

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

OA No. 628/2024

IN THE MATTER OF:

Alok Mohan

Applicant

Versus

Haryana State Pollution Control Board & Ors

Respondent

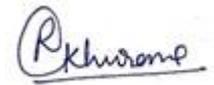
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Place: New Delhi

Dated: 01.05.2025

FILED BY:-



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**Report on behalf of Respondent No.1 i.e. Haryana State Pollution
Control Board in compliance of order dated 21.01.2025**

1. This original application has been filed by the Applicant making a complaint against violation of the environmental norms by Escorts Kutoba Limited at Faridabad. Hon'ble NGT passed order dated 21.01.2025" "applicant alleges that the project proponent is using chemicals in the process and causing air pollution by emitting fumes. The Report of the HSPCB is silent in this regard. Hence, we direct the HSPCB to carry out a fresh inspection, taking into account the entire manufacturing process of the project proponent, the chemicals used therein and the kind of air, water and noise pollution that has been caused in the process adopted by the Project Proponent. The report should disclose on storage of hazardous chemicals used and Air Pollution Control Device (APCD) installed for controlling emissions from stack and fugitive and also with compliance of Stack emissions standards particulars for VOCS/acid mist and other others. The HSPCB will submit the fresh report supported by the sample analysis reports within four weeks by supplying an advance copy to the applicant and the counsel for the project proponent, who will have an opportunity to file a response/objection thereto within two weeks thereafter."
2. That in compliance with the Hon'ble NGT's order dated 21.01.2025, the Haryana State Pollution Control Board, Faridabad, conducted an

inspection of Escorts Kubota Ltd. (EKL) on 25.04.2025 to assess its current operational status. A thorough inspection of the entire plant was carried out to determine whether any polluting activities were being conducted. It was found that the site comprises two separate units—one involved in machining operations and the other in tractor assembly.

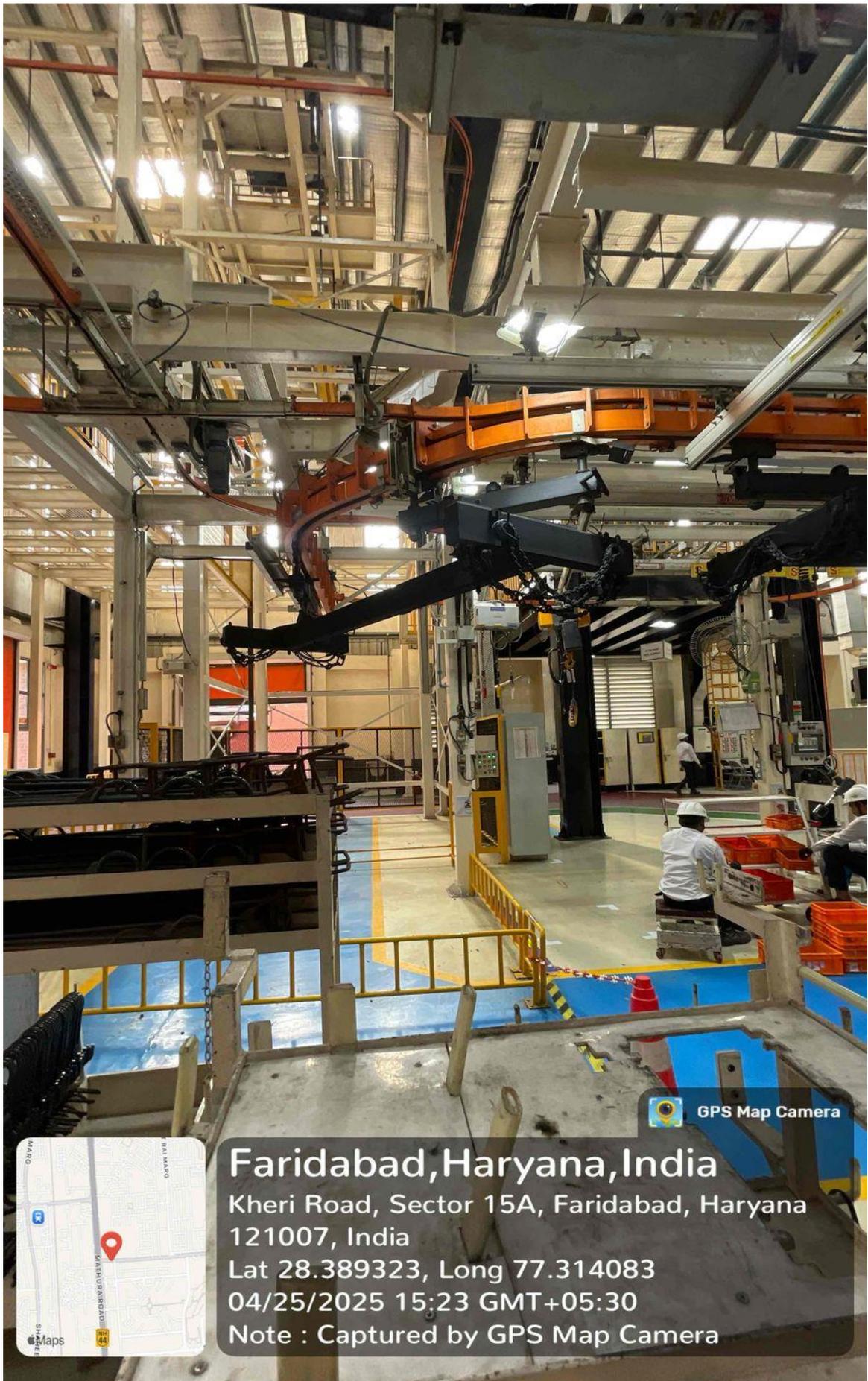
All areas and processes within the premises were comprehensively reviewed. The detailed operational process is outlined below:

