

**BEFORE HON'BLE NATIONAL GREEN
TRIBUNAL
WESTERN ZONE BENCH, PUNE**

APPEAL NO. 27/2024 (WZ)

Samrudhi Sugar Limited	Appellant
VERSUS		
Central Pollution Control Board & Ors	Respondents

**REJOINDER TO THE AFFIDAVIT OF
REPLY FILED BY RESPONDENT NO. 1
CPCB DATED 16/09/2024
BY APPELLANT
(SAMRUDHI SUGAR LIMITED)**

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Date : **04/08/2025**

Place : **Pune**

Filed by :



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CONTACT DETAILS

.... Appellant

1 Samrudhi Sugar Limited

VERSUS

.... Respondents

1 Central Pollution Control Board

2 Maharashtra Pollution Control Board

ABBREVIATIONS

Short form	Full Form
CEMS	Continuous Emissions Monitoring System
CETP	Common Effluent Treatment Plant
CPCB	Central Pollution Control Board
EC	Environmental Clearance Letter
GRAP	Graded Response Action Plan
MPCB	Maharashtra Pollution Control Board
NGT	National Green Tribunal
NPA	Non-Performing Asset
OA	Original Application
OCEMS	Online Continuous Emissions Monitoring System
SPCB	State Pollution Control Board
STP	Sewage Treatment Plant
WZ	Western Zone

**MOST RESPECTFULLY
SUBMITTED**

1. I, Pramod Gosavi, aged 56 years, working as Commercial Manager with Appellant industry i.e., Samrudhi Sugar Ltd. in this Appeal 27/2024, filing this rejoinder against the Affidavit in reply filed by the Respondent No. 1, the Central Pollution Control Board (hereinafter referred to as "CPCB") dated 16/09/2024. The Appellant herein submits this Rejoinder to the said Affidavit in Reply, unequivocally denying all averments, contentions, and submissions made by the CPCB that are contrary to or inconsistent with the Appeal Memorandum and the facts presented by the Appellant.

2. The Appellant reiterates and reaffirms all the submissions made in the Appeal No. 27/2024 (WZ) and the documents annexed thereto.

3. The appellant submit the summary response on following grounds.

a. The Appellant respectfully submits this rejoinder to contradict and clarify the averments made by the Respondent No.1 (CPCB) in its Affidavit-in-Reply dated 16.09.2024.

b. **At the outset**, the Appellant submits that the

Environmental Compensation (EC) imposed by CPCB is unsustainable, unjust, and in violation of fundamental environmental principles and judicial precedents.

A. Principle of Proportionality Violated

- i. The EC of ₹1.27 crore is grossly disproportionate to the alleged default, which was only a delay in linking Continuous Online Monitoring Systems (COMS) to the CPCB server. It is submitted that:
 - The equipment was **already installed and operational** [Annexure M & N of Appeal] well before final directions of 04.01.2024.
 - There is **no case of pollution beyond the prescribed standards** during this period.
 - CPCB has itself **not recorded or alleged any environmental damage** or violation of standards during the alleged period.
- ii. The Hon'ble Supreme Court in ***Tata Housing Development Co. Ltd. v. Goa Foundation & Ors.*** [(2021) 19 SCC 735] emphasized that **proportionality must guide all**

environmental enforcement actions.

Penalties cannot be punitive where no harm has been demonstrated.

B. Polluter Pays Principle Requires Actual Evidence of Pollution

- i. CPCB relies on the 'polluter pays' principle; however, the Hon'ble Supreme Court has repeatedly held that this principle is applicable **only when pollution is:
 - o established,
 - o measured or reasonably estimated, and
 - o quantified.**
- ii. In *Indian Council for **Enviro-Legal Action v. Union of India*** [(1996) 3 SCC 212], the Hon'ble Apex Court clarified that compensation must relate to **actual damage caused**, which in the present case, CPCB has neither pleaded nor proved.
- iii. CPCB has **levied EC without conducting any scientific assessment** of environmental degradation or even alleging exceedance of emission or effluent standards. There is no sampling under Section 21 of Water Act or Section 26 of Air Act.

