

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

APPEAL NO. 2 OF 2025

IN THE MATTER OF:

Freedom Park Life AOA

...Appellant

Versus

Haryana State Pollution Control Board & Anr.

...Respondents

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FILED BY:



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NEW DELHI
DATED: 04.10.2025

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI

APPEAL NO. 2 OF 2025

IN THE MATTER OF:

Freedom Park Life AOA

...Appellant

Versus

Haryana State Pollution Control Board & Anr.

...Respondents

REJOINDER TO REPLY OF RESPONDENT NO.1 & 2

MOST RESPECTFULLY SHOWETH:

At the outset, it is submitted that no averment, contention, statement and/or allegation made in the reply filed by respondent No.1 & 2 shall be deemed to be accepted or admitted unless done so expressly in the present rejoinder. The contents of the appeal filed by the appellant are reiterated to be true, correct and reaffirmed.

A. That the contents of Para A of the reply need no rejoinder.

REPLY TO THE COUNTER AFFIDAVIT:

1. That the contents of Para 1 of the reply need no rejoinder.

2. That the contents of Para 2 of the reply need no rejoinder.

3. That the contents of Para 3 of the reply are false, denied and the contents of para 3 of the appeal are reiterated to be correct and reaffirmed.
4. That the contents of Para 4 of the reply are false, denied and the contents of para 4 of the appeal are reiterated to be correct and reaffirmed.
 - (i) That the contents of Para 4(i) of the reply need no rejoinder.
 - (ii) That the contents of Para 4(ii) of the reply need no rejoinder.
 - (iii) That the contents of Para 4(iii) of the reply are false, denied and the contents of para 4(iii) of the appeal are reiterated to be correct and reaffirmed.
 - (iv) That the contents of Para 4(iv) of the reply need no rejoinder.
 - (v) That the contents of Para 4(v) of the reply are false, denied and the contents of para 4(v) of the appeal are reiterated to be correct and reaffirmed. It is submitted that in second week of August, 2022, heavy rainfall occurred in Gurugram, Haryana due to which huge quantity of storm water flooded in the

STP and STP panel, its motors, blowers got damaged and STP tanks also got flooded. Due to which the STP was not working properly to its full functionality and sample results show that only the BOD was beyond the prescribed limits, while the rest of the parameters were within limits. The appellant society was in the process of getting the STP repaired. In the meantime, on 27.08.2022 the respondent No.2/Regional Officer collected samples of the STP installed in appellant society. During the collection, the office bearer of the appellant society duly explained the whole situation and narrated the circumstance that due to heavy rainfall said issues arose in the STP, otherwise, it was working perfectly fine and the remedial measures are in progress.

- (vi) That the contents of Para 4(vi) of the reply need no rejoinder.
- (vii) That the contents of Para 4(vii) of the reply are false, denied and the contents of para 4(vii) of the appeal are reiterated to be correct and reaffirmed. It is submitted that in second week of August, 2022,

heavy rainfall occurred in Gurugram, Haryana due to which huge quantity of storm water flooded in the STP and STP panel, its motors, blowers got damaged and STP tanks also got flooded. The said STP due to Act of God of over flooding due to heavy rain and said issue arose due to the said natural cause. The appellant society was in the process of getting the STP repaired. In the meantime, on 27.08.2022 the respondent No.2/Regional Officer collected samples of the STP installed in appellant society. During the collection, the office bearer of the appellant society duly explained the whole situation and narrated the circumstance that due to heavy rainfall said issues arose in the STP, otherwise, it was working perfectly fine and the remedial measures are in progress. It is further submitted that the appellant society never applied for provisional consent to operate, it applied for proper regular consent to operate, by depositing re-sampling fee of Rs.4,500/- and a security deposit of Rs.5,00,000/- and the respondent on its own discretion granted only

was working perfectly fine and the remedial measures are in progress.

- (ix) That in rejoinder to the contents of Para 4(ix) of the reply, it is submitted that the heavy rainfall occurred in second week of August, 2022 due to which the STP of appellant society damaged and the appellant was in the process of hiring technical contractor, in the meantime, on 27.08.2022 the respondent No.2/Regional Officer collected samples of the STP installed in appellant society. During the collection, the office bearer of the appellant society duly explained the whole situation and narrated the circumstance that due to heavy rainfall said issues arose in the STP, otherwise, it was working perfectly fine and the remedial measures are in progress. Thereafter, on 01.09.2022 the Maintenance Contract was awarded by the appellant to professional maintenance Company namely – Nimbus Harbor Facilities Management Pvt. Ltd. for repair of STP.
- (x) That the contents of Para 4(x) of the reply are false, denied and the contents of para 4(x) of the appeal

provisional consent to operate without assigning any reason, whereas, petitioner always requested a complete CTO. The said conditions are matter of record, anything contrary to the record is false and denied.

- (viii) That in rejoinder to the contents of Para 4(viii) of the reply, it is submitted that in second week of August, 2022, heavy rainfall occurred in Gurugram, Haryana due to which huge quantity of storm water flooded in the STP and STP panel, its motors, blowers got damaged and STP tanks also got flooded. The said STP due to Act of God of over flooding due to heavy rain and said issue arose due to the said natural cause. The appellant society was in the process of getting the STP repaired. In the meantime, on 27.08.2022 the respondent No.2/Regional Officer collected samples of the STP installed in appellant society. During the collection, the office bearer of the appellant society duly explained the whole situation and narrated the circumstance that due to heavy rainfall said issues arose in the STP, otherwise, it

are reiterated to be correct and reaffirmed. It is submitted that the appellant never received the said show cause notice dated 12.09.2022 as the email fplestatemanager@gmail.com, which was defunct and was not functioning and the same was informed to the respondent at the time of representation. It is further submitted that after collection of sample, the appellant society did not hear anything from the respondent No.2 and was under the impression that the explanation given to the respondent No.2 at the time of collection of sample was sufficient and satisfactory. However, on 18.02.2024 Mr. Kuldeep (former Estate Manager) of maintenance agency (Nimbus) of appellant society was surprised and shocked to receive an intimation through whatsapp that a show cause notice was issued against the appellant society and no reply/response has been given. Thereafter, upon making inquiries, it was found that the lab test was conducted on the said sample collected and the same found unsatisfactory and the intimation was allegedly sent to appellant on an email

fplestatemanager@gmail.com, which was defunct and was not functioning and the same was never been received by appellant. Thereafter, on 09.10.2024 in the personal hearing all the above mentioned facts and circumstances and authentic material supporting appellant's version were duly explained and given by the appellant society.

- (xi) That the contents of Para 4(xi) of the reply are false, denied and the contents of para 4(xi) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the said notice dated 12.09.2022 was delivered to the appellant. As stated above that the appellant's STP was damaged due to heavy rain and because of which it was not functioning at the time of collection of sample and the same was duly communicated to the officials of respondents. Moreover, the appellant never received the said show cause notice dated 12.09.2022 as the email fplestatemanager@gmail.com, which was defunct and was not functioning and the same was informed to the respondent at the time of representation. It is

further submitted that after collection of sample, the appellant society did not hear anything from the respondent No.2 and was under the impression that the explanation given to the respondent No.2 at the time of collection of sample was sufficient and satisfactory. However, on 18.02.2024 Mr. Kuldeep (former Estate Manager) of maintenance agency (Nimbus) of appellant society was surprised and shocked to receive an intimation through whatsapp that a show cause notice was issued against the appellant society and no reply/response has been given.

- (xii) That the contents of Para 4(xii) of the reply are false, denied and the contents of para 4(xii) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the said notice dated 12.09.2022 was delivered to the appellant. The appellant's STP was damaged due to heavy rain and because of which it was not functioning at the time of collection of sample and the same was duly communicated to the officials of respondents. Moreover, the appellant never

received the said show cause notice dated 12.09.2022 as the email fplestatemanager@gmail.com, which was defunct and was not functioning and the same was informed to the respondent at the time of representation. It is further submitted that after collection of sample, the appellant society did not hear anything from the respondent No.2 and was under the impression that the explanation given to the respondent No.2 at the time of collection of sample was sufficient and satisfactory. However, on 18.02.2024 Mr. Kuldeep (former Estate Manager) of maintenance agency (Nimbus) of appellant society was surprised and shocked to receive an intimation through whatsapp that a show cause notice was issued against the appellant society and no reply/response has been given. Thereafter, upon making inquiries, it was found that the lab test was conducted on the said sample collected and the same found unsatisfactory and the intimation was allegedly sent to appellant on an email fplestatemanager@gmail.com, which was defunct

and was not functioning and the same was never been received by appellant. In the personal hearing held on 09.10.2024, all the above mentioned facts and circumstances and authentic material supporting appellant's version were duly explained and given by the appellant society.

- (xiii) That the contents of Para 4(xiii) of the reply are false, denied and the contents of para 4(xiii) of the appeal are reiterated to be correct and reaffirmed.
- (xiv) That the contents of Para 4(xiv) of the reply are false, denied and the contents of para 4(xiv) of the appeal are reiterated to be correct and reaffirmed. The appellant's STP was damaged due to heavy rain and because of which it was not functioning at the time of collection of sample and the same was duly communicated to the officials of respondents. Moreover, the appellant never received the said show cause notice dated 12.09.2022 as the email fplestatemanager@gmail.com, which was defunct and was not functioning and the same was informed to the respondent at the time of representation. It is

further submitted that after collection of sample, the appellant society did not hear anything from the respondent No.2 and was under the impression that the explanation given to the respondent No.2 at the time of collection of sample was sufficient and satisfactory. However, on 18.02.2024 Mr. Kuldeep (former Estate Manager) of maintenance agency (Nimbus) of appellant society was surprised and shocked to receive an intimation through whatsapp that a show cause notice was issued against the appellant society and no reply/response has been given. Thereafter, upon making inquiries, it was found that the lab test was conducted on the said sample collected and the same found unsatisfactory and the intimation was allegedly sent to appellant on an email fpolestatemanager@gmail.com, which was defunct and was not functioning and the same was never been received by appellant. In the personal hearing held on 09.102024, all the above mentioned facts and circumstances and authentic material supporting

appellant's version were duly explained and given by the appellant society.

- (xv) That the contents of Para 4(xv) of the reply need no rejoinder.
- (xvi) That the contents of Para 4(xvi) of the reply are false, denied and the contents of para 4(xvi) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the appellant has violated any Environmental Norms enumerated under the said policy orders as wrongly alleged. As stated above, the appellant's STP was not functioning due to the damage caused by flood of rain and the said environment compensation has been wrongly imposed by the respondents.
- (xvii) That the contents of Para 4(xvii) of the reply are false, denied and the contents of para 4(xvii) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the impugned Environmental compensation order dated 26.11.2024 was issued rightly or procedurally as per the methodology defined in policy order as wrongly alleged. It is

submitted that as per policy dated 22.11.2021 of the respondent No.1 the methodology for assessment of environment compensation prescribed under chapter 3/4 "Environmental Compensation to be levied for failure of preventing the pollutants being discharged in water bodies" and "Environment Compensation for discharge of untreated/partially treated sewage by concern individual/authority", whereas in the order dated 26.11.2024 the Methodology applied by the respondent No.1 and 2 is totally different i.e. "Formula of calculation of Environmental compensation", which has been wrongly applied and has no applicability in the present case.

(xviii) That the contents of Para 4(xviii) of the reply are false, denied and the contents of para 4(xviii) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the impugned Environmental compensation order dated 26.11.2024 was issued rightly or procedurally as wrongly alleged. It is false and denied that the appeal is not maintainable or

may be dismissed or devoid of merit as wrongly alleged.

(xix) That the contents of Para 4(xix) of the reply are false, denied and the contents of para 4(xix) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the impugned order is reasoned or does not require interference from this Hon'ble Tribunal as wrongly alleged.

(xx) That the contents of Para 4(xx) of the reply are false, denied and the contents of para 4(xx) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the impugned order is reasoned or does not require interference from this Hon'ble Tribunal as wrongly alleged.

Lab Test reports dated 20.01.2023, 28.06.2023, 20.09.2024, 04.01.2025 & 12.02.2025 has been annexed as Annexure - A-1. Purchase order dated 25.11.2022 with quotations and approval dated 26.11.2022 has been annexed as Annexure - A-2. Letter dated 07.05.2024, E-mails dated 08.05.2024, 23.12.2024 & 06.01.2025 has been annexed as

Annexure – A-3. CTO dated 04.03.2025 and Lab report dated 07.01.2025 has been annexed as Annexure – A-4. Show Cause notice dated 12.05.2025, reply dated 15.05.2025 and 24.05.2025 has been annexed as Annexure – A-5.

5. **REJOINDER TO REPLY OF GROUNDS**

- A. That the contents of Para 5(A) of the reply are false, denied and the contents of para 5(A) of the appeal are reiterated to be correct and reaffirmed. It is submitted that the Appellant is a residential society consisting of apartments of 573 middle class families and respondent No.1 Board has wrongly and illegally treated and considered the appellant as “**Industrial Unit**” for the purpose of calculating and imposing the environment compensation, whereas as a matter of fact and admittedly, the appellant is a residential society and is not an Industrial Unit. While passing the impugned order dated 26.11.2024, the respondent No.1 even failed to recognize the character and nature of the appellant society and its activity, which has been established as residential society to only look

after the welfare of its members and is nonprofit making and is not carrying any commercial activity.

- B. That the contents of Para 5(B) of the reply are false, denied and the contents of para 5(B) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the impugned order dated 26.11.2024 has been issued rightly or procedurally or there is any project of appellant or appellant's residential society covered under red category as wrongly alleged.
- C. That the contents of Para 5(C) of the reply are false, denied and the contents of para 5(C) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that no intimation regarding proper functioning of STP/subsequent improvement were intimated to the respondents as wrongly alleged. As stated above the appellant never received the said show cause notice dated 12.09.2022. It is false and denied that proper opportunity of being heard was given as wrongly alleged. The said alleged violation of 415 days has been wrongly taken by the respondents.

