

**BEFORE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

Execution Application No. 42/2019
In
O.A. No. 124 of 2015

IN THE MATTER OF:

Sumitra Devi

...Applicant

Versus

Central Pollution Control Board

....Respondents

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FILED BY:


Regional Officer,
Haryana State Pollution Control Board,
Dharuhera

Date: 29.10.2021

Place: Dharuhera

**BEFORE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

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In

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IN THE MATTER OF:

Sumitra Devi

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**SUBMISSIONS ON BEHALF OF HARYANA STATE
POLLUTION CONTROL BOARD IN RESPONSE TO REPORT
DATED 13.10.2021**

Most Respectfully showeth:

1. That present execution application has been filed seeking execution of the order dated 12.12.2017. The Haryana State Pollution Control Board (herein after referred as to 'HSPCB') has sought remedial action to stop industrial effluent and domestic sewage from entering into villages Maheshwari, Nandrampurbass, Malpura, residential sector Nos. 4 & 6 of Dharuhera and nearby residential area of State of Haryana adjacent to border of Haryana & Rajasthan under Tehsil Dharuhera, Dist. Rewari, Haryana.
2. That HSPCB wishes to place on record the following submissions in response to 'other observations & recommendations made in report:

S. No.	Findings	Submissions
1	The treated water of the STPs are also collected in cess pools and low lying areas and are not being utilized or recycled for plantation or by industries.	Corrective steps be taken by concerned authority
2	It is imperative that treated waste water of STP should be recycled and arrangements for the reuse is RO systems should be established for the recycling of the same by water intensive industries of the industrial area.	Corrective steps be taken by concerned authority
3	There is a proposal for installation of RO system at the CETP 9 MLD combined with 03 MEEs after the same for which bid has been finalized by RIICO for which amount of Rs. 146 Crores has been allotted by Govt. of India and the same is proposed to be completed in 18 months	Finding is contrary to compliance status of direction No.2 (Refer Page No.8 and 53) wherein financial bid stated to be opened shortly.
4	The treated waste water of the CETP is discharged through a conduit line which is installed till the Sabiriver. <u>However the line is broken in Khushkhera industrial area opposite M/s Sai Enterprises, Plot No. F-37, 47 RIA Khushkhera, the treated waste water is discharged through a drain into the RIICO plots and other nearby areas. It is worthwhile to note that the problem can be solved if the water intensive industries or any other industry which are abstracting ground water are bound to use this treated waste water of the CETP which is actually being waste or creating nuisance/pollution in the area. The industries of Khushkhera should be directed as above and RIICO be directed to lay any connectivity pipelines if need be</u>	Admittedly, conduit line is broken in khushkhera and effluent being discharged into RIICO plots and nearby areas. This effluent reached upto Haryana in its 'Nandrapurbas' village. It is therefore imperative that this conduit pipe be repaired to ensure discharge in to Sabi River and possibility of its discharge into 'Nandrapurbas' village (Haryana) can be avoided.

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	for example, The industry M/s Honda Cars India Pvt. Ltd. is already utilizing 1 MLD from the same & others should follow.	
5	During the visit information was gathered from the local people and Municipal Authorities and the following was received:	
a.	Domestic waste water generated from some area of Suraj cinema, Village - Harchandpur, Santhalka, Ghatal Nayagoan and commercial establishments which falls in between them is discharged in to RIICO drain through which it reached to CETP, Bhiwadi	
b.	Domestic waste water generated from village Akera (Harayana) Narayan Vihar, (Harayana), Karankunj, Ghatal (Harayana) is discharged in to RIICO drain through which it reached to CETP, Bhiwadi.	These small villages are surrounded at three sides by State of Rajasthan. Quantum of waste water not mentioned. However, admittedly same is not stagnated in open land, rather is drained and ultimately being treated. Had the HSPCB been called during inspection of these villages, it would have verified these contentions.
c.	Domestic waste water generated from Housing board sector 1,2, 3, Bhiwadi village, Neelam Chowk and Samtal Chowk and also the commercial establishments which fall in between them flow through drains and meet at nallah near bus stand Bhiwadi, from there it flow through gravity to Dharuhera.	<u>Quantum of this waste water is about 15-20 MLD in different periods. The record of measurement readily available is annexed herewith as Annexure-R/1. Video can also be shown. Joint Committee consisting of HSPCB may also inspect and assess the quantum of waste water received. <u>This waste water needs to be controlled and should be taken back to Rajasthan for re-use etc. by way of conduit pipeline or otherwise</u></u>