C. No Advantage from CPCB's Own Default

- i. It is respectfully submitted that CPCB's failure to monitor pollution in real time (despite collecting consent fees through MPCB for compliance monitoring) cannot now be used as a ground to presume violation.
- ii. The Hon'ble Supreme Court in ***Lulu Shopping Mall v. Union of India & Ors.*** [SLP (C) 11097/2022, Order dated 05.07.2022] held that **regulators cannot take advantage of their own failure to monitor and then penalize the regulated entity for lack of evidence.**

D. Environmental Compensation Must Be Linked to Remediation

- i. The Appellant further submits that EC cannot be collected in abstract without any **remediation plan or demonstrated cost of environmental restoration.**
- ii. In ***Kantha Vibhag Yuva Koli Samaj Parivartan Trust vs State of Gujarat*** [CA No. 1046/2019; see Annexure P of Appeal], the Hon'ble Supreme Court clarified that:

"Environmental compensation collected must be used specifically for environmental restoration, and only when

actual environmental degradation is established.”

12. In this case, no such remedial plan exists, nor has any damage been shown to be attributable to the Appellant.

E. Paryavaran Suraksha Judgment Not Applicable

- i. The reliance on ***Paryavaran Suraksha Samiti v. Union of India*** [OA 593/2017, NGT] by CPCB is entirely misplaced. That judgment:
 - pertains to **compliance with Zero Liquid Discharge and CETP norms**, not delay in **server connectivity of OCEMS**.
 - does not direct automatic imposition of EC in case of non-connectivity to CPCB server without any pollution.
- ii. The directions in that case were *aimed* at **untreated discharge** and not **mere monitoring linkage issues**.

F. Jurisdictional Overreach by CPCB

- i. CPCB acted in usurpation of the powers of the State Board (MPCB), despite:
 - MPCB having issued, renewed, and monitored the Consent to Operate [see MPCB

Affidavit dated 10.06.2024, para 5 & Annexure E].

- MPCB confirming that COMS was installed and **connected to both MPCB and CPCB servers as of 22.11.2023** [see MPCB Visit Report, Annexure I].

- ii. CPCB has not established any urgent or extraordinary circumstance under which it had to invoke powers under **Section 5 of EPA** directly, **instead of issuing directions under Section 18(1)(b) to MPCB.**

4. Appellant has addressed all the points replied by the Respondents through the filed submission one by one as follows;

POINT-WISE REPLY TO THE AFFIDAVIT IN REPLY FILED BY RESPONDENT NO. 1 DATED 16/09/2024:

1.	Para 7 (CPCB's claim of rightly imposed Environmental Compensation for non-installation/connectivity of OCEMS and violation of closure direction).
Reply	The averments contained in Para 7 of the CPCB's Affidavit in Reply are vehemently denied. While the Appellant acknowledges the CPCB's closure direction dated

22/03/2016 concerning OCEMS installation and connectivity, it is crucial to highlight that the Appellant has, in fact, installed and commissioned the Online Effluent Monitoring System (OCEMS) on **02/04/2019** and the Online Emission Monitoring System (CEMS) on **12/02/2020**, as evidenced by Annexures 'M' and 'N' of the Appeal Memo. The CPCB's assertion of "operating their industry without installation and connectivity" is misleading for the entire period cited. The delay in initial establishment of full connectivity, as explained in the Appeal Memo (Para 4(iv), and detailed in the Reply to Show Cause Notice - Annexure 'L'), was primarily due to severe financial constraints faced by the industry, including its loan accounts slipping into NPA, and not due to willful non-compliance.