- D. That the contents of Para 5(D) of the reply are false, denied and the contents of para 5(D) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that no intimation regarding proper functioning of STP/subsequent improvement were intimated to the respondents as wrongly alleged. As stated above the appellant never received the said show cause notice dated 12.09.2022.
- E. That the contents of Para 5(E) of the reply are false, denied and the contents of para 5(E) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the environment compensation has been imposed as per Board Policy as wrongly alleged.
- F. That the contents of Para 5(F) of the reply are false, denied and the contents of para 5(F) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that there is any project of appellant or the appellant residential society covered under re category as per categorization order or the STP unit of appellant was non complying till the alleged date as wrongly alleged. The respondent No.2 has wrongly

recommended Environmental compensation till 24.02.2023. It is false and vehemently denied that the calculation of Environment Compensation Assessment Committee was right appellant's STP was non complying on 14.10.2024 or 09.10.2024 as wrongly alleged. For the sake of argument, if it is presumed the appellant's STP was non compliant till 24.02.2023 as recommended by respondent No.2, how can without verification or inspection the respondents came to the conclusion that appellant's STP unit was non compliant till 09.10.2024 or 14.10.2024. It clearly shows that the impugned order dated 26.11.2024 has been passed on whimsical basis.

- G. That the contents of Para 5(G) of the reply are false, denied and the contents of para 5(G) of the appeal are reiterated to be correct and reaffirmed. It is false and emphatically denied that all factors were taken into consideration for calculation of Environment compensation by the Environment Compensation Assessment Committee as per methodology defined in Policy as wrongly alleged.

- H. That the contents of Para 5(H) of the reply are false, denied and the contents of para 5(H) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the appellant has been found discharging the environmental pollutants in excess of the standards prescribed under EP Rules, 1986 or to the standards prescribed in the consent granted to appellant unit under the Water and Air Acts as wrongly alleged.
- I. That the contents of Para 5(I) of the reply are false, denied and the contents of para 5(I) of the appeal are reiterated to be correct and reaffirmed. As stated above the appellant's STP was damaged due to heavy rain flood and was not working at the time of collection of the samples, which are subject of said report, and the same was also communicated to the officer of respondents, who was collecting the sample. And the appellants, later on got repaired the STP.
- J. That the contents of Para 5(J) of the reply are false, denied and the contents of para 5(J) of the appeal are reiterated to be correct and reaffirmed. It is false and

denied that the respondents have rightly applied modalities/methodology as defined in the policy as wrongly alleged.

- K. That the contents of Para 5(K) of the reply are false, denied and the contents of para 5(K) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the respondents have rightly applied modalities/methodology as defined in the policy as wrongly alleged.
- L. That the contents of Para 5(L) of the reply are false, denied and the contents of para 5(L) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the respondents have rightly applied modalities/methodology as defined in the policy as wrongly alleged.
- M. That the contents of Para 5(M) of the reply are false, denied and the contents of para 5(M) of the appeal are reiterated to be correct and reaffirmed. The respondents have wrongly applied red category to the appellant's STP unit.

- N. That the contents of Para 5(N) of the reply are false, denied and the contents of para 5(N) of the appeal are reiterated to be correct and reaffirmed.
- O. That the contents of Para 5(O) of the reply are false, denied and the contents of para 5(O) of the appeal are reiterated to be correct and reaffirmed.
- P. That the contents of Para 5(P) of the reply are false, denied and the contents of para 5(P) of the appeal are reiterated to be correct and reaffirmed. It is false and denied that the show cause notice dated 12.09.2022 was delivered to the appellant as wrongly alleged. As stated above appellants email ID was defunct and was not in use and same was also brought to the knowledge of the respondents.
- Q. That the contents of Para 5(Q) of the reply are false, denied and the contents of para 5(Q) of the appeal are reiterated to be correct and reaffirmed. Contents of said paragraphs are false and denied.
- R. That the contents of Para 5(R) of the reply are false, denied and the contents of para 5(R) of the appeal are reiterated to be correct and reaffirmed. As stated that

at the time of collection of sample, the appellant's STP was damaged due heavy rain floods and the same was communicated to the officer of the respondent.

- S. That the contents of Para 5(S) of the reply are false, denied and the contents of para 5(S) of the appeal are reiterated to be correct and reaffirmed. As stated that at the time of collection of sample, the appellant's STP was damaged due heavy rain floods and the same was communicated to the officer of the respondent.

It is false and denied that the present appeal be dismissed as wrongly alleged.

PRAYER

It is therefore, most respectfully prayed that in the above mentioned facts and circumstances, the Hon'ble Tribunal may graciously be pleased reject the reply and grant relief as per prayers made in the appeal.

FILED BY:


SUMIT GEHLOT & T.S. THAKRAON
(ADVOCATES FOR APPELLANT)
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NEW DELHI – 110017
PH.: 011 -40523688, 011-41323888

E-MAIL: delhi@fidelegal.com

NEW DELHI

DATED: 04.10.2025

VERIFICATION

I, Amar Gupta S/o. Late Shri Pyare Lal Gupta, R/o. D-1103, BPTP Freedom Park Life, Sector-57, Gurugram - 122003, aged about 60 years, do hereby verify that the contents of above mentioned rejoinder are correct to my knowledge and believed to be true and that I have not suppressed and material fact.

DEPONENT



BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI**APPEAL NO. 2 OF 2025****IN THE MATTER OF:**

Freedom Park Life AOA ...Appellant

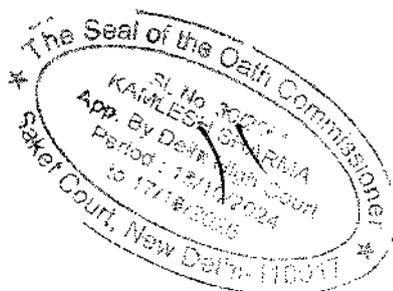
Versus

Haryana State Pollution Control Board & Anr. ...Respondents

AFFIDAVIT

I, Amar Gupta S/o. Late Shri Pyare Lal Gupta, R/o. D-1103, BPTP Freedom Park Life, Sector-57, Gurugram - 122003, aged about 60 years, do hereby solemnly affirm and declare as under:

1. I am secretary (Authorized Representative) of appellant society and am well conversant with the facts and circumstances of the present case and competent to swear this affidavit for and on behalf of the appellant society.
2. That the contents of the accompanying rejoinder to counter affidavit are true and correct to my knowledge. The contents of the same may kindly be read as part of this affidavit as the same are not repeated herein for the sake of brevity.

DEPONENT



FARELABS

FOOD ANALYSIS & RESEARCH LABORATORY

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TEST REPORT

Issued to: RIK ENVIRO SERVICES LLP

Sampling Location: Freedom Park

Sector-57, Gurgaon

J.O. No.: FL/W/03092023-215

ULR Code: TC5605 20 2 00010139 F

Report Date: 20/01/2023

Sample Receipt Date: 16/01/2023

Account Manager: Vartika Khandelwal

Credit Manager: Gulab/Septesh

Sample Particulars:

Nature of the Sample & No. of Sample

Sample Quantity & Packaging

Test Started on

Test Completed

Method of Sampling

Date of Sampling

Sample Collected by

: STP Outlet Water (One Sample)

: 1 Litre X3, Pet Bottle

: 16/01/2023

: 20/01/2023

: FL/SOP/B/D-1

: 16/01/2023

: Mr. Monu Dagar (FARELABS Representative)

Analysis Report

Physical Description: Light yellow colour water contains suspended solids

S. No.	Parameter	Test Result	Specification as per CPCB* Guidelines for STPs* (Inland for Surface Water), 2017	Protocol
1	pH Value	7.50	6.5 - 9.0	IS-3025 (P-11)
2	Total Suspended Solids, mg/L	10.5	50	IS-3025 (P-17)
3	Chemical Oxygen Demand, mg/L	54	250	IS-3025 (P-58)
4	Biochemical Oxygen Demand at 27°C for 3 days mg/L	9	20	IS-3025 (P-44)
5	Oil & Grease, mg/L	1	5	IS-3025 (P-39)

#STP= Sewage Treatment Plants

ND= Not Detected; LOQ= Limit of Quantification

*CPCB= Central Pollution Control Board

Reference: The tested sample of water conforms to CPCB Guidelines for STPs (Inland for Surface Water), 2017, w.r.t. above tests.

Testing Section

Prepared By
Pushpa Sharma

Checked By
Satish Kumar Singh

(AUTHORISED SIGNATURE)
D Mathur, Director

Page 1 of 1

NOTE: The laboratory accepts the responsibility for content of report. The results contained in this test report related only to the sample tested. Test report shall not be reproduced except in full, without written approval of the laboratory. This report is intended only for your guidance and not for legal purpose or for advertisement. Samples will be destroyed after 15 days from the date of issue of test certificate unless otherwise specified. Any complaints about this report should be communicated in writing within 7 days of issue of this report. Total liability of FARELABS Pvt. Ltd. is limited to invoiced amount only.

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ISO 13001:2004



OHSAS 18001:2007



ISO/IEC 27001:2013



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Test Report

Quality Standard	Parameters as desired
Issued to	- Freedom Park Life AOA, Plot A, Sector 57, Gurgaon
Kind attn.	- Mr.
Analysis no.	- 23062314
Nature of Sample	- Waste Water Sample marked STP Outlet
Sample received on	- 23 rd June 2023
Report Date	- 28 th June 2023
Analysis Dates	- 23 rd June 2023 to 28 th June 2023
Sample Receipt	- By Customer
Sample Packing	- Pet Bottle
Sampling Method	- Grab Sampling

	PARAMETER	UNITS	RESULTS	TEST METHOD	LIMIT		
					INLAND SURFACE	PUBLIC SEWER	LAND FOR IRR
General	Color	Hazen	15	IS 3025 PART 4	N.S	N.S	N.S
	Odor	Unit Less	Mild	IS 3025 PART 5	N.S	N.S	N.S
Organics	Chemical Oxygen Demand	mg/l	31.9	IS 3025 PART 58	250	-	-
	BOD for 03 days at 27°C	mg/l	10	IS 3025 PART 44	30	350	100
Physical	pH	Unit Less	8.04	IS 3025 PART 11	5.5-9.0	5.5-9.0	5.5-9.0
	Total Suspended Solids	mg/l	5.4	IS 3025 PART 17	100	600	200
	Total Dissolved Solids	mg/l	527	IS 3025 PART 16	2100	2100	2100
Chemical	Oil & Grease	mg/l	0.30	IS 3025 PART 39	10	20	10

Remarks: The no. of parameters tested is 08 only. The report is issued subject to the terms & conditions as mentioned over leaf.

Chemist	Authorized Signatory
---------	----------------------

Reviewed by Sign: *[Signature]*
Designation: Quality Analyst

Issued by Sign: *[Signature]*
Name: Dillip Thakur
Designation: Technical Manager



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.
Office : 302, Vardhman Charva Plaza-5, Plot No. 20, K² Block Commercial Centre, Preeti Park New Delhi-110038
Exclusive representatives in South Asia for Grean Seal, Inc., 1004, Connecticut Avenue, NW, Suite, 327, Washington, DC, USA
Exclusive representatives in India for Sone Aqua, Høerlingshagen No. 7340, OPPDAL, Norway
Exclusive representatives in India for Fornko Technical Council and Certification Ltd., Izmir, Turkey for CE Marking

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FARELABS

FOOD ANALYSIS & RESEARCH LABORATORY

TESTING, CALIBRATION, PROFICIENCY TESTING & TRAINING SERVICES

FARE LABS Private Limited
 L-171, 1st Floor, Market Chowk, Gurgaon
 Gurgaon-122002, Haryana, INDIA
 Phone : +91 124 4233213/14/15/16/17
 Fax : +91 124 4934016/17/18/19/20
 Email : farelabs@farelabs.com
 Website : www.farelabs.com

TEST REPORT

Issued to: RK ENVIRO SERVICES LLP
Sampling Location: Freedom Park
 Sector-57, Gurgaon

J.O. No.: FL/W/03062024-269
 ULR Code: TC5605 20 2 00010161 F
 Report Date: 20/09/2024
 Sample Receipt Date: 16/09/2024
 Account Manager: Vartika Khandelwal
 Credit Manager: Gulab/Septesh

Sample Particulars:

Nature of the Sample & No. of Sample : **STP Outlet Water (One Sample)**
 Sample Quantity & Packaging : **1 Litre X3, Pet Bottle**
 Test Started on : **16/09/2024**
 Test Completed : **20/09/2024**
 Method of Sampling : **FL/SOP/B/D-1**
 Date of Sampling : **16/09/2024**
 Sample Collected by : **Mr. Monu Dagar (FARELABS Representative)**

Analysis Report

Physical Description: Light yellow colour water contains suspended solids

S. No.	Parameter	Test Result	Specification as per CPCB* Guidelines for STPs* (Inland for Surface Water), 2017	Protocol
1	pH Value	7.50	6.5 - 9.0	IS-3025 (P-11)
2	Total Suspended Solids, mg/L	11.50	50	IS-3025 (P-17)
3	Chemical Oxygen Demand, mg/L	53	250	IS-3025 (P-58)
4	Biochemical Oxygen Demand at 27°C for 3 days mg/L	9	20	IS-3025(P-44)
5	Oil & Grease, mg/L	2.58	5	IS-3025(P-39)

#STP= Sewage Treatment Plants
 ND= Not Detected; LOQ= Limit of Quantification
 *CPCB= Central Pollution Control Board

Inference: The tested sample of water conforms to CPCB Guidelines for STPs (Inland for Surface Water), 2017; w.r.t. above tests.

Testing Section: *[Signature]* Prepared By: *[Signature]* Checked By: *[Signature]* Page 1 of 3
 Pushpa Sharma Satish Kumar Singh (AUTHORISED SIGNATORY) D Mathur, Director

NOTE: The laboratory accepts the responsibility for content of report. The results contained in this test report referred only to the sample tested. The report shall not be reproduced except in full, without written approval of the laboratory. This report is intended only for your guidance and not for any purpose or for advertisement. Samples will be destroyed after 15 days from the date of issue of test certificate unless otherwise specified. Any queries about this report should be communicated in writing within 7 days of issue of this report. Total liability at FARELABS Pvt. Ltd. is limited to the amount only.
 If you have any complaint/feedback regarding the sample collection/testing/test report, please send an email at feedback@farelabs.com and call at +91.9312664533.



