

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 340 OF 2025  
IN THE MATTER BETWEEN:**

Raj Kumar & Ors.

...Applicant

Versus

State of Haryana & Ors.

...Respondents

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**SAMAGRA LAW  
ADVOCATES FOR RESPONDENT NO. 4  
38,OKHLA PHASE-III,  
NEW DELHI-110019  
Contact No.+91-9654611805  
Email id:radhalakshmi@samagrallaw.com**

New Delhi

**Dated:**

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 340 OF 2025**

**IN THE MATTER BETWEEN:**

Raj Kumar & Ors.

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**REPLY/OBJECTIONS TO THE ORIGINAL APPLICATION  
ON BEHALF OF RESPONDENT NO. 4**

**MOST RESPECTFULLY SHOWETH:**

1. At the outset, Respondent No. 4 categorically denies all allegations of illegal pollution, harmful smoke emissions, or violation of any environmental norms, as alleged in the complaint filed by the Applicants. The present OA is based on incorrect assumptions, unverified claims, and lacks any scientific or documentary basis.
2. Respondent No. 4 company is a lawfully established industrial unit situated at Plot No. 30–31, Phase-II, Sector-14, IMT Bawal, District Rewari, Haryana, and is engaged in aluminium scrap recycling operations strictly in accordance with applicable environmental laws, rules, and regulations, including the Air (Prevention and Control of Pollution) Act, 1981, and the directions of the Haryana State Pollution Control Board (HSPCB). Mr. Rakesh Bharadwaj is the authorised representative of Respondent No. 4 and has been authorised pursuant to the Board Resolution dated 30.10.2025, annexed as **ANNEXURE R-1**.
3. It may be relevant to note here that an aluminium recycling plant comprises of an integrated set of equipment through which the

production flow is calibrated. Aluminium output is first generated in molten form and thereafter cast into moulds. Calibration and synchronisation of the required equipment for the desired output typically require 2–3 months after the issuance of the CTO.

4. Respondent No. 4 holds all required statutory approvals, including a valid Consent to Establish (CTE) and Consent to Operate (CTO). Routine inspections by HSPCB have never recorded any violation by the Respondent No. 4.
5. The Unit became operational in 2017 after obtaining the requisite statutory clearances, namely the *Consent to Establish* (“CTE”) dated 13.11.2014 and *Consent to Operate* (“CTO”), for a capacity of 30 MT per day. Copy of the CTE dated 11.02.2025 and CTO dated 30.01.2023 are annexed herewith as **ANNEXURE R-2** and **ANNEXURE R-3** respectively.
6. The Unit holds a valid Consent to Operate dated 30.01.2023 valid till 31.03.2028 for operation of one Skelner Furnace of 7 MT capacity (*Refer Pg 30-32*)
7. For the purpose of increasing its operational capacity, Respondent No. 4 obtained a fresh Consent to Establish on 11.02.2025, granted for Two Furnace of 06 MT capacity, One Rotary Furnace of 04 MT capacity, One Holding Furnace of 04 MT capacity, Two pots of 0.3 MT Capacity. (*Refer Pg 33-36*)
8. The Commission for Air Quality Management (CAQM) issued a Closure Direction on 20.08.2025 (*Pg 37-40*) and the unit was sealed on 22.08.2025 by HSPCB (*Pg 21-26*). The said position is reflected in the Joint Committee Report dated 03.09.2025. Pursuant to the Closure

directions the electricity supply of the unit was disconnected by DHBVNL on 21.08.2025.

9. It is submitted that the unit was closed on the allegation that additional furnaces were operational beyond the approved CTO capacity, based on inspection by CAQM on 02.08.2025. However it is pertinent to state that no Show Cause Notice was issued prior to the passing of the closure order dated 20.08.2025 in complete violation of the principles of natural justice.
10. CAQM directed the closure of the plant on 20.08.2025 without verifying the existence of the valid CTE for additional furnaces or affording any opportunity to furnish the same to the answering Respondent.
11. That pursuant to the Closure Direction dated 20.08.2025 issued by CAQM, Respondent No. 4 submitted a detailed reply/representation to Respondent No. 3 (HSPCB) on 29.08.2025, placing on record the complete factual and documentary clarification. In the said reply, Respondent No. 4 categorically explained that only one Aluminium Skelner Furnace of 7 MT capacity was operational as per the valid Consent to Operate dated 30.01.2023, and that the additional furnaces for which Consent to Establish had been granted on 11.02.2025 had not been commissioned, as the electricity connection had not been provided for the same. Respondent No. 4 also placed on record production data, photographs, purchase bills and stack emission monitoring report in support of its compliance. Copy of Respondent No. 4's reply dated 29.08.2025 is annexed herewith as **ANNEXURE R-4**.
12. It is further submitted that upon consideration of the aforesaid reply, the Member Secretary, HSPCB, vide order dated 27.10.2025, deputed senior scientific officers for re-inspection of the unit. In pursuance thereof, the inspection of the unit was carried out on 30.10.2025.

However, till date, no copy of the said inspection report has been supplied or made available to Respondent No.4, despite the inspection having been conducted, thereby seriously prejudicing the legal rights of Respondent No. 4. Copy of the Order dated 27.10.2025 is annexed herewith as **ANNEXURE R-5**.

13. Respondent No. 4 re-iterates that only one 7 MT Furnace was operational as per valid CTO, and the additional furnaces were electrically disconnected, mechanically non-functional, and were under installation stage only, as supported by production data, photographs and purchase records already submitted before the authorities .
14. It is further submitted that the production records from August 2024 to July 2025 clearly demonstrate that production never exceeded the permissible limits under the existing CTO and confirms non-operation of any additional furnace. The production figures are duly corroborated by sale invoices available on the GST Portal.
15. In view of the closure of the plant for over 100 days, adversely impacting livelihoods and disrupting an important component of the circular economy, **Respondent No. 4 has already deposited the entire Environmental Compensation amount of ₹1,25,000/- imposed was deposited on 24.11.2025**, as recommended by the HSPCB, with the competent authority, without prejudice to its legal rights and contentions, and solely to demonstrate its bonafides and compliance. A copy of the proof of deposit dated 24.11.2025 is annexed **ANNEXURE R-6**.
16. From the perusal of the OA/complaint, it appears to be based on misconceptions or possibly issues arising from unrelated industrial units in the vicinity. IMT Bawal is a large industrial cluster, and emissions from other factories, road dust, vehicular traffic, and

construction activity often contribute to ambient air levels. It is unjustified to attribute all such factors solely to Respondent No. 4.

17. Hence, it is prayed that this Hon'ble Tribunal may graciously permit the Respondent No. 4's unit to resume operations forthwith, subject to any further conditions as deemed fit, and it undertakes to strictly comply with every direction passed by this Hon'ble Tribunal.
18. The answering Respondent craves liberty to file additional Reply/submissions, if required, during the course of the proceedings and in the interest of justice.



**RESPONDENT NO. 4**

**THROUGH**

**SAMAGRA LAW  
38, OKHLA PHASE-III,  
NEW DELHI-110019  
Contact No.+91-9654611805  
Email id:radhalakshmi@samagrallaw.com**

**New Delhi**

**Dated:**

**BEFORE THE NATIONAL GREEN TRIBUNAL,  
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ORIGINAL APPLICATION NO. 340 OF 2025**

**IN THE MATTER BETWEEN:**

Raj Kumar & Ors. ...Applicant

Versus

State of Haryana & Ors. ...Respondents

**AFFIDAVIT**

I, Rakesh Bharadwaj, S/o Vasdev Sharma, aged about 47 years, authorized representative of Respondent No.4 having its office at Plot No. 30-31, Sector 14, HSIIDC, IMT, Bawal District, Rewari, presently at New Delhi do hereby solemnly affirm and declare as under:

1. I am duly authorised to file the present objections/reply on behalf of Respondent No. 4 vide Board Resolution dated 30.10.2025. I am fully conversant with the facts and circumstances of the case and hence, competent to swear this affidavit.
2. I have read and understood the contents of the accompanying objections and state that the contents thereof have been drafted under my instructions and that the same are true and correct to the best of my knowledge and belief, based on the records maintained by Respondent No. 4 in its regular course of business.
3. I say that the Annexures to the accompanying objections are true and correct to the best of my knowledge derived from records.



A handwritten signature in blue ink, appearing to be "Rakesh".

**DEPONENT**

**VERIFICATION:****10 DEC 2025**

Verified at New Delhi on this day of December, 2025 that the contents of my above affidavit are true and correct to my knowledge derived from records and no part of it is false and nothing material has been concealed therefrom.

**DEPONENT****10 DEC 2025****ATTESTED****NOTARY PUBLIC DELHI**

**SBA RECYCLING PVT. LTD.**

8

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari , Haryana, 123501  
CIN NO. U27106DL2013PTC256285

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE MEETING BOARD OF DIRECTORS OF SBA RECYCLING PRIVATE LIMITED HELD ON WEDNESDAY 30th OCTOBER 2025 AT ITS REGISTERED OFFICE SITUATED AT PLOT NO. 16-A, GALI NO. 3, ANAND PARBAT INDUSTRIAL AREA, NEW ROHTAK, ROAD, DELHI- 110005 AT 12.00 PM.**

**RESOLVED THAT Mr. Rakesh Bhardwaj (Manager) of SBA Recycling Private Limited is authorized to appear, sign, verify, declare, affirm, present submit and file all necessary notices, plaints, petitions, written statements, replies, affidavits, undertakings, vakalatnamas, engagement letters, declarations, appeals, revisions, applications, statements, complaints, evidence, papers, deeds and documents and all proceedings and matters in connection with any suit(s) or proceedings(s) filed by or against the Company before any court of law or any tribunal or any quasi-judicial or statutory or administrative authority in India.**

**RESOLVED THAT Mr. Rakesh Bhardwaj (the "Authorised Signatory"), be and is hereby authorized to defend legal proceedings initiated against SBA Recycling Private Limited and, for that purpose, to represent the Company, to sign, verify and file necessary documents, pleadings etc.**

**RESOLVED FURTHER THAT Mr. Rakesh Bhardwaj is authorized to nominate, appoint, and engage advocates, solicitors, counsel or other professionals and retainers; and to do all such acts, things, deeds as may be necessary or proper to carry out the purposes hereinabove mentioned.**

**RESOLVED FURTHER THAT the Authorised Signatory is also authorized to give statement and depose evidence on behalf of SBA Recycling Private Limited.**

**RESOLVED FURTHER THAT the Authorised Signatory is hereby authorised to do all such acts deeds and things as deemed necessary to give effect to the above resolution.**

For and on behalf of SBA Recycling Pvt Ltd.

