

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL**  
**PRINCIPAL BENCH, NEW DELHI**  
M.A. No. 90/2023 With M.A. No.94/2023  
In  
**ORIGINAL APPLICATION No. 774/2022**

**IN THE MATTER OF:**

GAURAV GARG

...APPLICANT

VERSUS

UNION OF INDIA & ORS.

...RESPONDENT

**INDEX**

S.No.	Particulars	Page No.
1	REPLY ON BEHALF OF THE MEMBER SECRETARY, SEIAA UTTAR PRADESH ALONGWITH THE SUPPORTING AFFIDAVIT.	2-20
2	<b><u>ANNEXURE NO. 1.</u></b> Copy of the 883 <sup>rd</sup> Minutes of meetings dated 27.03.2025 of SEIAA.	21-28
3	<b><u>ANNEXURE NO. 2.</u></b> COPY OF EC, IDENTIFICATION NO. EC25B3301UP5147670N, DATED 31.03.2025.	29-40

**THROUGH**

*Priyanka*

Date:02.04.2025

Place:NewDelhi

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## IN THE HON'BLE NATIONAL GREEN TRIBUNAL

**PRINCIPAL BENCH, NEW DELHI**

M.A. No. 90/2023 With M.A. No.94/2023

**ORIGINAL APPLICATION No. 774/2022****IN THE MATTER OF:**

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**REPLY ON BEHALF OF THE MEMBER SECRETARY, SEIAA UTTAR PRADESH ALONG WITH THE SUPPORTING AFFIDAVIT.**

1. The Hon'ble National Green Tribunal has passed an Order dated 10.01.2025 in the matter of Miscellaneous Application No.90/2023 & Miscellaneous Application No.94/2023 In Original Application No.774/2022: Gaurav Garg Versus Union of India & Ors. The Executive part of the order is as follows-

... "9. We do not accept this contention. Para 7 of the EIA Notification 2006 mentions four stages in prior environmental clearance process i.e., (i.) Screening, (ii.) Scoping, (iii.) Public Consultation and (iv.) Appraisal. Application for prior environmental clearance is required to be submitted in Form I which has four parts i.e., (i) Basic Information, (ii) Activity, (iii) Environmental Sensitivity, (iv) Proposed Terms of Reference for EIA Studies. As there is only one form prescribed for submission of application for grant of EC, the same can be treated as disposed of only by grant or refusal of EC. Till such disposal the application must be deemed to be pending with UPSEIAA for all

*practical purposes and the application is not disposed of merely by grant of TOR. Mere specification of stages in the course of processing of such application cannot be treated as independent stages for the simple reason that four different forms of application to be filed at the four stages have not been specified.*

*10. In view of the, directions issued by this Tribunal the application will be treated as pending and UPSEIAA will take appropriate steps to dispose of the same by grant of EC or refusing grant of EC within the specified time.*

..

..

*13. UPSEIAA, is directed to dispose of the application for EC filed by respondent no. 8 before 31.03.2025.*

..

*20. List on 08.04.2025 for further consideration.”*

### **REPLY ON MERITS**

1. That it is pertinent to mention here that the case was considered in 919<sup>th</sup> SEAC-1 Meeting dated 07.03.2025 wherein, the committee “gone through the reply submitted by the project proponent and after detailed analysis; the committee did not find any merit in the complaint. The committee also deliberated that this is an existing common biomedical waste treatment facility which is operating since 2003. In a way, the existing common biomedical waste treatment facility needs post-Facto environmental clearance.
2. That the above facts, the committee discussed the matter in depth and recommended to grant the environmental clearance for the proposal as

above along with standard environmental clearance conditions prescribed by MoEF&CC, GoI.” The committee also added additional Specific conditions.

3. It is further submitted that subsequently, the case was considered in 883<sup>rd</sup> SEIAA Meeting dated 27.03.2025 wherein, SEIAA has Stated “This project has been taken up in pursuance of Hon’ble NGT order dated 02.03.2023 in OA no. 774 of 2022 order which states: -

... “67. In these facts and circumstances of the case the application is disposed of with the directions to the Respondent No.8 to apply for EC within one month from the date of receipt of a copy of this order and (iii) to the UPPCB to allow the Respondent No.8 to run the CBWTF for at least three months till filing of the application and consideration of the same for grant of EC ex post facto, subject to extension in case of delay in disposal of the application for grant of EC.”

Copy of the 883<sup>rd</sup> Minutes of meetings dated 27.03.2025 of SEIAA is being annexed herewith as **ANNEXURE-1**.

4. That the project proponent applied for post facto EC. The project proponent has informed that the plant is operating since 2002. The facility has obtained authorization from UPPCB vide letter no. H46106/C3/BMW-08/20, dated 08/01/2020, for collection, reception, treatment, storage, transport and disposal of bio-medical wastes, valid upto 31/12/2024. The facility has also obtained Consent to Operate from the UPPCB on 16/10/2023.
5. That the in OA no. 774 of 2022 Hon’ble NGT has passed an order dated 02.03.2023 relevant part thereof is reproduced as: -

*57. The applicant has relied on letter dated 27.10.2017 sent by the MOEF&CC With reference to CPCB letter no F.No. B-31011/BWM (50)/ 2017WMD-I/629 dated 20.10.2017 clarifying the legal position regarding the queries mentioned therein and the relevant part thereof is reproduced as under: -*

*“Subject: Amendment to the EIA notification, 2006 issues by MOEFCC vide S.O. No. 1142(E), dated 17.04.2015-regarding.*

*The clarification to the queries that whether EC is required in the following cases; may please be seen as below: 1. CBMWTF desires to replaces the existing incinerator and install new incinerator of same capacity.*

*Clarification: EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator.*

*58. Since the Respondent No. 8 replaced its old incinerator 300 kg/hour with new and advanced incinerator of the same capacity300 kg/hour in the year 2018, case of the Respondent No.8 seems to fall under clarification to query No.1 leading to the conclusion that the Respondent No.8 is bound to take the EC under EIA Notification 2006 as amended vide notification dated 17.04.2015.”*

- 6.** That inthe pursuance this order project proponent made an application for ToR on Parivesh Portal on01/04/2023. The SEAC recommended this application in its757<sup>th</sup>meeting dated 17/05/2023. SEIAA in its 737<sup>th</sup> meeting dated 07.06.2023 considered the matter and raised certain queries

like authorization for 150 km radius coverage, ground water permission, details of 4788 health care unit and geo-coordinate of the area.

7. That in meanwhile the Hon'ble NGT in M.A. No. 63/2023 in Original Application No. 774/2022 passed order on 11/8/2023, operative part of which is as follows: -

*“....3. Since the matter is pending before SEIAA, UP thus, the SEIAA is directed to dispose of the application of the applicant as early as possible say within 30 days. In case of absence of any member, the SEIAA may take suitable action and to dispose of the application within the time frame.”*

8. It is further submitted that project proponent submitted his reply vide letter dated 28/06/2023. A complaint letter dated 21/08/2023 was also received by SEIAA.
9. That while his case was under consideration of SEIAA in a different case in O.A number of 622 of 2022 Hon'ble NGT had quashed EC granted by SEIAA to M/s PunahChakaranPvt. Ltd. and operative part of which is as follows:

*“...77. In the present case UPPCB and UPSEIAA have not (i) specifically granted any relaxation of land area requirement (ii) stipulated additional control measures and (iii) made any consultation with CPCB. Therefore, CTE granted by UPPCB and EC granted by SEIAA for establishment of CBWTF on plots No. E-25 & E-26 situated in Babrala Industrial Area with combined area of 3601 sq.mtrs. instead of one Acre- 4047 sq.mtrs. (approx.)*

*without grant of any relaxation, without stipulation of additional control measures and without consultation with CPCB are illegal being violative of Guideline 7 of the Revised CPCB Guidelines 2020 which is mandatory.*

*78. In view of the above the application converted to appeal is allowed and CTE and EC being violative of CBWTF Guidelines 2016 are held to be illegal, null and void and to be of no effect.”*

**10.** That in view of this order, the matter was discussed in the 757<sup>th</sup> meeting of SEIAA dated 14.09.2023 and Hon’ble NGT orders, replies submitted by project proponent, complaints received in the matter were referred back to SEAC to examine the issues raised and review the case. SEAC in its 810<sup>th</sup> meeting dated 20.11.2023 recommended to grant the terms of reference for the preparation of EIA report as recommended earlier in 751<sup>st</sup> SEAC meeting dated 17/05/2023. Matter was again discussed in 786<sup>th</sup> meeting of SEIAA dated 28.12.2023 and granted ToR to the above project to run as captive treatment facility because the land area on which the project is established was only 1242 sq. meters. This area is way below the land requirement as defined by CPCB Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities, 2016. The guidelines are mentioned below:

**....7) Land requirement**

*Sufficient land shall be allocated to the CBWTF to provide all requisite systems which include dedicated space for storage of waste (both treated and untreated), waste treatment equipment, vehicle washing bay, vehicle parking space, ETP, incineration ash storage provision, administrative room, space for DG Set etc.,*

*i. Preferably, a CBWTF shall be set up on a plot size of not less than one acre in all the areas. However, a CBWTF can be developed in*

*adjacent plots but cannot be set up in two or more different plots located in different areas. Separate plots can be permitted only for vehicle parking if located in the close vicinity of the proposed CBWTFs or the existing CBWTFs.*

*ii. In case of upcoming or new CBWTFs (both in municipal limits with population more than 25 lakhs or in rural areas), the land area requirement may be relaxed (but in any case not less than 0.5 acre) by the SPCB/PCC, with additional control measures such as zero liquid discharge, increase in stack height, stringent emission norms, odour control measures or any other measures felt necessary by the prescribed authority on case-to-case basis, only in consultation with CPCB.*

**11.** That the reading of these guidelines clearly mention land required for new or upcoming setting up of CBWTF is 1 acre minimum which can be relaxed to not less than 0.5 acres by the SPCB/PCC in municipal limits with population more than 25 lakhs or in rural areas. This requirement is for purpose of providing sufficient dedicated space for storage of treated and untreated waste etc. ***However, it is not clearly mentioned in the guidelines whether this land requirement is applicable to existing facilities or not.***

**12.** That the project proponent applied for an amendment in ToR on 23.01.2024 to remove the 'Captive' term from the name of the project and additional condition no. 1 of the ToR letter dated 18/01/2024.