FARELABS

FOOD ANALYSIS & RESEARCH LABORATORY

TESTING, CALIBRATION, PROFICIENCY TESTING & TRAINING SERVICES

FARE LABS Private Limited

L-17/3, DLF Phase-II, IFFCO Chowk, M.G. Road,
Gurgaon-122002, Haryana, INDIA

Phone : +91-124 4223207-08 4034205

Fax : +91 124 4036032, Cell : +91 93126 64533

E-mail : farelabs@farelabs.com

Website : www.fare-labs.com

TEST REPORT

Issued to: RK ENVIRO SERVICES LLP

Sampling Location: Freedom park
SECTOR-57, Gurgaon

Sample Particulars:

Nature of the Sample & No. of Sample
Sample Quantity & Packaging
Test Started on
Test Completed
Method of Sampling
Date of Sampling
Sample Collected by

: **STP Outlet Water (One Sample)**
: 1 LitreX3, Pet Bottle
: 30/12/2024
: 04/01/2025
: FL/SOP/B/D-1
: 30/12/2024
: Mr. Monu Dagar (FARELABS Representative)

J.O. No.: FL/W/16082024-305

ULR Code: TC5503 20 2 00010195 F

Report Date: 04/01/2025

Sample Receipt Date: 30/12/2024

Account Manager: Vartika Khandelwal

Credit Manager: Gulab/Septesh

Analysis Report

Physical Description: Light yellow colour water contains suspended solids

S. No.	Parameter	Test Result	Specification as per CPCB* Guidelines for STP	Protocol
1	pH Value	7	5.5 - 9.0	IS-3025 (P-11)
2	Total Suspended Solids, mg/L	9.20	20	IS-3025 (P-17)
3	Chemical Oxygen Demand, mg/L	40	50	IS-3025 (P-58)
4	Biochemical Oxygen Demand at 27°C for 3 days mg/L	7	10	IS-3025(P-44)
5	Oil & Grease, mg/L	2	5	IS-3025(P-39)

#STP= Sewage Treatment Plants

ND= Not Detected; LOQ= Limit of Quantification

*CPCB= Central Pollution Control Board

Inference: The tested sample of water conforms to CPCB Guidelines for STP

Testing Section

Prepared By
Pushpa Sharma

Checked By
Satish Kumar Singh

Page 1 of 1

(AUTHORISED SIGNATORY)
D Mathur, Director

NOTE: The laboratory accepts the responsibility for content of report. The results contained in this test report related only to the sample tested. The report shall not be reproduced except in full, without written approval of the laboratory. This report is intended only for your guidance and not for any purpose or for advertisement. Samples will be destroyed after 15 days from the date of issue of test certificate unless otherwise specified. Any complaints about this report should be communicated in writing within 7 days of issue of this report. Total liability of FARELABS Pvt. Ltd. is limited to invoiced amount only.

If you have any complaint/feedback regarding the sample collection/testing/test report, please send an email at feedback@farelabs.com and call at +91 9312664533.

IAS-ANZ



ISO 9001:2015

ISO 14001:2004

OHSAS 18001:2007

ISO/IEC 27001:2013

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Test Report

Quality Standard	Parameters as desired
Issued to -	BPTP Freedom Park Life, Sector 51, Gurgaon
Kind attn. -	Mr.
Analysis no. -	25020703
Nature of Sample -	Waste Water marked STP Treated
Sample received on -	7 th February 2025
Report Date -	12 th February 2025
Analysis Dates -	7 th February 2025 to 12 th February 2025
Sample Receipt -	Picked by Lab
Sample Packing -	Pet Bottle
Sampling Method -	Grab Sampling

	PARAMETER	UNITS	RESULTS	TEST METHOD	LIMIT		
					INLAND SURFACE	PUBLIC SEWER	LAND FOR IRRIGATION
General	Color	Hazen	10	IS 3025 PART 4	N.S	N.S	N.S
	Odor	Unit Less	Mild	IS 3025 PART 5	N.S	N.S	N.S
Organics	Chemical Oxygen Demand	mg/l	24	IS 3025 PART 58	250	--	--
	BOD for 03 days at 27*c	mg/l	8.3	IS 3025 PART 44	30	350	100
Physical	pH	Unit Less	8.46	IS 3025 PART 11	5.5-9.0	5.5-9.0	5.5-9.0
	Total Suspended Solids	mg/l	16	IS 3025 PART 17	100	600	200
Chemical	Oil & Grease	mg/l	0.10	IS 3025 PART 39	10	20	10

Remarks: The no. of parameters tested is 07 only. The report is issued subject to the terms & conditions as mentioned over leaf.

Chemist

Authorized Signatory

Reviewed by Sign : 
Designation : Quality Analyst

Issued by Sign : 
Designation : Technical Manager



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.

Office : 382, Vardhman Charve Plaza-5, Plot No. 20, KP Block Commercial Centre, Pitam Pura, New Delhi-110038

Exclusive representatives in South Asia for Green Seal, Inc., 1001, Connecticut Avenue, NW, Suite, 827, Washington, DC, USA

Exclusive representatives in India for Sens Aqua, Naeringshagen No. 7340, OPPDAL, Norway

Exclusive representatives in India for Femko Technical Control and Certification Ltd., Izmir, Turkey for CE Marking

PURCHASE ORDER

Buyer's To: FREEDOM PARK LIFE AOA BPTP, Sec-57, Gurugram, Haryana. GSTIN/UIN: 06AAAF0548H2V State Name: Haryana, Code: 06 PAN: AAFAF0548J E-Mail: fm.admin.office@gmail.com		Vendor No: PO-1		Date: 25-Nov-22		
Supplier: AMARJEET IT-134, B, new path, vihar, Sec-108 near arya samaj mandir, Gurugram, Gurgaon, Haryana, 122001. GSTIN/UIN: 06DXQPM1851P1ZP State Name: Haryana, Code: 06		Supplier's Ref Order No: (PO-1)		Vendor Terms of Payment: Payment after work completion		
		Description of work: STP Tank Cleaning		Other Reference(s): BPTP, Freedom Park Life, Sec-57, Gurugram(HR)		
		Terms & Conditions: <ol style="list-style-type: none"> 1. Payment will be done after work completion. 2. Safety of vendor team working for STP tank cleaning will be supervised by vendor. 3. Providing of oxygen support, safety belts, life insurance risk all will be under vendor scope. 4. Any kind of involvement of police, Govt. authorities etc. will be handled by vendor only, FPL AOA/RWA will not be responsible for any mishap. 5. Any kind of debris removal work will be under vendor scope. 6. On requirement water for tank cleaning and electricity connections can be provided from our side. 				
Sl No.	Description of work	Due on	Quantity	Rate	per	Amount
1	STP TANK Cleaning Works - 700 KL	19-Nov-22	01 JOB	12000.00	QTY	120000.00
			GST Input			21500.00
			Total	1 QTY		₹ 141500.00
Amount Chargeable (in words): INR One Lakh Fifty Four thousand Seven Hundred Rupees Only		For Freedom Park Life Apartments Owner Association Remarks: For Cleaning of STP Tanks Through AMARJEET. Company's PAN: DXQPM1851P				

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5/22/22 12:07 PM

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AMARJEET

9212208102

Centre for Environmental Biotechnology, STP Water & Waste Treatment
Sector 29, Gurgaon (Haryana)

Ref. No.

Dated 22/5/22

BPTP Freedom park Stp

Sec-57

STP all tank cleaning charge -

Water removed charge per m³ =

1,30,000

800 on
account

Note: When need of water and electricity

company given us

1. Payment term = half work half payment

full work full payment

2. 18% GST extra

Thankyou

NOTE:- Work completion time. Rate
-x- will be 7 days from date of
work order released.

9212208802

AMARJEET

Ceptic Tank Cleaner, Mobile Toilet, STF Water & Water Tank Supplier
Gurugram(Haryana)

Ref. No.

Dated: 25.11.2022

BPTP Freedom Park Life Sec- 57

STP all tank cleaning charge -	1,30,000/-
Water removed Chargepership-	800 on actual if required

Note:- When need of water and electricity

Company give us

Payment term: half work half payment

Full work full payment

& 18% GST extra

Thank You

NOTE: Work competition time will be 7 days from date of work order
released

S.D-

PURPOSE OF EXPENSE

Note: One line summary of the expense for which the approval is being sought.

Purchase Order for STP Tank Cleaning work
(SHARED EXPENSES AOA & RWA)

EST. AMOUNT and TYPE OF EXPENSE

Note: Opex or Capex

- OPEX, Rs 1,41,600/-

BUDGETED or UNBUDGETED

Note: Was this amount a part of the budget

BUDGETED

FINANCIAL YEAR

Note: Which financial year accounts will this impact

- 2022-23

JUSTIFICATION OR REQUIREMENT

Note: Elaborate on the rationale and detail all necessary information for which this expense needs to be approved

- Purchase Order for STP Tank (700KL) cleaning work for making STP functional and commissioning of STP plant

RISKS (IF ANY) IN CASE THE EXPENSE IS NOT INCURRED

Note: Outline all risks if this expense is not incurred

- STP will not be functional and treatment of sewage plant not be accomplished

WORK AWARDED TO

Note: Name of vendor

- AMARJEET

HAS A SIMILAR APPROVAL BEEN PROVIDED IN THE PAST 12 MONTHS

Note: Detail if a similar approval was given in the past 12 months. If yes, what is the reason for this recurrence?

- Yes

KEY REQUIREMENTS (to be enclosed):

- Detailed backup of calculations - Yes
- Detailed quote from vendor(s) - yes
- Attach 3 vendor quotes in case of third party intervention - yes

APPROVAL FOR EXPENSE: AOA & RWA

Date: 26.11.2022

Name: Kuldeep Goswami

Signature:

MC Decision: Approved/ Not Approved

PRESIDENT AOA:

SECRETARY AOA:

SECRETARY RWA:

Time lev. for Jb to be maintenance < penalty.



Freedom Park Life Apartment Owners Association

Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana -122011

Email: fpl.adm.office@gmail.com Landline No. 0124-4211683.

Registration Number: HR018202102703 (Registered with the Sub-Registrar Gurgaon)
Registered under "Haryana Registration and Regulation of Societies Act 2012"

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To,

May, 07th 2024

The Regional Officer

Regional Office, Gurugram North

Haryana State Pollution Control Board

Vikas Sadan, Opposite - New Court, Gurugram

hspcbrogrn@gmail.com

Kind Attn.: Mr. Kuldeep Singh- Regional Officer Gurugram North

Sub: - Reply Show Cause Notice Ref. I/133157/2022, File No. HSPCB - 260001/63/2021- Region Gurugram North - HSPCB for closure prosecution action under section 41/33/44/45A & 33-A of water (prevention and control of pollution) Act, 1974 for violation of section 24/25/26 of water (prevention and control of pollution) Act, 1974 & under section 37/38/39 & 31-A of Air (Prevention & control of Pollution) Act, 1981 for violation of Section 21/22 Air (prevention & Control of Pollution) Act, 1981 and levy of Environmental Compensation as per policy order dated 29.04.2019, 20.12.2019 & 22.12.2021

Dear Sir,

This has reference to the show cause notice referred above dated 12/09/2022 regarding environmental compensation against M/S FPL AOA received during month of March'24 to us through your good office (Regional Office, Gurugram (N), HSPCB, Vikas Sadan, Opposite - New Court Gurugram). In this regard we would like to inform you that we have not received any letter / communication in the subjected matter earlier through any official communication channel from HSPCB. We have communicated to your goodself via emails as well as verbally during our meeting on 23-04-2024 in Panchkula and 24-04-2024 in Gurugram.

On March, 18th 2024 we received a copy of this Show cause notice on 9311751007 via what's app from Mr. Neeraj Rajput from HSPCB gurugram office and we have accordingly responded to yourselves and also presented ourselves for a personal hearing at your good offices in Panchkula on 23-04-2024.



Freedom Park Life Apartment Owners Association

Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana -122011

Email: fp.l.adm.office@gmail.com Landline No. 0124-4211683.

Registration Number: HR018202102703 (Registered with the Sub-Registrar Gurgaon)
Registered under "Haryana Registration and Regulation of Societies Act 2012"

We would like to state that when the sampling or testing was carried out at M/S freedom Park Life AOA by the HSPCB department, our one blower of the STP had failed because of which just one parameter was slightly off range. As per the submission the BOD value was 42 mg/l, whereas the limit was 30 mg/l. All other parameters were within range, as per the prescribed limits of HSPCB.

Pertinent to mention here that having understood the seriousness of the matter, the FPLAOA management has duly taken resolute action to resolve any anomalies in our STP system. The following is the action taken from our side to ensure compliance to the norms as proposed by the HSPCB, applicable to our STP as well. It maybe noted that we only use the STP processed water for agricultural purposes (watering the plants in the FPL Complex) and for no other purpose.

1. Appointed a professional company M/s RK ENVIRO SERVICES LLP. In Feb-2023 for carrying out Operations and Maintenance of the STP Plant and the vendor in continuation managing and handling the STP plant at FPL Site. Vendor carrying out regular monitoring of the complete system to ensure compliance.
2. Replacement of the faulty equipment (e.g Blower, Re-circulation pumps, MCG & ACF filter media, Diffusers inside aeration tank & filter press system)
3. Carry out OEM recommended system modification(s) to increase the residence time of the slurry - installation of buffer/hopper system inside of sludge holding tank for improvement in MLSS to further improve performance
4. Complete overhauling of STP plant being done during Dec-22 & Jan-23 - Cleaning of all STP tanks through professional vendor, Repairs & servicing of STP plant inside fixed all motor pumps and electrical panel being carried out.

In view of the above positive action taken to address the anomaly in our STP as identified by the HSPCB, we humbly submit to you the details (work order/PO copies) of work carried out in STP plant for ensuring compliances.



Freedom Park Life Apartment Owners Association

Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana -122011

Email: fpj.adm.office@gmail.com Landline No. 0124-4211683.

Registration Number: HR01B202102703 (Registered with the Sub-Registrar Gurgaon)

Registered under "Haryana Registration and Regulation of Societies Act 2012"

We request to consider our concern and let us go through the complete case for requesting re-visit through your good office for re-sampling of the sample fail for providing us the clearance for smoother STP operations in our society and further for the CTO which is due for renewal in September 2024. We ensure that we will maintain the desired/prescribed parameters within range as per compliances of hon'ble Haryana Pollution Control Board (HSPCB).