Manufacturing Process Detail (Machining) EKL - Plant-1

	Process-1	Material Receiving	1. Metal Castings and Front Axles are brought from various 'Parts manufacturing suppliers' and these parts are stored for machining in machining area
	Process-2	Machining	1. These Casting and Axles are moved to respective machining lines on Pallets by Lifter for machining. 2. Casting and Axles move on respective conveyors sequentially for machining on all machines. 3. Water based chemical Castrol HOYSOL- 3505 is used for machining with the concentration of 4-5% and 95-96 % Water as coolant. 4. Coolant is re-used and Oil skimmer is installed for removal of oil and Grease. 5. Oil and Grease is being disposed of through Authorized Hazardous Waste Disposal Facility.

All Heavy Casting Machining Lines AND Machining (Water) Front Axle	Process-3	Washing	<p>1. These parts are shifted to cleaning process and cleaned in closed chamber to remove the dust/dirt/oil from the parts.</p> <p>2. Detergent based chemical Hiclean/L5070 Makee Hardcastle Quaker Clean-624 CP with Demineralized Water is used for cleaning with concentration of 4%-5% chemical and 95-96 % Water</p>
	Process-4	Predispatch inspection	Machined components are inspected by operators for any quality defect before dispatch.
	Process-5	Dispatch	All Components are then dispatched to Plant-2 & Plant-3 (situated at other distant unit) for assembling.
Facilities			
		Sewage Treatment Plant (Capacity-100 Kld)	1. Domestic Effluent is treated in Sewage Treatment Plant.
		Gas Generators	<p>1. Piped Natural Gas (PNG) based generators are installed for Electricity backup in case of power failure.</p> <p>2. Gas generators are also equipped with stack at 30-meter height.</p>

Photos taken during inspection:



GPS Map Camera



Faridabad, Haryana, India
Kheri Road, Sector 15A, Faridabad, Haryana
121007, India
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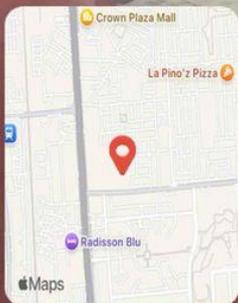
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GPS Map Camera