Name  For SBA Recycling Pvt.Ltd.  
Designation

Director


**HARYANA STATE POLLUTION CONTROL BOARD**

**HSPCB**
**Regional Office Rewari, SCO D-6 & D-7, Suncity  
Commercial Complex, First Floor, A-Block, Sector-6,  
Rewari-123401. Email- hspcbrodr@gmail.com**
*Website: www.hrocmmms.nic.in E-Mail - Hqhspcb@hspcb.org.in*
*Telephone No.: 0172-2577870-73*
**No. HSPCB/Consent/ : 313119825REWCTE90925163**
**Dated:11/02/2025**
**To.**
**M/s : SBA Recycling Pvt Ltd  
Plot No. 30-31,Sec.-14, HSIIDC, IMT, Bawal Distt-Rewari  
REWARI  
123501**
**Sub. : Grant of consent to Establish to M/s SBA Recycling Pvt Ltd**

Please refer to your application no. 90925163 received on dated 2025-01-10 in regional office Rewari.

With reference to your above application for consent to establish, M/s SBA Recycling Pvt Ltd is here by granted consent as per following specification/Terms and conditions.

<b>Consent Under</b>	AIR/WATER
<b>Period of consent</b>	11/02/2025 - 10/02/2030
<b>Industry Type</b>	Ferrous and Non - ferrous metal extraction involving different furnaces through melting, refining, -processing, casting and alloy re making -
<b>Category</b>	ORANGE
<b>Investment(In Lakh)</b>	835.93921
<b>Total Land Area (Sq. meter)</b>	3600.0
<b>Total Builtup Area (Sq. meter)</b>	1826.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	1.5 KL/Day
<b>Number of outlets</b>	1.0
<b>Mode of discharge</b>	
1. Domestic	Public Sewer
2. Trade	
<b>Permissible Domestic Effluent Parameters</b>	
1. BOD	350 mg/l
2. TSS	600 mg/l
3. pH	5.5-9.0
4. O&G	20 mg/l
<b>Permissible Trade Effluent Parameters</b>	

1. NA	mg/l
Number of stacks	1
<b>Height of stack</b>	
1. Common stack attached to Six Nos. furnace	30 Meter
<b>Permissible Emission parameters</b>	
1. SPM	80 mg/m <sup>3</sup>
2. NOX	50 mg/m <sup>3</sup>
3. SOX	50 mg/m <sup>3</sup>
<b>Capacity of boiler</b>	
1. NA	Ton/hr
<b>Type of Furnace</b>	
1. 2 Nos. Furnace	06 MT
2. 01 No. Rotary Furnace	04 MT
3. 01 No. Holding Furnace	04 MT
4. 02 Nos. pots	0.3 MT
<b>Type of Fuel</b>	
1. HSD	100 Ltr/Day
2. LSHS	3500 KG/Day
3. Biomass Pellets	700 KG/Day

**Regional Officer, Rewari**

*Haryana State Pollution Control Board.*

### **Terms and conditions**

1. The industry has declared that the quantity of effluent shall be 1.5 KL/Day i.e 0KL/Day for Trade Effluent, 0 KL/Day for Cooling, 1.5 KL/Day for Domestic and the same should not exceed .
2. The above 'Consent to Establish' is valid for 60 months from the date of its issue to be extended for another one year at the discretion of the Board or till the time the unit starts its trial production whichever is earlier. The unit will have to set up the plant and obtain consent during this period.
3. The officer/official of the Board shall have the right to access and inspection of the industry in connection with the various processes and the treatment facilities being provided simultaneously with the construction of building/machinery. The effluent should conform the effluent standards as applicable
4. That necessary arrangement shall be made by the industry for the control of Air Pollution before commissioning the plant. The emitted pollutants will meet the emission and other standards as laid/will be prescribed by the Board from time to time.
5. The applicant will obtain consent under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21/22 of the Air (Prevention & Control of Pollution) Act,1981 as amended to-date-even before starting trial production

6. The above Consent to Establish is further subject to the conditions that the unit complies with all the laws/rules/decisions and competent directions of the Board/Government and its functionaries in all respects before commissioning of the operation and during its actual working strictly.
7. No in-process or post-process objectionable emission or the effluent will be allowed, if the scheme furnished by the unit turns out to be defective in any actual experience
8. The Electricity Department will give only temporary connection and permanent connection to the unit will be given after verifying the consent granted by the Board, both under Water Act and Air Act.
9. Unit will raise the stack height of DG Set/Boiler as per Board's norms.
10. Unit will maintain proper logbook of Water meter/sub meter before/after commissioning.
11. That in the case of an industry or any other process the activity is located in an area approved and that in case the activity is sited in an residential or institutional or commercial or agricultural area, the necessary permission for siting such industry and process in an residential or institutional or commercial or agricultural area or controlled area under Town and Country Planning laws CLU or Municipal laws has to be obtained from the competent Authority in law permitting this deviation and be submitted in original with the request for consent to operate.
12. That there is no discharge directly or indirectly from the unit or the process into any interstate river or Yamuna River or River Ghaggar.
13. That the industry or the unit concerned is not sited within any prohibited distances according to the Environmental Laws and Rules, Notification, Orders and Policies of Central Pollution control Board and Haryana State Pollution Control Board.
14. That of the unit is discharging its sewage or trade effluent into the public sewer meant to receive trade effluent from industries etc. then the permission of the Competent Authority owing and operating such public sewer giving permission letter to his unit shall be submitted at time of consent to operate.
15. That if at any time, there is adverse report from any adjoining neighbor or any other aggrieved party or Municipal Committee or Zila Parishad or any other public body against the unit's pollution; the Consent to Establish so granted shall be revoked.
16. **That all the financial dues required under the rules and policies of the Board have been deposited in full by the unit for this Consent to Establish.**
17. In case of change of name from previous Consent to Establish granted, fresh Consent to Establish fee shall be levied.
18. 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
19. That the unit will take all other clearances from concerned agencies, whenever required.
20. That the unit will not change its process without the prior permission of the Board.
21. That the Consent to Establish so granted will be invalid, if the unit falls in Aravali Area or non conforming area.
22. That the unit will comply with the Hazardous Waste Management Rules and will also make the non-leachate pit for storage of Hazardous waste and will undertake not to dispose off the same except for pit in their own premises or with the authorized disposal authority.

23. That the unit will submit an undertaking that it will comply with all the specific and general conditions as imposed in the above Consent to Establish within 30 days failing which Consent to Establish will be revoked.
24. That unit will obtain EIA from MoEF, if required at any stage.
25. In case of unit does not comply with the above conditions within the stipulated period, Consent to Establish will be revoked.
26. That unit will obtain consent to operate from the board before the start of product activity.
27. 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.
28. 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

#### Other Conditions :

1. CTE so granted is on the basis of detail submitted by the unit in online application, CTE granted will be without prejudice to any violation made by unit in past & will be deemed revoked & further action will be taken as per law if any violation is observed at any stage. 2. Unit will not change the quantity of domestic effluent/trade effluent/air emission without prior permission of the Board. 3. Unit will obtain prior CTO before starting of production. 4. Unit will obtain all necessary clearance from all concerned departments. 5. The unit will install the project only on the land for which Town and Country Planning Department/HUDA/HSIIDC has given license. 6. Unit will apply for CTO/ CTE Extension at least 90 days before expiry date of this CTE. 7. That in case any additional charges / fees / penalty etc. are found payable towards this authorization / CTO/ CTE as per audit then the same shall be paid by the unit without any objection immediately as and when demanded by this office. 8. If at any stage found that unit was involved in any past violation, If at any stage found that unit was involved in any past violation regarding Environment Laws / Rules / Acts then CTE so granted shall be revoked automatically & legal action will be initiate against the project proponent. 9. Unit will use only treated effluent supplied from Sewage treatment plant during construction phase of the project 10. That this CTE will not provide any immunity from any other Act/Rules/Regulations applicable to the project/land in question. 11. Unit will comply CAQM direction issued vide No. 65 & amended till date, HSPCB direction vide order dated 21.07.2022 regarding standard list of approved fuels in NCR and direction No. 76 dt. 29.09.2023 of CAQM regarding installation of retro-fitment of duel fuel/ECDs and fitment of RECDs certified by the authorized agencies on DG sets more than 19 kW. 12. Unit will install DG set as per CAQM direction No. 76.

HARISH  
KUMAR

Digitally signed by  
HARISH KUMAR  
Date: 2025.02.11  
12:06:26 +05'30'

*Regional Officer, Rewari*

*Haryana State Pollution Control Board.*



## HARYANA STATE POLLUTION CONTROL BOARD

Lala Nemi Chand Singhal Enc.Sohna Road, Near  
Hanuman Mandir,Dharuhera Ph. 01274-244440-  
41(O) Email:- hspcbrodr@gmail.com

E-mail: hspcb@hry.nic.in



No. HSPCB/Consent/: 313119823REWCTO31981610

Dated:30/01/2023

To.

M/s :SBA Recycling Pvt Ltd  
Plot No. 30-31,Sec.-14, HSIIDC, IMT, Bawal Distt-Rewari

Subject: Grant of consent to operate to M/s SBA Recycling Pvt Ltd.

Please refer to your application no. 31981610 received on dated 2022-12-23 in regional office Dharuhera. With reference to your above application for consent to operate, M/s SBA Recycling Pvt Ltd is here by granted consent as per following specification/Terms and conditions.

<b>Consent Under</b>	BOTH
<b>Period of consent</b>	01/04/2023 - 31/03/2028
<b>Industry Type</b>	Ferrous and Non - ferrous metal extraction involving different furnaces through melting, refining, -processing, casting and alloy re making -
<b>Category</b>	ORANGE
<b>Investment(In Lakh)</b>	709.16168
<b>Total Land Area(Sq. meter)</b>	3600.0
<b>Total Builtup Area(Sq. meter)</b>	1826.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	1.5 KL/Day
<b>Number of outlets</b>	1.0
<b>Mode of discharge</b>	
1. Domestic	SEWER
2. Trade	
<b>Domestic Effluent Parameters</b>	
1. NA	
<b>Trade Effluent Parameters</b>	
1. NA	
<b>Number of stacks</b>	1
<b>Height of stack</b>	
1. ATTACHED TO METLING FURNACE	30 meter
<b>Emission parameters</b>	
1. SPM	150 mg/m3

<b>Product Details</b>	
1. ALUMINIUM ALLOYS	30 Metric Tonnes/day
<b>Capacity of boiler</b>	
1. na	0 Ton/hr
<b>Type of Furnace</b>	
1. SCAKLNER FURNACE	7 ton
<b>Type of Fuel</b>	
1. LSHS	3 3 TON/DAY
<b>Raw Material Details</b>	
ALUMINIUM SCRAP	30 Metric Tonnes/Day

*Regional Officer, Dharuhera  
Haryana State Pollution Control Board.*

### Terms and conditions

1. 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.
2. 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.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. 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.
6. 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.
7. 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 alongwith 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.