**13.** It is further submitted that, letter dated 13/03/2024 of MoEF&CC, Govt. of India was received. SEIAA in its 810<sup>th</sup> meeting on 30/4/24 referred this letter to SEAC with a request to consider the matter of the project

proponent in light of MoEFCC's letter and seek clarification from the project proponent regarding the minimum area required for establishing CBWTF and the area available with him. The committee in its 851<sup>st</sup> meeting dated 16/05/2024 noted that in compliance of MoEF&CC, Govt. of India letter dated 13/03/2024 the Regional Officer, UPPCB, Meerut has also issued a letter dated 07/05/2024 to M/s Synergy Waste Management Pvt. Ltd. to submit their explanation within 07 days on the points mentioned in the aforesaid letter. In view of the above circumstances, the committee opined to share these letters with project proponent for seeking his reply.

**14.** That the Project proponent submitted his reply on 12/07/2024. After this the application for amendment was considered in SEAC meeting dated 01/10/2024. SEAC agreed for the amendment in TOR as requested by the ProjectProponent, and additional TOR condition was imposed as follows: -

*1. The EIA report prepared by the consultant should be vetted by the environment department of any IIT/NIT or NEERI so that there is no adverse environmental impact on surrounding areas due to the technology of this plant.*

**15.** That the matter was discussed in 846<sup>th</sup> SEIAA meeting dated 18/10/2024, and in light of less/inadequate area, following conditions were imposed: -

a) Details of availability of land for storage of waste (both treated and untreated), waste treatment equipment, vehicle washing bay, vehicle parking space, ETP, incineration ash storage provision, administrative room, space for DG Set etc. If this land is in the ownership of project proponent, then copy of ownership documents should be submitted and if it is taken on lease then copy of lease deed should be submitted. A map showing these facilities as well as their distance from each other should also be submitted.

b) Project proponent shall submit an affidavit stating that this project will not indulge in any hazardous activity and no pollution will be caused while transportation or storage of Bio-Medical Waste from different hospitals and different districts.

**16.**That the project proponent submitted EIA along with application for EC on Parivesh Portal on 07/02/2025 which was appraised by SEAC in its 919<sup>th</sup> meeting dated 07/03/2025 and SEAC recommended grant of EC.

**17.**It further submitted that the time of appraisal by SEAC the project proponent also submitted an affidavit dated 06.03.2025 stating that this project will not indulge in any hazardous activity and no pollution will be caused while transportation or storage of Bio-Medical Waste from different hospitals and different districts.

**18.**It is further submitted that SEIAA considered the matter in its 883<sup>rd</sup> meeting dated 27/03/2025 and considered all aspects of the case. CPCB Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities were examined. The guidelines state:

***...4) Applicability of these guidelines***

*These guidelines are applicable to all the upcoming or new CBWTFs. In case of the existing CBWTFs, these guidelines shall be applicable in case 'capacity'*

*(Or)*

*The existing CBWTFs desires to modernize the existing treatment equipment with the new equipment with enhancement in the existing treatment capacity.*

- 19.** That it clearly means that existing CBWTF require EC only when existing CBWTF desires to expand or enhance the existing facility or to modernise existing treatment equipment with new equipment with enhancement in “existing treatment facility”
- 20.** It is further submitted that reading of EIA page 60-point no.2.5 shows that project proponent does not intend to expand his capacity nor has he done any modernization. The treatment capacity has remained same i.e. incinerator 300kg/hr, autoclave 300litres/batch, shredder capacity 300kg/hr as has been mentioned on page number 60 of EIA submitted by him.
- 21.** That in OA no. 774 of 2022 Hon’ble NGT has passed an order dated 02.03.2023 relevant part thereof is reproduced as: -

*“...57. The applicant has relied on letter dated 27.10.2017 sent by the MOEF&CC With reference to CPCB letter no F.No. B-31011/BWM (50)/ 2017WMD-I/629 dated 20.10.2017 clarifying the legal position regarding the queries mentioned therein and the relevant part thereof is reproduced as under: -*

*“Subject: Amendment to the EIA notification, 2006 issues by MOEFCC vide S.O. No. 1142(E), dated 17.04.2015-regarding.*

*The clarification to the queries that whether EC is required in the following cases; may please be seen as below: 1. CBMWTF desires to replaces the existing incinerator and install new incinerator of same capacity.*

*Clarification: EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator.*

*58. Since the Respondent No. 8 replaced its old incinerator 300 kg/hour with new and advanced incinerator of the same capacity 300 kg/hour in the year 2018, case of the Respondent No.8 seems to fall under clarification to query No.1 leading to the conclusion that the Respondent No.8 is bound to take the EC under EIA Notification 2006 as amended vide notification dated 17.04.2015.”*

However MoEF&CC letter dated 27/10/2017 issued to address query raised with regards to CPCB guideline, 2016 mentions that:-

*“EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator”*

**22.** That as mentioned in Hon’ble NGT order that Project proponent has replaced old incinerator of 300 kg/hour with new and advance incinerator and the same capacity EC is required to run the facility. There is underlying assumption that since he has changed the incinerator although by his own admission, he has neither enhanced the capacity nor has he brought in any major modernisation in the plant. There is an ambiguity because the CBWTF guideline, 2016 clearly state that existing facilities will not require EC unless expansion of existing facilities or modernization with a view to enhance existing treatment capacity.

**23.** It is further submitted that similarly, CBWTF guidelines define land requirement for new and upcoming CBWTF as 1acre relaxable to 0.5 acres in municipal limits with population more than 25 lakhs or in rural areas. The guidelines are however silent regarding the requirement of land for existing CBWTFs. The only logic appears to be the fact that when these CBWTFs were established there was no minimum land requirement defined. However, this ambiguity creates confusion in the minds of people at large who think that even existing CBWTFs need an area of 1 acre. The

result is a large number of complaints against this CBWTF and because of the issues raised in these complaints condition of availability of additional area was imposed in terms of reference granted by SEIAA.

24.It is further submitted that during the course of appraisal, SEIAA/SEAC received following complaint/letter regarding the above project: -

<b>Sr. No.</b>	<b>Date</b>	<b>Sender</b>
1.	13.06.2023, 21.08.2023, 11.10.2023	Mr. Raju Singhal
2.	28.08.2023	Mr. Vijay Kumar
3.	28.06.2023	GoUP no. 631/81-6-2022
4.	13.03.2024	MoEFCC, GoI (HSM Division) letter no. 20/4/2021-HSMD regarding representation against illegal functioning and operation of CBWTF by M/s Synergy Waste Management Pvt. Ltd. in violation of EP Act, 1986 and CPCB revised guidelines as notified under BMW rules, 2016.
5.	07.05.2024	UPPCB RO, Meerut regarding land requirement.

25.That in compliance of condition imposed in SEAC meeting dated 01/10/2024 the EIA was vetted by Civil Engineering Department, Motilal Nehru National Institute of technology ,Allahabad vide letter no.2032/CED/R&C/2022-23 dated 03/03/2025.SEIAA noted that the

technology proposed in existing common biomedical waste treatment facility was vetted by Civil engineering Department, Motilal Nehru National Institute of Technology Allahabad vide its letter no. 2032/CED/R&C/2024-25, dated 03/03/2025 with following observation:

- a) In the EIA report, the CBWTF facilities have captive treatment facilities for the treatment and disposal of biomedical waste through incinerators, autoclaves, and shredders technologies as per the BMWM Rules, 2016.
- b) The distance from the nearest CBWTF is not mentioned in the EIA report. (It is also emphasized in the rules that no healthcare facility shall establish on-site treatment and disposal facility for BMW, if a service of CBWTF is available within 75 kilometers of travelling distance of the facility. All the public healthcare facilities within reach of 75 kilometers of CBWTF needs to dispose of the BMW through such CBWTF only and are not allowed to establish its own treatment and disposal facility BMWM Rules, 2016.)
- c) The fixed hearth type incinerator capacity 300 kg/hr is used and operation in the project in EIA report. For 300 kg/hr capacity, the Rotary Kiln type incinerator may be used in place of fixed hearth type incinerator in EIA report as per CPCB Guideline 2016. (For higher capacity incinerators (i.e., 250 kg/hour or more), incinerators rotary kiln-based incinerators are preferred over fixed hearth incinerators. Rotary Kiln shall be preferred; in case of the total biomedical waste treated in a batch (8 hour) is exceeding 2.5 to 3 Tonnes as per CPCB Guideline 2016.)
- d) The Autoclave [300 lit/batch] having temperature to be maintained more than 121°C at pressure of 15 pounds per square inch (psi) and

the residence time will be more than 1 hour as per CPCB Guideline 2016.