As advised by your goodself during our meeting on 24-04-2024, we are touch with Mr. Sunil co-ordinating with him to do the needful for carrying out fresh sampling.

Subsequently we have not only repaired the blower, we have also carried complete re-commissioning of our plant, so we would request you to collect the samples again and this time we assure you that the parameters will be within range.

Please note, as per the HSPCB advice, keeping in view the discharge norms, we will use the treated water only for agriculture purposes.

Authorized Signatory


Freedom Park Life AOA

Amar Gupta
Secretary FPLAOA
M. No. 9582737777

CC: Mr. Yogesh Yadav
Superintendent (WC)
Member Secretary
hspcbwatercell@gmail.com

6/21/24, 11:12 AM

Gmail - Reply HSPCB 12.09.2022 Show Cause Notice - Freedom Park Life



FPL ESTATE MANAGER <fpl.estatemanager.plota@gmail.com>

Reply HSPCB 12.09.2022 Show Cause Notice - Freedom Park Life

1 message

FPL ESTATE MANAGER <fpl.estatemanager.plota@gmail.com>

Wed, May 8, 2024 at 11:36 AM

To: hspcbrogrn@gmail.com

Cc: hspcbwatercell@gmail.com, FPLAOA President <fpl.aoa.president@gmail.com>, FPLAOA Secretary <fpl.aoa.secretary@gmail.com>, FPLRWA Secretary <fpl.rwa.secretary@gmail.com>, FPLRWA Treasurer <fpl.rwa.treasurer@gmail.com>, Jitender Yadav <jitender.yadav@nimbusharbor.com>, FPL ADMIN <fpl.adm.office@gmail.com>

To,

The Regional Officer

Regional Office, Gurugram North
Haryana State Pollution Control Board
Vikas Sadan, Opposite – New Court, Gurugram
hspcbrogrn@gmail.com

Kind Attn.: Mr. Kuldeep Singh- Regional Officer Gurugram North

Sub: - Reply Show Cause Notice Ref. I/133157/2022, File No. HSPCB – 260001/63/2021- Region Gurugram North – HSPCB for closure prosecution action under section 41/33/44/45A & 33-A of water (prevention and control of pollution) Act, 1974 for violation of section 24/25/26 of water (prevention and control of pollution) Act, 1974 & under section 37/38/39 & 31-A of Air (Prevention & control of Pollution) Act, 1981 for violation of Section 21/22 Air (prevention & Control of Pollution) Act, 1981 and levy of Environmental Compensation as per policy order dated 29.04.2019, 20.12.2019 & 22.12.2021

Dear Sir,

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On March, 18th 2024 we received a copy of this Show cause notice on 9311751007 via what's app from Mr. Neeraj Rajput from HSPCB gurugram office and we have accordingly responded to yourselves and also presented ourselves for a personal hearing at your good offices in Panchkula on 23-04-2024.

6/21/24, 11:12 AM

Gmail - Reply HSPCB 12.09.2022 Show Cause Notice - Freedom Park Life

We would like to state that when the sampling or testing was carried out at M/S freedom Park Life AOA by the HSPCB department, our one blower of the STP had failed because of which just one parameter was slightly off range. As per the submission the BOD value was 42 mg/l, whereas the limit was 30 mg/l. All other parameters were within range, as per the prescribed limits of HSPCB.

Pertinent to mention here that having understood the seriousness of the matter, the FPLAOA management has duly taken resolute action to resolve any anomalies in our STP system. The following is the action taken from our side to ensure compliance to the norms as proposed by the HSPCB, applicable to our STP as well. It maybe noted that we only use the STP processed water for agricultural purposes (watering the plants in the FPL Complex) and for no other purpose.

1. Appointed a professional company M/s RK ENVIRO SERVICES LLP. In Feb-2023 for carrying out Operations and Maintenance of the STP Plant and the vendor in continuation managing and handling the STP plant at FPL Site. Vendor carrying out regular monitoring of the complete system to ensure compliance.
2. Replacement of the faulty equipment (e.g Blower, Re-circulation pumps, MCG & ACF filter media, Diffusers inside aeration tank & filter press system)
3. Carry out OEM recommended system modification(s) to increase the residence time of the slurry - installation of buffer/hopper system inside of sludge holding tank for improvement in MLSS to further improve performance
4. Complete overhauling of STP plant being done during Dec-22 & Jan-23 - Cleaning of all STP tanks through professional vendor, Repairs & servicing of STP plant inside fixed all motor pumps and electrical panel being carried out.

Attached herewith are the relevant details of the above mentioned actions taken w.r.t STP plant.

In view of the above positive action taken to address the anomaly in our STP as identified by the HSPCB, we humbly submit to you the details (work order/PO copies) of work carried out in STP plant for ensuring compliances.

We request to consider our concern and let us go through the complete case for requesting re-visit through your good office for re-sampling of the sample fail for providing us the clearance for smoother STP operations in our society and further for the CTO which is due for renewal in September 2024. We ensure that we will maintain the desired/prescribed parameters within range as per compliances of hon'ble Haryana Pollution Control Board (HSPCB).

As advised by your goodself during our meeting on 24-04-2024, we are in touch with Mr. Sunil co-ordinating with him to do the needful for carrying out fresh sampling.

Subsequently we have not only repaired the blower, we have also carried out complete re-commissioning of our plant, so we would request you to collect the samples again and this time we assure you that the parameters will be within range.

Please note, as per the HSPCB advice, keeping in view the discharge norms, we will use the treated water only for agriculture purposes.

Thanks & Regards
Kuldeep Goswami
Estate Manager
Call:9311751007

Site - Freedom Park Life
Sector-57, Gurugram(HR)

CC: Mr. Yogesh Yadav
Superintendent (WC)
Member Secretary
hspcbwatercell@gmail.com

10 attachments

-  Reply HSPCB 12.09.2022 Show Cause Notice - FPL.pdf
3417K
-  Plant Under AMC of vendor RK ENVIRO from FEB - 2023.pdf
1129K
-  HOPPER SYSTEM RE-CIRCULATION PUMP SUCTION LINE (SLVDGING HOLDING TANK).pdf
947K
-  PO & payment - Complete STP Plant Tanks cleaning.pdf
2882K
-  STP PLANT ALL PUMPS & MOTOR PEPAIRING - Nov-22.pdf
3193K
-  EMAIL (fpl.estatemanager@gmail.com)NOT WORKING.pdf
2832K
-  REPAIRS OF RE-CIRCULATION PUMP.pdf
1015K
-  PO & Payment - STP Plant Re-Commissioning and diffusers Replacement - Dec-22 & Jan-23.pdf
1888K
-  Quote & Payments Repair of MGF & ACF Filters and Media Replaced.pdf
3772K
-  Sanrachna Enterprises - Work order Repair of MGF & ACF, Media Replace & Filter Press repair - Sep-22.pdf
2377K

1/15/25, 3:06 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no....



FPL ESTATE MANAGER <fpl.estatemanager.plota@gmail.com>

Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no. I/258815/2024 dated 04/10/2024 and EC Order dated 26 November 2024)

2 messages

FPL ESTATE MANAGER <fpl.estatemanager.plota@gmail.com>

Mon, Dec 23, 2024 at 12:25 PM

To: hspcbrogrn@gmail.com, hspcbwatercell@gmail.com

Cc: FPLAOA President <fpl.aoa.president@gmail.com>, FPLAOA Secretary <fpl.aoa.secretary@gmail.com>, FPLRWA Secretary <fpl.rwa.secretary@gmail.com>, Jitender Yadav <jitender.yadav@nimbusharbor.com>

Bcc: FPL Technical Manager <fpl.technicalmanager@gmail.com>

To

Hon'ble Member Secretary
Haryana State Pollution Control Board,
C-11, Sector -6 Panchkula
hspcbwatercell@gmail.com

Through: Mr. Yogesh Yadav- Superintendent (WC) for Member Secretary

Sub: - Personal hearing regarding environmental Compensation against M/s Freedom Park Life AOA, Freedom Park Life Group Housing Society, Village Samaspur, Sector -57, Gurugram

Your Ref: - **Letter no. I/258815/2024 for hearing dated 04/10/2024 and your EC Order dated 26 November 2024.**

Our Ref: - **Personal hearing attended at HSPCB office, C-11, Sector-6, Panchkula on 09.10.2024**

Dear Sir,

This has reference to the hearing on 09.10.2024 to the reference of letter no I/258815/2024 received on 04.10.2024 through mail regarding environmental compensation against M/s Freedom Park Life AOA. In this regard we would like to inform you that we had attended personal hearing on dated 02-07-2024, 12-09-2024 and 09.10.2024 at your good office in Panchkula **ref. letter no. HSPCB/WC/10212 dated 28.06.2024, I/257453/2024 dated 09.09.2024 and I/258815/2024.** In all the meetings, we met with Member Secretary, IAS, Shri Pardeep Kumar, Chief Engineer Mr. Balraj Ahlawat, Superintendent Engineer Mr. JP Singh and we had explained to all about the Clarification over show cause notice issued in the matter of STP water sample failure and also appraised that the Builder had handed over the complex in 2012 to the RWA and since then we, Freedom Park Life AOA (FPLAOA) are managing the operations in the complex.

In all of these hearings we had requested for resampling & testing of our STP plant water as all the parameters are within the prescribed range as per our latest in house test reports we had carried out. In the previous meeting which was on 09.10.2024 Mr. Balraj Ahlawat strictly address the resampling task to the concerned SDO (Mr. Aparnesh Kaushik) who was also present in the hearing panel. We are very sorry to state that despite several requests we have not been approached so far by the department, to carry

1/15/25, 3:06 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no

out re-sampling of our STP unit. Instead, and to our utter surprise and acute disappointment, a huge penalty has been levied, which we, as a cash-strapped RWA with no profit no loss as it's motive, are not in a position to pay.

Sir, principles of natural justice also recommends that an opportunity should be provided to the unsuspecting alleged defaulter, to rectify their mistake. Unfortunately, we have not been given any such opportunity in this case and our various requests for a fair hearing seems to not have been granted. We request you to please reconsider your order in this light and carry out a fresh evaluation.

Sir, at our end we have already submitted fees of Rs.4500/- (Four Thousand Five Hundred Only) for resampling along with the refundable security of Rs.500000/- (Five Lakhs Only) as directed by Gurgaon HSPCB office on 29.06.2024 (As attached copy).

Meanwhile, we regularly analyze our STP outlet water to ensure compliance to SPCB norms. Attaching the recent lab test report of STP water tested on 19.11.2024. And we are happy to inform you that all parameters are maintained within range as proposed.

You are humbly requested to direct the RO & SDO North, Gurgaon, to carry out the resampling of the STP water.

We would also like to state that the fines have been erroneously imposed on us and request the same to be withdrawn due to the reasons as mentioned below:
Due to factors beyond our control – flooding during August-September 2022 period, our STP had got waterlogged and there was major damage to our STP system (see attached proof of flooding and repairs carried out). We had to carry out a complete revamp of the system, spending nearly 11 lakhs in the process despite not receiving any notice from HSPCB about the results of the sampling. The notice is purported to have been sent to an email i.d. that was not in use at that point in time. And no physical copy of the notice or report was sent to us.

We have filed an appeal before the NGT for consideration (Appeal No. 0701116022432024) for a review of our case.

Our STP system was made fully operational on 1st January 2023. A sampling of the discharge water was carried out on 16/01/2023. The results, as you can see, were within the SPCB recommended parameters (report dated 20/01/2023 enclosed for reference). We have also given the maintenance of the STP to R.K. Enviro, from 01st Feb. 2023. R. K. Enviro specializes in STP O&M.

In light of the above, we request you to kindly issue necessary instructions to:

1. Carry out a re-sampling of our STP discharge water at the earliest
2. And to consider to completely waive-off the imposed penalty of Rs. 1,55,62,500 as it has been imposed due to miscommunication, as explained above.

Should you need any additional information on the above, we shall be happy to provide.

Many thanks for your understanding.

Thanks & Regards

414

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1/15/25, 3:06 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no....

Mandeep Kumar
Estate Manager
M-9311751007

1/15/25, 3:06 PM

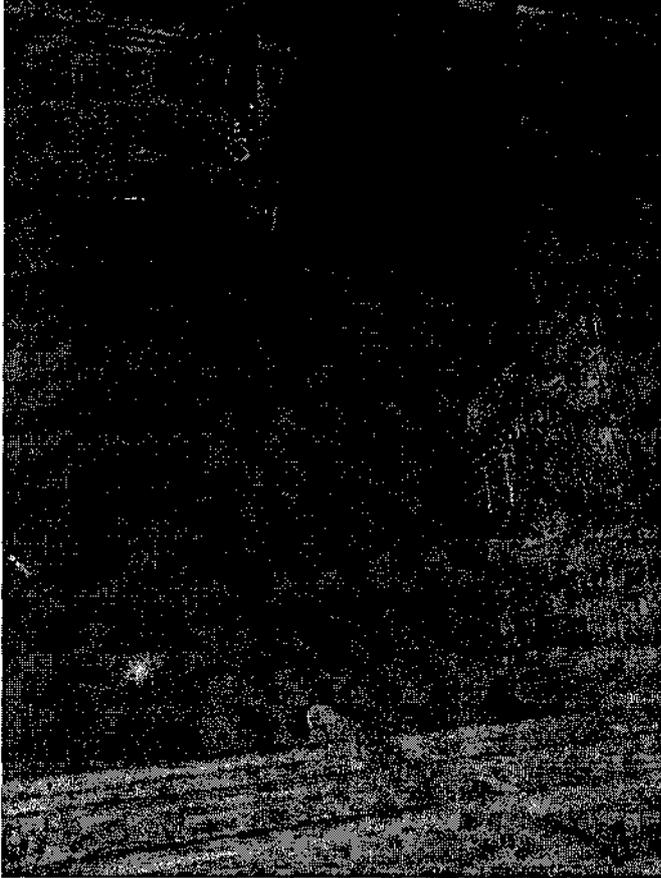
Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no

45



Jan 25, 3:06 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no....)