#### **Specific Conditions :**

1. The unit will make agreement with authorized TSDF/Recycler for disposal of hazardous waste i.e. used oil of DG set and will submit the Annual Report under HWM Rules, 2016 by 30th June every year. 2. That the unit shall keep all the parameters within the prescribed limits and shall comply with all the Norms and Rules as prescribed in the Act. 3. That the unit will not discharge any untreated effluent inside and outside its premises. 4. Unit will deposit balance consent fee if any found due at any stage. 5. That the unit will not add any air polluting process/ machinery and also not to add any process which increases the water pollution load. 6. Unit will apply for renewal of consent/Authorization at least 90 days before expiry date of the consent/Authorization. 7. This CTO is without prejudice to any action under the provisions of applicable laws / acts / notification / courts order to be taken in respect of any violation at any stage without any claim of the unit. If the unit fails to comply the provisions/conditions of CTO, various applicable provisions of concerned departments / agencies / authorities / any relevant decision of court, the consent to operate so granted shall be revoked automatically without giving any notice. 8. Unit will comply all the prescribed effluent/ air emission standards and will installed /upgrade/ maintained necessary Pollution control measures to control air emission/ to treat trade/ domestic effluent if required under the Provisions of Water Act, 1974/Air Act, 1981 and Environment (Protection ) Act, 1986 amended from time to time. 9. Unit will comply all the prescribed discharged effluent/ air emission standards and the directions of any Court/Authority related to this proposed project amended from time to time

*Regional Officer, Dharuhera  
Haryana State Pollution Control Board.*

**SBA RECYCLING PVT. LTD.**

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari , Haryana, 123501  
CIN NO. U27106DL2013PTC256285

To

Dated: 29-08-2025

**The Member Secretary**

Haryana State Pollution Control Board

Sector-6, Panchkula (Haryana)

**Subject: Request for revocation regarding Closure Direction Issued by CAQM and Subsequent Sealing of Unit**

**Ref. F. No. 16014/14/2021/MERD/IP/CLOSURE/6982-87, Dated 20<sup>th</sup> Aug 2025**

**Reference Closure Direction No. 705-IP.**

**Respected Sir,**

This is to respectfully submit that the closure direction issued to our unit, M/s SBA Recycling Pvt. Ltd., by the Commission for Air Quality Management (CAQM) vide Direction No. 705/IP dated 20.08.2025, appears to have been based on incomplete and unverified documentation.

In line with the Closure Direction No. 705-IP issued by CAQM dated 20.08.2025 to our unit **M/s SBA Recycling Pvt. Ltd.**, we respectfully submit the following for your kind consideration:

**1. Findings of the inspection done by the flying squad of CAQM mentioned in the closure direction.**

The closure notice mentions that “*the unit operates one rotary furnace of 4-ton capacity and 2 melting furnaces of 7-ton capacity each; however, the Consent to Operate (CTO) mentions only one Skelner furnace of 7-ton capacity. Furthermore, no stack emission monitoring report has been submitted.*”

**2. Clarification regarding the findings**

In this regard, we would like to clarify that **presently only one Aluminium Skelner Melting Furnace of 7 MT capacity is operational**, strictly as per the CTO granted by the Regional Office, HSPCB vide Consent No. *HSPCB/Consent/: 313119823REWCTO31981610 dated 30.01.2023. (Annexure-1)*

Further, we have obtained Consent to Establish (CTE) for expansion vide Consent No. *HSPCB/Consent/: 313119825REWCTE90925163 dated 11.02.2025* for the installation of: *(Annexure-2)*



# **SBA RECYCLING PVT. LTD.**

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari , Haryana, 123501  
CIN NO. U27106DL2013PTC256285

- 2 Nos. Aluminium Skelner Melting Furnaces (6 MT each)
- 1 No. Rotary Aluminium Melting Furnace (4 MT)
- 1 No. Holding Furnace (4 MT)
- 2 Nos. Pot Furnaces (0.3 MT each)

"We would like to inform you that the electricity connection to the electric panels and the referenced furnaces is yet to be established; consequently, operating these furnaces at this stage is not feasible."

We confirm that these additional furnaces shall remain **non-operational until the corresponding Consent to Operate (CTO) is granted.**

Also, we wish to bring to your kind attention that the Regional Officer, Rewari, HSPCB, proceeded to seal our unit solely on the basis of the said direction. No opportunity was provided to us to present our compliance status or clarify discrepancies in the documentation referred to by the CAQM.

We firmly believe that a site-specific inspection by the Regional Office would have revealed critical operational and compliance details that were either misrepresented in the Flying Squad's report. The absence of such verification has resulted in an abrupt disruption of our operations, causing significant hardship and reputational damage.

### **3. Evidence of Non-Operation of Other Furnaces**

To further substantiate compliance, we are submitting the monthly production records as well as turnover details for the period from August 2024 to July 2025, which clearly indicate non-operation of any additional furnaces which was setup after the grant of CTE Expansion from the HSPCB. (*Annexure-3*)

As per the CTO granted the maximum production capacity is 30 MT/day [7,50,000 Kgs / Month considering 25 days average days in a month]. However, we have not crossed the same in the any month during the last one year.



# **SBA RECYCLING PVT. LTD.**

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari , Haryana, 123501  
CIN NO. U27106DL2013PTC256285

Furthermore, Photographs depicting the non-operational status of the aforementioned furnaces have been enclosed. (*Annexures-4*)

Furthermore, Purchase bills for the above-mentioned furnaces have been enclosed. (*Annexure-5*)

#### **4. Compliance with Closure Order**

Our plant situated at *Plot No. 30-31, Sector-14, HSIIDC, IMT Bawal, District Rewari, Haryana – 123501* has suspended operations with immediate effect from 20.08.2025 in compliance with the closure directions of CAQM. Further, our electricity connection has also been temporarily disconnected by DHBVN dated 21.08.2025. (*Annexure-6*)

**Stack emission report of 7 Ton Melting Furnace has been enclosed in compliance to the direction of closure of CAQM. (*Annexure-7*)**

In light of the above submissions, we humbly request your good-self office **to revoke this closure direction** at the earliest.

Furthermore, we attended the hearing at the Commission for Air Quality Management (CAQM) office on 28.08.2025, submitting our formal reply along with supporting documentation. During the proceedings, we presented our case that the closure direction issued against our unit was based on incomplete or outdated documentation.

Upon review, the CAQM acknowledged the merit of our submission and directed us to obtain a formal letter from the Haryana State Pollution Control Board (HSPCB) confirming the following:

1. That our unit has been granted a valid *Consent to Establish* as per the policy of the board.
2. That no *Environmental Compensation* will be applicable on the unit.



**SBA RECYCLING PVT. LTD.**

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari , Haryana, 123501  
CIN NO. U27106DL2013PTC256285

We further request your kind intervention for an expedited resolution and **revocation of the closure order** so that our operations may resume at the earliest.

We sincerely hope for your prompt and favourable consideration of our request.

For M/s SBA Recycling Private Limited.



Authorized Signatory

**List of Enclosures: -**

**Annexure-1** - CTO with Consent No. HSPCB/Consent/: 313119823REWCTO31981610 dated 30.01.2023

**Annexure-2** – CTE expansion with Consent No. HSPCB / Consent / 313119825REWCTE90925163 dated 11.02.2025.

**Annexure-3** – Production details for the period from August 2024 to July 2025.

**Annexure-4** - Photographs depicting the non-operational status of the furnaces

**Annexure-5** – Purchase bills for all the additional furnaces.

**Annexure-6** – Electricity discontinuation letter issued by DHBVN dated 21.08.2025.

**Annexure-7** – Stack Emission Report of 7 Ton Melting Furnace.



## HARYANA STATE POLLUTION CONTROL BOARD

Lala Nemi Chand Singhal Enc.Sohna Road, Near  
Hanuman Mandir,Dharuhera Ph. 01274-244440-

41(O) Email:- hspcbrodr@gmail.com

E-mail: hspcb@hry.nic.in



No. HSPCB/Consent/ : 313119823REWCTO31981610

Dated:30/01/2023

To.

M/s :SBA Recycling Pvt Ltd

Plot No. 30-31,Sec.-14, HSIIDC, IMT, Bawal Distt-Rewari

Subject: Grant of consent to operate to M/s SBA Recycling Pvt Ltd.

Please refer to your application no. 31981610 received on dated 2022-12-23 in regional office Dharuhera. With reference to your above application for consent to operate, M/s SBA Recycling Pvt Ltd is here by granted consent as per following specification/Terms and conditions.

<b>Consent Under</b>	BOTH
<b>Period of consent</b>	01/04/2023 - 31/03/2028
<b>Industry Type</b>	Ferrous and Non - ferrous metal extraction involving different furnaces through melting, refining, -processing, casting and alloy re making -
<b>Category</b>	ORANGE
<b>Investment(In Lakh)</b>	709.16168
<b>Total Land Area(Sq. meter)</b>	3600.0
<b>Total Builtup Area(Sq. meter)</b>	1826.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	1.5 KL/Day
<b>Number of outlets</b>	1.0
<b>Mode of discharge</b>	
1. Domestic	SEWER
2. Trade	
<b>Domestic Effluent Parameters</b>	
1. NA	
<b>Trade Effluent Parameters</b>	
1. NA	
<b>Number of stacks</b>	1
<b>Height of stack</b>	
1. ATTACHED TO METLING FURNACE	30 meter
<b>Emission parameters</b>	
1. SPM	150 mg/m <sup>3</sup>

<b>Product Details</b>	
1. ALUMINIUM ALLOYS	30 Metric Tonnes/day
<b>Capacity of boiler</b>	
1. na	0 Ton/hr
<b>Type of Furnace</b>	
1. SCAKLER FURNACE	7 ton
<b>Type of Fuel</b>	
1. LSHS	3 3 TON/DAY
<b>Raw Material Details</b>	
ALUMINIUM SCRAP	30 Metric Tonnes/Day

*Regional Officer, Dharuhera  
Haryana State Pollution Control Board.*

### Terms and conditions

1. 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.
2. 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.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. 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.
6. 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.
7. 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 alongwith 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.

#### **Specific Conditions :**

1. The unit will make agreement with authorized TSDF/Recycler for disposal of hazardous waste i.e. used oil of DG set and will submit the Annual Report under HWM Rules, 2016 by 30th June every year. 2. That the unit shall keep all the parameters within the prescribed limits and shall comply with all the Norms and Rules as prescribed in the Act. 3. That the unit will not discharge any untreated effluent inside and outside its premises. 4. Unit will deposit balance consent fee if any found due at any stage. 5. That the unit will not add any air polluting process/ machinery and also not to add any process which increases the water pollution load. 6. Unit will apply for renewal of consent/Authorization at least 90 days before expiry date of the consent/Authorization. 7. This CTO is without prejudice to any action under the provisions of applicable laws / acts / notification / courts order to be taken in respect of any violation at any stage without any claim of the unit. If the unit fails to comply the provisions/conditions of CTO, various applicable provisions of concerned departments / agencies / authorities / any relevant decision of court, the consent to operate so granted shall be revoked automatically without giving any notice. 8. Unit will comply all the prescribed effluent/ air emission standards and will installed /upgrade/ maintained necessary Pollution control measures to control air emission/ to treat trade/ domestic effluent if required under the Provisions of Water Act, 1974/Air Act, 1981 and Environment (Protection ) Act, 1986 amended from time to time. 9. Unit will comply all the prescribed discharged effluent/ air emission standards and the directions of any Court/Authority related to this proposed project amended from time to time

*Regional Officer, Dharuhera  
Haryana State Pollution Control Board.*


**HARYANA STATE POLLUTION CONTROL BOARD**


**Regional Office Rewari, SCO D-6 & D-7, Suncity  
Commercial Complex, First Floor, A-Block, Sector-6,  
Rewari-123401. Email- hspcbrodr@gmail.com**

*Website: www.hrocmmms.nic.in E-Mail - Hqhspcb@hspcb.org.in*

*Telephone No.: 0172-2577870-73*

No. HSPCB/Consent/ : 313119825REWCTE90925163

Dated:11/02/2025

To.