Faridabad, Haryana, India

Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

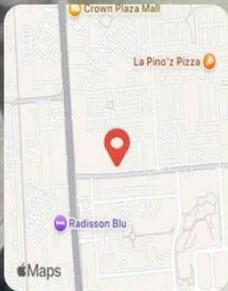
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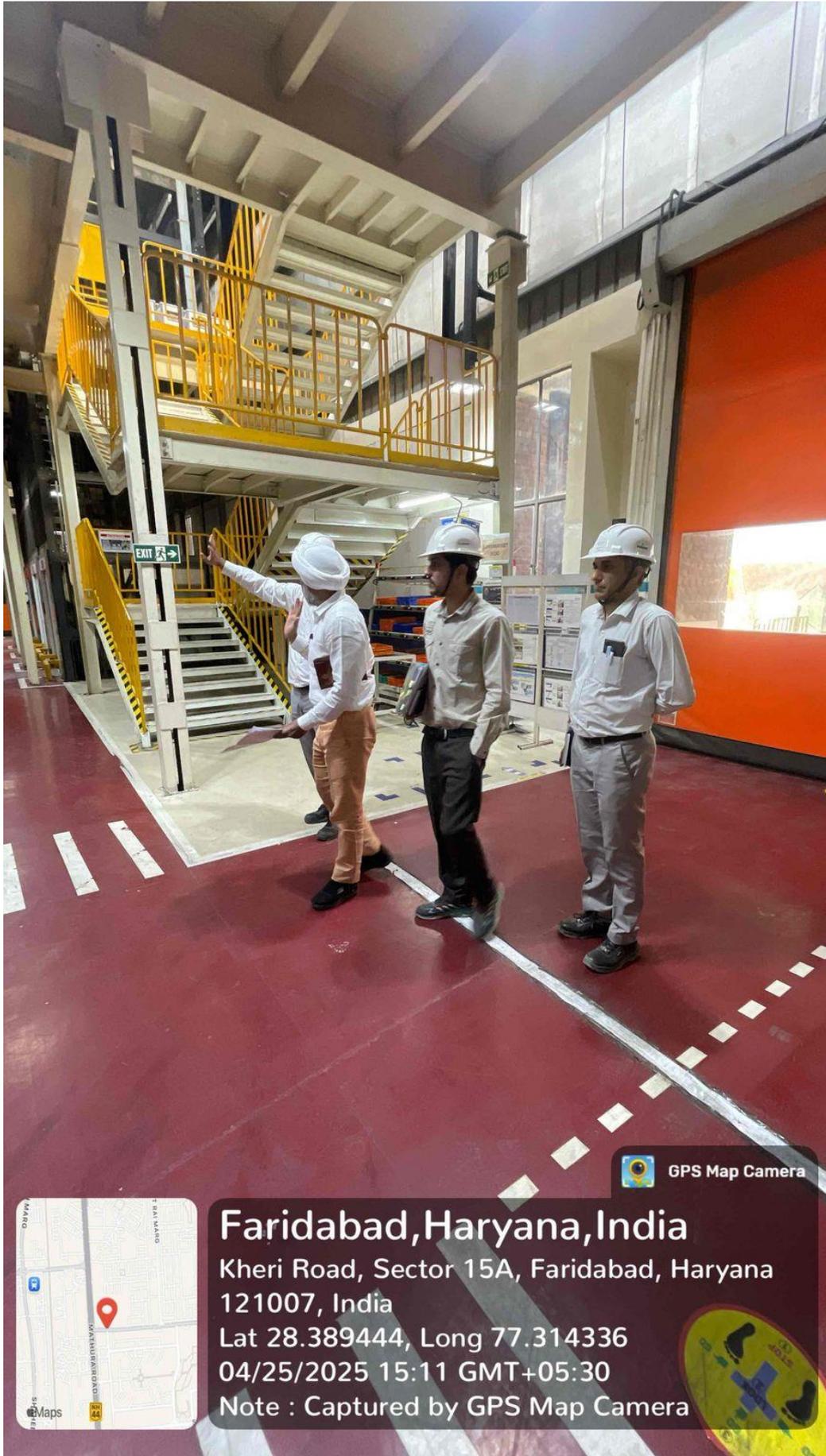
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121007, India
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Escorts Kubota India (Tractor Assembly Plant) 18/4 Mathura Road, Faridabad.

