lifts the untreated trade effluent which is then transported to the plant of the answering Respondent for treatment and disposal.

9. That there are industries situated since very long in a various part of State of Punjab. It is practically and economically not possible to convey the untreated trade effluent through dedicated underground pipeline system. Futher, as untreated trade effluent produced by each unit/ industries is in small quantity it is also not be feasible to sent it to CETP by pipelines. Hence, it was decided by the authorities that the answering Respondent deploye dedicated vehicles for lifting and transportation of effluent from various industries/ unitsto CETP Ludhiana, Punjab.

10. That all the vehicles of company have been provided with GPS system (Global Positioning System). The information of portal of GPS is already been shared with PPCB authorities. A true copy of the GPS details of the lifting of the effluent from the six industries is **ANNEXURE R-1**

11. That after lifting untreated trade effluent from the industries/ units, manifest/slip for lifted quantity of untreated trade effluent is issued to them and a copy of the same is kept by the answering Respondent for future records. The monthly record of lifting of effluent from each industries/ unit is submitted by the answering Respondent to the Punjab Pollution Control Board (PPCB) for its information and necessary action.

12. That it is pertinent to mention here that after receiving the effluent at CETP, it undergoes following processes:

a) The effluent is received from the vehicles under gravity into the collection tank. There after it is transferred into the equalization tank. As the effluent is received from different industries with different composition, so to avoid the jerks during chemical radiation, the effluent if made homogeneous into equalization tank.

b) After equalization tank the effluent is taken to reaction tank where chemical like Sodium Meta Bi Sulphite, Lime and Poly-electrolyte are added to convert the metals into respective salts in the form of flocks (sludge).

c) The chemically reacted solution is made to pass through tube settlers where the flocks settled down at the bottom to form sludge whereas the clear water is received at the top which is sent to other process for treatment. The sludge collected at bottom is finally collected in sludge thickener where it is thickened under gravity and is de-watered and collected with the help of centrifugal machines and is allowed to dry in sludge drying beds. The sludge is finally sent to govt. facility TSDF at Nimbua Green Fields Derabassi near Chandigarh for final treatment and disposal.

d) The clearer water from the tube settler is taken to clarifier where the final minute particles of the sludge are settled.

e) After clarifier the water is sent to sand filters and activated carbon filters where filtration and adsorption of suspended particles takes place. The water gets clearer and turns colorless and odorless.

f) After filtration the water is received at Anion & Cation unit where the water passes through positive & negative charges resigns and thus the hardness of the water is removed here.

g) Finally, the water is made to pass through RO membranes where final filtration for removal of TDS takes place. The TDS of water comes within 300-600 mg per liter with final pH value between 7-8.

h) The RO treated water is filled in tankers and is used for plantation, gardening, construction work, parks and other similar works.

i) The RO reject is sent to Multi Effect Evaporator where the reject is heated with the help of thermopack unit. The steam so produced is cooled down to form water which is also mixed with the RO treated water (permeate).

j) Thus, the effluent once received from the industries is either made useable for various purposes as described above and the remainder is received at sludge which is

sent to Nimbua Green Field Derabassi for final disposal. So, the complete incoming effluent is completely treated into permeate and sludge. And no content of it is discharged anywhere in raw form or nothing remains at the plant. Hence, the plant achieves Zero Liquid Discharge.

Photographs of the treatment process at the ZLD CETP of the answering Respondent is **ANNEXURE-2** and A chart of the generated treated trade effluent providing the disposal during the year 2024 is **ANNEXURE R-3.**

13. That the above reply is submitted in compliance of the direction of this Tribunal.

JBR Technologies Limited
Respondent no. 54

Through

(GAURAV AGARWAL)
Advocate, Supreme Court
GRV LEGAL
Advocates and Legal Consultants
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AFFIDAVIT

I, RAJINDER SINGH, aged about 53 years, S/o Shri Piara Singh, R/o House No. 2680, Jain Colony, Moti Nagar, Focal Point, PO: Focal Point, District Ludhiana, Punjab-141010, do hereby state on solemn affirmation as under:

1. That the deponent is the Director of the answering Respondent in the present Original Application as such I am well conversant with the facts and circumstances of the present case and hence, competent to swear this affidavit.