4 attachments

-  Reply Letter HSPCB.pdf
3111K
-  Work Order RK Enviro For STP.pdf
2698K
-  Freedom Park Water test report Jan 23.pdf
862K
-  STP Plant Repairing Details.pdf
12333K

FPL ESTATE MANAGER <fpl.estatemanager.plota@gmail.com>

Mon, Jan 6, 2025 at 5:03 PM

To: hspcbrogrn@gmail.com, hspcbwatercell@gmail.com

Cc: FPLAOA President <fpl.aoa.president@gmail.com>, FPLAOA Secretary <fpl.aoa.secretary@gmail.com>, FPLRWA Secretary <fpl.rwa.secretary@gmail.com>, Jitender Yadav <jitender.yadav@nimbusharbor.com>

Bcc: FPL Technical Manager <fpl.technical.manager@gmail.com>

To

Hon'ble Member Secretary

Haryana State Pollution Control Board,

C-11, Sector -6 Panchkula

hspcbwatercell@gmail.com

1/15/25, 3:06 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no. 97)

Through: Mr. Yogesh Yadav- Superintendent (WC) for Member Secretary

Sub: - Personal hearing regarding environmental Compensation against M/s Freedom Park Life AOA, Freedom Park Life Group Housing Society, Village Samaspur, Sector -57, Gurugram

Your Ref: - Letter no. I/258815/2024 for hearing dated 04/10/2024 and your EC Order dated 26 November 2024.

Our Ref: - Personal hearing attended at HSPCB office, C-11, Sector-6, Panchkula on 09.10.2024

Dear Sir,

We wish to thank the HSPCB team for collecting the STP water sample on 30.12.2024 from our premises, as was being requested by us. As your team is aware that we also took the sample from the same source and at the same time with the HSPCB inspection team. The Lab representative collected the sample and sent it to the laboratory for carrying out due analysis/testing.

We have received the STP water test report on 04.01.2025 and we are happy to state that all the parameters of our STP outlet are well within the limits as recommended by HSPCB. We are happy to share the report for your necessary information and needful please.

Dear Sirs, we have applied for renewal of our CTO on 28.11.2024 and are looking forward for the CTO approval at the earliest possible.

We are sure that our commitment to protecting our environment has once again been demonstrated by the results of the sample analysis.

[Quoted text hidden]

[Quoted text hidden]

4 attachments



WhatsApp image 2024-12-23 at 11.45.36 AM (3).jpeg
46K



WhatsApp Image 2024-12-23 at 11.45.36 AM (2).jpeg
50K

1/15/21 5 PM

Gmail - Reply HSPCB - Personal hearing regarding Environmental compensation against M/s Freedom Park Life AOA (your ref. no....



WhatsApp Image 2024-12-23 at 11.45.36 AM (1).jpeg
97K



FREEDOM PARK WATER TEST REPORTS DEC-24.pdf
424K



HARYANA STATE POLLUTION CONTROL BOARD

Gurgaon North Vikas Sadan, 1st Floor, Near DC Court, Gurgaon Ph.0124-2332775 Email:-

hspcbrogrn@gmail.com

E-mail: hspcb@hry.nic.in

No. HSPCB/Consent/: 329962325GUNOCTO86702178

Dated: 04/03/2025

To:

M/s. Freedom Park Life AOA

FREEDOM PARK LIFE GROUP HOUSING VILL SAMASPUR SECTOR 57

GURGAON

Subject: Grant of consent to operate to M/s Freedom Park Life AOA.

Please refer to your application no. 86702178 received on dated 2024-11-28 in regional office Gurgaon North. With reference to your above application for consent to operate, M/s Freedom Park Life AOA is hereby granted consent as per following specification/Terms and conditions.

Consent Under	BOTH
Period of consent	05/02/2025 - 05/08/2025
Industry Type	Building and Construction projects having waste water generation more than 100 KLD in respective of their built-up area.
Category	RED
Investment(In Lakh)	14300.0
Total Land Area(Sq. meter)	56162.68
Total Builtup Area(Sq. meter)	98750.0
Quantity of effluent	
1. Trade	0.0 KL/Day
2. Domestic	555.0 KL/Day
Number of outlets	1.0
Mode of discharge	
1. Domestic	Recycling/Reuse
2. Trade	
Domestic Effluent Parameters	
1. BOD	10 mg/l
2. COD	50 mg/l
3. TSS	20 mg/l
4. pH	5.5-9.0
5. Total Nitrogen	10 mg/l
6. Fecal coliform (MPN/100ML)	Less than 100
7. Total Phosphorus	1 mg/l

Trade Effluent Parameters	
1. NA	
Number of stacks	1
Height of stack	
1. Stack to DG sets 1010 KVA x 3	6 METER
Emission parameters	
1. NA	
Product Details	
1. NA	Metric Tonnes/day
Capacity of boiler	
1. NA	Ton/hr
Type of Furnace	
1. NA	
Type of Fuel	
1. Diesel	0.25 KL/day
Raw Material Details	
NA	Metric Tonnes/Day

HARYANA STATE

Regional Officer, Gurgaon North
Haryana State Pollution Control Board.

Terms and conditions

- The applicants shall maintain good house-keeping both within factory and in the premises. All hose pipelines valves, storage tanks etc. shall be leak proof. In plant allowable pollutants levels, if specified by State Board should be met strictly.
- The applicant/company shall comply with and carry out directive/orders issued by the Board in this consent order at all subsequent times without negligence of his/its part. The applicant/company shall be liable for such legal action against him as per provision of the law/act in case of violation of any order/directives. Issued at any time and/or non compliance of the terms and conditions of his consent order.
- The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
- Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
- If due to any technological improvement or otherwise this Board is of opinion that all or any of the conditions referred to above required variation (including the change of any control equipment either in whole or in part) this Board shall after giving the applicant an opportunity of being heard vary all or such condition and there upon the applicant shall be bound to comply with the conditions so varied.
- The industry shall provide adequate arrangement for fighting the accidental leakages, discharge of any pollutants gas/liquids from the vessels, mechanical equipment etc. which are likely to cause environment pollution.
- The industry shall comply noise pollution (Regulation and control) Rules, 2000.

8. The industry shall comply all the direction/Rules/Instructions as may be issued by the MOEF/CPCB/HSPCB from time to time.
9. The industry shall ensure that various characteristics of the effluents remain within the tolerance limits as specified in EPA Standard and as amended from time to time and at no time the concentration of any characteristics should exceed these limits for discharge.
10. The industry would immediately submit the revised application to the Board in the event of any change in the raw material in process, mode of treatment/discharge of effluent. In case of change of process at any stage during the consent period, the industry shall submit fresh consent application along with the consent to operate fee, if found due, which may be on any account and that shall be paid by the industry and the industry would immediately submit the consent application to the Board in the event of any change during the year in the raw material, quantity, quality of the effluent, mode of discharge, treatment facilities etc.
11. The officer/official of the Board shall reserve the right to access for the inspection of the industry in connection with the various process and the treatment facilities. The consent to operate is subject to review by the Board at any time.
12. Permissible limits for any pollutants mentioned in the consent to operate order should not exceed the concentration permitted in the effluent by the Board.
13. The industry shall pay the balance fee, in case it is found due from the industry at any time later on.
14. If the industry fails to adhere to any of the conditions of this consent to operate order, the consent to operate so granted shall automatically lapse.
15. If the industry is closed temporarily at its own, they shall inform the Board and obtain permission before restart of the unit.
16. The industry shall comply all the Directions/ Rules/Instructions issued from time to time by the Board.
17. Industry should adopt water conservation measures to ensure minimum consumption of water in their process. Ground water based proposals of new industries should get clearance from Central Ground Water Authority (CGWA)/ Haryana Water Resources (Conservation, Regulation and Management) Authority (HWRA) for scientific development of precious resource.
18. The industrial/non industrial sector projects shall develop green belt (as applicable) in its premises including periphery, entry and exit, as per notifications/conditions of EC/directions of MOEF/CPCB/SPCB/NGT/ any court of law. In case of stone crushers, hot mix plants, mineral grinding units, screening plants and brick kilns etc., the unit shall develop adequate green belt and erect barrier/barricade/boundary wall as applicable, as per notifications/directions of MOEF/CPCB/SPCB/NGT/ any court of law.
19. The unit shall develop paved or hard surfaced approach road to the site of unit (including the storage site, if it is at different place) from the nearest public road for transportation of raw material/final product.

Specific Conditions :

1. The Board may launch prosecution under the provisions of the Water Act, 1974/Environmental (Protection) Act, 1986 against the Project proponent for violation of provisions of the said Acts. In such cases where consent to operate is refused on the ground of failure of effluent samples or operating the project without Environment Clearance, as required under EIA notification dated 14.09.2006 or any other reasons and further, environment

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compensation may be imposed as per the methodology formulated by the CPCB and approved by the Hon'ble National Green Tribunal. 2. In case the performance of STP of the project is found adequate for 01 year and all the treated waste water samples of sewage treatment plant collected in a year are found within the norms, the Board may consider to grant consent to operate under the provisions of the Water Act, 1974 on yearly basis or as per the policy of HSPCB. 3. The provisional consent to operate (CTO) so granted shall be without prejudice to the action taken for past violations and CTO so granted will have no effect on prosecution action or any other penal action taken or to be taken by the Board against such projects. 4. The Project Proponent shall continue to operate its primary effluent treatment units to reduce pollution load in the disposal system and environment, during the period. 5. The project proponent shall upgrade/remove deficiencies in various components of sewage treatment plant and other activities within 04 months and report may be submitted to the Board. 6. The Board shall monitor the performance of STP of the project and check its all compliances within 01 month. 7. In case the performance of STP of the project is found adequate and analysis results of the treated sewage are within the norms, the Board may extend its further consent to operate for 01 year and further check the performance of sewage treatment plant on quarterly basis. 8. During the first 06 months, in case the project proponent fails to achieve the prescribed standards and the performance of STP is found inadequate and fails to comply with other environment compliances, additional prosecution under the provision of Water Act, 1974 shall be launched along with imposition of additional amount of environmental compensation on the project proponent. 9. The projects established/setup without environment clearance as required under EIA notification dated 14.9.2006 may not be allowed to make any further expansion in the existing project and also may not be given any further license /approval by the competent authority to construct any new such project/activity in the State and he may be delicensed from the said activities. 10. Unit will submit STP upgradation plan to within one month. 11. Unit will run and maintain it's APCM regularly and properly, will provide separate energy meter on their STP/APCM and maintain the Log Book for energy consumption of ETP/APCM and chemicals used daily for the STP. 12. That the unit shall comply with all the Norms and Rules as prescribed in the Act. 13. That the unit will comply directions of CAQM w.r.t DG sets. 14. That the unit will provide interlocking arrangement of DG set (complying with CAQM's direction) with STP/APCM and shall have separate D.G. set (complying with CAQM directions) to ensure regular and effective running of pollution control devices. 15. That the unit will not discharge any untreated effluent inside and outside its premises. 16. Unit will provide separate flow meter at Inlet/ Outlet of STP for which separate log book will be maintained if required. 17. That the unit will not add any air polluting process/ machinery and also not to add any process which increases the water pollution load. 18. That the CTO so granted shall become invalid in case of violation of any of the above / any law of the land.

NIRMAL
KUMAR
Regional Officer, Gurgaon North
Haryana State Pollution Control Board.

Digitally signed by NIRMAL
KUMAR
Date: 2025.07.09 16:29:58
+05'30'



**PREVENT
POLLUTION**

FORM J
(See Rule.36)

Report No.:-2012
Dated - January 07, 2025

I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 31st day of December, 2024 from Sh. Aparnesh Kumar, Sc-'B', a sample of liquid domestic effluent of M/s Freedom Park Life AOA Samaspur, Sec-57, Gurgaon, collected on 30.12.2024 from the Inlet & Outlet of STP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 31/12/2024 to 07/01/2025 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of STP	of	Outlet of STP	of	Prescribed Limits	Test Method
1.	pH Value at 25°C	7.12		7.31		----	APHA 4500 H ⁺ B (24 th Edition 2023)
2.	Conductivity µS/cm at 25°C	1890		1165		----	APHA 2510 B (24 th Edition 2023)
3.	Total Suspended Solids mg/l	185		14		20	APHA 2540 - D (24 th Edition 2023)
4.	B.O.D.(3 Days at 27° C) mg/l	90		8.2		10	IS 3025 (Part 44) 2023
5.	Chemical Oxygen Demand mg/l	355.6		46.6		50	APHA 5220-B (24 th Edition 2023)
6.	Oil & Grease mg/l	10.2		BDL* (DL**=4)		----	APHA 5520-B (24 th Edition 2023)

BDL* = Below Detection Limit

DL** = Detection Limit

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

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

Signed this on 07th day of January, 2025

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

Narender Hooda
Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Gurgaon North / M/s Freedom Park Life AOA Samaspur, Sec-57, Gurgaon.

Endst. No. HSPCB/LAB/F/2025/ 9872

Dated: 7-1-25

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



**PREVENT
POLLUTION**

FORM J
(See Rule 36)

Report No.:-2012
Dated - January 07, 2025

I, hereby, certify that I Narender Hooda as Board Analyst, duly appointed under sub section (3) of section 53 of Water (Prevention and control of Pollution) Act, 1974(6 of 1974) received on the 31st day of December, 2024 from Sh. Aparnesh Kumar, Sc-'B', a sample of liquid domestic effluent of M/s Freedom Park Life AOA Samaspur, Sec-57, Gurgaon, collected on 30.12.2024 from the Inlet & Outlet of STP for analysis. The Sample was in a condition fit for analysis reported below:-

I further certify that I have analyzed the afore-mentioned sample on 31/12/2024 to 07/01/2025 and declare the result of analysis to be as follow:-

Sr. No.	Parameter	Inlet of STP	Outlet of STP	Prescribed Limits	Test Method
1.	Colour	Blackish	Almost Colorless	-----	-----
2.	Odour	Bad	Odourless	-----	-----

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

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

Signed this on **07th day of January, 2025**

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

Narender Hooda
Board Analyst

To

The Member Secretary, HSPCB, Panchkula/ Regional Office, HSPCB, Gurgaon North / M/s Freedom Park Life AOA Samaspur, Sec-57, Gurgaon.

Endst. No. HSPCB/LAB/F/2025/ 9872

Dated: 7-1-25.