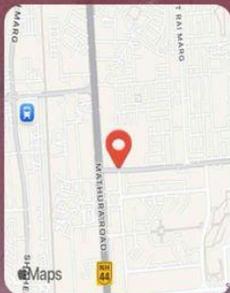
Process-1	Material Receiving	1. Parts of various size and material like Casting, Sheet metal, Mild steel are brought from various 'Parts manufacturing suppliers' to Escorts Kubota India Faridabad Tractor assembly plant.
Process-2	Washing	1. These parts are cleaned in closed Chamber by washing process to remove the dust/dirt/oil. 2. Detergent based chemical Assiano 1041L (Non-Toxic in Nature) is used for cleaning with concentration of 3% chemical with 97% water. 3. Effluent of washing machine is drained to a collection tank. 4. Effluent from Collection tank is treated in Effluent treatment plant.
Process-3	Assembly- Before Paint	1. Washed parts (e.g. gears/Bearing/Shfts etc.) are assembled manually by operators on moving conveyors 2. Parts are assembled by operators using various tools & Tackles 3. All major parts are assembled like Engine/Gear box/Front axle etc. before sending them to Painting process.
Process-4	Pretreatment Process	1. Assembled tractor is now moved to paint shop via conveyor. 2. In first step assembled tractor is moved though Pre-Treatment process before painting. 3. PT process consists of Total 7 stage of washing: - Inside closed chamber 3.1 Hot water (100% water) 3.2 Phosphate-I (Ground dg28: Water) (1:99) Non-Polluting detergent based Soap like chemical used for cleaning the dust & dirt from parts. 3.3 Phosphate-II (Ground dg28: Water) (1:99) 3.4 Water Rinse-I (100% water) 3.5 Water Rinse-II (100% water) Cleaning with water as per defined process 3.6 De-Ionized water rinse (100% water) 3.7 De-Ionized Water rinse-II (100% water) 4. Effluent of Pretreatment tanks is drained to a collection tank. 5. Effluent from Collection tank is treated in

		Effluent treatment plant for treatment.
Process-5	Painting	<ol style="list-style-type: none"> 1. Assembled tractor from Pretreatment process is moved to Painting Process. 2. Painting is done inside an enclosed painting booth with air flow of down draft, where operators are using electrostatic painting guns for painting. 3. Air filters are installed inside painting booth along with water-based scrubber & baffled based venturi system for APCM. 4. Effluent of water scrubber is drained to a collection tank. 5. Effluent from Collection tank is treated in Effluent treatment plant.
Process-6	Paint Baking	<ol style="list-style-type: none"> 1. Painted Tractor is now moved to Paint baking oven. 2. Natural gas is used as fuel for heating the air inside the oven to 110 Deg Celsius. 3. Wet painted parts are now dried at 110 deg Celsius temperature inside oven.
Process-7	Assembly- After Paint	<ol style="list-style-type: none"> 1. Painted tractor is further assembled manually by operator 2. Parts are assembled by operators using various tools & Tackles 3. Major assembly done after painting are: Tire assembly, Fender/Bonnet assembly, Diesel/Coolant/Oil filling etc.
Process-8	Dispatch	<ol style="list-style-type: none"> 1. Tractors are inspected by operators for any quality defect before dispatch. 2. Tractors are then dispatched in a truck to company dealers.
Other Facilities	Sewage Treatment Plant	<ol style="list-style-type: none"> 1. Domestic effluent (Toilet & Canteen waste) is transferred to Sewage Treatment Plant 2. Treated water is then utilized in gardening / Toilet flushing
	Gas Generators	<ol style="list-style-type: none"> 1. Natural Gas based generators are installed for Electricity backup in case of power failure. 2. Gas generators are also equipped with stack at 30-meter height.