- e) The Shredder [300 kg/hr] used for de-shaping or cut into smaller pieces to make it unrecognizable waste as per Guideline 2016 & BMWM Rules, 2016.
- f) The air pollution controlling equipments in EIA reports as per the & BMWM Rules, 2016
- g) The Effluent Treatment Plant of 5 KLD capacity comprises of collection tank, O&G trap, chemical dosing cum mixing (Flash and slow), coagulation chamber, primary settling tank, biological treatment process, secondary settling tank, pressure filter, activated carbon filter, pH correction tank to comply with the water recirculation process. The treated effluent is recycled for vehicle cleaning and scrubbing cum quenching purpose in air pollution control device of the incinerator as per the Guideline.

**26.** It is further submitted that the issue before SEIAA was whether the land requirement of 01 acre is applicable for existing CBWTFs or not. The Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities by the CPCB is silent regarding minimum land requirement in case of existing CBWTF. When these facilities were established, there was no requirement of minimum land area, but presently when application is being considered for CBWTF it is considered for grant of EC as per CBWTF guidelines, 2016. SEIAA has to follow these guidelines and SEIAA cannot interpret or ignore these guidelines.

**27.** That the project proponent did not mention anything regarding land availabilities in the EIA report but on 27/03/2025, the project proponent submitted a letter dated 27/03/2025 mentioning that Subharti Medical

University has agreed to allocate one acre of land to project proponent for compliance with CPCB guidelines for their existing CBWTF situated in Meerut. SEIAA finds it a very strange coincidence that on the day of appraisal by SEIAA the project proponent submitted this letter. There is no communication submitted either on behalf of Subharti Medical University or any kind of commitment from the said University supporting the submission of PP regarding land requirement.

**28.**It is further submitted that clear from the above discussion that the issue of the requirement of EC arose from an assumption that some kind of technological up gradation might have been made although project proponent has categorically mentioned that he is neither expanding his existing facility nor is he enhancing the treatment capacity.

**29.**It is further submitted that the silence in CPCB guidelines regarding the land requirement for existing CBWTF has created a lot of confusion and large number of complaints.

**30.**That after considering all the issues including the letter dated 27/3/2025 as well as conditions imposed by Civil engineering Department, Motilal Nehru National Institute of Technology Allahabad, SEIAA agrees to grant EC to project adding following conditions:

- a) The fixed hearth type incinerator capacity 300 kg/hr is used and is operational in the project as mentioned in EIA report. For 300 kg/hr capacity, the Rotary Kiln type incinerator may be used in place of fixed hearth type incinerator in EIA report as per CPCB Guideline 2016. (For higher capacity incinerators (i.e., 250 kg/hour or more), rotary kiln-based incinerators are preferred over fixed hearth incinerators. Rotary Kiln shall be preferred; in case of the total

biomedical waste treated in a batch (8 hour) is exceeding 2.5 to 3 Tones as per CPCB Guideline 2016.)

- b) The Autoclave [300 lit/batch] temperature is to be maintained Atmore than 121°C at pressure of 15 pounds per square inch (psi) and the residence time will be more than 1 hour as per CPCB Guideline 2016.
- c) The Shredder [300 kg/hr.] used for de-shaping or cutting into smaller pieces to make it unrecognizable waste as per Guideline 2016 & BMWM Rules, 2016.
- d) The air pollution controlling equipment's should be as per the prescribed BMWM Rules, 2016
- e) The Effluent Treatment Plant of 5 KLD capacity comprises of collection tank, O&G trap, chemical dosing cum mixing (Flash and slow), coagulation chamber, primary settling tank, biological treatment process, secondary settling tank, pressure filter, activated carbon filter, pH correction tank to comply with the water recirculation process. The treated effluent is to be recycled for vehicle cleaning and scrubbing cum quenching purpose in air pollution control device of the incinerator as per the Guideline.
- f) In light of letter dated 27/3/2025 Commitment of Subharti Medical University for land allotment should be submitted within 03 months failing which this EC is liable to be revoked.
- g) Zero Liquid Discharge system (ZLD) should be maintained as proposed.
- h) The emissions of the parameters Hcl, SO<sub>2</sub>, CO, total Organic Carbon, HF, NO<sub>x</sub>, total Dioxins and Furans, Hg and its compounds shall be strictly per Environment (Protection) Rules 1986 as amended. The CO<sub>2</sub> concentration in tail gas shall not be less than 7%. Secondary combustion chamber of Incinerator's minimum temperature will be

1100 degree centigrade with gas residence time not less than 2 seconds.

- i) As part of CER activities, the project proponent shall conduct awareness camps and workshops in nearby habitations regarding maintenance of personal as well as community hygiene. First aid training should be given to school students in the vicinity of hospital. Details of such workshops shall be uploaded on the website of project and also submitted to SEIAA.”

**31.** It is further submitted that SEIAA, vide EC identification No. EC25B3301UP5147670N, dated 31.03.2025 issued grant of Environment Clearance for the Proposed Project Activity under the provision of EIA Notification 2006. The Concerned copy of EC, identification No. EC25B3301UP5147670N, dated 31.03.2025 is being attached herewith and marked as **ANNEXURE NO. 2.**

**THROUGH**



Date:02.04.2025

Place:NewDelhi

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**IN THE HON'BLE NATIONAL GREEN TRIBUNAL  
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M.A. No. 90/2023 With M.A. No.94/2023

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GAURAV GARG

...APPLICANT

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UNION OF INDIA & ORS.

...RESPONDENT

**AFFIDAVIT**

I, Vidhyotma Bharti, aged about 49 years W/o Dr. G.L. Nigam presently posted as ASSISTANT DIRECTOR, REGIONAL OFFICE, NOIDA, DIRECTORATE OF ENVIRONMENTAL, UP. having an office at E-12/1, NOIDA, UTTAR PARDESH. *Presently at New Delhi*

1. That I am posted as stated above and well conversant with the facts of the present case and as such competent to swear this affidavit on behalf of **Member Secretary, SEIAA** before this Tribunal.
2. That the accompanying Application has been drafted by our counsel upon my instructions.
3. That the contents of the accompanying Application are true and correct, and the knowledge has been derived from official records and nothing material has been concealed therefrom.



*D/G 2024/2020*  
I identified the deponent who  
has signed in my presence

**VERIFICATION**



*V. Bhasini*

**DEPONENT**

Verified on solemn affirmation at New Delhi on this 03 day of APR 2025,  
that the contents of the foregoing affidavit are true and correct to the best of my  
knowledge and no part of it is false and nothing material has been concealed  
therefrom.

*V. Bhasini*

**ATTESTED**  
**NOTARY PUBLIC**  
**(INDIA)**

**DEPONENT**

**03 APR 2025**

**Minutes of the 883<sup>th</sup> Meeting of the State Level Environment Impact Assessment Authority, UP (SEIAA) held on 27-03-2025**

The meeting of 883<sup>th</sup> State Level Environment Impact Assessment Authority, UP (SEIAA) was held online on 27.03.2025 the Directorate of Environment. The following were present in the meeting: -

- |                                    |                                     |
|------------------------------------|-------------------------------------|
| <b>1. Smt. Mamta Sanjeev Dubey</b> | <b>Chairman, SEIAA, U.P</b>         |
| <b>2. Shri Paras Nath</b>          | <b>Member, SEIAA, U.P</b>           |
| <b>3. Shri Ajay Kumar Sharma</b>   | <b>Member Secretary, SEIAA, U.P</b> |

**Agenda-Minutes of 919<sup>th</sup> SEAC-1 Meeting Dated 07/03/2025**

**1. (23) Existing Common Bio-Medical Waste Treatment Facility at Subharti Medical College Campus, Subharti Puram, Meerut, Uttar Pradesh, M/s Synergy Waste Management Pvt. Ltd., 9679/7761/SIA/UP/INFRA2/522886/2025.**

This project has been taken up in pursuance of Hon'ble NGT order dated 02.03.2023 in OA no. 774 of 2022 order which states:-

*... "67. In these facts and circumstances of the case the application is disposed of with the directions to the Respondent No.8 to apply for EC within one month from the date of receipt of a copy of this order and (iii) to the UPPCB to allow the Respondent No.8 to run the CBWTF for at least three months till filing of the application and consideration of the same for grant of EC ex post facto, subject to extension in case of delay in disposal of the application for grant of EC."*

The project proponent applied for post facto EC. The project proponent has informed that the plant is operating since 2002. The facility has obtained authorization from UPPCB vide letter no. H46106/C3/BMW-08/20, dated 08/01/2020, for collection, reception, treatment, storage, transport and disposal of bio-medical wastes, valid upto 31/12/2024. The facility has also obtained Consent to Operate from the UPPCB on 16/10/2023.