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



Haryana State Pollution Control Board
Gurgaon North Vikas Sadan, 1st Floor, Near DC Court, Gurgaon
Ph.0124-2332775 Email:- hspcbrogrn@gmail.com



No. R25GUNOCTOA/WSCN102969555

DT. 12/05/2025

To

M/s Freedom Park Life AOA
FREEDOM PARK LIFE GROUP HOUSING VILL SAMASPUR SECTOR 57
GURGAON
GURGAON
GURGAON NORTH

Sub: Show cause notice for refusal of consent to operate under Section 25/26 of Water Act, 1974, Section 21/22 of Air Act, 1981.

Please refer to your application dated 2025-05-07 received in the Board for consent to operate under Air (Prevention & Control of Pollution) Act, 1981 and Water Act, 1974.

Your application has been examined by the Board and it has been observed that the application submitted by you is incomplete and not conforming to the requirement of the provisions of the Air (Prevention & Control of Pollution) Act, 1981 and Water (Prevention & Control of Pollution) Act, 1974 as per policy of the Board.

Accordingly, Show Cause Notice for refusal of consent under above said Acts is issued to reply or take corrective measures for the deficiencies and incompleteness in your application as per details given below:-

1. A. Unit has not submitted:- 1. Online application for renewal of CTO on prescribed Performa (Annexure-XI). 2. Deposit of required and applicable consent fee (as per schedule available on the web-site www.hspcb.gov.in). 3. Latest copy of balance sheet duly attested by CA or CA certificate w.r.t. capital investment cost of the unit for the preceding year. (Capital investment cost should include the original cost of land, building, plant & machinery without depreciation but with upto date additions. The cost of land and building should be included in the capital investment cost even if it is on lease or rent or mortgage). 4. Latest inspection report and analysis reports of effluent/ air emissions/ noise conducted by Board officer (s) for the mandatory inspection, if conducted. 5. In case of industries/projects/establishments handling Hazardous Chemicals having threshold quantities mentioned in schedule II and III of MSIHC, Rules, 1989 and covered under rule 10 & 13 of these Rules, proof of submission of updated safety audit report duly audited with the help of an expert, annually and up to date onsite emergency plan alongwith report of the mock drill

of the same to Chief Inspector of Factories alongwith copy of the same, (Required as per instructions of MOEF & CC issued vide letter No. 14-7(382)/2010-HSMD dated 09.03.2016). 6. Detail of land in case the effluent is discharged on land for percolation or for irrigation along with copy of registered agreement made with the land owners in case the land belong to the persons other then the land of the applicant unit (in case not submitted earlier). 7. Conditional CTO for two times has already been granted to the unit and unit continues to operate without depositing the amount of Environmental compensation of Rs. 15562500/- imposed vide Head office letter No. I/261159/2024 dated 25.11.2024. Moreover, there is no policy provision for granting conditional CTOs on multiple occasions in such cases.

General Deficiencies :

In case, you fail to submit reply or submit compliance of the deficiencies within 7 days, the consent to operate under Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 shall be refused due to the above deficiencies/ incompleteness in your application.

HARYANA STATE

**** Note:-**

1. Reply of SCN submitted to concerned RO offices shall only be considered and in case unit submitted their reply to other offices of the Board, the same is not liable for consideration on any legal forum.
2. Representatives of the units may also come in person at the concerned Regional office to represent against the proposed action communicated through show cause notice, within the stipulated time period mentioned in show cause notice.

**Regional Officer, Gurgaon North
For Haryana State Pollution Control Board**

Freedom Park Life Apartment Owners Association

Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana -122011

Email: freedomparklife@gmail.com Landline No: 0124-4211683

Registration Number: HR018202102703(Registered with the Sub-Registrar Gurgaon)

Registered under "Haryana Registration and Regulation of Societies Act 2012"

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May, 15th 2025

To

The Regional Officer

Regional Office, Gurgaon North

Haryana State Pollution Control Board

Vikas Sadan, Opposite - New Court, Gurgaon

Haryana State Pollution Control Board

Kind Attn.: Mrs. Akansha Tanwar, Regional Officer, Gurgaon North**Sub: - Covering Letter - Reply & submission of documents for CTO renewal for Freedom Park Life AOA, Ref. No.102969555 dated 07.05.2025**

Dear Sir/Madam,

This is in reference to the show cause notice referred above dated 12.05.2025 against the CTO renewal application ref. no. 102969555 filed online by Freedom Park Life AOA on dated 07.05.2025. Please find below attached annexures for your reference.

1. Online Application for renewal of CTO on prescribed Performa (Annexure-XI) -Please find the attachment as Annexure-I
2. Deposit of required and applicable consent fee-Please find the attachment as Annexure-II
3. Latest copy of balance sheet duly attested by CA-Please find the attachment as Annexure-III
4. Latest inspection report and analysis report of effluent/air emissions/noise and water report-Please find the attachment as Annexure-IV
5. Emergency response plan for site-Please find the attachment as Annexure-V
6. Details of land in case the effluent is discharged on land-Not Applicable

Freedom Park Life Apartment Owners Association

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Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana-122011

Email: freedomparklife@gmail.com Landline No. 0124-4211683.

Registration Number: HR016202102703 (Registered with the Sub-Registrar Gurgaon)

Registered under "Haryana Registration and Regulation of Societies Act 2012"

7. Environmental compensation- We would like to clarify that M/s Freedom Park Life AOA has never applied for a provisional Consent to Operate (CTO). In all our applications, including the current one, we have consistently applied for a CTO valid for three years and have duly submitted the corresponding three-year renewal fee.

Regarding the environmental compensation, we wish to bring to your attention that the matter is currently sub-judice, being decided before the Hon'ble National Green Tribunal (NGT). Besides, the issue of Environmental Compensation is entirely unrelated to the CTO renewal process.

In light of the above, we kindly request you not to hold the CTO for this account and respectfully urge you to waive this objection.

We would also request you to issue the CTO for the remaining period of two years, and not in a piecemeal basis as is currently being done, at the earliest convenient.

Authorized Signatory



Freedom Park Life AOA

Secretary FPLAOA

M. No. 9582737777

CC: Mr. Aprnesh Kaushik

Superintendent (WC)

Member Secretary

freedomparklife@gmail.com

Format of the application for auto renewal of the consent to operate under Water Act, 1974 / Air Act, 1981.

To

The Member Secretary,
Haryana State Pollution Control Board,
C-11, Sector 6, Panchkula.

Sub: Application for auto-renewal of the consent to operate for the period 06.08.2025 to 30.09.2027 under Water Act, 1974 / Air Act, 1981.

Sir,

It is submitted that we had been granted the consent to operate under Water Act, 1974 / Air Act, 1981 upto 05.08.2025 by the Board vide letter No. HSPCB/Consent/ : **329962325GUNOCTO86702178 dt. 04.03.2025** respectively. Now we are submitting our application for auto renewal of the consent to operate under Water Act, 1974 / Air Act, 1981 for the period **06.08.2025 to 30.09.2027**, along with the prescribed consent fees for the same and with the following declaration and undertaking as per policy of your Board :-

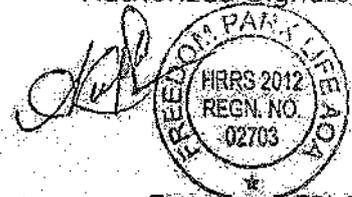
1. That we have valid consent to operate under Water Act, 1974 / Air Act, 1981 upto **05.08.2025** issued by HSPCB vide above referred letters, copies of which are enclosed herewith.
2. That the present details of the manufacturing process and other informations /data of our unit are same as submitted / provided by the Board earlier with original application for obtaining previous Consent to operate referred above and therefore the same may be considered for present application for renewal of consent to operate for further period w.e.f. **01.10.2021 to 30.09.2024**.
3. That the capital investment cost on land, building, plant and machinery of our industry/ project without charging depreciation and with upto date additions as on 07.05.2025 is Rs. 143.20 Crore and the consent fees has been deposited according to the said capital investment cost of our unit. We undertake to deposit the balance consent fees if any found due at any stage due to increase in the investment cost on Land, Building, Plant and Machinery of our unit at any later stage.
4. That we are complying with the conditions of previous consent to operate granted to our unit by the Board valid upto 05.08.2025 and also complying with all the standards / norms prescribed under EP Rules, 1986 for discharge of environmental pollutants, by operating our pollution control devices regularly and effectively.
5. That there will be no change in the raw material, process, products, quantity of effluent, source of air emissions, technology of pollution control measures

- and increase in production or pollution load and will remain same as submitted in the previous application for consent to operate.
6. That we shall keep on operating and maintaining our pollution control measures / devices regularly and effectively and will maintain and keep all the parameters within standards / norms prescribed under EP Rules, 1986.
 7. That we are submitting herewith the copy of the latest inspection report and analysis report of effluent/ air emissions/ noise conducted by the Board's officers on 15/05/2025 along with copy of fresh analysis reports dated 24/04/2025 of effluent/ air emissions/ noise analyzed from Board's laboratory/ recognized laboratory, showing the compliance of prescribed standards.
 8. We undertake to comply with all the conditions of renewal of consent to operate to be imposed by the Board if any.
 9. That we shall comply with all the relevant provisions of water Act, 1974 and Air Act, 1981.
 10. We undertake that auto renewal of consent to operate will not prevent the Board for taking coercive action against us if our unit fails to comply with the prescribed standards or conditions of consent granted during auto renewal of the same.
 11. The undertaking has the approval of the Board of Directors/ Partner/Owner of the industry/project and copy of the resolution of the Board/ Power of Attorney is attached herewith.

It is therefore requested that the consent to operate under Water Act, 1974/ Air Act, 1981 may kindly be renewed further for another period w.e.f. 06.08.2025 to 30.09.2027

Dated: 06.08.2025

Authorized Signatory



Secretary FPLAOA

M.No. 9582737777/9311751007

Email- fpl.aoa.secretary@gmail.com

fpl.estatemanagerplota@gmail.com

Receipts No.	645178084
Depositor Name	Mr Amar Gupta
Bank Name	NA
Bank Id.	1060
Application No.	71335434
Name and Address of Industry	Freedom Park Life AOA, FREEDOM PARK LIFE GROUP HOUSING VILL SAMASPUR SECTOR 57 GURGAON, Gurugram, GURGAON NORTH
Name of Regional Office	Gurgaon North
Applied For	CTO - both - new
Payment Date	2024-06-26 12:34:54.706
Payment Details	
CTO Both (Rs.)	5.0
Total Amount Paid (Rs.)	450000.00
Transaction Status	Successfully Completed
Receipt No.	639418168
Depositor Name	Mr Amar Gupta
Bank Name	NA
Bank Id.	1170
Application No.	71335434
Name and Address of Industry	Freedom Park Life AOA, FREEDOM PARK LIFE GROUP HOUSING VILL SAMASPUR SECTOR 57 GURGAON, Gurugram, GURGAON NORTH
Name of Regional Office	Gurgaon North
Applied For	CTO - both - new
Payment Date	2024-06-23 20:57:27.652
Payment Details	
CTO Both (Rs.)	5.0
Total Amount Paid (Rs.)	5.0
Transaction Status	Successfully Completed

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R.K Mahindru & Co.

Chartered Accountants

Mobile: 9780489316

HO: 401-B, Lord Krishna Apartments
Sector 43, Gurgaon-122002, Haryana

Auditor's Report

To the members of Freedom Park Life Apartment Owners Association (Regd.)

Gurgaon

Report on the Financial Statements

We have audited the accompanying financial statements of Freedom Park Life Apartment Owners Association (Regd.) ("the Association") which comprises of the balance sheet, Receipts and Payments Accounts and the Income and Expenditure Accounts for the year ended 31st March 2024.

Managements responsibility for the Financial Statements:

Management is responsible for the preparation of these financial statements that give true and fair view of the financial position and financial performance of the Association.

Further we report that:-

- (a) We have obtained all the information and explanations, which to the best of our knowledge and belief were necessary for the purpose of our audit.
- (b) In our opinion, proper books of accounts as required have been kept by the association so far as appears from our examination of these books.
- (c) The Balance Sheet, the Income and Expenditure Accounts and the Receipts and Payments Accounts dealt with by this report are in agreement with the books of account.
- (d) In our opinion, the Balance Sheet and the Income and Expenditure Accounts are prepared on accrual basis.
- (e) In our opinion and to the best of our information and according to the explanations given to us, the said accounts give a true & fair view:-
 - I. In the case of the Balance Sheet, of the state of affairs of the association as at 31.03.2024
 - II. In the case of the Income and Expenditure Account, of the excess of income over expenditure for the year ended on that date; and
 - III. In the case of Receipts and Payments Account, of the cash flows for the year ended on that date.

Place: Gurgaon
Date: 21.09.2024
UDIN:24080152BKMFXP2725

For R.K. MAHINDRU & CO.
Chartered Accountants


 CA RAMAN MAHINDRU
 Proprietor
 M.No.080152

Background

The association has been formed to operate & maintain common facilities including club etc. of the building name Tower A, D, E, F, G, H & Tower J of Freedom Park Life situated at Sector-57, Gurgaon.

Accounting Policies

Basis of Accounting

The Financial Statements have been prepared under the Historical Cost Convention, in accordance with the generally Accepted Accounting Policies under the Double entry system of Accounting.

Unless otherwise stated here under, the Financial Accounts are drawn on Accrual Basis.

Treatments of Fixed Assets & Depreciation

Assets acquired are valued at Historical Cost including all Direct Costs (i.e. purchase price, transportation expenses, installation charges & other expenses incurred for bringing the Fixed Assets in working Condition), incurred prior to its use.

Depreciation has been charged as per the rates given in the Income Tax Act 1961.

The members have carried out physical verification of Association's fixed assets, as informed to us no discrepancies were noticed on such verification.

Treatment of interest earned in the bank account and fixed deposits accounts

Interest earned on funds kept in the saving bank and fixed deposits accounts maintained by the association is accounted on accrual basis.