Photos taken during inspection:



GPS Map Camera



Faridabad, Haryana, India

Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

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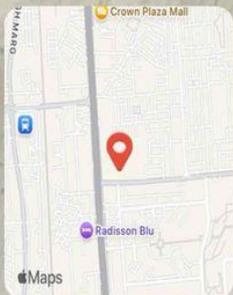
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GPS Map Camera



Faridabad, Haryana, India

Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

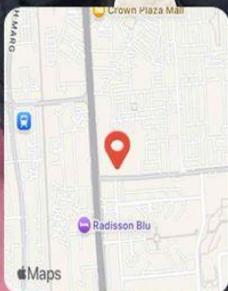
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GPS Map Camera



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Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

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Note : Captured by GPS Map Camera







PAINTING AREA IN ENCLOSED CHAMBER



GPS Map Camera



Faridabad, Haryana, India

Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

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PAINT BAKING OVEN



 GPS Map Camera



Faridabad, Haryana, India

Kheri Road, Sector 15A, Faridabad, Haryana
121007, India

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Details of stacks:

Total no of stacks are 12 no's as mentioned in the CTO. In none of the process connected with exhaust stacks, any kind of Chemical is used. Details of stacks as under:

S no	Stack Name	Process Attached to	APCM Attached
1	ED Oven Fan	PNG Fired Oven	Hood and Chimney
2	Top Coat Oven	PNG Fired Oven	Hood and Chimney
3	Dry off Oven	PNG Fired Oven	Hood and Chimney
4	Bake Oven	PNG Fired Oven	Hood and Chimney
5	Hot Water Generator 1	PNG Fired Oven	Hood and Chimney
6	Hot water Generator 2	PNG Fired Oven	Hood and Chimney
7	Paint Booth 1	Painting Process	Air filters are installed inside painting booth along with water-based scrubber & baffled based venturi system for APCM.
8	Paint Booth 2	Painting Process	Air filters are installed inside painting booth along with water-based scrubber & baffled based venturi system for APCM.
9	Paint Booth 3	Painting Process	Air filters are installed inside painting booth along with water-based scrubber & baffled based venturi system for APCM.
10	Stack attached to Genset Capacity 650 KVA	Power Generator	Chimney
11	Stack attached to PNG based Genset Capacity 1875 KVA	Power Generator	Chimney
12	Stack attached to PNG based Genset Capacity 1875 KVA	Power Generator	Chimney

Other Relevant Information:

1. During inspection it was also observed that the unit has started the working for the execution on the recommendations made in report dated 12/09/2024.

A. Accoustic Enclosure on the Wall facing the house of complainant:

Unit submitted the purchase Order (No. 901966319 dated 31.03.2025) issued for the installation of an acoustic barrier along the eastern boundary wall, which is shared with neighbouring properties. an initial sample of the acoustic Wall/barrier will be installed during Phase I.

Neighboring stakeholders including applicant will be consulted for feedback before the full-scale installation is carried out. The entire installation is expected to be completed within three months following confirmation from the neighbors.

B. Zero Liquid Discharge from ETP:

Unit submitted a purchase Order (No. 17055 dated 28.02.2025) for the installation of Zero Liquid Discharge (ZLD) facility, aimed at recycling treated water from the Effluent Treatment Plant (ETP). This facility is scheduled to be fully operational by 31st March 2026.

C. The unit has removed the chemical process from the STP.

2. There is no pickling/Electroplating process in the unit. Hence, there is no probability of acid mist generation.
3. The Authorisation under HWM Rules has been granted to both the units and unit has provided the sludge storage room in the premises and Waste DG oil is stored in the drums and both the unit are complying under HWM Rules. For their safe disposal, unit has an agreement with Service Providers i.e. Treatment, Storage & Disposal Facility and oil recycler.



WASTE OIL STORAGE IN DRUMS



SLUDGE STORAGE ROOM



Report submitted for consideration of this Hon'ble Tribunal.

Place: Faridabad

Date 01.05.2025

Handwritten signature of Sandeep Singh in blue ink.

**Sandeep Singh, RO,
HSPCB, Faridabad**