In OA no. 774 of 2022 Hon'ble NGT has passed an order dated 02.03.2023 relevant part thereof is reproduced as:-

*57. The applicant has relied on letter dated 27.10.2017 sent by the MOEF&CC With reference to CPCB letter no F.No.B-31011/BWM(50)/ 2017WMD-I/629 dated 20.10.2017 clarifying the legal position regarding the queries mentioned therein and the relevant part thereof is reproduced as under:-*

*"Subject: Amendment to the EIA notification, 2006 issues by MOEFCC vide S.O. No. 1142(E), dated 17.04.2015-regarding.*

*The clarification to the queries that whether EC is required in the following cases; may please be seen as below: 1. CBMWTF desires to replaces the existing incinerator and install new incinerator of same capacity.*

*Clarification: EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator.*

*58. Since the Respondent No. 8 replaced its old incinerator 300 kg/hour with new and advanced incinerator of the same capacity 300 kg/hour in the year 2018, case of the Respondent No.8 seems to fall under clarification to query No.1 leading to the conclusion that the Respondent No.8 is bound to take the EC under EIA Notification 2006 as amended vide notification dated 17.04.2015."*

In pursuance this order project proponent made an application for ToR on Parivesh Portal on 01/04/2023. The SEAC recommended this application in its 757<sup>th</sup> meeting dated 17/05/2023. SEIAA in its 737<sup>th</sup> meeting dated 07.06.2023 considered the matter and raised certain queries like authorization for 150 km radius coverage, ground water permission, details of 4788 health care unit and geo-coordinate of the area.

Meanwhile the Hon'ble NGT in M.A. No. 63/2023 in Original Application No. 774/2022 passed order on 11/8/2023, operative part of which is as follows:-

*..."3. Since the matter is pending before SEIAA, UP thus, the SEIAA is directed to dispose of the application of the applicant as early as possible say within 30 days. In case of absence of any member, the SEIAA may take suitable action and to dispose of the application within the time frame."*

The project proponent submitted his reply vide letter dated 28/06/2023. A complaint letter dated 21/08/2023 was also received by SEIAA.

While his case was under consideration of SEIAA in a different case In O.A number of 622 of 2022 Hon'ble NGT had quashed EC granted by SEIAA to M/s Punah Chakaran Pvt. Ltd. and operative part of which is as follows:

*..."77. In the present case UPPCB and UPSEIAA have not (i) specifically granted any relaxation of land area requirement (ii) stipulated additional control measures and (iii) made any consultation with CPCB. Therefore, CTE granted by UPPCB and EC granted by SEIAA for establishment of CBWTF on plots No. E-25 & E-26 situated in Babrala Industrial Area with combined area of 3601 sq. mtrs. instead of one Acre- 4047 sq.mtrs. (approx.) without grant of any relaxation, without stipulation of additional control measures and without consultation with CPCB are illegal being violative of Guideline 7 of the Revised CPCB Guidelines 2020 which is mandatory.*

*78. In view of the above the application converted to appeal is allowed and CTE and EC being violative of CBWTF Guidelines 2016 are held to be illegal, null and void and to be of no effect."*

In view of this order, the matter was discussed in the 757<sup>th</sup> meeting of SEIAA dated 14.09.2023 and Hon'ble NGT orders, replies submitted by project proponent, complaints received in the matter were referred back to SEAC to examine the issues raised and review the case. SEAC in its 810<sup>th</sup> meeting dated 20.11.2023 recommended to grant the terms of reference for the preparation of EIA report as recommended earlier in 751<sup>st</sup> SEAC meeting dated 17/05/2023. Matter was again discussed in 786<sup>th</sup> meeting of SEIAA dated 28.12.2023 and granted ToR to the above project to run as captive treatment facility because the land area on which the project is established was only 1242 sq.

meters. This area is way below the land requirement as defined by CPCB Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities, 2016. The guidelines are mentioned below:

**....7) Land requirement**

*Sufficient land shall be allocated to the CBWTF to provide all requisite systems which include dedicated space for storage of waste (both treated and untreated), waste treatment equipment, vehicle washing bay, vehicle parking space, ETP, incineration ash storage provision, administrative room, space for DG Set etc.,.*

- i. Preferably, a CBWTF shall be set up on a plot size of not less than one acre in all the areas. However, a CBWTF can be developed in adjacent plots but cannot be set up in two or more different plots located in different areas. Separate plots can be permitted only for vehicle parking if located in the close vicinity of the proposed CBWTFs or the existing CBWTFs.*
- ii. In case of upcoming or new CBWTFs (both in municipal limits with population more than 25 lakhs or in rural areas), the land area requirement may be relaxed (but in any case not less than 0.5 acre) by the SPCB/PCC, with additional control measures such as zero liquid discharge, increase in stack height, stringent emission norms, odour control measures or any other measures felt necessary by the prescribed authority on case-to-case basis, only in consultation with CPCB.*

Reading of these guidelines clearly mention land required for new or upcoming setting up of CBWTF is 1 acre minimum which can be relaxed to not less than 0.5 acres by the SPCB/PCC in municipal limits with population more than 25 lakhs or in rural areas. This requirement is for purpose of providing sufficient dedicated space for storage of treated and untreated waste etc. **However it is not clearly mentioned in the guidelines whether this land requirement is applicable to existing facilities or not.**

The project proponent applied for an amendment in ToR on 23.01.2024 to remove the 'Captive' term from the name of the project and additional condition no. 1 of the ToR letter dated 18/01/2024.

Meanwhile, letter dated 13/03/2024 of MoEF&CC, Govt. of India was received. SEIAA in its 810<sup>th</sup> meeting on 30/4/24 referred this letter to SEAC with a request to consider the matter of the project proponent in light of MoEF&CC's letter and seek clarification from the project proponent regarding the minimum area required for establishing CBWTF and the area available with him. The committee in its 851<sup>st</sup> meeting dated 16/05/2024 noted that in compliance of MoEF&CC, Govt. of India letter dated 13/03/2024 the Regional Officer, UPPCB, Meerut has also issued a letter dated 07/05/2024 to M/s Synergy Waste Management Pvt. Ltd. to submit their explanation within 07 days on the points mentioned in the aforesaid letter. In view of the above circumstances, the committee opined to share these letters with project proponent for seeking his reply.

Project proponent submitted his reply on 12/07/2024. After this the application for amendment was considered in SEAC meeting dated 01/10/2024. SEAC agreed for the amendment in TOR as requested by the Project Proponent, and additional TOR condition was imposed as follows:-

1. *The EIA report prepared by the consultant should be vetted by the environment department of any IIT/NIT or NEERI so that there is no adverse environmental impact on surrounding areas due to the technology of this plant.*

The matter was discussed in 846<sup>th</sup> SEIAA meeting dated 18/10/2024, and in light of less/inadequate area, following conditions were imposed:-

- (a) Details of availability of land for storage of waste (both treated and untreated), waste treatment equipment, vehicle washing bay, vehicle parking space, ETP, incineration ash storage provision, administrative room, space for DG Set etc. If this land is in the ownership of project proponent, then copy of ownership documents should be submitted and if it is taken on lease then copy of lease deed should be submitted. A map showing these facilities as well as their distance from each other should also be submitted.
- (b) Project proponent shall submit an affidavit stating that this project will not indulge in any hazardous activity and no pollution will be caused while transportation or storage of Bio-Medical Waste from different hospitals and different districts.

The project proponent submitted EIA along with application for EC on Parivesh Portal on 07/02/2025 which was appraised by SEAC in its 919<sup>th</sup> meeting dated 07/03/2025 and SEAC recommended grant of EC.

At the time of appraisal by SEAC the project proponent also submitted an affidavit dated 06.03.2025 stating that this project will not indulge in any hazardous activity and no pollution will be caused while transportation or storage of Bio-Medical Waste from different hospitals and different districts.

SEIAA considered the matter in its 883<sup>rd</sup> meeting dated 27/03/2025 and considered all aspects of the case. CPCB Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities were examined. The guidelines state:

**....4) Applicability of these guidelines**

*These guidelines are applicable to all the upcoming or new CBWTFs. In case of the existing CBWTFs, these guidelines shall be applicable in case 'capacity'*

*(Or)*

*The existing CBWTFs desires to modernize the existing treatment equipment with the new equipment with enhancement in the existing treatment capacity.*

It clearly means that existing CBWTF require EC only when existing CBWTF desires to expand or enhance the existing facility or to modernise existing treatment equipment with new equipment with enhancement in "existing treatment facility"

Reading of EIA page 60 point no.2.5 shows that project proponent does not intend to expand his capacity nor has he done any modernization. The treatment capacity has remained same i.e. incinerator 300 kg/hr, autoclave 300 litres/batch, shredder capacity 300 kg/hr as has been mentioned on page number 60 of EIA submitted by him.