2. That I have gone through the accompanying Reply from para 1 to 13 and day that the contents thereof are true and correct to the best of my knowledge and belief and I believe the same to be true.

3. That the Annexures R-1 and R-3 to the reply are true copy of the documents.

Solemnly affirmed on this __ day of April, 2025 at Ludhiana, Punjab.

Certified that the affidavit/S.P.A./G.P.A. has been read over & explained to the deponent/ executant who seemed directly to understand the same at the time making thereof

DEPONENT

VERIFICATION

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

Attested as Identified

DEPONENT

NOTARY PUBLIC
LUDHIANA (Pb.) India

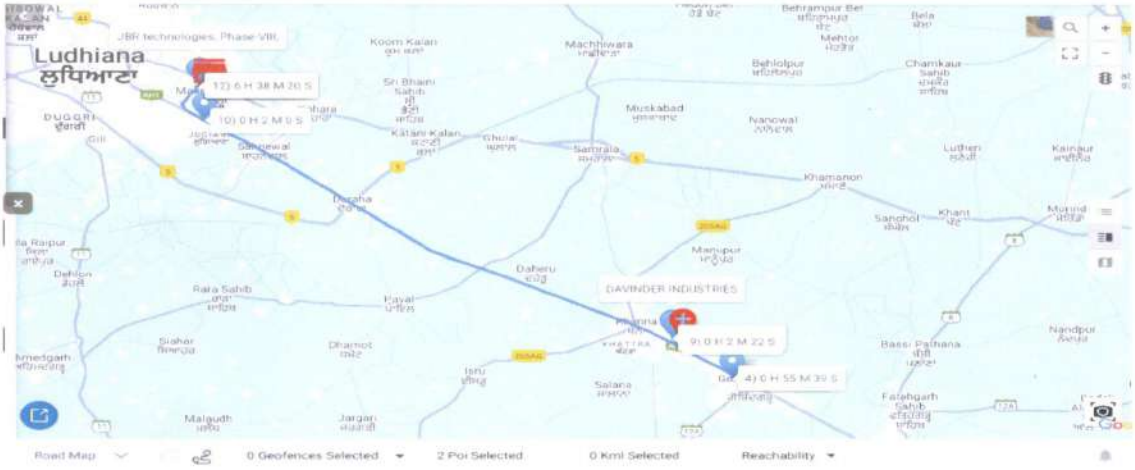
16 APR 2025

ANNEXURE R-1

10) The GPS Details for lifting of effluent from six industries is as under:

a) NAME OF INDUSTRY: M/S DAVINDER INDUSTRIES KHANNA

Vehicle No.	:	PB 10 HQ 0698
Starting time of lifting	:	30-11-2024 at 15:12:40
End time of lifting	:	30-11-2024 at 16:09:53
Halting time	:	57 min. 13 sec
Time of Return to CETP	:	30-11-2024 17:21:39
Quantity of Effluent Lifted:		2000 liter



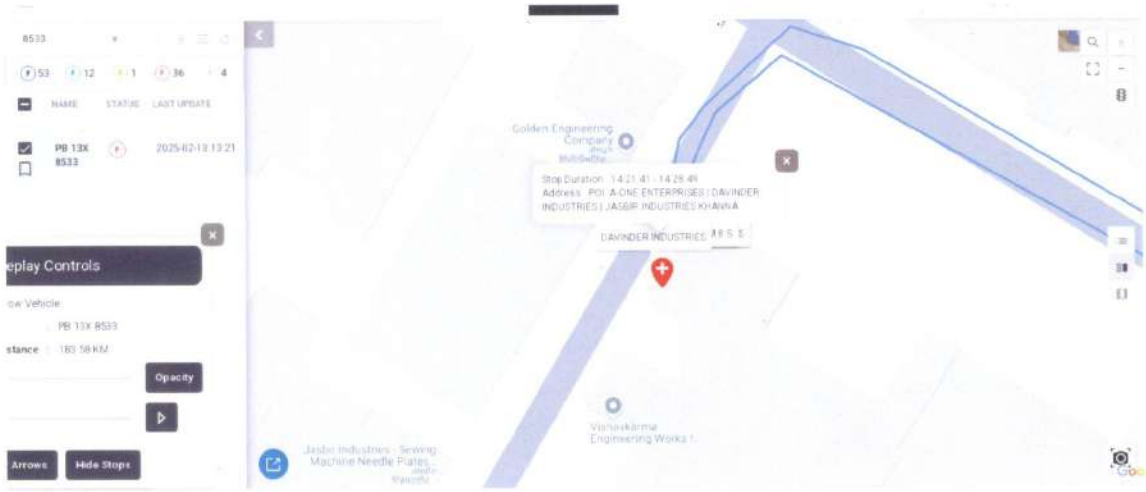
Path of vehicle Dated 30-11-2024 showing CETP and Davinder industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