The imposition of Environmental Compensation (EC) of Rs. 1,27,20,000/- is vehemently contested as exorbitant, arbitrary, and without any scientific logic or demonstrable nexus to actual environmental damage. The Appellant maintains that the fundamental premise for the "Polluter Pays" principle - i.e., the occurrence of actual pollution or environmental degradation - is entirely absent in this case (Appeal Memo, Para 5(e), (m), (n), (o), (p), (r)). The CPCB

	<p>has failed to provide any "Law Evidence Samples" or identify specific instances of pollution or damage to the environment attributable to the Appellant during the period in question. The online monitoring results of Stack and STP as of 21/03/2023 (Annexure 'O' of Appeal Memo, Page 72) further demonstrate compliance with standards.</p>
2.	<p>Para 8 (CPCB's claim on the correct calculation of non-compliance period and distinct jurisdiction from MPCB)</p>
Reply	<p>The Appellant reiterates that the calculation of the "non-compliance period" as 424 days, even if purportedly based on operational days, remains questionable in its application, particularly given the seasonal nature of the sugar industry, which typically operates for six months (Appeal Memo, Para 4(v)). While the CPCB states the period is calculated for operational days, the sheer magnitude of the EC still fails to account for the Appellant's proactive steps in installing the OCEMS and the absence of proven pollution.</p> <p>Regarding the distinct functions of CPCB and MPCB, the Appellant acknowledges their independent statutory roles. However, the present dispute pertains to an alleged "paper/procedural delay" in</p>

	<p>OCEMS connectivity, not proven environmental pollution. The Appellant has consistently complied with the MPCB's Consent to Operate, which involves regular inspections and monitoring by the MPCB (Appeal Memo, Para 17). It is submitted that in cases of mere procedural non-compliance, particularly where a State Pollution Control Board is actively involved in monitoring and has not reported environmental damage, the CPCB's powers under Section 5 of the Environment (Protection) Act, 1986, should be exercised judiciously and not in a manner that usurps the field-level enforcement authority of the MPCB. The Appellant also refers to the MPCB's own circular dated 12.07.2021 regarding penalty imposition for consent renewal delays, which should be considered relevant in the context of procedural non-compliance (Appeal Memo, Para 4(vi)).</p>
3.	<p>Para 9, 10, 15, 16 (CPCB's claim of providing an opportunity of hearing and consideration of submissions)</p>
Reply	<p>The Appellant strongly disputes the CPCB's contention that adequate opportunity of hearing was granted and that submissions were duly considered. While a personal hearing was indeed scheduled via Video Conferencing on</p>

11/07/2023, the Appellant's Appeal Memo (Para 5(a), 8, 10, 26) clearly states that this opportunity could **not be effectively availed** due to the industry being non-operative during its lean period, when most of the staff is unavailable. The Appellant made **repeated requests for a personal hearing** subsequent to this, including by letters dated 04/10/2023 and 25/10/2023 and email dated 26/10/2023 (Annexures 'B', 'C', 'D' of Appeal Memo). These requests demonstrate the Appellant's bonafide desire to present its case thoroughly.

The CPCB's minutes of the meeting (Annexure-II of CPCB Reply) state that the Unit "admittedly agreed" to operate without OCEMS/revocation and did not provide documentary evidence within 15 days to dispute the 424 days. This "admission" as recorded is out of context and needs clarification. The Appellant's submissions in its reply to the Show Cause Notice (Annexure 'L' of Appeal Memo) and subsequent letters clearly detailed the reasons for delay, the installation of OCEMS, and the absence of pollution. The CPCB's final direction, which merely reiterated the initial proposed EC amount without any apparent reduction or a clear breakdown that accounts for the Appellant's specific circumstances, strongly indicates that the

	Appellant's detailed written submissions were not judiciously considered (Appeal Memo, Para 5(c)). The decision appears to have been predetermined, and the process lacked genuine application of mind to the Appellant's specific circumstances and explanations.
4.	Para 11, 20, 21 (CPCB's justification of the EC amount and methodology)
Reply	<p>The Appellant reiterates that the EC amount of Rs. 1,27,20,000/- is disproportionate and lacks a rational basis, especially when compared to the actual cost of the online instruments (approx. Rs. 11 lakhs) (Appeal Memo, Para 19). While the CPCB refers to the NGT-approved methodology for assessing EC, the application of this methodology in the present case is flawed because it fails to account for the crucial fact that there has been no proven environmental damage or violation of emission standards by the Appellant. The "Polluter Pays" principle requires the assessment of actual damage, which is absent here.</p> <p>The principle of proportionality, well-established in environmental jurisprudence and acknowledged even in the Enforcement Policy of the Maharashtra Pollution Control Board (as</p>