In OA no. 774 of 2022 Hon'ble NGT has passed an order dated 02.03.2023 relevant part thereof is reproduced as:-

*... "57. The applicant has relied on letter dated 27.10.2017 sent by the MOEF&CC With reference to CPCB letter no F.No.B-31011/BWM(50)/ 2017WMD-I/629 dated 20.10.2017 clarifying the legal position regarding the queries mentioned therein and the relevant part thereof is reproduced as under:-*

*“Subject: Amendment to the EIA notification, 2006 issues by MOEFCC vide S.O. No. 1142(E), dated 17.04.2015-regarding.*

*The clarification to the queries that whether EC is required in the following cases; may please be seen as below: 1. CBMWTF desires to replaces the existing incinerator and install new incinerator of same capacity.*

*Clarification: EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator.*

*58. Since the Respondent No. 8 replaced its old incinerator 300 kg/hour with new and advanced incinerator of the same capacity 300 kg/hour in the year 2018, case of the Respondent No.8 seems to fall under clarification to query No.1 leading to the conclusion that the Respondent No.8 is bound to take the EC under EIA Notification 2006 as amended vide notification dated 17.04.2015.”*

However MoEF&CC letter dated 27/10/2017 issued to address query raised with regards to CPCB guideline, 2016 mentions that:-

*“EC will be required, as there might be configuration changes that might impact the performance efficiency of the incinerator”*

As mentioned in Hon’ble NGT order that Project proponent has replaced old incinerator of 300 kg/hour with new and advance incinerator and the same capacity EC is required to run the facility. There is underlying assumption that since he has changed the incinerator although by his own admission he has neither enhanced the capacity nor has he brought in any major modernisation in the plant. There is an ambiguity because the CBWTF guideline, 2016 clearly state that existing facilities will not require EC unless expansion of existing facilities or modernization with a view to enhance existing treatment capacity.

Similarly, CBWTF guidelines define land requirement for new and upcoming CBWTF as 1acre relaxable to 0.5 acres in municipal limits with population more than 25 lakhs or in rural areas. The guidelines are however silent regarding the requirement of land for existing CBWTFs. The only logic appears to be the fact that when these CBWTFs were established there was no minimum land requirement defined. However, this ambiguity creates confusion in the minds of people at large who think that even existing CBWTFs need an area of 1 acre. The result is a large number of complaints against this CBWTF and because of the issues raised in these complaints condition of availability of additional area was imposed in terms of reference granted by SEIAA.

During the course of appraisal, SEIAA/SEAC received following complaint/letter regarding the above project:-

Sr. No.	Date	Sender
1.	13.06.2023, 21.08.2023, 11.10.2023	Mr. Raju Singhal
2.	28.08.2023	Mr. Vijay Kumar
3.	28.06.2023	GoUP no. 631/81-6-2022
4.	13.03.2024	MoEFCC, Gol (HSM Division) letter no. 20/4/2021-HSMD regarding representation against illegal functioning and operation of CBWTF by M/s Synergy Waste Management Pvt.

		Ltd. in violation of EP Act, 1986 and CPCB revised guidelines as notified under BMW rules, 2016.
5.	07.05.2024	UPPCB RO, Meerut regarding land requirement.

In compliance of condition imposed in SEAC meeting dated 01/10/2024 the EIA was vetted by Civil Engineering Department, Motilal Nehru National Institute of technology, Allahabad vide letter no.2032/CED/R&C/2022-23 dated 03/03/2025. SEIAA noted that the technology proposed in existing common biomedical waste treatment facility was vetted by Civil engineering Department, Motilal Nehru National Institute of Technology Allahabad vide its letter no. 2032/CED/R&C/2024-25, dated 03/03/2025 with following observation:

1. In the EIA report, the CBWTF facilities have captive treatment facilities for the treatment and disposal of biomedical waste through incinerators, autoclaves, and shredders technologies as per the BMW Rules, 2016.
2. The distance from the nearest CBWTF is not mentioned in the EIA report. (It is also emphasized in the rules that no healthcare facility shall establish on-site treatment and disposal facility for BMW, if a service of CBWTF is available within 75 kilometer of travelling distance of the facility. All the public healthcare facilities within reach of 75 kilometers of CBWTF needs to dispose of the BMW through such CBWTF only and are not allowed to establish its own treatment and disposal facility BMW Rules, 2016.)
3. The fixed hearth type incinerator capacity 300 kg/hr is used and operation in the project in EIA report. For 300 kg/hr capacity, the Rotary Kiln type incinerator may be used in place of fixed hearth type incinerator in EIA report as per CPCB Guideline 2016. (For higher capacity incinerators (i.e., 250 kg/hour or more), incinerators rotary kiln-based incinerators are preferred over fixed hearth incinerators. Rotary Kiln shall be preferred; in case of the total biomedical waste treated in a batch (8 hour) is exceeding 2.5 to 3 Tonnes as per CPCB Guideline 2016.)
4. The Autoclave [300 lit/batch] having temperature to be maintained more than 121°C at pressure of 15 pounds per square inch (psi) and the residence time will be more than 1 hour as per CPCB Guideline 2016.
5. The Shredder [300 kg/hr] used for de-shaping or cut into smaller pieces to make it unrecognizable waste as per Guideline 2016 & BMW Rules, 2016.
6. The air pollution controlling equipments in EIA reports as per the & BMW Rules, 2016
7. The Effluent Treatment Plant of 5 KLD capacity comprises of collection tank, O&G trap, chemical dosing cum mixing (Flash and slow), coagulation chamber, primary settling tank, biological treatment process, secondary settling tank, pressure filter, activated carbon filter, pH correction tank to comply with the water recirculation process. The treated effluent is recycled for vehicle cleaning and scrubbing cum quenching purpose in air pollution control device of the incinerator as per the Guideline.

Now, the issue before SEIAA was whether the land requirement of 01 acre is applicable for existing CBWTFs or not. The Revised Guidelines for Common Bio-medical Waste Treatment and Disposal Facilities by the CPCB is silent regarding minimum land

requirement in case of existing CBWTF. When these facilities were established there was no requirement of minimum land area, but presently when application is being considered for CBWTF it is considered for grant of EC as per CBWTF guidelines, 2016. SEIAA has to follow these guidelines and SEIAA cannot interpret or ignore these guidelines.

The project proponent did not mention anything regarding land availabilities in the EIA report but on 27/03/2025, the project proponent submitted a letter dated 27/03/2025 mentioning that Subharti Medical University has agreed to allocate one acre of land to project proponent for compliance with CPCB guidelines for their existing CBWTF situated in Meerut. SEIAA finds it a very strange coincidence that on the day of appraisal by SEIAA the project proponent submitted this letter. There is no communication submitted either on behalf of Subharti Medical University or any kind of commitment from the said University supporting the submission of PP regarding land requirement.

It is clear from the above discussion that the issue of the requirement of EC arose from an assumption that some kind of technological up gradation might have been made although project proponent has categorically mentioned that he is neither expanding his existing facility nor is he enhancing the treatment capacity.

Similarly, the silence in CPCB guidelines regarding the land requirement for existing CBWTF has created a lot of confusion and large number of complaints.

After considering all the issues including the letter dated 27/3/2025 as well as conditions imposed by Civil engineering Department, Motilal Nehru National Institute of Technology Allahabad, SEIAA agrees to grant EC to project adding following conditions:

1. The fixed hearth type incinerator capacity 300 kg/hr is used and is operational in the project as mentioned in EIA report. For 300 kg/hr capacity, the Rotary Kiln type incinerator may be used in place of fixed hearth type incinerator in EIA report as per CPCB Guideline 2016. (For higher capacity incinerators (i.e., 250 kg/hour or more), rotary kiln-based incinerators are preferred over fixed hearth incinerators. Rotary Kiln shall be preferred; in case of the total biomedical waste treated in a batch (8 hour) is exceeding 2.5 to 3 Tones as per CPCB Guideline 2016.)
2. The Autoclave [300 lit/batch] temperature is to be maintained at more than 121°C at pressure of 15 pounds per square inch (psi) and the residence time will be more than 1 hour as per CPCB Guideline 2016.
3. The Shredder [300 kg/hr.] used for de-shaping or cutting into smaller pieces to make it unrecognizable waste as per Guideline 2016 & BMWM Rules, 2016.
4. The air pollution controlling equipments should be as per the prescribed BMWM Rules, 2016
5. The Effluent Treatment Plant of 5 KLD capacity comprises of collection tank, O&G trap, chemical dosing cum mixing (Flash and slow), coagulation chamber, primary settling tank, biological treatment process, secondary settling tank, pressure filter, activated carbon filter, pH correction tank to comply with the water recirculation process. The treated effluent is to be recycled for vehicle cleaning and scrubbing cum quenching purpose in air pollution control device of the incinerator as per the Guideline.

6. In light of letter dated 27/3/2025 Commitment of Subharti Medical University for land allotment should be submitted within 03 months failing which this EC is liable to be revoked.
  7. Zero Liquid Discharge system (ZLD) should be maintained as proposed.
  8. The emissions of the parameters Hcl, SO<sub>2</sub>, CO, total Organic Carbon, HF, NO<sub>x</sub>, total Dioxins and Furans, Hg and its compounds shall be strictly per Environment (Protection) Rules 1986 as amended. The CO<sub>2</sub> concentration in tail gas shall not be less than 7%. Secondary combustion chamber of Incinerator's minimum temperature will be 1100 degree centigrade with gas residence time not less than 2 seconds.
  9. As part of CER activities the project proponent shall conduct awareness camps and workshops in nearby habitations regarding maintenance of personal as well as community hygiene. First aid training should be given to school students in the vicinity of hospital. Details of such workshops shall be uploaded on the website of project and also submitted to SEIAA.
2. **Expansion of Existing Unit from 96mt/day to 400mt/day Billets and TMT Bars from 300 mt/day to 500 mt/day through ELEctrical/ Induction Furnace and 190MT/day production of sponge iron along with 4MW captive power plant at Village – Dhauhan, Tehsil Chunar, District – Mirzapur, Uttar Pradesh by M/s Maamahamaya Ispat and Alloys Private Limited., 9385/7825/SIA/UP/IND1/502425/2024**

SEIAA noted that the above projECt was taken in its 880<sup>th</sup> meeting dated 19.03.2025 SEIAA reviewed the case and opined to add one more condition to the granted EC-

1. The ProjECt proponent shall install pre cleaning facility of adequate capacity to remove paints, varnishes and other foreign matter deposited over the mild steel scrap before start of production. Complete details along with design details must be submitted to SEIAA within 2 months' time failing which EC shall be revoked. UPPCB should also ensure its installation before grant of CTO.