M/s : SBA Recycling Pvt Ltd  
Plot No. 30-31,Sec.-14, HSIIDC, IMT, Bawal Distt-Rewari  
**REWARI**  
123501

**Sub. : Grant of consent to Establish to M/s SBA Recycling Pvt Ltd**

Please refer to your application no. 90925163 received on dated 2025-01-10 in regional office Rewari.

With reference to your above application for consent to establish,M/s SBA Recycling Pvt Ltd is here by granted consent as per following specification/Terms and conditions.

<b>Consent Under</b>	AIR/WATER
<b>Period of consent</b>	11/02/2025 - 10/02/2030
<b>Industry Type</b>	Ferrous and Non - ferrous metal extraction involving different furnaces through melting, refining, -processing, casting and alloy re making -
<b>Category</b>	ORANGE
Investment(In Lakh)	835.93921
Total Land Area (Sq. meter)	3600.0
Total Builtup Area (Sq. meter)	1826.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	1.5 KL/Day
Number of outlets	1.0
<b>Mode of discharge</b>	
1. Domestic	Public Sewer
2. Trade	
<b>Permissible Domestic Effluent Parameters</b>	
1. BOD	350 mg/l
2. TSS	600 mg/l
3. pH	5.5.9.0
4. O&G	20 mg/l
<b>Permissible Trade Effluent Parameters</b>	

1. NA	mg/l
Number of stacks	1
<b>Height of stack</b>	
1. Common stack attached to Six Nos. furnace	30 Meter
<b>Permissible Emission parameters</b>	
1. SPM	80 mg/m <sup>3</sup>
2. NOX	50 mg/m <sup>3</sup>
3. SOX	50 mg/m <sup>3</sup>
<b>Capacity of boiler</b>	
1. NA	Ton/hr
<b>Type of Furnace</b>	
1. 2 Nos. Furnace	06 MT
2. 01 No. Rotary Furnace	04 MT
3. 01 No. Holding Furnace	04 MT
4. 02 Nos. pots	0.3 MT
<b>Type of Fuel</b>	
1. HSD	100 Ltr/Day
2. LSHS	3500 KG/Day
3. Biomass Pellets	700 KG/Day

**Regional Officer, Rewari**

*Haryana State Pollution Control Board.*

### **Terms and conditions**

1. The industry has declared that the quantity of effluent shall be 1.5 KL/Day i.e 0KL/Day for Trade Effluent, 0 KL/Day for Cooling, 1.5 KL/Day for Domestic and the same should not exceed .
2. The above 'Consent to Establish' is valid for 60 months from the date of its issue to be extended for another one year at the discretion of the Board or till the time the unit starts its trial production whichever is earlier. The unit will have to set up the plant and obtain consent during this period.
3. The officer/official of the Board shall have the right to access and inspection of the industry in connection with the various processes and the treatment facilities being provided simultaneously with the construction of building/machinery. The effluent should conform the effluent standards as applicable
4. That necessary arrangement shall be made by the industry for the control of Air Pollution before commissioning the plant. The emitted pollutants will meet the emission and other standards as laid/will be prescribed by the Board from time to time.
5. The applicant will obtain consent under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21/22 of the Air (Prevention & Control of Pollution) Act,1981 as amended to-date-even before starting trial production

6. The above Consent to Establish is further subject to the conditions that the unit complies with all the laws/rules/decisions and competent directions of the Board/Government and its functionaries in all respects before commissioning of the operation and during its actual working strictly.
7. No in-process or post-process objectionable emission or the effluent will be allowed, if the scheme furnished by the unit turns out to be defective in any actual experience
8. The Electricity Department will give only temporary connection and permanent connection to the unit will be given after verifying the consent granted by the Board, both under Water Act and Air Act.
9. Unit will raise the stack height of DG Set/Boiler as per Board's norms.
10. Unit will maintain proper logbook of Water meter/sub meter before/after commissioning.
11. That in the case of an industry or any other process the activity is located in an area approved and that in case the activity is sited in an residential or institutional or commercial or agricultural area, the necessary permission for siting such industry and process in an residential or institutional or commercial or agricultural area or controlled area under Town and Country Planning laws CLU or Municipal laws has to be obtained from the competent Authority in law permitting this deviation and be submitted in original with the request for consent to operate.
12. That there is no discharge directly or indirectly from the unit or the process into any interstate river or Yamuna River or River Ghaggar.
13. That the industry or the unit concerned is not sited within any prohibited distances according to the Environmental Laws and Rules, Notification, Orders and Policies of Central Pollution control Board and Haryana State Pollution Control Board.
14. That of the unit is discharging its sewage or trade effluent into the public sewer meant to receive trade effluent from industries etc. then the permission of the Competent Authority owing and operating such public sewer giving permission letter to his unit shall be submitted at time of consent to operate.
15. That if at any time, there is adverse report from any adjoining neighbor or any other aggrieved party or Municipal Committee or Zila Parishad or any other public body against the unit's pollution; the Consent to Establish so granted shall be revoked.
16. **That all the financial dues required under the rules and policies of the Board have been deposited in full by the unit for this Consent to Establish.**
17. In case of change of name from previous Consent to Establish granted, fresh Consent to Establish fee shall be levied.
18. 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
19. That the unit will take all other clearances from concerned agencies, whenever required.
20. That the unit will not change its process without the prior permission of the Board.
21. That the Consent to Establish so granted will be invalid, if the unit falls in Aravali Area or non conforming area.
22. That the unit will comply with the Hazardous Waste Management Rules and will also make the non-leachate pit for storage of Hazardous waste and will undertake not to dispose off the same except for pit in their own premises or with the authorized disposal authority.

23. That the unit will submit an undertaking that it will comply with all the specific and general conditions as imposed in the above Consent to Establish within 30 days failing which Consent to Establish will be revoked.
24. That unit will obtain EIA from MoEF, if required at any stage.
25. In case of unit does not comply with the above conditions within the stipulated period, Consent to Establish will be revoked.
26. That unit will obtain consent to operate from the board before the start of product activity.
27. 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.
28. 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

#### Other Conditions :

1. CTE so granted is on the basis of detail submitted by the unit in online application, CTE granted will be without prejudice to any violation made by unit in past & will be deemed revoked & further action will be taken as per law if any violation is observed at any stage. 2. Unit will not change the quantity of domestic effluent/trade effluent/air emission without prior permission of the Board. 3. Unit will obtain prior CTO before starting of production. 4. Unit will obtain all necessary clearance from all concerned departments. 5. The unit will install the project only on the land for which Town and Country Planning Department/HUDA/HSIIDC has given license. 6. Unit will apply for CTO/ CTE Extension at least 90 days before expiry date of this CTE. 7. That in case any additional charges / fees / penalty etc. are found payable towards this authorization / CTO/ CTE as per audit then the same shall be paid by the unit without any objection immediately as and when demanded by this office. 8. If at any stage found that unit was involved in any past violation, If at any stage found that unit was involved in any past violation regarding Environment Laws / Rules / Acts then CTE so granted shall be revoked automatically & legal action will be initiate against the project proponent. 9. Unit will use only treated effluent supplied from Sewage treatment plant during construction phase of the project 10. That this CTE will not provide any immunity from any other Act/Rules/Regulations applicable to the project/land in question. 11. Unit will comply CAQM direction issued vide No. 65 & amended till date, HSPCB direction vide order dated 21.07.2022 regarding standard list of approved fuels in NCR and direction No. 76 dt. 29.09.2023 of CAQM regarding installation of retro-fitment of duel fuel/ECs and fitment of RECDs certified by the authorized agencies on DG sets more than 19 kW. 12. Unit will install DG set as per CAQM direction No. 76.