	<p>cited in Annexure 'O' of Appeal Memo - Baramati Agro Ltd. Vs. MPCB judgment), has been violated. The CPCB, having options of regulation, prohibition, and closure, has resorted to the most stringent measure of a massive financial penalty without demonstrating the immediate, grave environmental threat that would justify such an action (Appeal Memo, Para 5(j), 19, 20). The Appellant has consistently demonstrated compliance post-installation of OCEMS and has not been found to be polluting the environment</p>
5.	Para 12, 13 (CPCB's claim of violation and OCEMS status)
Reply	<p>The Appellant reiterates that no violation of environmental standards, pollution, or damage to the environment has been proven or even alleged by the CPCB with concrete evidence (Appeal Memo, Para 5(m), (n), (o), (p)). The Show Cause Notice and the impugned direction are solely based on the alleged "non-installation and connectivity of real-time OCEMS devices with CPCB server and notwithstanding CPCB's closure direction dated 22/03/2016." The Appellant has already demonstrated that the OCEMS were installed on 02/04/2019 and 12/02/2020</p>

	<p>(Annexures 'M' & 'N' of Appeal Memo), and post-installation, data has been transmitted. The CPCB's reply states that "no EC has been levied on the appellant Unit for any period after 24/08/2020 i.e. after the connectivity of real-time OCEMS devices to CPCB server." This acknowledges the subsequent compliance and further strengthens the Appellant's argument that the EC is for a period where, despite technical connectivity issues (which were eventually resolved), there was no actual environmental harm.</p>
6.	Para 18, 19 (CPCB's claim of distinct and non-overlapping jurisdiction)
Reply	<p>The Appellant re-emphasises that while CPCB and MPCB have distinct jurisdictions, there is an inherent overlap in enforcing environmental regulations (Appeal Memo, Para 18). In the context of a procedural delay where no actual pollution is identified, the Appellant submits that the MPCB, as the field-level agency responsible for consent management and regular monitoring, is the primary authority. The CPCB has the power to direct MPCB under Section 18(2) of the Act to ensure compliance, rather than directly imposing such a severe financial penalty on an industry that is otherwise compliant with pollution control</p>

	measures
7.	Para 24, 25 (CPCB's prayer for dismissal and reliance on similar cases)
Reply	<p>The Appellant respectfully submits that the CPCB's reliance on Appeal No. 33/2020 (WZ) (Sadashivrao Mandlik), Appeal No. 39/2020 (WZ) (Shri Sant Damaj), and Appeal No. 40/2020 (WZ) (Bhairavnath Sugar Works) is distinguishable from the present case. In those cited cases, the Hon'ble Tribunal primarily dismissed the appeals because the appellants "failed to produce the data of the period in question" and "failed in his duty to transmit data to the Respondents for the aforesaid period" (Sadashivrao and Bhairavnath judgments) or "did not ensure transmission of data for the aforementioned period" (Shri Sant Damaj judgment). The emphasis in those judgments was on the failure to transmit data AND the inability to convincingly explain this failure or provide alternative proof of compliance.</p> <p>This appeal is completely different. The Appellant in the present case:</p> <p>a) Did install the OCEMS and CEMS on 02/04/2019 and 12/02/2020 respectively, well within the crushing</p>

seasons for which EC is being levied (2017-18, 2018-19, 2019-20).

b) **Has explained** the initial delays in connectivity due to genuine financial hardship, not wilful defiance (Appeal Memo, Annexure 'L').

c) **Has consistently asserted and provided proof** that there was **no actual pollution or environmental damage** during the period in question, unlike implied in the cited cases, where the lack of data transmission meant environmental impact could not be ruled out. The Appellant's pollution control equipment was always operative and meeting standards (Appeal Memo, Para 4(vii), 5(m), (q), 21).

d) **Attempted repeatedly to seek a meaningful personal hearing** to present these facts, which were not adequately provided (Appeal Memo, Annexures 'B', 'C', 'D').