b) NAME OF INDUSTRY : M/S DAVINDER INDUSTRIES KHANNA

Vehicle No.	:	PB 13 X 8533
Starting time of lifting	:	03-01-2025 at 13:26:47
End time of lifting	:	03-01-2025 at 14:28:49
Halting time	:	63 min 2 sec.
Time of Return to CETP	:	18:18:21
Quantity of Effluent Lifted:		2000 liter

Path of vehicle Dated 03-01-2025 showing CETP and Davinder industries for the Vehicle



Lifting time and other details as per GPS of Industry Site

c) NAME OF INDUSTRY : M/S DAVINDER INDUSTRIES KHANNA

Vehicle No.	:	PB 10 BK 4811
Starting time of lifting	:	30-01-2025 at 10:30:55
End time of lifting	:	30-01-2025 at 11:31:24
Halting time	:	01h:0m:29sec
Time of Return to CETP	:	13:35:08
Quantity of Effluent Lifted:		2000 liter

Path of vehicle Dated 30-01-2025 showing CETP and Davinder industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

d) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 10 BK 4811
Starting time of lifting	:	19-11-2024 at 11:08:41
End time of lifting	:	19-11-2024 at 12:04:18
Halting time	:	55m:37s
Time of Return to CETP	:	14:23:51
Quantity of Effluent Lifted:		4000 liter

Path of vehicle Dated 19-11-2024 showing CETP and JASBIR industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

e) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 10 HQ0698
Starting time of lifting	:	30-11-2024 at 15:12:40
End time of lifting	:	30-11-2024 at 16:09:53
Halting time	:	57min:13 sec
Time of Return to CETP	:	17:17:16
Quantity of Effluent Lifted:		4000 liter

Path of vehicle Dated 30-11-2024 showing CETP and JASBIR industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

f) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 10BK4811
Starting time of lifting	:	18-12-2024 at 14:04:17
End time of lifting	:	18-12-2024 at 15:06:29
Halting time	:	1h:2m:12s
Time of Return to CETP	:	16:18:36
Quantity of Effluent Lifted:		5000 liter

Path of vehicle Dated 18-12-2024 showing CETP and JASBIR industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

g) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 13 X 8533
Starting time of lifting	:	31-12-2024 at 14:14:49
End time of lifting	:	31-12-2024 at 15:38:18
Halting time	:	1h:23m:29s
Time of Return to CETP	:	16:58:53
Quantity of Effluent Lifted:		4000 liter

Path of vehicle Dated 31-12-2024 showing CETP and JASBIR industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

h) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 65E 9036
Starting time of lifting	:	21-01-2025 at 12:10:56
End time of lifting	:	21-01-2025 at 13:08:37
Halting time	:	57m:41s
Time of Return to CETP	:	14:15:16
Quantity of Effluent Lifted:		4000 liter