*Regional Officer, Rewari*  
*Haryana State Pollution Control Board.*

ANNEXURE-3

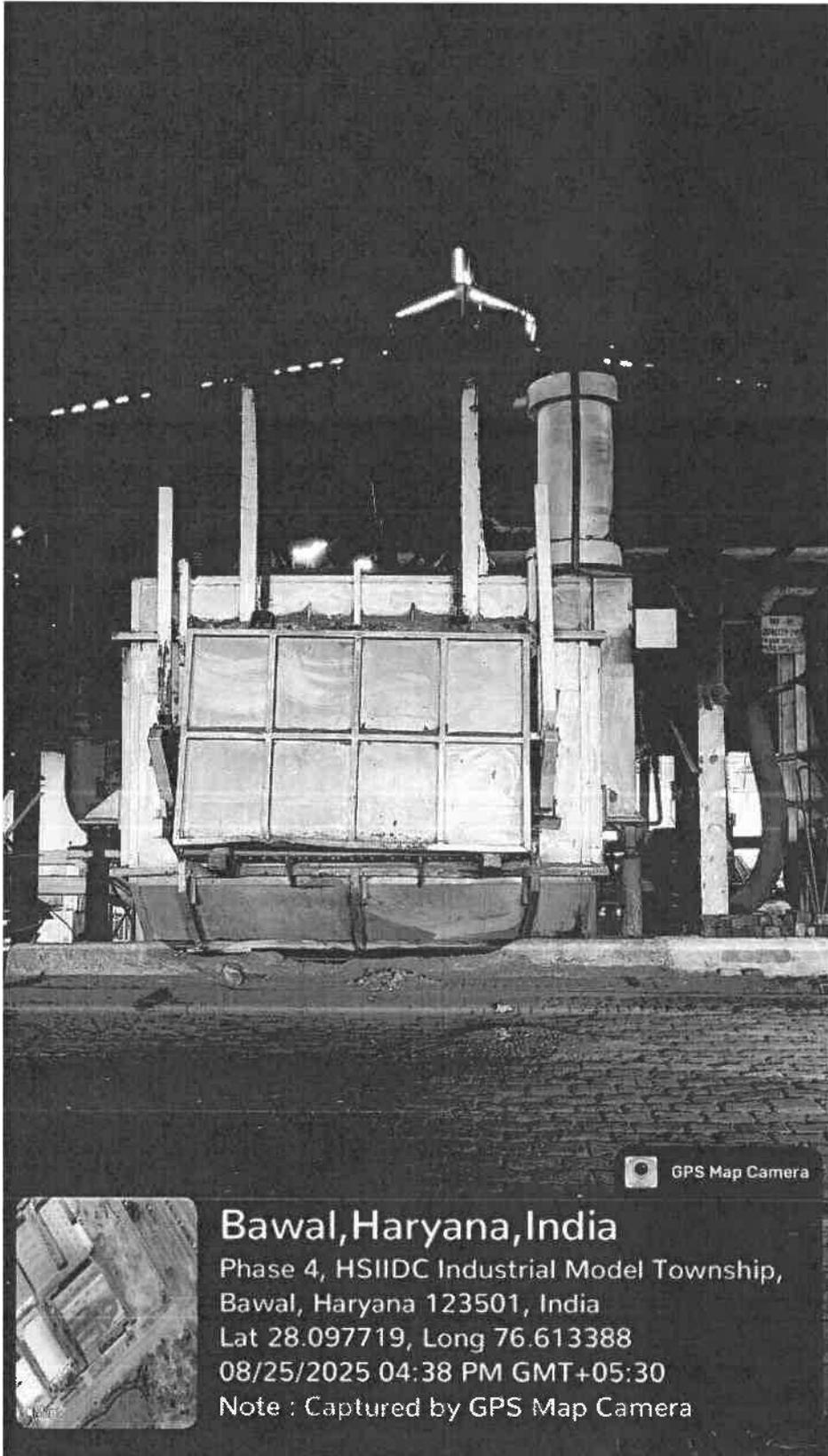
# **SBA RECYCLING PVT. LTD.**

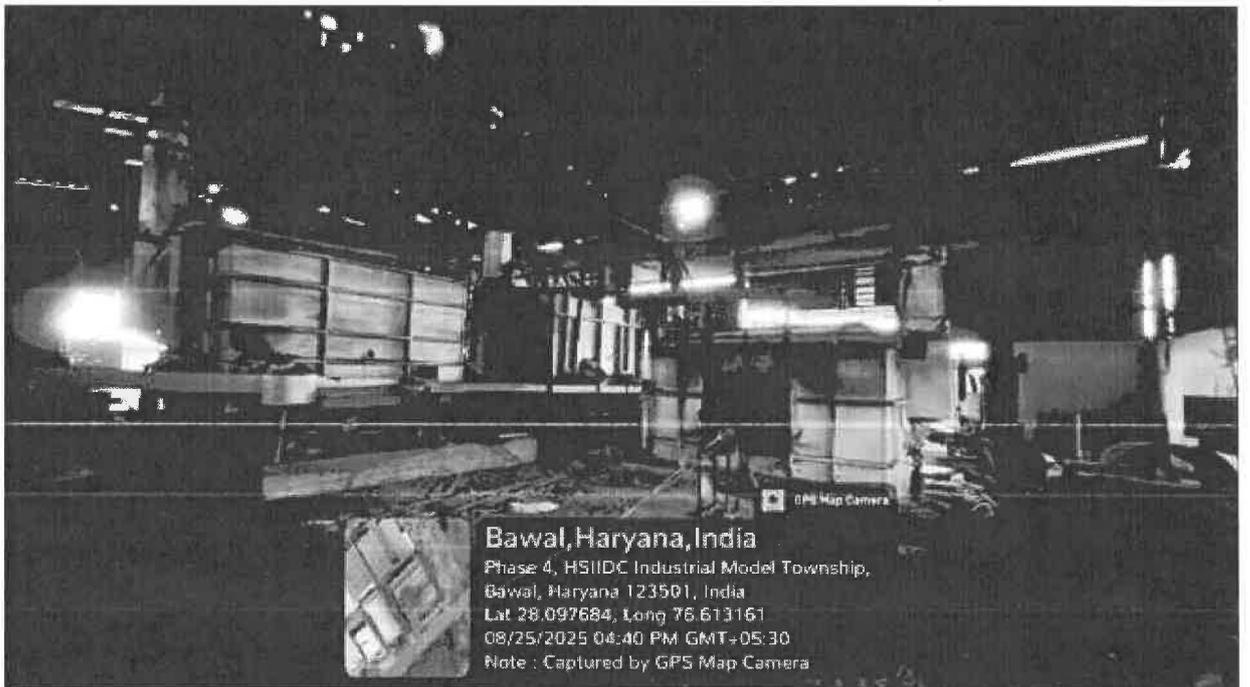
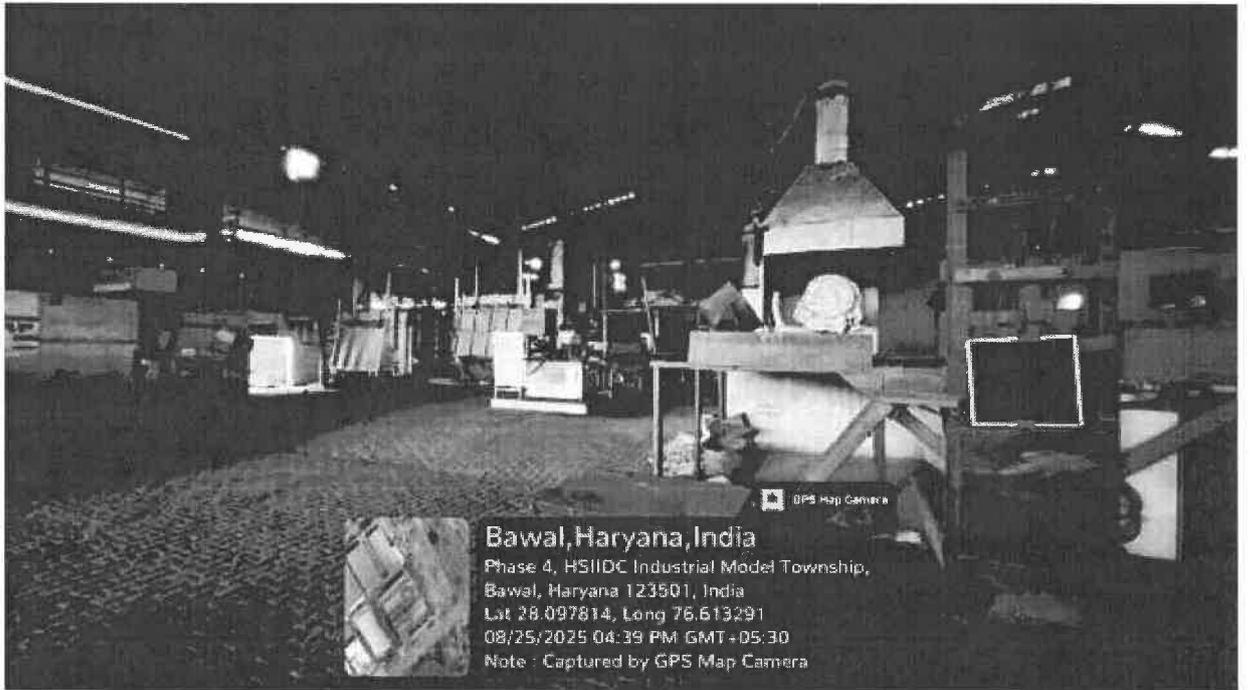
Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari, Haryana, 123501  
CIN NO. U27106DL2013PTC256285

SBA Recycling Pvt Ltd  
Details of Production from  
August, 2024 to August, 2025

Month	Installed Capacity (KGS)	Actual Production QTY (KGS)	Transferred From SBAPL DHR	Total Qty (KGS)	Total Sold QTY of Alloys (KGS)	Alloys Turnover (Value)	Others Sale Value (of Byproduct)	Total Sale Value
Aug-24	750000	325733		325733	321130	70658516	44870872	115529388
Sep-24	750000	734733		734733	739336	160128460	17597553	177726013
Oct-24	750000	408270		408270	408270	90097854	11357621	101455475
Nov-24	750000	203157		203157	203157	43861488	7964349	51825837
Dec-24	750000		138922	138922	138922	28762200	7795142	36557342
Jan-25	750000	225463	16849	242312	240580	44746602	3036019	47782621
Feb-25	750000	295548		295548	297279	59136879	1753077	60889956
Mar-25	750000	163614		163614	163614	34195222	11353040	45548262
Apr-25	750000	229195		229195	219695	47899457	1091454	48990911
May-25	750000	165363		165363	171963	38660817	5228135	43888952
June-25	750000	125057	51340	176397	171783	38135486	77700	38213186
July-25	750000	363880	45448	409328	398477	92905807	10737090	103642897
Aug-25	750000							