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6	<p>It may be please be noted that although the case has been filed by State Pollution Control Board, Haryana regarding discharge of waste water into Dharuhera it was found that waste water from Dharuhera also enters the Rajasthan boundary at certain points and sample were taken at such points</p>	<p>Efforts appear to be made to divert the issue from severe problem being faced by State of Haryana for years due to discharge and stagnation of waste water from State of Rajasthan. Quantum of waste water not mentioned. However, admittedly same is not stagnated in open land, rather is drained and ultimately being treated. Had the HSPCB been called during inspection of these villages, it would have verified these contentions. The submissions made at serial No. 5(b).</p>
7	<p>During the visit of Dharuhera it was founded the industries of the area may not be on ZLD and it must be investigated as to how the sewage waste water of Dharuhera and the industrial waste water is being treated and it was gathered on visual observations that the problem is aggregated due to waste water (sewage/industrial) of Dharuhera itself</p>	<p>The sewage and effluent of the units at Dharuhera is being treated through their own STP and ETP respectively. No waste water is being discharges therefore no question arises to aggregate the problem as alleged.</p>
8	<p>It needs be mentioned that looking to the fact that domestic waste water is also either reaching to CETP or flowing towards Dharuhera due to poor progress in sewer line confectioning with the newly installed STPs at Santhalka, RHB Arravali Vihar, near existing BIDA STP and Mundana Mev STP. For example, STP near the existing STP (BIDA) has a capacity of 03 MLD and as per the observations during inspection only 0.5-0.8 MLD waste water is being received there, The municipal authorities</p>	<p><u>Total waste water coming from Rajasthan side varies from 15 to 20 MLD in different periods. The record of measurement readily available is annexed herewith as Annexure-R/1.</u> Video can also be shown. Joint Committee consisting of HSPCB may also inspect and assess the quantum of waste water received. <u>This waste water needs to be controlled and should be taken back to Rajasthan for re-use etc.</u></p>

	<p>should check the reason of the same vis-à-vis the DPR prepared and the area which should contribute waste water to the STP above and such areas which should but not conveying waste water should be connected. All the above points were also discussed with the CEO BIDA, Bhiwadi Sh. Rohitashav Singh Tomar (IAS) who assured to take up the matter and as such coordinates with different department. He immediately gave directions to the Municipal Officers to calculate the total volume of water generated based on the thumb rule and compare it with the capacities of STP installed.</p>	<p><u>by way of conduit pipeline or otherwise.</u></p>
<p>9</p>	<p>During the visit the joint committee has also collected 3 drain samples from Nagina Marriage Garden (pH7.69, TSS-129mg/l, BOD-67mg/l and COD-157mg/l), Modern Public School (pH-7.49, TSS-150 mg/l, BOD- 97mg/l and COD-314mg/l) and Open drain at Bestech City Center (pH-7.77, TSS-41mg/l, BOD-24mg/l and COD-188mg/l). All the drain samples results are within the limits except the BOD values of Modern Public School and Bestech City Center drains whereas the accumulated wastewater sample values are near to lower than the drain samples values. The lower concentrations (pH-8.36, TSS-61 mg/l, COD-173 mg/l, BOD-18 mg/l and Fluoride-0.59 mg/l) of wastewater accumulated in the open land at the Dharuhera industrial area reveals that industrial effluent from Dharuhera industrial area also mixing with the accumulated wastewater as well as rain water</p>	<p>It is incorrect that all the drain samples results are within limits except the BOD values of Modern Public School and Bestech City Centre drains. Other parameters are also exceeding (refer: Pg 20). It is also incorrect that lower concentration of wastewater accumulated in the open land at the Dharuhera industrial area reveals that industrial effluent from Dharuhera industrial area also mixing with the accumulated wastewater. Had industrial waste get mixed with accumulated water, concentration of pollutants would have higher in accumulated water rather lower.</p>

10	During the visit the joint committee members collected the samples of treated waste water pumped from CETP to Khushkhera industrial area where the treated effluent is accumulated in open area and the analysis values found to be pH-7.71, TSS-38 mg/l, TDS-1005 mg/l, COD-88 mg/l, BOD-19 mg/l, Chlorides-122 mg/l, Sulphate-168 mg/l, Fluoride-0.07 mg/l. from the analysis report that it indicate rain water mixing that the COD, BOD and fluoride values are under the discharge norms of CETP.	Corrective steps, if any may be taken
11	Compliance status of member unit in meeting the PETP norms/standards: In order to verify the compliance of PETP standards sample was taken from the inlet to CETP where the combined effluent from all the member industries is reaching after the PETPs individually installed, the parameters in the analysis report meets the CETP inlet standards/ PETPs discharge standards hence it can be said that member industries as a whole comply with the CETP inlet standards/ PETPs discharge standards.	Corrective steps be maintained.