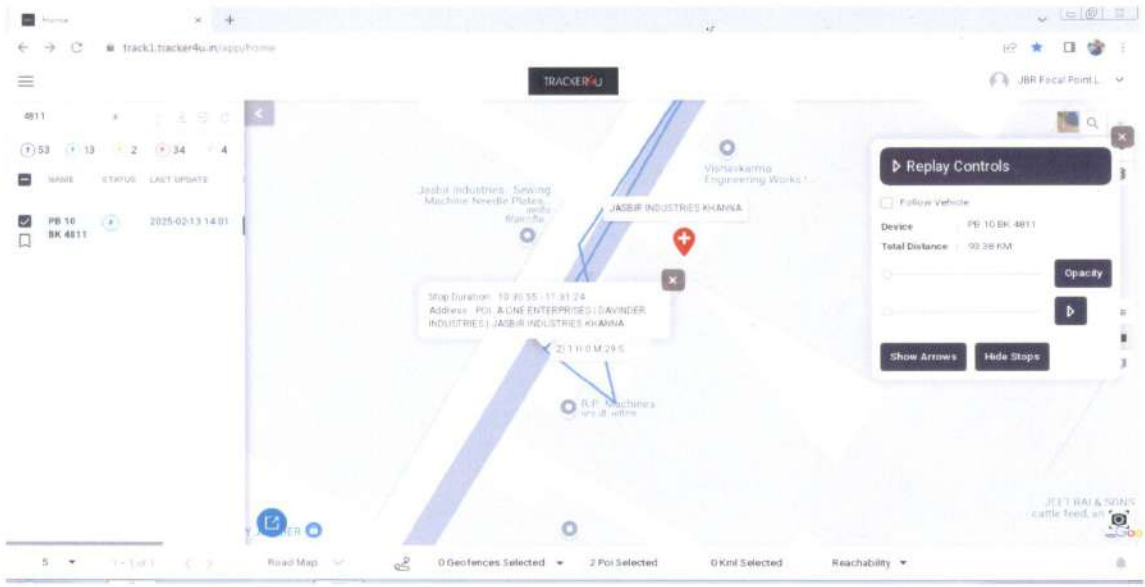
Path of vehicle Dated 21-01-2025 showing CETP and JASBIR industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

i) NAME OF INDUSTRY : M/S JASBIR IND. KHANNA

Vehicle No.	:	PB 10BK 4811
Starting time of lifting	:	30-01-2025 at 10:30:55
End time of lifting	:	30-01-2024 at 11:31:24
Halting time	:	1h:0m:29s
Time of Return to CETP	:	13:35:08
Quantity of Effluent Lifted:		4000 liter

Path of vehicle Dated 30-01-2025 showing CETP and JASBIR industries for the Vehicle



Lifting time and other details as per GPS of Industry Site

j) NAME OF INDUSTRY : M/S VEENA IND. KHANNA

Vehicle No.	:	PB 13AL 0298
Starting time of lifting	:	16-11-2024 at 12:21:33
End time of lifting	:	16-11-2024 at 13:02:32
Halting time	:	40m:59s
Time of Return to CETP	:	14:52:56
Quantity of Effluent Lifted:		3700 liter

Path of vehicle Dated 16-11-2024 showing CETP and VEENA INDUSTRIES for the Vehicle

Lifting time and other details as per GPS of Industry Site

k) NAME OF INDUSTRY : M/S VEENA IND. KHANNA

Vehicle No.	:	PB 10HQ 0698
Starting time of lifting	:	13-12-2024 at 13:45:12
End time of lifting	:	13-12-2024 at 15:17:48
Halting time	:	1h:32m:36s
Time of Return to CETP	:	17:29:28
Quantity of Effluent Lifted:		3600 liter