#### **Nodal Officer**

#### **SEIAA, UP**

MoM prepared by SEcRetariat in consultation with  
Chairman & Members on the basis of dECisions  
taken by SEIAA during the meeting.

**(Smt. Mamta Sanjeev Dubey)**  
**Chairman**  
**SEIAA**

**(Ajay Kumar Sharma)**  
**Member-SEcRetary**  
**SEIAA**

**(Paras Nath)**  
**Member**  
**SEIAA**



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ANNEXURE-2

File No: 9679-7761

Government of India

Ministry of Environment, Forest and Climate Change

(Issued by the State Environment Impact Assessment Authority (SEIAA),  
UTTAR PRADESH)

\*\*\*



Date 31/03/2025



To,

Shri Neeraj Aggarwal  
M/s SYNERGY WASTE MANAGEMENT PRIVATE LIMITED  
517-518, 5th Floor, D-Mall, Sector-10, Rohini, New Delhi, 110085, Sector-10, NORTH WEST, DELHI,  
110085  
info@synergyworld.co.in

**Subject:** Grant of prior Environmental Clearance (EC) to the proposed project under the provision of the EIA Notification 2006 -regarding Existing Common Bio-Medical Waste Treatment Facility” at Subharti Medical College Campus, Subharti Puram, Meerut, Uttar Pradesh, M/s Synergy Waste Management Pvt. Ltd.

**Sir/Madam,**

This is in reference to your application submitted to SEIAA vide proposal number SIA/UP/INFRA2/522886/2025 dated 07/02/2025 for grant of prior Environmental Clearance (EC) to the proposed project under the provision of the EIA Notification 2006 and as amended thereof.

2. The particulars of the proposal are as below :

(i) EC Identification No.	EC25B3301UP5147670N
(ii) File No.	9679-7761
(iii) Clearance Type	Fresh EC
(iv) Category	B1
(v) Project/Activity Included Schedule No.	7(da) Bio-Medical Waste Treatment Facilities
(vii) Name of Project	Existing Common Bio-Medical Waste Treatment Facility at Subharti Medical College Campus, Subharti Puram, Meerut, Uttar Pradesh
(viii) Name of Company/Organization	SYNERGY WASTE MANAGEMENT PRIVATE LIMITED
(ix) Location of Project (District, State)	MEERUT, UTTAR PRADESH
(x) Issuing Authority	SEIAA
(xi) Applicability of General Conditions as per EIA Notification, 2006	No

3. In view of the particulars given in the Para 1 above, the project proposal interalia including Form-2(Part A, B and C)/

EIA & EMP Reports were submitted to the SEAC for appraisal under the provision of EIA notification 2006 and its subsequent amendments. 4. The above-mentioned proposal has been considered by SEAC in its meeting held on 07-03-2025. The minutes of the meeting and all the project documents are available on PARIVESH portal which can be accessed from the PARIVESH portal by scanning the QR Code above.

5. Details of the minerals to be mined along with production capacity and the brief on the salient features of the project as submitted by the project proponent in Form 1 (Part A and B) in the reports and as presented during SEAC meeting are annexed to this EC as Annexure (2).

6. The SEAC, in its meeting held on 07-03-2025 based on information submitted viz: Form 1 (Part A, B and C), EIA/EMP report etc & clarifications provided by the project proponent and after detailed deliberations on all technical aspects and public hearing issues and compliance thereto furnished by the Project Proponent, recommended the proposal for grant of Environment Clearance under the provision of EIA Notification, 2006 and as amended thereof subject to stipulation of Specific and Standard EC conditions as given in Annexure (1).

7. The SEIAA in its meeting held on 27-03-2025 has examined the proposal in accordance with the provisions contained in the Environment Impact Assessment (EIA) Notification, 2006 & further amendments thereto and based on the recommendations of the SEIAA hereby accords Environment Clearance for the instant proposal to Neeraj Aggarwal under the provisions of EIA Notification, 2006 and as amended thereof subject to compliance of the Specific conditions as given in Annexure (1)

8. The SEIAA reserves the right to stipulate additional conditions, if found necessary.

9. The Environmental Clearance to the aforementioned project is under provisions of EIA Notification, 2006. It does not tantamount to approvals/consent/permissions etc. required to be obtained under any other Act/Rule/regulation. The Project Proponent is under obligation to obtain approvals /clearances under any other Acts/ Regulations or Statutes, as applicable, to the project.

10. The PP is under obligation to implement commitments made in the Environment Management Plan, which forms part of this EC.

11. General Instructions:

a) The project proponent shall prominently advertise it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days indicating that the project has been accorded environment clearance and the details of SEIAA website where it is displayed.

b) The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn must display the same for 30 days from the date of receipt.

c) The project proponent shall have a well laid down environmental policy duly approved by the Board of Directors (in case of Company) or competent authority, duly prescribing standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental / forest / wildlife norms / conditions.

d) Action plan for implementing EMP and environmental conditions along with responsibility matrix of the project proponent (during construction phase) and authorized entity mandated with compliance of conditions (during operational phase) shall be prepared. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Six monthly progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six-Monthly Compliance Report.

e) Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.

f) The project proponent shall also ensure that the proposed site is not a part of any no-development zone as required/prescribed/identified under law. In case of violation, this permission shall automatically deem to be cancelled. Also, in the event of any dispute on ownership or land use of the proposed site, this clearance shall automatically deem to be cancelled.

g) Any appeal against this EC shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

h) The SEIAA reserves the right to revoke the environmental clearance, if conditions stipulated are not implemented to the satisfaction of SEIAA. SEIAA may impose additional environmental conditions or modify the existing ones, if necessary.

12. This issues with the approval of the Competent Authority

**Annexure 1**

## Specific EC Conditions for (Bio-medical Waste Treatment Facilities)

## 1. Environmental Attributes

S. No	EC Conditions
1.1	<ol style="list-style-type: none"> <li>1. Project proponent should ensure to develop 1500 sqm green belt nearby the existing plant of Synergy Biomedical Waste Treatment Facility.</li> <li>2. The observations provided in the vetting recommendation letter dated 03/03/2025 issued by the Civil Engineering Department, Motilal Nehru National Institute of Technology, Allahabad will be strictly followed by the project proponent.</li> <li>3. Proponent shall comply with the action plan for CER submitted by PP at the time of EIA presentation. Compliance report of investment under CER to be submitted regularly to the Directorate, UPPCB and District Administration.</li> <li>4. Proposed CBWTF shall comply with the guidelines for Bio-medical Waste Treatment and Disposal, transportation &amp; storage facilities etc. issued by CPCB from time to time.</li> </ol>
1.2	<ol style="list-style-type: none"> <li>1. The fixed hearth type incinerator capacity 300 kg/hr is used and is operational in the project as mentioned in EIA report. For 300 kg/hr capacity, the Rotary Kiln type incinerator may be used in place of fixed hearth type incinerator in EIA report as per CPCB Guideline 2016. (For higher capacity incinerators (i.e., 250 kg/hour or more), rotary kiln-based incinerators are preferred over fixed hearth incinerators. Rotary Kiln shall be preferred; in case of the total biomedical waste treated in a batch (8 hour) is exceeding 2.5 to 3 Tones as per CPCB Guideline 2016.)</li> <li>2. The Autoclave [300 lit/batch] temperature is to be maintained at more than 121°C at pressure of 15 pounds per square inch (psi) and the residence time will be more than 1 hour as per CPCB Guideline 2016.</li> <li>3. The Shredder [300 kg/hr.] used for de-shaping or cutting into smaller pieces to make it unrecognizable waste as per Guideline 2016 &amp; BMW Rules, 2016.</li> <li>4. The air pollution controlling equipments should be as per the prescribed BMW Rules, 2016</li> <li>5. The Effluent Treatment Plant of 5 KLD capacity comprises of collection tank, O&amp;G trap, chemical dosing cum mixing (Flash and slow), coagulation chamber, primary settling tank, biological treatment process, secondary settling tank, pressure filter, activated carbon filter, pH correction tank to comply with the water recirculation process. The treated effluent is to be recycled for vehicle cleaning and scrubbing cum quenching purpose in air pollution control device of the incinerator as per the Guideline.</li> <li>6. In light of letter dated 27/3/2025 Commitment of Subharti Medical University for land allotment should be submitted within 03 months failing which this EC is liable to be revoked.</li> <li>7. Zero Liquid Discharge system (ZLD) should be maintained as proposed.</li> <li>8. The emissions of the parameters Hcl, SO<sub>2</sub>, CO, total Organic Carbon, HF, NO<sub>x</sub>, total Dioxins and Furans, Hg and its compounds shall be strictly per Environment (Protection) Rules 1986 as amended. The CO<sub>2</sub> concentration in tail gas shall not be less than 7%. Secondary combustion chamber of Incinerator's minimum temperature will be 1100 degree centigrade with gas residence time not less than 2 seconds.</li> <li>9. As part of CER activities the project proponent shall conduct awareness camps and workshops in nearby habitations regarding maintenance of personal as well as community hygiene. First aid training should be given to school students in the vicinity of hospital. Details of such workshops shall be uploaded on the website of project and also submitted to SEIAA.</li> </ol>