**Annexure-4 (Photographs Showing non-operation of furnaces)**









GPS Map Camera

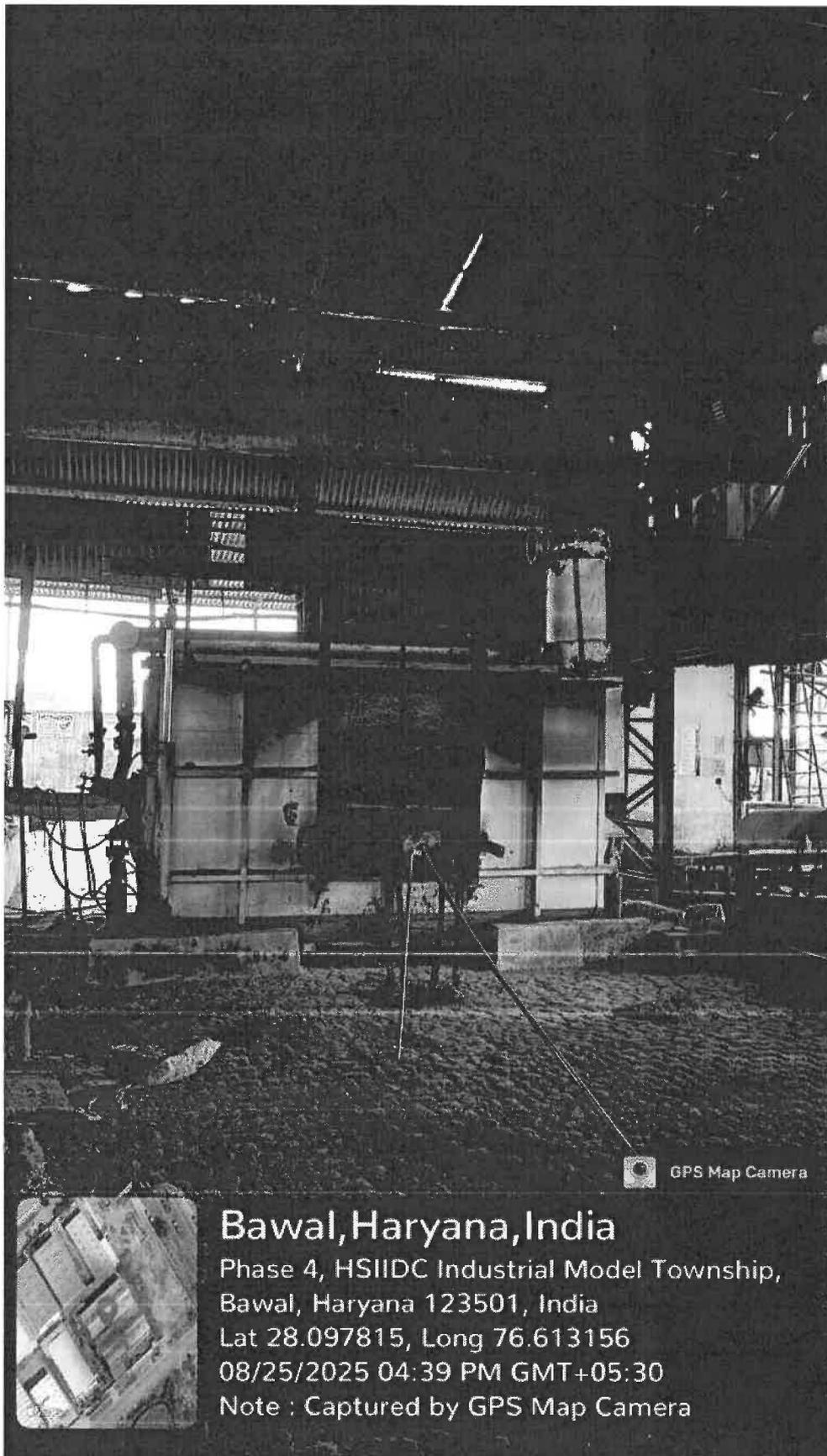
**Bawal, Haryana, India**

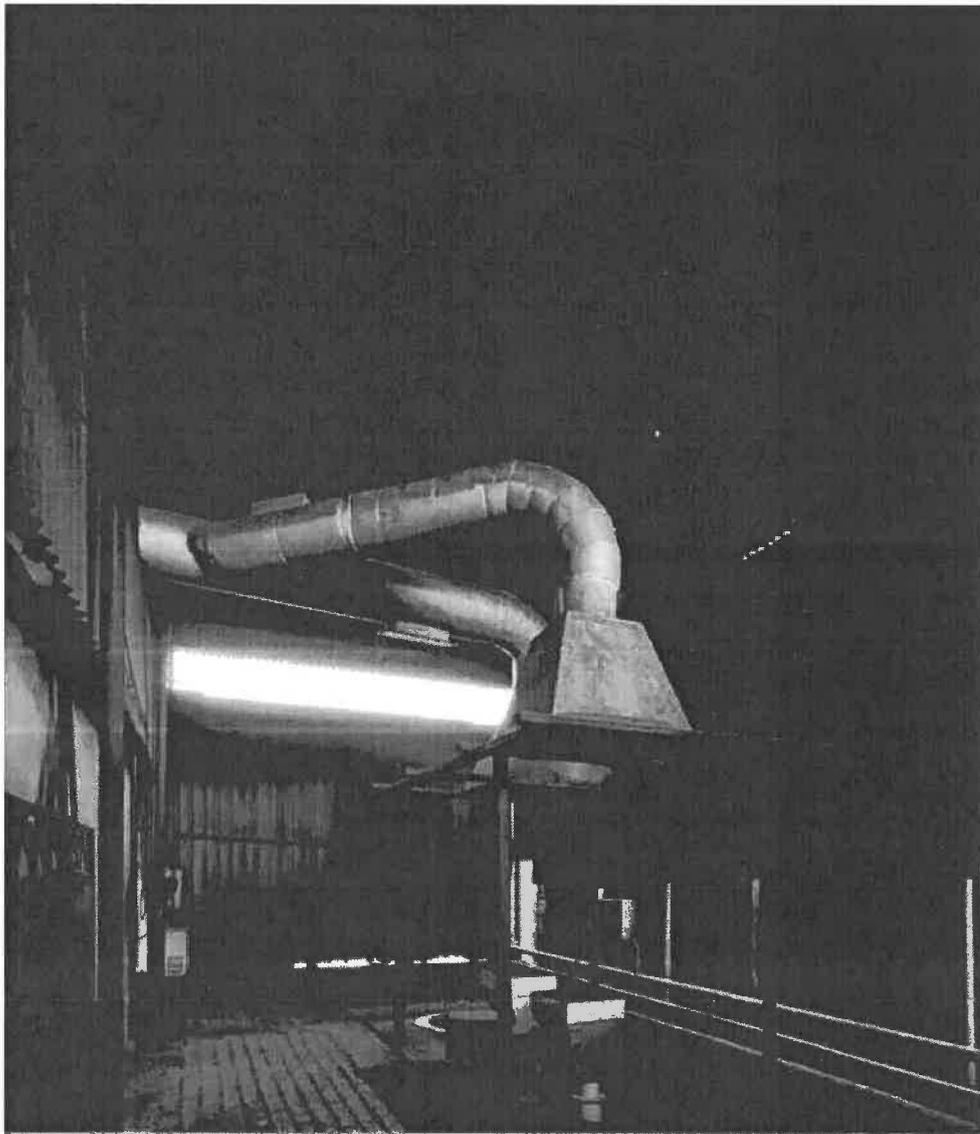
Phase 4, HSIIDC Industrial Model Township,  
Bawal, Haryana 123501, India

Lat 28.097775, Long 76.613376

08/25/2025 04:38 PM GMT+05:30

Note : Captured by GPS Map Camera





 GPS Map Camera



### Bawal, Haryana, India

Phase 4, HSIIDC Industrial Model Township,  
Bawal, Haryana 123501, India

Lat 28.097901, Long 76.613046

08/25/2025 04:42 PM GMT+05:30

Note : Captured by GPS Map Camera

Shree Balaji Alumnicast Pvt.Ltd. III  
VIII.- Kota Khandewala Tehsil Tauru  
Dist- Mewat, Haryana, 122103  
GSTIN/UIN: 06AAHCS7228N1ZU  
State Name : Haryana, Code : 06  
E-Mail : [accountskota@sbapl.com](mailto:accountskota@sbapl.com)

Delivery Note No.  
**SBAPLKOTA/F1055**

Dated  
**20-Feb-25**  
Mode/Terms of Payment

Reference No. & Date.

Other References

Consignee (Ship to)

Buyer's Order No.

Dated

**SBA Recycling Pvt Ltd**

Dispatch Doc No.

Plot No. 30/31, Sector-14,  
HSIIDC, Bawal, Rewari, Haryana  
123501

Dispatched through  
**BY ROAD**

Destination  
**BAWAL**

GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Bill of Lading/LR-RR No.  
**963**

Motor Vehicle No.  
**HR73A4659**

Terms of Delivery

Buyer (Bill to)

**SBA Recycling Pvt Ltd**

Plot No. 30/31, Sector-14,  
HSIIDC, Bawal, Rewari, Haryana  
123501

GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Sl No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	<b>ROTARY ALUMINIUM MELTING FURNACE</b> <i>With Furnance Accessories</i>	84171000	1 NOS	46,70,777.00	NOS	46,70,777.00
Total			1 NOS			In ₹ 46,70,777.00

Amount Chargeable (in words)

E. & O.E

Indian Rupees Forty Six Lakh Seventy Thousand Seven Hundred Seventy Seven Only

HSN/SAC

Taxable Value

84171000

46,70,777.00

Total 46,70,777.00

Tax Amount (in words) : NIL

Company's PAN

2AFC57228N

Recd. in Good Condition

*[Signature]*

for Shree Balaji Alumnicast Pvt. Ltd. III

*[Signature]*  
Authorised Signatory

This is a Computer Generated Document

**JUI WARD**  
Shree Balaji Alumnicast Pvt. Ltd.  
A. No. 1168, Date: 20/2/25  
Plot-111  
*[Signature]*

**76**  
DELIVERY NOTE

**35**  
(ORIGINAL FOR CONSIGNEE)

Shree Balaji Alumnicast Pvt.Ltd. III  
Vill.- Kota Khandewala Tehsil Tauru  
Distt- Mewat,Haryana, 122103  
GSTIN/UIN: 06AAHCS7228N1ZU  
State Name : Haryana, Code : 06  
E-Mail : [accountskota@sbapl.com](mailto:accountskota@sbapl.com)

Delivery Note No  
**SBAPLKOTA/F1101**

Dated  
**3-Mar-25**  
Mode/Terms of Payment

Reference No. & Date.

Other References

Consignee (Ship to)  
**SBA Recycling Pvt Ltd**  
Plot No. 30/31, Sector-14,  
HSIIDC, Bawal, Rewari, Haryana  
123501  
GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Buyer's Order No.

Dated

Dispatch Doc No.  
**BY SELF TRANSPORT**

Dispatched through  
**BY ROAD**

Destination  
**BAWAL**

Bill of Lading/LR-RR No.

Motor Vehicle No.  
**HR47D3326**

Terms of Delivery

Buyer (Bill to)  
**SBA Recycling Pvt Ltd**  
Plot No. 30/31, Sector-14,  
HSIIDC, Bawal, Rewari, Haryana  
123501  
GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Sl No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	<b>Plant &amp; Machinery</b> <i>Ducting Band, Ducting Wall, MS Plate MS Ducting MS Chimney Pipe</i>	84282019				1,71,572.00
Total						In ₹ 1,71,572.00

Amount Chargeable (in words)

E & O E

**Indian Rupees One Lakh Seventy One Thousand Five Hundred Seventy Two Only**

HSN/SAC	Taxable Value
84282019	1,71,572.00
<b>Total</b>	<b>1,71,572.00</b>

Tax Amount (in words) : **NIL**

**301 WARD**  
Shree Balaji Alumnicast Pvt. Ltd.  
No. 1218A Date 3/3/25  
Plant-III

Company's PAN

AAHCS7228N

Recd. in Good Condition

1218A  
3/10  
3/03/25  
*[Signature]*

for Shree Balaji Alumnicast Pvt.Ltd. III

*[Signature]*  
Authorized Signatory

**77**  
DELIVERY NOTE

(ORIGINAL FOR RECIPIENT)

36

**Shree Balaji Alumnicast Pvt.Ltd. III**  
Vill.- Kota Khandewala Tehsil Tauru  
Distt- Mewat, Haryana, 122103  
GSTIN/UIN: 06AAHCS7228N1ZU  
State Name : Haryana, Code : 06  
E-Mail : [accountskota@sbapl.com](mailto:accountskota@sbapl.com)

Delivery Note No.  
**SBAPLKOTA/G0012**

Dated  
**3-Apr-25**  
Mode/Terms of Payment

Consignee (Ship to)  
**SBA Recycling Pvt Ltd**  
Plot No. 30/31, Sector-14,  
HSIDC, Bawal, Rewari, Haryana  
123501  
GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Reference No. & Date.

Other References

Buyer's Order No.

Dated

Dispatch Doc No.

Dispatched through  
**BY ROAD**

Destination  
**BAWAL**

Bill of Lading/LR-RR No.