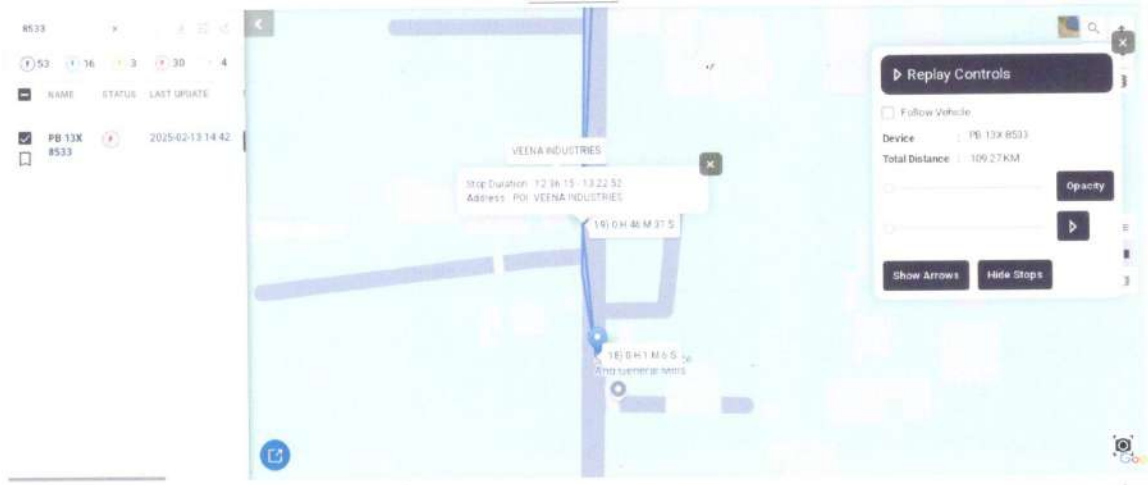
Path of vehicle Dated 13-12-2024 showing CETP and VEENA INDUSTRIES for the Vehicle

Lifting time and other details as per GPS of Industry Site

I) NAME OF INDUSTRY : M/S VEENA IND. KHANNA

Vehicle No.	:	PB 13 X 8533
Starting time of lifting	:	20-01-2025 at 12:36:15
End time of lifting	:	20-01-2025 at 13:22:52
Halting time	:	46m:37sec
Time of Return to CETP	:	14:28:21
Quantity of Effluent Lifted:		3000 liter

Path of vehicle Dated 20-01-2025 showing CETP and VEENA INDUSTRIES for the Vehicle



Lifting time and other details as per GPS of Industry Site

m) NAME OF INDUSTRY : M/S KAY BEE INDUSTRIES KHANNA

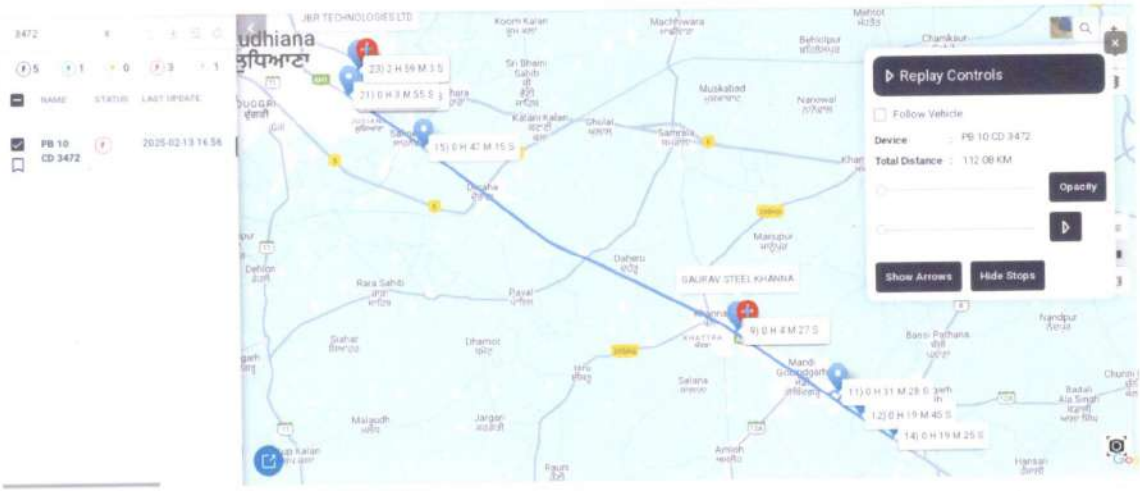
Vehicle No.	:	PB 10 CD 3472
Starting time of lifting	:	19-12-2024 at 12:22:06
End time of lifting	:	19-12-2024 at 12: 50:46
Halting time	:	28m:40s
Time of Return to CETP	:	20:31:13
Quantity of Effluent Lifted:		2500 liter