## Standard EC Conditions for (Bio-Medical Waste Treatment Facilities)

## 1. Statutory Compliance

S. No	EC Conditions
1.1	The project proponent shall obtain forest clearance under the provisions of Forest (Conservation) Act, 1980, in case of the diversion of forest land for non-forest purpose involved in the project.
1.2	The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.
1.3	The project proponent shall prepare a Site-Specific Conservation Plan & Wildlife Management Plan and approved by the Chief Wildlife Warden. The recommendations of the approved Site-Specific Conservation Plan/Wildlife Management Plan shall be implemented in consultation with the State Forest Department. The implementation report shall be furnished along with the six-monthly compliance report (in case of the presence of schedule-I species in the study area)
1.4	The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the concerned State Pollution Control Board/ Committee.
1.5	Transportation and handling of Bio-medical Wastes shall be as per the Bio-Medical Waste Management Rules, 2016 including the section 129 to 137 of Central Motor Vehicle Rules 1989.
1.6	Project shall fulfill all the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 including collection and transportation design etc. and also guidelines for Common Hazardous Waste Incineration - 2005, issued by CPCB Guidelines of CPCB/MPPCB for Bio-medical Waste Common Hazardous Wastes incinerators shall be followed.
1.7	The project proponent shall obtain the necessary permission from the Central Ground Water Authority, in case of drawl of ground water / from the competent authority concerned in case of drawl of surface water required for the project.
1.8	A certificate of adequacy of available power from the agency supplying power to the project along with the load allowed for the project should be obtained.
1.9	All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department shall be obtained, as applicable by project proponents from the respective competent authorities

## 2. Air Quality Monitoring And Preservation

S. No	EC Conditions
2.1	The project proponent shall install emission monitoring system including Dioxin and furans to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB and CPCB online servers and calibrate these systems from time to time according to equipment supplier specification through labs recognised under Environment (Protection) Act, 1986 or NABL accredited laboratories.
2.2	Periodical air quality monitoring in and around the site including VOC, HC shall be carried out.

S. No	EC Conditions
2.3	Incineration plants shall be operated (combustion chambers) with such temperature, retention time and turbulence, so as to achieve Total Organic Carbon (TOC) content in the slag and bottom ashes less than 3%, or their loss on ignition is less than 5% of the dry weight of the material.
2.4	Venturi scrubber (alkaline) should be provided with the incinerator with stack of adequate height (Minimum 30 meters) to control particulate emission within 50mg/Nm <sup>3</sup> .
2.5	Appropriate Air Pollution Control (APC) system shall be provided for fugitive dust from all vulnerable sources, so as to comply prescribed standards. All necessary air pollution control devices (quenching, Venturi scrubber, mist eliminator) should be provided for compliance of emission standards.
2.6	Masking agents should be used for odour control.

### 3. Water Quality Monitoring And Preservation

S. No	EC Conditions
3.1	The project proponent shall install effluent monitoring system with respect to standards prescribed in Environment (Protection) Rules 1986 through labs recognised under Environment (Protection) Act, 1986 or NABL accredited laboratories.
3.2	Waste water generated from the facility shall be treated in the ETP and treated waste water shall be reused in the APCD connected to the incinerator. The water quality of treated effluent shall meet the norms prescribed by State Pollution Control Board. Zero discharge should be maintained.
3.3	Process effluent/any waste water should not be allowed to mix with storm water.
3.4	Total fresh water use shall not exceed the proposed requirement as provided in the project details. Prior permission from competent authority shall be obtained for use of fresh water.
3.5	Sewage Treatment Plant shall be provided to treat the wastewater generated from the project. Treated water shall be reused within the project.
3.6	A certificate from the competent authority for discharging treated effluent/ untreated effluents into the Public sewer/disposal/drainage systems along with the final disposal point should be obtained.
3.7	The leachate from the facility shall be collected and treated to meet the prescribed standards before disposal.
3.8	Magnetic flow meters shall be provided at the inlet and outlet of the ETP & all ground water abstraction points and records for the same shall be maintained regularly.
3.9	Rain water runoff from hazardous waste storage area shall be collected and treated in the effluent treatment plant.

### 4. Noise Monitoring And Prevention

S. No	EC Conditions
4.1	The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

### 5. Energy Conservation Measures

S. No	EC Conditions
5.1	Provide solar power generation on roof tops of buildings, for solar light system for all common areas, street lights, parking around project area and maintain the same regularly;
5.2	Provide LED lights in their offices and residential areas

### 6. Waste Management

S. No	EC Conditions
6.1	Incinerated ash shall be disposed at approved TSDF and MoU made in this regard shall be submitted to the Ministry prior to the commencement.
6.2	The solid wastes shall be segregated as per the norms of the Solid Waste Management Rules, 2016.
6.3	A certificate from the competent authority handling municipal solid wastes should be obtained, indicating the existing civic capacities of handling and their adequacy to cater to the M.S.W. generated from project.
6.4	Any wastes from construction and demolition activities related thereto shall be managed so as to strictly conform to the Construction and Demolition Waste Management Rules, 2016
6.5	No landfill site is allowed within the CBWTF site
6.6	The Project proponent shall not store the Hazardous Wastes more than the quantity that has been permitted by the CPCB/SPCB.

### 7. Green Belt

S. No	EC Conditions
7.1	Green belt shall be developed in area as provided in project details, with native tree Green belt shall be developed in an area equal to 33% of the plant area with a native tree species in accordance with CPCB guidelines. The greenbelt shall inter alia cover the entire periphery of the plant.

### 8. Public Hearing And Human Health Issues

S. No	EC Conditions
8.1	Feeding of materials/Bio-medical waste should be mechanized and automatic no manual feeding is permitted.

S. No	EC Conditions
8.2	Proper parking facility should be provided for employees & transport used for collection & disposal of waste materials.
8.3	Necessary provision shall be made for fire-fighting facilities within the complex.
8.4	Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
8.5	Emergency plan shall be drawn in consultation with SPCB/CPCB and implemented in order to minimize the hazards to human health or environment from fires, explosion or any unplanned sudden or gradual release of hazardous waste or hazardous waste constituents to air, soil or surface water.
8.6	Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.
8.7	Occupational health surveillance of the workers shall be done on a regular basis.

#### 9. Miscellaneous

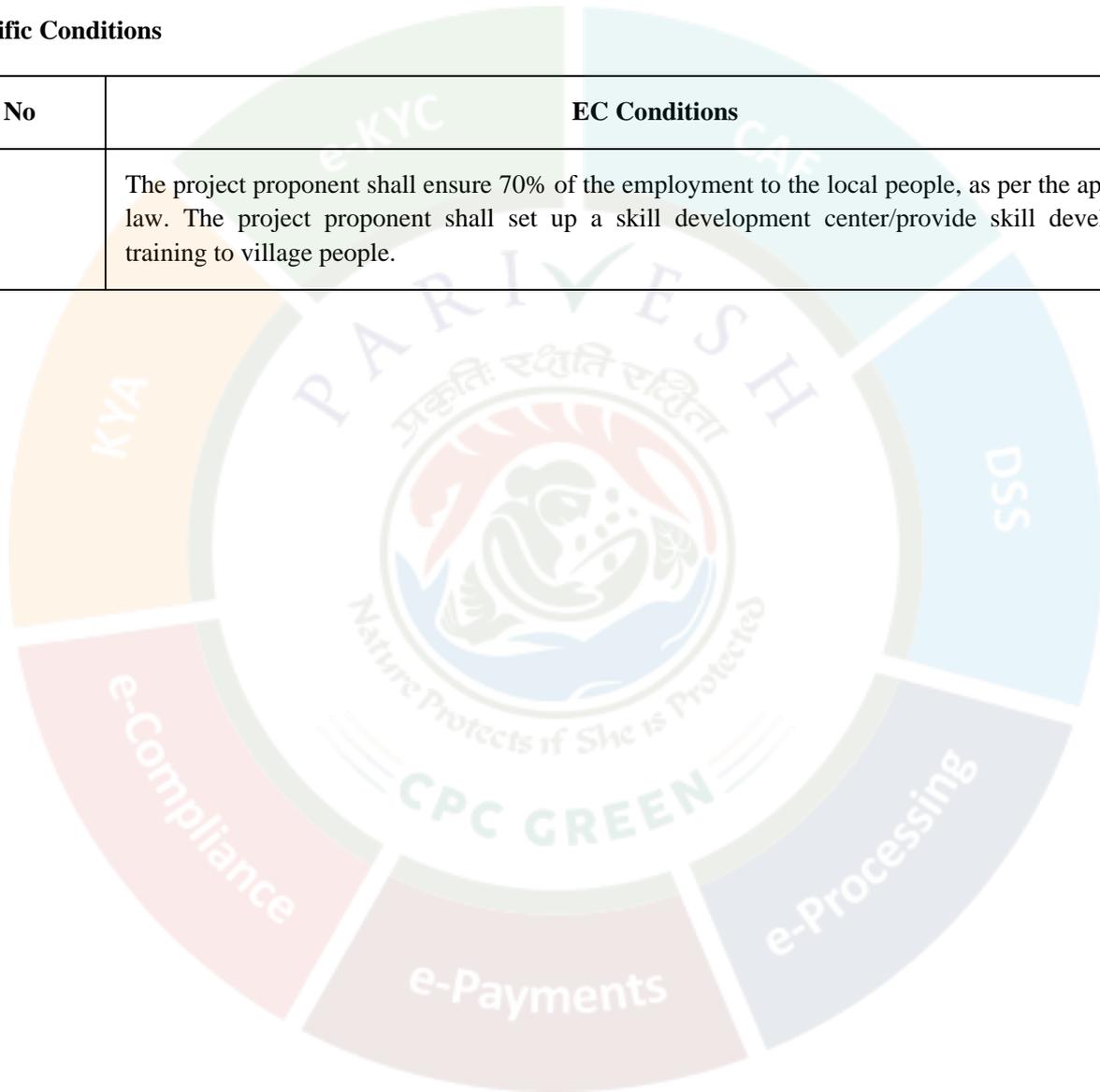
S. No	EC Conditions
9.1	The project proponent shall prominently advertise it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days indicating that the project has been accorded environment clearance and the details of MoEF&CC/SEIAA website where it is displayed
9.2	The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.
9.3	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and update the same on half-yearly basis.
9.4	The project proponent shall submit six-monthly reports on the status of the compliance of the stipulated environmental conditions on the website of the ministry of Environment, Forest and Climate Change at environment clearance portal.
9.5	The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/wildlife norms/conditions. The company shall have defined system of reporting infringements/deviation/violation of the environmental/forest/wildlife norms/ conditions and / or shareholder's/stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.