Notes to accounts

- a) During the year, the association has received Rs. 5,83,24,402/- & in previous year Rs. 6,06,31,222/- from members and same was not subject to tax based on doctrine of mutuality.
- b) During the year association has received Rs. 2,10,052/- from members as Mutation Charges.
- c) List of pending legal cases as on 31.03.2024 attached herewith as List A

- d) During the year, the association has received Rs. 40,000/-. Therefore, the closing balance under FRPP deposits as on 31.03.2024 is negative balance of Rs. 11,52,083/-
- e) Unbilled Revenue Income include shared cost of INR 0/- which is billed in next financial year and expense against which booked during the year.
- f) The Monthly GST returns are subject to reconciliation in GSTR-9C and will be rectified in the annual GSTR-9C return to be filed. Impact of same if any on the books of accounts will be taken in FY 2024-25.
- g) Previous year's figures regrouped/recast wherever necessary to confirm to current year's classification/presentation.

For R.K. MAHENDRU & CO.
Chartered Accountants
CA RAMAN MAHENDRU
Proprietor
M.No.080152

Place: Gurgaon
Date: 21.09.2024
DIN:24080152BKMFXP2725

Freedom Park Life Apartment Owners Association (Regd)
Balance Sheet as on 31st March 2024
(All amounts in Rupees)

Liabilities	As on 31st March 2024	As on 31st March 2023	Assets	As on 31st March 2024	As on 31st March 2023
Opening Balance	4,90,67,729	4,67,23,360	Fixed Assets (As per Annexure attached)	19,10,035	20,52,327
Add: More Funds raised	-	11,800	Current Assets (Cash and Advances)	4,41,45,964	4,07,97,862
Less: Income Tax of Previous Entities	6,15,922	-	Receivables from members	1,32,366	83,163
Add: Excess of Income over expenditure (Carried from Income & expenditure account)	57,55,008	43,21,369	Prepaid Tax Refundable	-	6,56,975
	5,42,07,795	4,90,62,739	Prepaid expenses	2,95,789	2,09,198
Contributions received for FRR Deposits Received during the year	(11,92,083)	(11,92,083)	Income Tax	5,00,000	-
Add: Additions during the year	80,000	-	Security Deposit	3,00,000	5,00,000
Less: Payment to Vendor	(11,62,083)	(11,92,083)	Cash and bank balances	-	-
	5,20,45,712	4,78,70,656	Bank balances:-	52,50,869	1,73,65,809
Contingency & Large Projects Corpus Deposits & FRR Opening Balance	78,21,673	78,21,673	Balance with Axis bank	1,40,680	3,86,015
Add: Additions during the year	-	-	Balance with HDFC bank	22,381	22,381
Less: Adjusted with Capital Fund	-	-	Balance with Pwntm	28,759	55,573
	78,21,673	78,21,673	Cash in Hand	1,37,59,576	-
Current Liabilities and Provisions:			Balance with Fixed Deposits	-	-
Suppliers creditors	49,72,079	50,75,271			
TDS payable	83,547	1,70,249			
Expenses payable	8,97,317	11,87,158			
	59,53,943	63,32,678			
Total	6,02,89,655	6,20,19,992	Total	6,62,86,398	6,20,19,862

As per our report attached

for R.K. MAHINDRA & CO.
Chartered Accountants
Member No. 000124
CA RAVI ANAND
Proprietor
Place: Gurgaon
Date: 21.09.2024
UDIN: 24090152SKMPX2725

For Freedom Park Life Apartment Owners Association (Regd.)

Sanjay Gupta
President

[Signature]
Secretary

[Signature]
Treasurer

Place: Gurgaon
Date: 21.09.2024

Freedom Park Life Apartment Owners Association
Income & Expenditure Account for the year ending 31st March 2024

Expenditure	For the year Ending 31st March 2024	For the year Ending 31st March 2023	Income	For the year Ending 31st March 2024	For the year Ending 31st March 2023
Property Management Service	1,62,47,605	1,61,25,858	Collection from Members		
Electricity Expenses	2,84,75,774	3,04,06,247	Common Area Maintenance	2,21,20,680	2,29,41,530
Cultural programmes	1,93,368	2,44,438	Electricity	2,83,81,768	3,04,88,756
Insurance expenses	3,35,302	2,07,525	Make AMC Charges	3,60,089	5,01,852
Office Expenses/housekeeping	8,83,779	7,59,368	Cheque bounce charges	1,500	
Printing & Stationary expenses	73,813	1,56,705	Shifting charges	2,65,000	2,80,076
Accounting charges	8,47,000	8,40,000	Legal fees		38,644
Electrical, Plumbing & Other Consumables	16,22,669	22,87,188	DG Charges	7,17,518	19,20,987
Audit fee	25,000	25,000	Driver receipts	5,80,790	5,94,739
Bank Charges	2,343	8,115	Retrospective Cost from AWA	19,39,398	17,73,884
Civil & Repair Work	4,34,868	1,54,128	Interest On Delay Payments	39,57,673	5,43,775
Conveyance expenses	35,470	97,398	Fire-Fighting Charges		13,60,000
Fire Fighting Expenses	1,82,025	69,624	Reversal of F&E Project Expense		1,86,482
Fees & Taxes (Licence fees)		71,261		5,81,24,402	6,06,21,222
Repairs and maintenance	20,86,308	22,86,447			
Pest control and fumigation	1,29,250	3,33,398	Collection from Non Members:-		
Legal and Professional charges	2,55,000	2,91,178	Rent collections	91,102	
Other charges	3,68,315	5,35,507	Club and yoga services charges	16,889	85,129
Telephone expenses	16,486	56,809	Commissions from sale wastage & scrap	1,80,256	68,562
AMC Charges	18,00,277	19,69,589	Notice Board charges		12,000
CFO & Pollution Control Board Expenses	1,53,188	1,53,148	Others	6,02,806	6,78,495
Depreciation	3,18,065	3,16,660			
GST Input Reversal	10,177			9,11,103	8,24,186
Sewage & Water Treatment Plant Expenses	21,000	54,775			
Swimming pool expenses	2,58,969	1,55,894	Interest Income		
Reversal of Interest Income due to Pre Mature		3,90,755	Interest on FD	8,35,532	
Income Tax of Previous year (FY 2022-23)	4,72,067		Interest from Bank	7,18,053	3,85,803
Inspection Fee	20,850		Insurance Claim Received		5,60,996
Meter Charges	71,560			10,53,587	9,46,859
			Other Indirect Income		
			Credit for W/Off		10,044
Excess of income over Expenditure			Discount received	55,875	22,541
(trfd to capital fund)	57,56,029	49,21,369	Round Off (other)		8
				55,875	32,993
Total	6,03,44,963	6,24,25,260	Total	6,03,44,963	6,24,25,260

As per our report attached

for Freedom Park Life Apartment Owners Association (Regd.)

for R.K. MAHINDRU & CO.
Chartered Accountants

Membership No. 880180

CA. RAVAN MAHINDRU

Proprietor

Place: Gurgaon

Dated: 21.09.2024

UDIN: 24080152BKMEXP2725

Sangay Gupta

President

Shilpa

Secretary

Usharona

Treasurer

Place: Gurgaon
Dated: 21.09.2024

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Freedom Park Life Apartment Owners Association (Reg.)
 Receipts & Payment Account for the year ending 31 March 2024
 (All amounts in Rupees)

Receipts	For the year Ending 31st March 2024	For the year Ending 31st March 2023	Payments	For the year Ending 31st March 2024	For the year Ending 31st March 2023
Opening Balance			General Expenses		2,09,20,690
Cash in hand	56,573	42,161	Office Expenses	1,03,011	2,44,438
Bank Balance	1,72,74,174	21,87,540	Office Expenses/Housekeeping	66,769	92,706
	1,78,30,747	22,29,701	Pay with HDFC Bank	1,30,00,000	
Receipt from Members			Telephone Exp.	16,486	
Membership fees	1,201	11,500	Printing Stationery Exp.		15,570
Maintenance Charges	2,10,052	1,08,475	Contribution		35,023
Club booking charges			Bank Charges		8,130
Marketing charges	2,66,000	2,90,076	Civil work and painting work	5,740	60,711
Other receipts	1,72,832	1,68,424	Repair and maintenance	97,158	2,18,758
Receipt - CDD			Other amenities	2,87,128	2,17,865
GST, Electricity, Interest	5,23,02,638	5,82,49,816	Travelling exp.	90,731	41,169
			GST Paid		7,80,001
Receipt from Non-Members			Tax Deducted At Source Paid	5,47,192	5,03,691
Apex board charges		10,000	Payments to creditors	5,47,74,592	3,25,09,527
Collections from safe wastage & scrap	1,80,296	98,896	GST receivable	4,71,073	61,100
Club and yoga services charges	36,899	59,129	Std TV	3,000	
Other Receipts	2,68,418	7,52,911	Closing Balance		
Other Receipts			Cash in hand	28,259	56,573
Interest from Saving bank	2,16,053	3,65,668	Bank balances	59,13,870	1,77,74,174
Proceeds from HDFC FDR including interest		1,33,15,447		59,42,629	1,78,30,747
Received from Freedom Park Life RWA	27,26,853	25,63,767			
Insurance claim received		5,80,998			
Deception fund	30,000				
GST	1,31,392				
Total	7,54,06,039	7,95,75,157	Total	7,54,06,039	7,95,75,157

As per our report attached
 for P.K. Maiti Chartered Accountant
 Membership No. 200152
 Partner
 Place: Guwahati
 Date: 21.03.2024
 PIN: 781004

for Freedom Park Life Apartment Owners Association (Regd.)
 Sany Gupta
 President
 Secretary
 Treasurer
 Place: Guwahati
 Date: 21.03.2024

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Freedom Park Life Apartment Owners Association
 Schedule of Depreciation for the year ending 31st March 2024

Particulars	Rate of Depreciation	WDV as on 01.03.2023	Additions upto 01.10.2023	Additions after 01.10.2023	Deletion	Total as on 31.03.2024	Depreciation	WDV as on 31.03.2024
Computer	40	21,970	-	26,272	-	48,242	16,022	34,169
Furniture & Fixture	10	6,72,987	-	13,038	-	6,84,005	67,259	6,16,155
Office Equipments	15	13,26,023	1,02,425	35,558	-	14,46,006	2,15,434	12,28,572
Plant & Machinery	40	31,398	20,500	-	-	51,898	20,755	31,143
Total		28,52,377	1,22,925	57,868	-	22,28,100	3,18,055	19,10,035

Receivable from Members

Particulars	As on 31.03.2024	As on 31.03.2023
CAM Receivables	3,51,10,074	3,31,28,038
Electricity Receivables	80,87,694	62,47,629
Sinking Fund Receivables	11,41,509	11,41,509
Receipt from Debtors	(2,97,792)	(3,97,792)
Local Pvt Ltd	(18,470)	(19,470)
RWA Shared Cost	1,04,593	5,97,312
ABBIE IT MART PVT LTD	(642)	(642)
Total	6,41,45,564	4,07,97,582

CLFC

Particulars	As on 31.03.2024	As on 31.03.2023
Sinking Fund		
Opening	67,79,472	67,79,472
Add: Addition	-	-
Less: Payment	67,79,472	67,79,472
TMS		
Opening	10,42,201	10,42,201
Add: Addition	-	-
Less: Payment	10,42,201	10,42,201
Total	78,21,673	78,21,673



For Freedom Park Life Apartment Owners Association (Regd)

Sachin Gupta
 President

Deep
 Secretary

Abhishek
 Treasurer

Place: Gurgaon
 Dated: 21.03.2024

List of Sundry creditors as on year ended

Particulars	As on 31.03.2024	As on 31.03.2023
Agsm Advisory	1,85,677	1,26,000
Anil Traders	45,424	85,050
Aquabrim Home Appliance Pvt. Ltd.	97,440	89,320
Azad Trading Company	38,124	1,19,655
Bhim	7,425	14,770
Blue Syndicate Solutions Llp	1,997	11,996
Desibasket Office Supplies	43,305	-
Dhbyn	12,51,659	48,993
D-Tech Solutions	1,44,140	1,33,094
Gurgaon Waste Management System Pvt Ltd	60,478	69,600
Haryana State Pollution Control Board	(76,923)	(2,30,071)
Haryana Urban Development Authority	1,50,318	1,16,348
Kanishka Pest Control Services	13,455	11,700
Lakmi Sanitary Hardware	13,770	-
Mapple Infocom Pvt Ltd	(881)	35,381
Nimbus Harbor Facilities Management Pvt Ltd	27,27,287	27,17,743
Pinky General Store	14,773	-
Rk Enviro Services Llp	2,06,202	1,37,460
Shvam Electric Company	34,309	-
Suraj Electrical	14,100	12,592
Alpha Corp Management Services Pvt. Ltd.	-	8,14,879
Green Visions Enterprises	-	19,352
Himalayan Pumps & Wells Engg	-	75,399
H.K. Fouji	-	13,546
Millennium Fuel Pvt. Ltd.	-	1,76,840
PAL SVAM POWER SOLUTIONS PVT. LTD.	-	2,31,132
Rachna Devi	-	8,660
Sarvachna Enterprises	-	94,459
SARITA CHOUDHARY	-	24,646
SHREE KRISHAN TRADERS	-	16,727
Grand Total	49,72,079	50,25,271



for Freedom Park Life Apartment Owners Association (Regd.)