5. Respondent CPCB has referred 3 different appeals filed before Hon'ble NGT opposing the environmental compensation (EC) calculated by the CPCB. In all three appeals, CPCB has strongly mentioned that the EC had been calculated for the non-installation of the OCEMS and the EC amount derived from the formula prepared in OA No. 593/2017 (WP CIVIL) No. 375/2012, Paryavaran Suraksha Samiti & Anr. Vs. Union of India & Ors. Whereas the said formula is prepared and used for

different type of case, and this appeal is entirely different. Appellant submits that said formula has errors on its face of it, which are as follows;

WRONGFUL COMPUTATION OF THE ENVIRONMENTAL COMPENSATION

6. The Appellant says that the amount of compensation arrived the formula evolved by CPCB in **O.A. 593/2017 Paryavaran Suraksha Samiti v/s UoI.**

$$\mathbf{EC = EC= PI \times N \times R \times S \times LF}$$

where;

- PI** - Pollution Index of Industrial Sector
- N** - No. of days of violation took place
- R** - A factor in Rupees for EC
- S** - factor for the scale of operation
- LF** - Location Factor

The above formula was case-specific, and the same has not been approved by CPCB (i.e., the Board of CPCB). It is not even directed by the CPCB under the Act, by using formal directions to State Boards and MPCB. The CPCB has already mentioned the limitations and circumstances as the pre-conditions in which this formula can be even thought of applying. [**Emphasis supplied**].

7. Said formula is not Gazetted/Notified by MoEFCC under the Act/Rules under any of the environmental Acts. There is no legal sanctity to it. In short, this has no techno-legal acceptance OR scrutiny for

applying it en masse in all other cases, without considering the facts of the case.

8. The present appeal is in no way similar to **Paryavaran Suraksha Samiti case**. There is no similarity between the facts, circumstances, activity, location, nature of the product, type of emissions, pollutants, and their impact on the surrounding environmental settings. As such, the formula won't apply in the present case. This ought to have been considered by the Appellant before applying the formula ad-hoc, ad-valorem basis instead of modifying or applying it mutatis mutandis basis. CPCB is the central technical board, and as such, this can't be blindly done by just because a formula is available.

9. The formula has a major defect. It doesn't recognize or consider the quantitative or the degree of violation. The same formula comes to effect for the computation of damage, which is utterly indifferent to the pollutants emitted or let out, the degree of violation. The formula also doesn't consider the potential of the pollutants to pollute or damage the environment. The uncertainty in sample grab collection, the variation in source or grab sample results, are ignored. Project or Activity that has caused pollution, damage to the environment, parameters that have

been affected, emissions, the impact of that on the environment, etc. are not even identified. Resultant impact, increase in levels of recipient environmental settings/bodies, is not determined, even empirically.

10. The marks given to industries for categorization or classification have been used as a factor for calculating fines, for which there is no scientific basis at all. **It will be like marks/score given to height or weight or colour or caste of the person to compute the fine to be imposed for PUC traffic violation.** There is no scientific linkage of marks given for categorization, in determining the environmental damaging potency of the alleged polluting parameters, the potency to damage environment, or the ascertainment of actual violation and its degree of violation

11. And a more important thing is that the environmental damage caused by to absence of OCEMS is neither considered in this formula nor appreciated by the NGT. CPCB is misinterpreting the order of the Hon'ble Tribunal in the matter of OA 593/2017 "Paryavaran Suraksha Samiti & Anr. Vs Union of India & Ors. dated 28/08/2019. This order only speaks about the environmental compensation.

a) *Environment Compensation to be levied on*

Industrial Units

- b) *Environmental Compensation to be levied on all violations of Graded Response Action Plan (GRAP) in NCR.*
- c) *Environmental Compensation to be levied in case of failure of preventing the pollutants being discharged in water bodies and failure to implement waste management rules*
- d) *Environment Compensation for Discharge of Untreated/Partially Treated Sewage by Concerned Individual/ Authority*
- e) *Environment Compensation to be Levied on Concerned Individual/Authority for Improper Solid Waste Management*
- f) *Compensation in Case of Illegal Extraction of Ground Water*