S. No	EC Conditions
9.6	A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly report to the head of the organization.
9.7	Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.
9.8	Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.
9.9	The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.
9.10	The criteria pollutant levels namely; PM2.5, PM10, SO2, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
9.11	The project proponent shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities, commencing the land development work and start of production operation by the project.
9.12	The project authorities must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government.
9.13	The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.
9.14	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
9.15	Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.
9.16	The Ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.
9.17	The Ministry reserves the right to stipulate additional conditions if found necessary. The Company in a time bound manner shall implement these conditions.
9.18	The Regional Office of this Ministry shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data/information/monitoring reports.
9.19	The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention &

S. No	EC Conditions
	Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India / High Courts/NGT and any other Court of Law relating to the subject matter.
9.20	Any appeal against this EC shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

#### 10. Specific Conditions

S. No	EC Conditions
10.1	The project proponent shall ensure 70% of the employment to the local people, as per the applicable law. The project proponent shall set up a skill development center/provide skill development training to village people.



**Annexure-2**

A presentation was made by the project proponent along with their consultant M/s Ind Tech House Consult to SEAC on 07/03/2025.

**Project Details Informed by the project proponent and their consultant**

1. The environmental clearance is sought for “Existing Common Bio-Medical Waste Treatment Facility” at Subharti Medical College Campus, Subharti Puram, Meerut, Uttar Pradesh, M/s Synergy Waste Management Pvt. Ltd.
2. The terms of reference for the project proposal was issued by SEIAA, U.P. vide letter no. 381/Parya/SEIAA/7761/2023 dated 18/01/2024 for the Captive Treatment Facility.
3. Amendment terms of reference letter was issued by SEIAA, U.P. vide letter dated 21/10/2024 for the Existing Common Bio-Medical Waste Treatment Facility.
4. Salient features of the project as submitted by the project proponent:

SN	Parameters	Description
1.	Identification of project	Project falls under Category “B” of item 7 (da) as per EIA Notification dated 14th September, 2006 & amendments thereof. However, this plant requires Post-Facto EC Approval as per NGT order dated 02.03.2023
2.	Project Location	Subharti Medical College Campus, Subharti Puram, Meerut, UP - 250 005 Site coordinates - 28°57'46.02" N, 77° 37'58.64"E
3.	Existing Plant capacity	Incinerator [capacity 300 Kg/hour] Autoclave [capacity – 300 Lit/batch] Shredder [capacity - 300 kg/hour]
4.	Plot Area	1242 sq m
5.	Land Ownership	Land allocated by the Medical College Authority on rent basis.
6.	Water requirement	Fresh water requirement – 5 KLD Total water requirement including recycled treated waste water from onsite ETP - 9 KLD
7.	Source of water	Fresh water source – Onsite ground water abstraction through tube-well. Necessary permission has been obtained. Recycled water source: Onsite ETP treated wastewater.
8.	Wastewater	Wastewater is generated from equipment washing, floor washing, vehicle washing operations etc. and treated in onsite effluent treatment plant of capacity 5 KLD.
9.	Man Power	At present, total 113 employees [direct 62 including vehicle helpers + staff + 51 contractual drivers] are engaged with the operational activities of the facility.
10.	Power Requirement	Power Requirement: 49 KW Source: UP Power Corporation Limited Emergency backup – one DG set of 62.5 KVA
11.	Waste carrying vehicles [GPS enabled]	51 nos.
12.	Green Area	As the allocated area is very small, no green area could be developed within the premises. However, the PP has submitted an undertaking to develop green area of 1500 sqm on a separate land nearby the existing facility.

18.	Total Project Cost	Project cost is INR. 94.71 Lakh.
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## 5. Land use details:

Component	Area, (in m <sup>2</sup> )	Percentage (%)
Incinerator area	218.9	17.6
Penal Room	12.0	1.0
Shredder Area	11.9	1.0
Red Waste room	11.9	1.0
Autoclave Area	55.8	4.5
Chimney	9.8	0.8
Ash Storage Room	9.1	0.7
Yellow Waste Store Room	13.3	1.1
Vehicle Washing Area	20.5	1.7
Septic Tank	2.2	0.2
DG Set	33.7	2.7
ETP Area	50.1	4.0
Office	23.7	1.9
Office	16.6	1.3
Store Room	14.2	1.1
Wash Room	7.2	0.6
Fire Fighting Water tank	47.7	3.8
Store	1.5	0.1
Road/ Other open area/ services	681.9	54.9
Total Plant Area	1242.0	100.0

## 6. Proposed activity:

S.N.	Activities
1.	Collection of biomedical wastes from different Health Care units [HCU]
2.	Transportation of segregated wastes from HCUs to Project Site
3.	Segregated waste storage at site as per color coded bags
4.	Operation of Incinerator
5.	Operation of Autoclave
6.	Operation of Shredder
7.	Handling of Sharps
8.	Vehicle Cleaning
9.	Operation of ETP and recycling of treated effluent
10.	Storage & disposal of hazardous waste [ETP sludge and incineration ash]
11.	Site Security and Fire Safety

## 7. Water requirement details:

Usage	Source	Water Quantity [KLD]	Effluent [KLD]	Treatment
Domestic requirement [11@45 lpcd]	Fresh – onsite tubewell	0.5	0.3	Sewer line of Subharti Medical College Campus.
Floor Washing	Fresh	1	0.9	ETP
Quencher and Scrubber	Recycled – Onsite ETP	1.5	1	ETP
Vehicle Cleaning	Onsite ETP	2.5	2.3	ETP
Green area outside	Fresh	3.5	0	--
Total Water Required		9 KLD		

Head	Source	Quantity
Fresh Water Requirement	On site Tube Well	5KLD
Treated Water Requirement	On site ETP	4 KLD
Total water Requirement		9 KLD

8. Solid & other waste details:

- MSW of around 1.6 Kg/day will be generated from workers which is disposed through municipal waste disposal system of the Medical College.

SN	Type of waste	Category as per HW Rule 2016	Quantity	Storage	Disposal
1.	Used Oil	Sch.I, 5.1	0.1 KL/year	Stored in HDPE drums	Sale to registered recycler
2.	Ash from incinerator and flue gas cleaning residue	Sch.I, 35.1, 37.2	120 kg/day	Stored onsite at secured place	Through Common HWTSDF
3.	ETP sludge	Sch.I, 35.3	5.1 Kg/day	Stored onsite at secured place	

9. The project proposal falls under category-7(da) of EIA Notification, 2006 (as amended).

**Copy, through email, for information and necessary action to –**

- Principal Secretary, Department of Environment, Forest and Climate Change, Government of Uttar Pradesh, Lucknow (email – [psforest2015@gmail.com](mailto:psforest2015@gmail.com))
- Joint Secretary, Ministry of Environment, Forest and Climate Change, Government of India, 3rd Floor, Prithvi-Block, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110003 (email – [sudheer.ch@gov.in](mailto:sudheer.ch@gov.in))
- Deputy Director General of Forests (C), Integrated Regional Office, Ministry of Environment, Forest and Climate Change, Kendriya Bhawan, 5th Floor, Sector “H”, Aliganj, Lucknow – 226020 (email – [roc.lko-mef@nic.in](mailto:roc.lko-mef@nic.in))
- District Magistrate, Meerut.
- Member Secretary, Uttar Pradesh Pollution Control Board, TC-12V, Paryavaran Bhawan, Vibhuti Khand, Gomti Nagar, Lucknow-226010 (email – [ms@uppcb.in](mailto:ms@uppcb.in))
- Copy for Guard File.

(Ajay Kumar Sharma)  
Member Secretary, SEIAA

Signature Not Verified

Digitally Signed by: Mr Ajay Kumar Sharma  
Member Secretary, SEIAA

Date: 31/03/2025