Sanjay Gupta
President

Devi
Secretary

Utkarsh
Treasurer

Place: Gurgaon

Dated: 21.09.2024

FREEDOM PARK LIFE LEGAL AYE CASES DETAIL WITH CURRENT STATUS

No.	Case Title	Case No.	Paragon	Agent	Client	Lawyer	Case Status	Last Meeting/Update	Next Meeting	Attachment Copy
1	REDEMPTION OF THE ESTATE OF THE LATE MR. JAMES W. WILSON	CPA 02/2017	Monmouth State Bank	Mr. K. Williams	One Ridgeview Avenue, Camden, NJ	Mr. Williams	Open	02/21/2017 - Agreement signed	03/01/2017	Attachment Copy
2	REDEMPTION OF THE ESTATE OF THE LATE MR. JAMES W. WILSON	CPA 02/2017	Monmouth State Bank	Mr. K. Williams	One Ridgeview Avenue, Camden, NJ	Mr. Williams	Open	02/21/2017 - Agreement signed	03/01/2017	Attachment Copy
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12	REDEMPTION OF THE ESTATE OF THE LATE MR. JAMES W. WILSON	CPA 02/2017	Monmouth State Bank	Mr. K. Williams	One Ridgeview Avenue, Camden, NJ	Mr. Williams	Open	02/21/2017 - Agreement signed	03/01/2017	Attachment Copy



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279, Sector-57, Udyog Vihar, Phase-II,
Gurgaon - 122 001 (Haryana) India.
Lab Tel: 0122-4384380 /
24x7 Customer Care : 9212436415
9810098791
Visit us at : www.qualityanalyst.net
E-mail : support@qualityanalyst.net

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23 Years of Analytical Experience

Test Report

Quality Standard	Parameters as desired
Issued to	- BPTP Freedom Park Life, Sector 57, Gurgaon
Kind Attn.	- Mr.
Analysis no.	- 25042419
Nature of Sample	- Noise Monitoring DG 1010 KVA
Sampling Done on	- 24 th April 2025
Sampling by	- Noise Meter
LOCATION	RESULTS (dB)
A1- Reading 1	74.8
A2- Reading 2	75.1
A3- Reading 3	75.3
A4- Reading 4	73.9
Average Insertion Loss	25.3
Remarks: The no. of points tested are 05 only. The limits for Noise as per Factory act is 90dB. The report is issued subject to the terms & conditions as mentioned overleaf.	
Date: 29 th April 2025	Manager-Quality Control

Reviewed by Sign
Quality Analyst



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.
Office : 382, Vardaan Chakra Plaza-5 Plot No. 20, KP Block Commercial Centre, Pitam Pura, New Delhi-110032
Exclusive representatives in South Asia for Green Seal, Inc., 1601, Connecticut Avenue, NW, Suite, 617, Washington, DC, USA
Exclusive representatives in India for Sens Avisa, Nævingshagen No. 7340, DPPDAL, Norway
Exclusive representatives in India for Ferma Technical Control and Certification Ltd., Izmir, Turkey for CE Marking

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QUALITY LAB

Environmental & Industrial Analysis

270, Sector-57, Lityog Vihar, Phase-6,
Gurgaon - 122 001 (NCR) India
Lab Tel: 0124-4104305-1
24x7 Customer Care : 91124430006
9810098791
Visit us at: www.qualityanalyst.net
E-mail: support@qualityanalyst.net

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ISO 14001:2015 Certified
CIN: U87105DL100397C121383
27 Years of Analytical Expertise

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Test Report

Quality Standard	Parameters as desired
Issued to	BPTP Freedom Park Life, Sector 57, Gurgaon
Kind Attn.	Mr.
Analysis no.	25042418
Nature of Sample	Ambient Air - Near Fountain, Behind Tower C
Sample Received on	24 th April 2025
Sampling By	Ambient Air Sampler
Sampling Method	BIS/APHA

	PARAMETER	RESULT	LIMIT
Physical (microgram/m ³)	Particulate Matter PM10	53.9	100
	Particulate matter PM2.5	38	60
Chemical	Benzo Pyrine ng/m ³	N.D	1.0
	Ozone as O ₃ microg/m ³	32.7	100
	Benzene as C ₆ H ₆ microg/m ³	N.D	5.0
	Arsenic as As ng/m ³	N.D	6.0
	Nickel as Ni ng/m ³	N.D	20
	Sulphur dioxide microg/m ³	40.6	80
	Oxides of Nitrogen microg/m ³	31.4	80
	Lead as Pb microg/m ³	N.D	1.0
	Carbon Monoxide as CO	0.18	2.0
Ammonia as NH ₃	20.3	400	

Remarks: The no. of parameters tested are 12 only. N.D. signifies not detectable. The report is issued subject to the terms & Conditions as mentioned overleaf.

Date: 30th April 2025

Manager-Quality Control

Reviewed by: 
 Authorisation: Quality Analyst



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.

Office : 352, Vardhman Charve Plaza-6, Plot No. 20, KP Block Commercial Centre, Pitam Pura, New Delhi-110005

Exclusive representatives in South Asia for Green Seal, Inc., 1001 Connecticut Avenue, NW, Suite 827, Washington DC USA

Exclusive representatives in India for Sans Aqua, Hærringshaugen No. 7340, OPPDAL, Norway

Exclusive representatives in India for Fenike Technical Control and Certification Ltd., Izmir, Turkey for CE Marking

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QUALITY LAB

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9516098797
Visit us at : www.qualityanalyst.net
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Test Report

Quality Standard		Stack Emissions as per IS 5182
Issued to	-	BPTP Freedom Park Life, Sector 57, Gurgaon
Kind Attn.	-	Mr.
Analysis no.	-	25042417
Nature of Sample	-	Stack Emission
Date of sampling	-	24 th April 2025
Sample received on	-	24 th April 2025
Stack Identification	-	Stack Attached to DG Set-1010 KVA
Diameter of Chimney	-	0.20 m
Total Height of Chimney	-	73 m (approx.)
Products Manufactured	-	Housing Society
Report Date	-	29 th April 2025
Stack temperature *C	-	146
Ambient Temperature *C	-	35
Exit velocity of the gas m/sec	-	12.8
PARAMETER	RESULT	Desired
	(mg/Nm3)	(mg/NM3)
Particulate Matter (at 15% O2)	36.9	50
Nitrogen oxides as NOX (at 15%O2)	213	650
Carbon Monoxide as CO (at 15% O2)	28.4	100
Remarks: The fugitive emissions were found to be nil. The report is issued subject to the terms & Conditions as mentioned overleaf.		
Chemist		Manager Quality Control

Reviewed by Sign: _____
Designation: Quality Analyst



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.
Office : 382, Vardhman Charge Plaza-3, Plot No. 20, KP Block Commercial Centre, Pitam Pura, New Delhi-110048
Exclusive representatives in South Asia for Green Seal, Inc., 4001, Connecticut Avenue, NW, Suite, 027, Washington, DC, USA
Exclusive representatives in India for Swiss Aqua, Naeringsgaten No. 7340, OPPDAL, Norway
Exclusive representatives in India for Fems Technical Control and Certification Ltd., Izmir, Turkey for CE Marking

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QUALITY LAB

Environmental & Analytical Laboratory

27B, Sector-37, Udyog Vihar, Phase-6,
Gurgaon - 122 001 (NCR) India
Lab Tel: 0124-4334380-4
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9910098791
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E-mail: support@qualityanalyst.net

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CIN: U05185DL2003PTC121383
25 Years of Analytical Experience

Test Report

Quality Standard	Parameters as desired
Issued to: -	BPTP Freedom Park Life, Sector 5J, Gurgaon
Kind attn: -	Mr.
Analysis no: -	25042203
Nature of Sample: -	Waste Water marked STP Treated
Sample received on: -	22 nd April 2025
Report Date: -	28 th April 2025
Analysis Dates: -	22 nd April 2025 to 28 th April 2025
Sample Receipt: -	Picked by Lab
Sample Packing: -	Pet Bottle
Sampling Method: -	Grab Sampling

	PARAMETER	UNITS	RESULTS	TEST METHOD	LIMIT		
					INLAND SURFACE	PUBLIC SEWER	LAND FOR IRRIGATION
General	Color	Hazen	10	IS 3025 PART 4	N.S	N.S	N.S
	Odor	Unit Less	Mild	IS 3025 PART 5	N.S	N.S	N.S
Organics	Chemical Oxygen Demand	mg/l	16	IS 3025 PART 58	250	-	-
	BOD for 03 days at 27°C	mg/l	5.2	IS 3025 PART 44	30	350	100
Physical	pH	Unit Less	7.39	IS 3025 PART 11	5.5-9.0	5.5-9.0	5.5-9.0
	Total Suspended Solids	mg/l	4.3	IS 3025 PART 17	100	600	200
Chemical	Oil & Grease	mg/l	0.10	IS 3025 PART 39	10	20	10

Remarks: The no. of parameters tested is 07 only. The report is issued subject to the terms & conditions as mentioned over leaf.

Chemist	Authorized Signatory
---------	----------------------

Monitored by Lab
Designation: Quality Analyst



QUALITY LAB is a trademark and fully owned unit of Quality Analyst & Labs Pvt. Ltd.

Office: 382, Verdhunan Churne Plaza-5 Plot No. 20, KP Block Commercial Centre, Pitambara, New Delhi-110027

Exclusive representatives in South Asia for Greiner India, Inc. 1001, Connecticut Avenue, NY, Suite 327, Washington, DC, USA

Exclusive representatives in India for Sano Aqua, Narsingshagan No. 1340, DPPDAL, Norway

Exclusive representatives in India for Fenko Technical Control and Certification Ltd., Izmir, Turkey for US Marking



Office Address: Freedom Park Life Complex, Sector 57, Gurgaon, Haryana - 122011
 Email: ~~freedom@freedomparklife.com~~ Landline No. 0124-4393119.
 Registration Number: 3508 (Registered with the Sub-Registrar Gurgaon)
 Registered under "Haryana Apartment Ownership Act 1988" through "Deed of Declaration"

EMERGENCY RESPONSE PLAN

Even after all the preventive measures are exhausted and if any emergency raised, the following infrastructure has been provided to tackle such a situation

1. Administrative offices are made as emergency control room.
2. Assembly area is demarcated.
3. Communication system has been installed in the complex which includes an intercom and public addressing system.
4. Fire alarm has been installed at vulnerable places.
5. The evacuation plan of building been displayed at each other.
6. The safe zones (at the time of emergency) on maps have been displayed at different locations.
7. A first aid facility has been made available at the control room.

In case of emergency, following actions shall be taken:

- I. The Emergency shall be declared in case of following:
 1. Fire Alarm buzzing (fire hazard)
 2. Vibration/earthquake feeling (earthquake)
 3. Water Logging in complex above 30 cm (Flood)
 4. Any unusual smell of gas or suffocation feeling.
 5. Security alarm on main gate (Security risk/Terrorism)
- II. on declaration of emergency, Communication shall be made to occupants about the type of emergency and specific procedures to be followed.
- III. Disaster management team shall be formed with a location of work.
- IV. All the occupants of the affected area shall be moved to safe zone.
- V. The control measures shall be done as per the emergency action plan for each type of hazard.
- VI. All the member of the disaster management cell shall take charge of their respective duties.
- VII. Outside help like fire tender, police, ambulance etc. shall be called by site controller or incident controller.

Recovery Procedure

The recovery procedure will depend of the type of emergency; recovery procedure shall be followed by the engineering section to restore the essential service like electricity, water, telephone, first aid and essential medical and other supplies.

a. Security plan

Most importantly, training the property management staff and volunteering Disaster management team member need to be regularly impacted in dealing with such situations.

- Manual checks : at all gate the visitors and guests shall be manually checked and asked for ID's

Freedom Park Life Apartment Owners Association
Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana-122011
Email: freedomparklife@gmail.com Landline No. 0124-4211683
Registration Number: HR018202102703 (Registered with the Sub-Registrar Gurgaon)
Registered under "Haryana Registration and Regulation of Societies Act 2012"

May, 24th 2025

To
The Regional Officer
Regional Office, Gurgaon North
Haryana State Pollution Control Board
VikasSadan, Opposite - New Court, Gurgaon

Kind Attn.: Mrs. Akansha Tanwar, Regional Officer, Gurgaon North

Sub: - Covering Letter - Reply & submission of documents for CTO renewal for Freedom Park Life AOA, Ref. No. 102969555 dated 07.05.2025

Dear Sir/Madam,

This is in reference to the Show Cause Notice (SCN) dated 12.05.2025 concerning the CTO renewal application (Ref. No. 102969555), submitted online by Freedom Park Life AOA on 07.05.2025. A detailed reply, along with all the required documents, was previously submitted on 15.05.2025.

However, as the same SCN has been forwarded again, we are hereby resubmitting the aforementioned documents for your kind perusal.

Additionally we are submitting response for CA certificate and balance sheet as per your latest query

1. Online Application for renewal of CTO on prescribed Performa (Annexure-XI) -Please find the attachment as Annexure-I
2. Deposit of required and applicable consent fee-Please find the attachment as Annexure-II
3. Latest copy of balance sheet duly attested by CA-Please find the attachment as Annexure-III
4. Latest inspection report and analysis report of effluent/air emissions/noise and water report-Please find the attachment as Annexure-IV

Freedom Park Life Apartment Owners Association

Office Address: Freedom Park Life Complex, Sector-57, Gurgaon, Haryana-122011

Email: foa@freedomparklife.com Landline No. 0124-4211683.

Registration Number: HR018202102703 (Registered with the Sub-Registrar Gurgaon)

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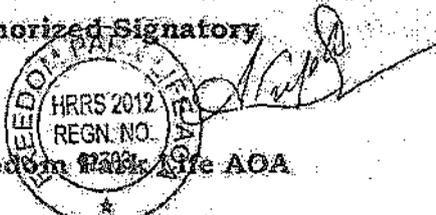
6. Details of land in case the effluent is discharged on land-Not Applicable

7. Environmental compensation- We would like to clarify that M/s Freedom Park Life AOA has never applied for a provisional Consent to Operate (CTO). In all our applications, including the current one, we have consistently applied for a CTO valid for three years and have duly submitted the corresponding three-year renewal fee.

Regarding the environmental compensation, we wish to bring to your attention that the matter is currently sub judice before the Hon'ble National Green Tribunal (NGT). This issue is entirely unrelated to the CTO renewal process.

In light of the above, we kindly request you not to hold the CTO for this account and respectfully urge you to waive this objection.

Authorized Signatory



Freedom Park Life AOA

Secretary FPLAOA

M. No. 9582737777

CC: Mr. Aprnesh Kaushik
Superintendent (WC)
Member Secretary



Tervender Thakraon <tervender.thakraon@fidelegal.com>

**Appeal No. 2 of 2025 – Freedom Park Lifer AoA Vs Haryana State
Pollution Control Board & Anr. - Service of Rejoinder on behalf of
Appellant**

1 message

Tervender Thakraon <tervender.thakraon@fidelegal.com>

Mon, Oct 6, 2025 at 6:08
PM

To: hspcbrogrn@gmail.com, hspcbwatercell@gmail.com

Dear All,

In the matter of Appeal No. 2 of 2025 – Freedom Park Lifer AoA Vs Haryana State Pollution Control Board & Anr., Please find attached herewith the scan copy of Rejoinder on behalf of Appellant.

Regards

T.S. Thakraon
Advocate for Appellant

 Freedom Park Life Vs HSPCB Rejoinder.pdf
6686K