3. That report does not suggest about the remedial measures/action plan to ensure that effluent coming from State of Rajasthan into territory of Haryana as mentioned at serial No.5(c) and 8 of 'observations & recommendations' be stopped and residents of Dharuhera Tehsil may be saved from consequent health hazards.

For next visit and inspection of the area(s) in question, officer(s) of Haryana State Pollution Control Board should also be made part of the Committee submitting the report. It will not be out of place to mention here that Rajasthan State Pollution Control Board is part of team inspecting and submitting the report w.r.t the area falling under both the States.

Prayer

In view of the submissions made herein above, it is humbly prayed that necessary directions be issued to State of Rajasthan, its agencies and RSPCB to stop the discharge of treated and untreated effluent into village Maheshwari, Nandrampurbas, malpura, Sector 4 and 6 of Dharuhera and other residential areas adjacent to border of Haryana & Rajasthan falling under Tehsil Dharuhera, District-Rewari.



Regional Officer,
Haryana State Pollution Control Board,
Dharuhera

Date: 29.10.2021

Place: Dharuhera



Laboratory Of The
Haryana State Pollution Control Board
Vikas Sadan 1st Floor Gurgaon

Tel-2332596

8

Paid / Monitoring

Description :-

- (1) Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road, Dharuhera Report No: 28

Station Code- DHR-RDQ-001, N-28°12'29.80512" E-76°48'30.74256"

Dated: 19-04-2021

Description of the Sample: - Received on 09-04-2021 a sample of Trade effluent / domestic effluent from Sh. Vikas Grewal, Sc 'B', Sh. Sanjay Singh, Irrigation & Sh. Sudhir Malik, JE, Irrigation collected on 09-04-2021 from Drain Effluent Point.

ANALYSIS REPORT
RESULTS

Sr. No.	Parameters	Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road Dharuhera
1.	Colour	Greyish
2.	Odour	Mild
3.	pH value	7.4
4.	Suspended Solids mg/l	246
5.	B.O.D. for 3 days at 27°C mg/l	80
6.	C.O.D. mg/l	368
7.	Oil & Grease mg/l	7.0
8.	Conductivity us/cm	5340
9.	Total Dissolved Solids mg/l	3710
10.	Chlorides as Cl mg/l	580
11.	Iron as Fe mg/l	0.4
12.	Phosphate as P mg/l	3.1
13.	Sulphide as S mg/l	2.4
14.	Zinc as Zn mg/l	1.8
15.	Nickel as Ni mg/l	0.7
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	58.8
19.	Nitrite (NO ₂) mg/l	18.6
20.	Nitrate (NO ₃) mg/l	7.9
21.	TKN (Total Kjeldhal Nitrogen) mg/l	35.1
22.	Dissolved Oxygen, mg/l	3.6
23.	Turbidity as NTU	17.2
24.	Total Collform, MPN/100 ml	290000
25.	Fecal Collform, MPN/100ml	110000
26.	Streptococci, MPN/100ml	16000
27.	Sodium Absorption Ratio (S.A.R.)	5.8
28.	Flow Rate (Cusec)	6.5

Sample Collected/Not Collected by us
Sample Consumed in testing

HSPCB/Lab/GR/2021/ 78
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LAB INCHARGE

Dated

19/04/2021



Laboratory Of The
Haryana State Pollution Control Board
Vikas Badan 1st Floor Gurgaon

Tel: 2532566

9

Wastewater / Monitoring

Description :
(1) Effluent flowing from Bhiwadi, Rajasthan to Dharuhara, through Alyar by pass Road in 'A' road, Dharuhara

Station Code: DHR-RDQ 001, N-20°12'29.80512" E-76°48'30.74256"

Date: 17-05-2021

Description of the Sample: Received on 10-05-2021 a sample of Trade effluent / Domestic effluent from Sh. Vikas Grewal, St. 'B' collected on 10-05-2021 from Drain Effluent Point.