Path of vehicle Dated 19-12-2024 showing CETP and Kay Bee Industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

n) NAME OF INDUSTRY : M/S GAURAV STEEL KHANNA

Vehicle No.	:	PB 10 CD 3472
Starting time of lifting	:	19-12-2024 at 13:10:50
End time of lifting	:	19-12-2024 at 13:31:06
Halting time	:	20m:16s
Time of Return to CETP	:	20:31:13
Quantity of Effluent Lifted:		2000 liter



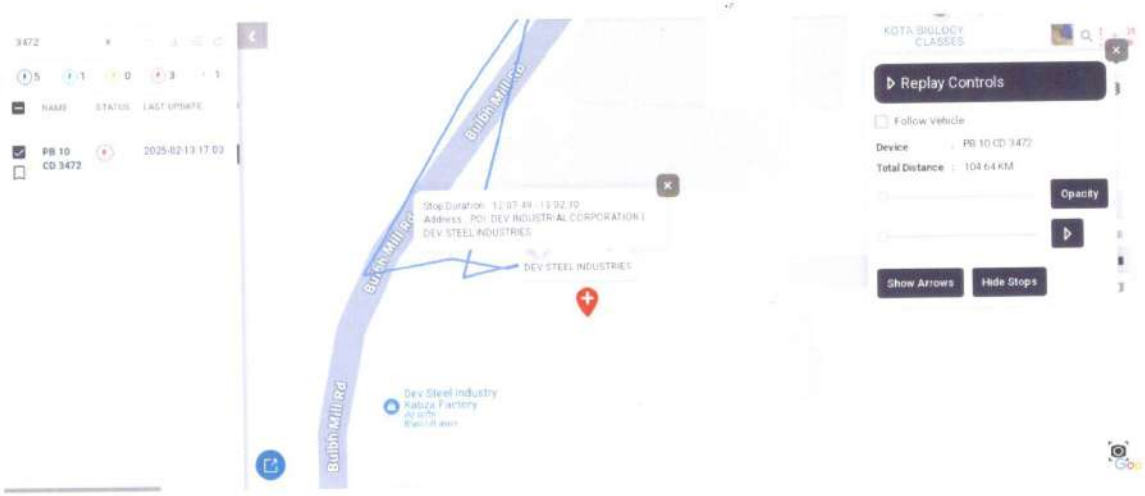
Path of vehicle Dated 19-12-2024 showing CETP and Gaurav Steel Industries for the Vehicle

Lifting time and other details as per GPS of Industry Site

o) NAME OF INDUSTRY : M/S Dev Steel Industries KHANNA

Vehicle No.	:	PB 10 CD 3472
Starting time of lifting	:	16-12-2024 at 12:07:49
End time of lifting	:	16-12-2024 at 13:02:30
Halting time	:	54m 41s
Time of Return to CETP	:	17:12:43
Quantity of Effluent Lifted	:	4000 liter

Path of vehicle Dated 16-12-2024 showing CETP and Dev Steel Industries for the Vehicle