Motor Vehicle No.  
**HR47D3326**

Terms of Delivery

Buyer (Bill to)  
**SBA Recycling Pvt Ltd**  
Plot No. 30/31, Sector-14,  
HSIDC, Bawal, Rewari, Haryana  
123501  
GSTIN/UIN : 06AATCS4767Q1Z6  
State Name : Haryana, Code : 06

Sl No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	ALUMINIUM MELTING SKELNER FURNACE 01 NOS Capacity 6 Ton					18,52,000.00
	001A 21/10 3/04/25 <i>[Signature]</i>					Total

**OUTWARD**  
Shree Balaji Alumnicast Pvt. Ltd.  
No. 12 Date: 3/4/25  
Plant-III  
*[Signature]*

Amount Chargeable (in words)  
**Indian Rupees Eighteen Lakh Fifty Two Thousand Only**

In ₹ 18,52,000.00  
E. & O.E

Company's PAN : AAHCS7228N

Recd. in Good Condition

for Shree Balaji Alumnicast Pvt.Ltd. III

*[Signature]*  
Authorized Signatory

**Shree Balaji Alumnicast Pvt Ltd-V - (from 1-Apr-2021)**  
 57-58 Kms Stone, Delhi-Jaipur Highway  
 Binola Industrial Area, Near Alicon Castalloy Ltd,  
 Bhora Kalan, Gurugram, Haryana, 123413  
 GSTIN/UIN: 06AAHCS7228N1ZU  
 State Name : Haryana, Code : 06  
 CIN: 074899DL1995PTC064325  
 E-Mail : info.dhr@sbapl.com  
 Consignee (Ship to)

**SBA Recycling Pvt.Ltd**  
 Plot No.30&31, Sec.14 HSIIDC  
 Groth Center, Bawal  
 Distt. Rewari  
 GSTIN/UIN : 06AATCS4767Q1Z6  
 State Name : Haryana, Code : 06

Buyer (Bill to)  
**SBA Recycling Pvt.Ltd**  
 Plot No.30&31, Sec.14 HSIIDC  
 Groth Center, Bawal  
 Distt. Rewari  
 GSTIN/UIN : 06AATCS4767Q1Z6  
 State Name : Haryana, Code : 06

Delivery Note No

SBAPLBIN/G0019

Dated

17-May-25

Mode/Terms of Payment

Reference No. &amp; Date.

Other References

Buyer's Order No.

Dated

Dispatch Doc No.

Dispatched through

BY ROAD

Bill of Lading/LR-RR No.

Destination

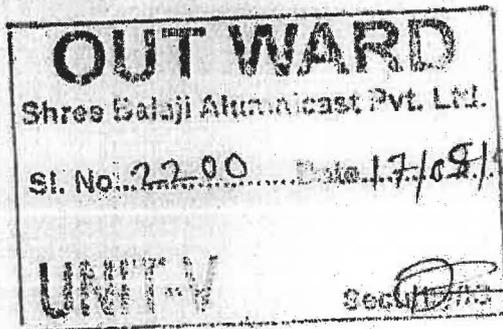
BAWAL

Motor Vehicle No

RJ32GC2425

Terms of Delivery

Sl No.	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	ALUMINIUM MELTING SKELNER FURNACE 01 NOS Capacity 6 Ton					72,00,000.00



Total

₹ 72,00,000.00

E. &amp; O E

Amount Chargeable (in words)

INR Seventy Two Lakh Only

Company's PAN : AAHCS7228N

Recd. in Good Condition

for Shree Balaji Alumnicast Pvt Ltd (from 1-Apr-2021)

Authorised Signatory  
 Authorised Signatory

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Tax Invoice

INVOICE FORM 1

570449316331e4e9102e7da96166eb51b5e3e00165e38-

8246766669455d6m1

Invoice No: 16 May 25



SHREE MANGLAM PROJECTS PVT. LTD  
Plot No. 307-407, Sector-6, IIT Mandi  
Gurgaon, Haryana 122001  
GST INTRN. No. 06AA1001791791  
State Name: Haryana Code: 06  
PIN: 122001  
E-Mail: manglam2000@gmail.com

Invoice No: 16 May 25  
e-Way Bill No: SBAPLDIL/25-26/015  
332601001228

AGARSI DE WET

Reference No. & Date: SBAPLDIL/25-26/015  
10 May 25

SHREE BALAJI ALUMINICAST PRIVATE LIMITED (BINOLA) At Village-SIKRA KALAN, NATIONAL HIGHWAY NO 08  
Gurgaon, Haryana 122001

Buyer's Order No: SBAPLDIL/25-26/015

State Name: Haryana Code: 06  
Buyer (Bill to): SHREE BALAJI ALUMINICAST PRIVATE LIMITED (BINOLA)

Invoice No: SBAPLDIL/25-26/015

BINOLA BILASPU

Village-SIKRA KALAN, NATIONAL HIGHWAY NO 08  
Gurgaon, Haryana 122001

Plant and Machinery: Aluminium Melting Sköfner Furnace-01 Nos

State Name: Haryana Code: 06  
Goods and Services

FURNACE  
Aluminium Melting Sköfner Furnace

HSN/SAC	Quantity	Rate	Amount
84178090	1 NOS	72000000	72,00,000.00

FREIGHT & CARTAGE 996511  
Output-CGST

23 000000  
840 07100

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continued to page 02 of 02

Tax Invoice (Page 2)

**DURG MANU AM PROJE CTS PVT LTD**  
 Plot No. 20, 30B, Sector 6, MF Manesar  
 Haryana, India - 122005  
 GSTIN: 06AHC0228N1ZU  
 State Name: Haryana, Code: 06  
 Buyer Ref No: 06AHC0228N1ZU  
 Seller Ref No: 06AHC0228N1ZU  
**SHEEL BALAJI OMNICAST PRIVATE LIMITED (BIRLA)**  
 Village: BHOLA KALAN, NATIONAL HIGHWAY NO-08  
 BIRLA AREA NEAR ALICON CASTING ALLOYS LTD  
 (Near Chausani) (HR)  
 GSTIN: 06AHC0228N1ZU  
 State Name: Haryana, Code: 06  
 Buyer Ref No: 06AHC0228N1ZU  
 Seller Ref No: 06AHC0228N1ZU

**SHAPLARK 25 200 B**  
 Dispatched through: KANAK LOGISTICS  
 Bill of Lading (B/L) No: 1010 dt. 16-May-25  
 Term of Delivery: Plant and Machinery  
 Aluminum Melting Skelner furnace-01 No. 1

Output: SGST

Total 1 NOS ₹ 85,23,140.00

Amount in words: INR Eighty Five Lakh Twenty Three Thousand One Hundred Forty Only

HSN/SAC	Taxable Value		CGST		SGST/UTGST	
	Value	Rate	Amount	Rate	Amount	Rate
72090000	72,00,000.00	9%	6,48,000.00	9%	6,48,000.00	
23000000	23,00,000.00	9%	2,07,000.00	9%	2,07,000.00	
<b>Total</b>	<b>72,23,000.00</b>		<b>6,50,070.00</b>		<b>6,50,070.00</b>	

Amount in words: INR Thirteen Lakh One Hundred Forty Only  
 Company's PAN: AADCD7582C

- TERMS & CONDITIONS
1. Our risk and responsibility ceases when the goods leave our premises.
  2. Interest @ 24% will be the charge if payments not received within agreed period.
  3. Please inform any discrepancies within 7 days of billing.

for DURG MANU AM PROJE CTS PVT LTD

This is a Computer Generated Invoice

PURCHASE ORDER

CUSTOMER DETAILS

PRODUCTS WISE DETAILS

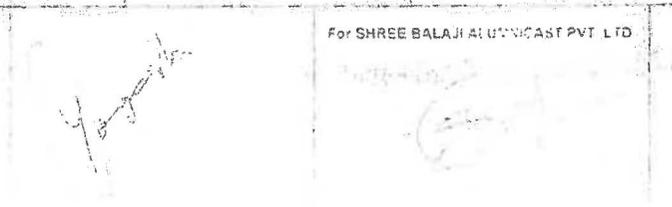
SPECIAL NOTICE

PAYMENT TERMS

PREPARED BY

For SHREE BALAJI ALUMINICAST PVT. LTD

40

32e BOMMA WADA NATIONAL HIGHWAY NO-8, BIALUR AND APPA NEAR BILON, GARGAON, DIST. GARGAON (HR) Phone: 01244246550, Fax: 01244246551, E-MAIL: purchase03@sbcast.com															
DEPARTMENT: 06A4H57228/111															
NAME: SHREE BALAJI ALUMINICAST PVT. LTD.												CITY: GARGAON		STATE: HR	
ADDRESS: PLOT NO-307-308, SECTOR 6, IMT MANSAR												CONTACT PERSON: SHARAD KUMAR		PHONE: 01244246550	
GARGAON, HARYANA												DATE: 15/07/2015		TIME: 11:21 AM	
SNO	PRODUCT DESCRIPTION	HSE/SAC CODE	QTY	UNIT	RATE	TOTAL SALE	DISC IN RATE	DISC AMT	TAXABLE VALUE	ES		SGST		IGST	
										RATE %	AMOUNT	RATE %	AMOUNT	RATE %	AMOUNT
	ALUMINIUM MELTING SKELNER FURNACE CAP. 6000 KGS			NOS	720000	720000	0%	0	720000	9.00%	64800.00	0.00%	64800.00	0.00%	0.00
TOTAL						720000	0	0	720000	9.00%	64800.00	0.00%	64800.00	0.00%	0.00
FREIGHT EXTRA										SUMMARY		AMOUNT			
										TOTAL INVOICE VALUE		720000			
SPECIAL NOTICE:										TOTAL DISCOUNTS		0			
SELLER MUST SUPPLY THE MATERIAL AS PER DELIVERY SCHEDULE MENTIONED IN PURCHASE ORDER, OTHERWISE BUYER RESERVES THE RIGHT TO REJECT THE MATERIAL AND SEND BACK TO SUPPLIER ON HIS COST/RISK										TOTAL TAXABLE VALUE		720000			
										TOTAL CGST		64800			
										TOTAL SGST		64800			
ALL THE TERMS OF THE CONTRACT TO BE GOVERNED BY GENERAL PURCHASE TERMS AND CONDITIONS OF SHREE BALAJI ALUMINICAST PVT LTD										TOTAL NET		0			
										GRAND TOTAL		849600			
PAYMENT TERMS				NO. DATES		AMOUNT IN WORDS		REMARKS							
				IMMEDIATE				For SHREE BALAJI ALUMINICAST PVT. LTD 							
PREPARED BY															

# 82

## DELIVERY NOTE

(ORIGINAL FOR CONSIGNEE)

41

**Shree Balaji Alumnicast Pvt.Ltd. III**  
 Vill.- Kota-Khandewala Tehsil Tauru  
 Distt- Mewat,Haryana, 122103  
 GSTIN/UIN: 06AAHCS7228N1ZU  
 State Name : Haryana, Code : 06  
 E-Mail : accountskota@sbapl.com  
 Consignee (Ship to)

**SBA Recycling Pvt Ltd**  
 Plot No. 30/31, Sector-14,  
 HSIIDC, Bawal, Rewari, Haryana  
 123501  
 GSTIN/UIN : 06AATCS4767Q1Z6  
 State Name : Haryana, Code : 06

Buyer (Bill to)  
**SBA Recycling Pvt Ltd**  
 Plot No. 30/31, Sector-14,  
 HSIIDC, Bawal, Rewari, Haryana  
 123501  
 GSTIN/UIN : 06AATCS4767Q1Z6  
 State Name : Haryana, Code : 06

Delivery Note No.  
**SBAPLKOTA/G0274**

Dated  
**22-Jul-25**  
 Mode/Terms of Payment

Reference No. & Date.