ANALYSIS REPORT

RESULTS

Sr. No.	Parameters	Effluent flowing from Bhiwadi, Rajasthan to Dharuhara, through Alyar by pass Road Dharuhara
1.	Colour	Grayish
2.	Odour	Mild
3.	pH value	7.1
4.	Suspended Solids mg/l	269
5.	D.O.D. for 3 days at 27°C mg/l	65
6.	C.O.D. mg/l	348
7.	Oil & Grease mg/l	8.0
8.	Conductivity us/cm	5450
9.	Total Dissolved Solids mg/l	3910
10.	Chlorides as Cl mg/l	565
11.	Iron as Fe mg/l	0.2
12.	Phosphate as P mg/l	2.6
13.	Sulphide as S mg/l	2.0
14.	Zinc as Zn mg/l	0.7
15.	Nickel as Ni mg/l	ND
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	62.1
19.	Nitrite (NO ₂) mg/l	19.8
20.	Nitrate (NO ₃) mg/l	7.6
21.	TKN (Total Kjeldhal Nitrogen) mg/l	33.4
22.	Dissolved Oxygen, mg/l	3.5
23.	Turbidity as NTU	21.1
24.	Total Coliform, MPN/100 ml	310000
25.	Fecal Coliform, MPN/100ml	140000
26.	Streptococci, MPN/100ml	19000
27.	Sodium Absorption Ratio (S.A.R.)	5.4
28.	Flow Rate (Cusec)	4.8

Sample Collected/Not Collected by us
Sample Consumed in testing

LAB INCHARGE

Dated

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Tel-2332596

10

Paid / Monitoring

Description :-

(1) Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road, Dharuhera

Report No: 185

Dated: 14-06-2021

Station Code- DHR-RDQ-001, N-28°12'29.80512" E-76°48'30.74256"

Description of the Sample: - Received on 07-06-2021 a sample of Trade effluent / domestic effluent from Sh. Vikas Grewal, Sc 'B' collected on 07-06-2021 from Drain Effluent Point.

ANALYSIS REPORT
RESULTS

Sr. No.	Parameters	Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road Dharuhera
1.	Colour	Greyish
2.	Odour	Mild
3.	pH value	6.9
4.	Suspended Solids mg/l	282
5.	B.O.D. for 3 days at 27°C mg/l	75
6.	C.O.D. mg/l	324
7.	Oil & Grease mg/l	6.0
8.	Conductivity us/cm	4890
9.	Total Dissolved Solids mg/l	2680
10.	Chlorides as Cl mg/l	590
11.	Iron as Fe mg/l	0.3
12.	Phosphate as P mg/l	2.1
13.	Sulphide as S mg/l	2.4
14.	Zinc as Zn mg/l	0.5
15.	Nickel as Ni mg/l	ND
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	57.2
19.	Nitrite (NO ₂) mg/l	21.6
20.	Nitrate (NO ₃) mg/l	7.0
21.	TKN (Total Kjeldhal Nitrogen) mg/l	35.6
22.	Dissolved Oxygen, mg/l	3.2
23.	Turbidity as NTU	29.4
24.	Total Coliform, MPN/100 ml	370000
25.	Fecal Coliform, MPN/100ml	180000
26.	Streptococci, MPN/100ml	24000
27.	Sodium Absorption Ratio (S.A.R.)	5.8
28.	Flow Rate (Cusec)	4.6

Sample Collected/Not Collected by us
Sample Consumed In testing

HSPCB/Lab/GR/2021/ 303

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LAB INCHARGE

Dated 14/06/21



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Tel-2332596

11

Paid / Monitoring

Description :-

- (1) Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road, Dharuhera Report No: 808

Station Code- DHR-RDQ-001, N-28°12'28.5552" E-76°48'14.64552"

Dated:20-09-2021

Description of the Sample: - Received on 13-09-2021 a sample of Trade effluent / domestic effluent from Sh. Vikas Grewal, Sc 'B', Sh. Manjeet Singh, SDE, Irrigation & Sh. Sudhir Malik, JE, Irrigation collected on 13-09-2021 from Drain Effluent Point.

ANALYSIS REPORT
RESULTS

Sr. No.	Parameters	Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road Dharuhera
1.	Colour	Blackish
2.	Odour	Mild
3.	pH value	6.8
4.	Suspended Solids mg/l	396
5.	B.O.D. for 3 days at 27°C mg/l	110
6.	C.O.D. mg/l	432
7.	Oil & Grease mg/l	15.0
8.	Conductivity us/cm	4270
9.	Total Dissolved Solids mg/l	2366
10.	Chlorides as Cl mg/l	620
11.	Iron as Fe mg/l	ND
12.	Phosphate as P mg/l	4.6
13.	Sulphide as S mg/l	3.2
14.	Zinc as Zn mg/l	1.1
15.	Nickel as Ni mg/l	0.3
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	62.4
19.	Nitrite (NO ₂) mg/l	25.2
20.	Nitrate (NO ₃) mg/l	13.8
21.	TKN (Total Kjeldhal Nitrogen) mg/l	56.2
22.	Dissolved Oxygen, mg/l	3.6
23.	Turbidity as NTU	39.4
24.	Total Coliform, MPN/100 ml	420000
25.	Fecal Coliform, MPN/100ml	230000
26.	Streptococci, MPN/100ml	42000
27.	Sodium Absorption Ratio (S.A.R.)	1.2
28.	Flow Rate (Cusec)	20