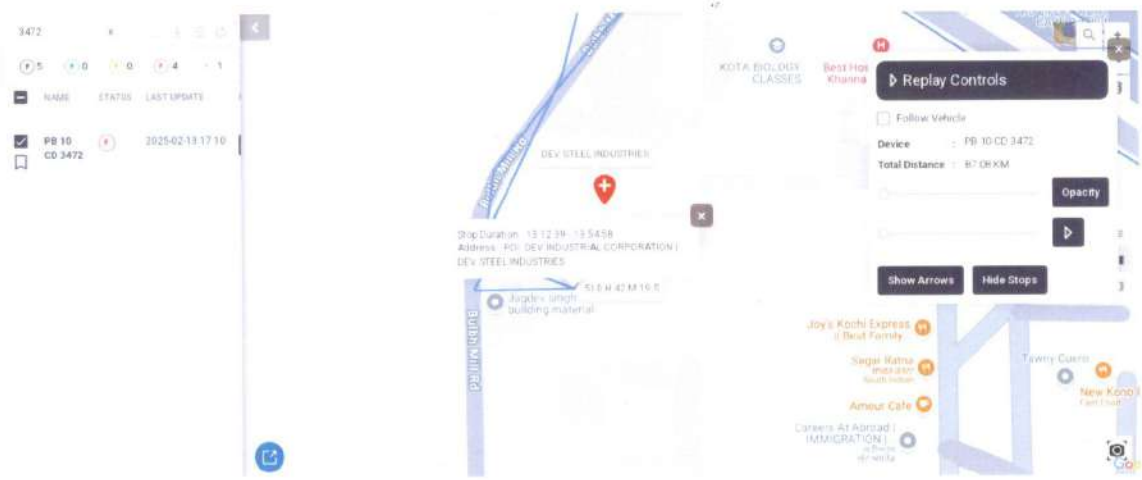


Lifting time and other details as per GPS of Industry Site

p) NAME OF INDUSTRY : M/S DEV STEEL KHANNA

Vehicle No.	:	PB 10 CD 3472
Starting time of lifting	:	24-01-2025 at 13:12:39
End time of lifting	:	24-01-2025 at 13:54:58
Halting time	:	42m:19sec
Time of Return to CETP	:	16:45:14
Quantity of Effluent Lifted	:	4000 liter

Path of vehicle Dated 24-01-2025 showing CETP and Dev Steel Industries for the Vehicle



Lifting time and other details as per GPS of Industry Site

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zero Liquid Discharge.

Various processes for treatment of effluent at CETP ZLD Focal Point Ludhiana.

Collection Tank

Equalization Tank

Reaction Tank

Tube Settler

Clarifier

Carbon filter

Anion & Cation Unit

Reverse Osmosis (RO)

Multi-Effect Evaporator (MEE)

Thickner

Centrifuge

Sludge Drying Beds

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ANNEXURE R-3

J.B.R. TECHNOLOGIES LTD. D-260-261, PHASE 8 FOCAL POINT LUDHIANA																		
MONTH	EFFLUENT TREATED (KL)	R.O. PERMEATE THROUGH METER (KL)	R.O. PERMEATE THROUGH VEHICLE (KL)	SUPPLY TO N.H 95 (KL)	MCL (KL)	GOURVE CONTRACT OR (KL)	SUNIL KUMAR CONT.	SUPPLY TO VARDHMAN (KL)	SUPPLY TO KAY JAY FORGING(KL)	M.C.L. SAHNEWAL	I.H.R. CONT.	GUSTON, CONT.	H.A.C CONT. (KL)	RYAN INT. SCHOOL	DHANASUC ONST.	EKAM TRANSPORT	J.B.R. PLANTATION (THROUGH VEHICLE)	COOLING TOWER (KL)	PLANTATION & GARDNING (KL)
Jan-24	13420	9867	8781	8044.5	0	0	0	0	731.5		0	0	5					800	286
Feb-24	13920	10255	9262	7165.5			22		1794			245	35.5					780	213
Mar-24	13960	10364	9257.5	5926	8			29	3105.5		28	105	56					850	256.5
Apr-24	13280	9807	8848.5	4760.5		3	8		4025		52							750	208.5
May-24	13280	9781	8746.5	3934.5	0	6	88	335	4199		48	0	0	64.5		14	57.5	780	254.7
Jun-24	12330	9083	8163.5	4519		9	12	408	3044.5		36				75	28	32	710	209.5
Jul-24	13480	9938	9005.5	8026.5	7	6	47		651		4				250	14		735	197.5
Aug-24	11880	8617	7754.5	5542	32	6	24		1897.5		24				188		41	700	162.5
Sep-24	13260	9751	9085	5789		9	244		2908		68					14	53	630	36
Oct-24	12160	9066	8287.5	4222		6	8		3776.5		76				112	14	73	690	88.5
Nov.-24	11660	8637	7859	5099		6		30	2532	56	36		8		24	38	30	630	148
Dec-24	11960	8803	8064	5507.5					2351	86	16		16		59.5	28		680	59
TOTAL	154590	113969	103114.5	68536	47	51	453	802	31015.5	142	388	350	120.5	64.5	708.5	150	286.5	8735	2119.7

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