12. Whereas none of the above heads speaks about the levying of environmental compensation for non-installation of the OCEMS or the data submission under it. The mentioned order of the Hon'ble NGT has never dealt with the OCEMS issue. We accept that it was part of the CPCB submission in the said case as:

II. Report dated 14.08.2019 with regard to monitoring of CETPs

18.CPCB directed SPCBs to take following steps:

1.

2.

3.

4. In case, OCEMS are not connected with CPCB & SPCB servers, ensure a robust system of physical inspections to verify compliance by drawing samples.”

Where CPCB is supposed to provide a robust system on the basis of physical inspection and by drawing the samples through SPCB, which is not done in this case.

13. Therefore, Appellant further submits that CPCB has imposed the wrong environmental compensation, which is based on the wrong formula and wrong calculations.

14. Therefore, based on the submitted facts and the circumstances, Appellant urges to Hon'ble Tribunal to Quash and set aside the direction issued to the Appellant by the Central Pollution Control Board u/s 5 of the 'Environmental (Protection) Act 1986 dated 04/01/2024.



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AND for this act of kindness, Appellant shall pray
forever as duty-bound



Pramod Gosavi

Place: ~~Pune~~ *Chh. S. Nagar*
Date: **04/08/2025**

Pramod Gosavi
DEPENDENT

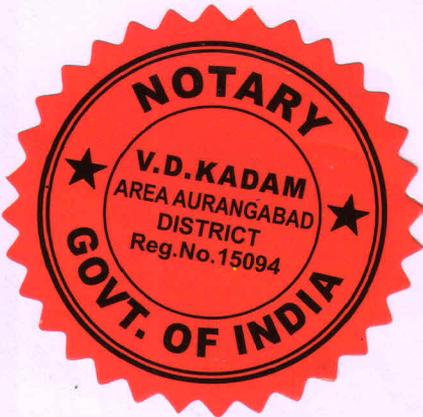
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04 AUG 2025



**NGT APPEAL 27-2024(WZ) : Samrudhi Sugars Ltd Vs CPCB: 07-August-2025**

1 message

Raghunath Mahabal <mahabal60@gmail.com>

4 August 2025 at 17:37

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To: The Hon'ble Registrar, NGT WZ Pune

I am pleased to circulate the Rejoinder affidavit (**Samrudhi Sugar Limited**) in the above matter.

I also upload the document on NGT Portal.

Regards

Dhananjay Chavan|7038383654

R. B. Mahabal रघुनाथ भालचंद्र महाबळ +91-7400116222 mahabal60@gmail.com**Advocate - National Green Tribunal**

BE (Mech.), ME (Industrial Management) VJTI Mumbai, LL.M., FIE, Chartered Engineer, Arbitrator IIE

CHINCHWAD: A Building, Flat Nos. 1, 2, 3, 4, Kakade Angan, Tanaji Nagar, Chinchwad gaon, Pune - 411033. <https://maps.app.goo.gl/ePx4MyTW5fm6xrt7A>**MUMBAI:** Flat Nos. A-101, 201, 202, 203, B-201, 202, 203, B-302, Chandravijay, Phule Road, Mulund EAST, Mumbai - 400081. <https://maps.app.goo.gl/ruAoCMCDJLAHYXbL9>**PUNE:** A-101, Sadhu Darshan, Sadhu Vaswani Chowk, Pune - 411001. <https://maps.app.goo.gl/QUHH41Jdu4PVfT88>**NAGPUR:** Plot Nos. 15, 16, 17, 18, Grampanchyat Bokhara भोकरा, कोराडी, Nagpur-441111, Maharashtra. <https://maps.app.goo.gl/fDuPrcGCKtpnhgD79>**2025-08-04 Appeal 27-2024_Rejoinder to CPCB_19-09-2024 F.pdf**

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