Sample Collected/Not Collected by us
Sample Consumed In testing

HSPCB/Lab/GR/2021/ 1369
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Dated 20/09/21



Paid / Monitoring

Description :-

- (1) Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road, Dharuhera Report No: 648

Station Code- DHR-RDQ-001, N-28°20'78.4743" E-76°80'48.545"

Dated:16-08-2021

Description of the Sample: - Received on 10-08-2021 a sample of Trade effluent / domestic effluent from Sh. Vikas Grewal, Sc 'B' collected on 09-08-2021 from Drain Effluent Point.

ANALYSIS REPORT

RESULTS

Sr. No.	Parameters	Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road Dharuhera
1.	Colour	Grey
2.	Odour	Mild
3.	pH value	7.1
4.	Suspended Solids mg/l	216
5.	B.O.D. for 3 days at 27°C mg/l	47
6.	C.O.D. mg/l	252
7.	Oil & Grease mg/l	2.0
8.	Conductivity us/cm	3510
9.	Total Dissolved Solids mg/l	1802
10.	Chlorides as Cl mg/l	340
11.	Iron as Fe mg/l	ND
12.	Phosphate as P mg/l	1.1
13.	Sulphide as S mg/l	0.8
14.	Zinc as Zn mg/l	0.2
15.	Nickel as Ni mg/l	ND
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	29.4
19.	Nitrite (NO ₂) mg/l	11.8
20.	Nitrate (NO ₃) mg/l	2.2
21.	TKN (Total Kjeldhal Nitrogen) mg/l	17.8
22.	Dissolved Oxygen, mg/l	4.9
23.	Turbidity as NTU	13.4
24.	Total Coliform, MPN/100 ml	140000
25.	Fecal Coliform, MPN/100ml	52000
26.	Streptococci, MPN/100ml	9800
27.	Sodium Absorption Ratio (S.A.R.)	ND
28.	Flow Rate (Cusec)	20

Sample Collected/Not Collected by us
Sample Consumed in testing

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Dated 16/08/2021

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Tel-2332596

13

Paid / Monitoring

- Description :-
(1) Trade Effluent/Untreated Domestic effluent coming from Khuskhera Industrial Area Cutting into Village-Nandrampur Bass Dharuhera
Station Code- DHR-RDQ-002, N-28⁰130'70.92" E-76⁰77524345"

Report No: 649

Dated: 16-08-2021

Description of the Sample: - Received on 10-08-2021 a sample of Trade effluent / domestic effluent from Sh. Vikas Grewal, Sc 'B' collected on 09-08-2021 from Drain Effluent Point.

ANALYSIS REPORT

RESULTS

Sr. No.	Parameters	Effluent Flowing from Bhiwadi, Rajasthan to Dharuhera, through Alwar by pass road Dharuhera
1.	Colour	Grey
2.	Odour	Mild
3.	pH value	7.0
4.	Suspended Solids mg/l	181
5.	B.O.D. for 3 days at 27°C mg/l	45
6.	C.O.D. mg/l	236
7.	Oil & Grease mg/l	ND
8.	Conductivity us/cm	3240
9.	Total Dissolved Solids mg/l	1670
10.	Chlorides as Cl mg/l	290
11.	Iron as Fe mg/l	ND
12.	Phosphate as P mg/l	1.0
13.	Sulphide as S mg/l	0.8
14.	Zinc as Zn mg/l	0.4
15.	Nickel as Ni mg/l	ND
16.	Total Chromium as Cr mg/l	ND
17.	Boron as B mg/l	ND
18.	Ammonical Nitrogen mg/l	27.4
19.	Nitrite (NO ₂) mg/l	9.8
20.	Nitrate (NO ₃) mg/l	2.6
21.	TKN (Total Kjeldhal Nitrogen) mg/l	13.4
22.	Dissolved Oxygen, mg/l	4.8
23.	Turbidity as NTU	10.2
24.	Total Coliform, MPN/100 ml	110000
25.	Fecal Coliform, MPN/100ml	38000
26.	Streptococci, MPN/100ml	9200
27.	Sodium Absorption Ratio (S.A.R.)	ND
28.	Flow Rate (Cusec)	8.0

Sample Collected/Not Collected by us
Sample Consumed in testing

HSPCB/Lab/GR/2021/10/0-1019

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Dated 16/08/2021

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