Other References

Buyer's Order No.

Dated

Dispatch Doc No.

Dispatched through  
**BY ROAD**

Destination  
**BAWAL**

Bill of Lading/LR-RR No.

Motor Vehicle No.  
**HR38AC8726**

Terms of Delivery

Sl No	Description of Goods	HSN/SAC	Quantity	Rate	per	Amount
1	TRITING KOTHALI QURESHABLE FURNACE 02 Nos	84282019				6,21,860.00
Total						In ₹ 6,21,860.00

Amount Chargeable (In words)

**Indian Rupees Six Lakh Twenty One Thousand Eight Hundred Sixty Only**

E & O.E

HSN/SAC

Taxable Value

84282019

6,21,860.00

Total 6,21,860.00

Tax Amount (in words) : NIL

DUPLICATE

Shree Balaji Alumnicast Pvt. Ltd.  
 Bill No. 449 Date 22/7/25  
 Plant-III

Company's PAN : AAHCS7228N

Recd. in Good Condition

for Shree Balaji Alumnicast Pvt.Ltd. III

Authorised Signatory

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127A

24/05

22/07/25

[Signature]

DAKSHIN HARYANA BIJLI VITRAN NIGAM  
(A Govt. of Haryana Undertaking)  
Office of S.D.O 'OP' S/ Division, Bawal  
Ph No. & Fax: No; 01284-260041, Mob: 9992110816  
E-mail: sdobawal2@gmail.com website: www.dhbvn.com

42

Memo No. 8991

Date. 22/8/25

To

XEN 'OP' Divn,  
DHBVN S/Urban Rewari

Sub:- Regarding disconnection of power supply of M/s SBA Recyling Pvt Ltd. Plot No. 30-31, Sec-14, IMT Bawal as per order of Commission of AIR Quality Management in NCR and adjoining area.

Ref:- F. NO. 16014/14/2021-MERD/IP/CLOSURE/6982-6987, Dated-20<sup>th</sup> August 2025.

In the subject cited matter it is submitted that electric connection of SBA Recyling Plot No. 30-31, Sec-14, IMT Bawal Bawal has been disconnected on dated 21-08-2025. (temporary).

This is for your kind information please.

SDO (OP) S/Divn,  
DHBVN Bawal

CC to:-

1. CE (OP) DHBVN, Delhi for kind information please.
2. SE (OP) Circle, Rewari for kind information please.



# UNIVERSAL ANALYTICAL LAB PVT. LTD.

AN ISO 9001 CERTIFIED & GOVERNMENT APPROVED LABORATORY

Works : Plot No. -77-77A, Khevat No. 222, Opposite HUDA Sector- 4A, Nagarpalika, Dharuhera-123106, Distt. Rewari (Haryana)

E-mail : universalanalyticallab@gmail.com, info@universallab.in, Web : www.universallab.in

Mob.: +91 9992929181, +91 9729948882, +91 8569966516



CERTIFICATE NO. Q-1518-0450

Report No: UAL/DH/-1098/07/25

Date: 28/07/2025

Issued to:

SBA Recycling Pvt. Ltd.

Plot No-30-31, Sector-14

Bawal (Haryana)

Customer's Ref No: Verbal

Dated: 24/07/2025

Lab Job Order No: 1298/07/25

Period of Testing: 26/07/2025 to 28/07/2025

## TEST REPORT

### A. SAMPLE PARTICULARS:

1. Name of the Unit	:	SBA Recycling Pvt. Ltd.
2. Name of Plant/Section	:	Furnace Section
3. Capacity of Furnace	:	7 Ton
4. Date & Time of Sampling	:	26/07/2025 10:25 AM to 11:06 AM
5. Type of Fuel Used	:	LSHS Oil
6. Stack height(From the Ground level)	:	100 Feet
7. Stack diameter	:	3 Feet
8. Point of Sample Collection	:	From Port hole of Stack (P-3)
9. Purpose of Analysis	:	Monitoring
10. Sample Collected/ Supplied by	:	Our Lab Rep.
11. Sampling procedure	:	As per IS 11255
12. Sampling Plan	:	5.7-F.01 (C)
13. Weather Condition	:	Clear Sky

### B. OBSERVATIONS:

1. Stack Temperature, °C	:	173
2. Ambient Temperature, °C	:	36
3. Flue gas velocity, m/sec	:	8.08
4. Sampling flow rate, lt./min.	:	24
5. Period of sampling, minutes	:	42
6. Volumetric flow rate, Nm <sup>3</sup> /Hr.	:	12701.1

### C. TEST RESULTS:

S. No.	Parameters	Results	Standard Limits	Test Method
1.	PM(Particulate Matter), mg/Nm <sup>3</sup>	41.7	150	IS 11255(P-1)
2.	Sulphur dioxide(SO <sub>2</sub> ), mg/Nm <sup>3</sup>	6.3	-	IS 11255(P-2)
3.	Oxides of Nitrogen(NO <sub>2</sub> ), mg/Nm <sup>3</sup>	29.1	-	IS 11255(P-7)
4.	Carbon Monoxides(CO), %	<0.2	-	IS 13270

Mgr./ Sr. Analyst  
Akshay



Authorized Signatory  
Ajeet Singh  
Technical Manager

Note : 1. This report is not to be reproduced wholly or in part and cannot be used as evidence in the court of law.  
2. This report should not be used in any advertising media without our special permission in writing.  
3. Sample will be destroyed after retention time unless otherwise specified.  
4. The results are related to the test items only.

Page 1 of 1

ANNEXURE R-5  
44

**HARYANA STATE POLLUTION CONTROL BOARD**  
C-11, SECTOR-6, PANCHKULA  
Ph-0172-577870-73, Fax No. 2581201  
E-Mail: hspcbcoordination@gmail.com  
website: hspcb.org.in



### Order

The following officers are hereby deputed for inspecting the unit i.e. M/s SBA Recycling Pvt. Ltd., Plot No. 30-31, Sector-14, HSIIDC, IMT, Bawal Distt. Rewari to re-verify the facts submitted by the CAQM in their inspection, reply submitted by the unit and details submitted by Regional Officer, HSPCB, Rewari in recommendation of Environmental Compensation:-

1. Sh. Ramniwas, Scientist-C, Lab Incharge, Gurugram.
2. Sh. Vikas Grewal, Scientist-C (HQ).

The above said officers are directed to submit their report to Competent Authority at the earliest.

**Dated, Panchkula  
the  
27th October, 2025**

**Pardeep Kumar  
Member Secretary, HSPCB**

**Endst. No. I/280005/2025**

**Dated: 27-10-2025**

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

1. The Regional Officer, HSPCB, Rewari.
2. Sh. Ramniwas, Scientist-C, Lab Incharge, Gurugram.
3. Sh. Vikas Grewal, Scientist-C (HQ).
4. PA to Member Secretary, HSPCB.

Digitally signed by  
PINKI SCIENTIST-C  
For Member Secretary  
Date: 27-10-2025  
15:28:16

**SBA RECYCLING PVT. LTD.**

Plot No 30-31, Phase II, Sector 14, IMT BAWAL, Rewari, Haryana, 123501  
CIN NO. U27106DL2013PTC256285

45

To  
The Regional Officer  
Regional Office, HSPCB  
SCO D-6 & D-7, Suncity Commercial Complex  
Sector-6, Rewari

**Subject: Deposition of Environmental Compensation – M/s SBA Recycling Private Limited, Plot No. 30–31, Sector–14, HSIIDC, IMT Bawal, Rewari**

Respected Sir,

This is with reference to the proceedings of the Environmental Compensation Assessment Committee (ECAC) meeting held on 13.11.2025, wherein an environmental compensation of ₹1,25,000/- was levied on our unit, M/s SBA Recycling Private Limited, for the period from 02.08.2025 to 22.08.2025 [20 days], in accordance with the methodology prescribed vide Board's letter no. HSPCB/PLG/2021/2343–2381 dated 22.12.2021.

We are hereby submitting that the said amount of ₹1,25,000/- has been deposited towards environmental compensation as directed by the Committee. The payment details are as follows:

- **Amount Deposited:** ₹1,25,000/-
- **Transaction Reference No.:** INF/NEFT/IN42532857222557/INDB0000164/SB
- **Date of Payment:** 24.11.2025

We request you to kindly acknowledge the receipt of the above payment and update the records accordingly. Receipt of deposited amount is attached as Annexure-1. Further, we reaffirm our commitment to ensuring full compliance with the applicable environmental norms and directives issued by the Board and other regulatory authorities.

For M/s SBA Recycling Private Limited

  
08/12/2025

Authorized Signatory

Regd. Office: PLOT NO 16A, GALI NO.3,  
ANAND PARBAT INDUSTRIAL AREANEW ROHTAK ROAD DELHI- 110005  
Email: [accountsho@sbaapl.com](mailto:accountsho@sbaapl.com) Cont No.9996543619

DAKSHIN HARYANA BIJI VITRAN NIGAM  
(A Govt. of Haryana Undertaking)  
Office of S.D.O 'OP' S/ Division, Bawal  
Ph No. & Fax: No; 01284-260041, Mob: 9992110816  
E-mail: sdobawal2@gmail.com website: www.dhbvn.com

Memo No. 899)

Date. 21/8/25

To

XEN 'OP' Divn,  
DHBVN S/Urban Rewari

Sub:- Regarding disconnection of power supply of M/s SBA Recycling Pvt Ltd. Plot No. 30-31, Sec-14, IMT Bawal as per order of Commission of AIR Quality Management in NCR and adjoining area.

Ref:- F. NO. 16014/14/2021-MERD/IP/CLOSURE/6982-6987, Dated-20<sup>th</sup> August 2025.

In the subject cited matter it is submitted that electric connection of SBA Recycling Plot No. 30-31, Sec-14, IMT Bawal Bawal has been disconnected on dated 21-08-2025 (temporary).

This is for your kind information please.

SDO (OP) S/Divn,  
DHBVN Bawal

CC to:-

1. CE (OP) DHBVN, Delhi. for kind information please.
2. SE (OP) Circle, Rewari for kind information please.



---

**O.A. No. 340 of 2025 Raj Kumar & Ors vs. State of Haryana & Ors.**

---

**From** Radhalakshmi <radhalakshmi@samagralaw.com>  
**Date** Wed 12/10/2025 12:20 PM  
**To** rkhuranalegal@gmail.com <rkhuranalegal@gmail.com>

1 attachment (16 MB)

Reply and Objections, R. 4. OA No. 340 of 2025.pdf;

Sir,

Please find attached the reply/objections filed on behalf of Respondent No. 4 in the captioned matter. Please treat this as effective service.

Best regards,  
Radhalakshmi R.  
Senior Associate



38, Okhla Phase-III, New Delhi- 110020

**Mobile:** [+91- 9654611805](tel:+91-9654611805) **E-mail:** [radhalakshmi@samagralaw.com](mailto:radhalakshmi@samagralaw.com)

**Website:** <https://samagralaw.com/>

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