

To,

DATED: 05/02/2024

✓ The National Green Tribunal,
Faridkot Bhawan,
Copernicus Marg,
New Delhi-110001

The Member Secretary,
Chandigarh Pollution Control Committee,
Ground Floor, Paryavaran Bhawan,
Madhya Marg, Sector 19 B,
Chandigarh – 160019 India

Subject: **Request for remedial action for Objections / Averments raised in Compliance of Original Application No.670/2023 in Lalit Gupta Versus Union Territory of Chandigarh & Ors.**

Dear Sir,

In Compliance of Order dated: 12-01-2024 passed by Hon'ble NGT, New Delhi in O.A. No. 670/2023 (Lalit Gupta vs Union of Territory of Chandigarh & Ors..) regarding complaining about operation of Common Bio-Medical Waste Treatment Facility at Plot No. 182/9, Industrial Area, Phase- 1 Chandigarh by M/s Alliance Envirocare company Pvt. Ltd. in violation of conditions imposed at the time of grant of Environmental Clearance and Consent to Operate and in violation of environmental norms as mentioned in the application.

Therefore, The undersigned highlights the *Prima facie* the averments made in the petition point wise which raise substantial questions relating to environment arising out of the implementation of the enactments specified in Schedule-I to the National Green Tribunal Act, 2010 should be addressed by Joint Committee constituted by Hon'ble NGT, New Delhi as follow:

1. Extract of CPCB Revised Guidelines dated: 21-12-2016, 7) Land requirement:

- (a) 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.
- (b) **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.**

Hence, CPCC (Chandigarh Pollution Control Committee) and SEIAA/SEAC, Union Territory, Chandigarh have not considered Land requirement for establishment of CBWTF. Thereafter, CTE granted by CPCC and EC granted by SEIAA/SEAC, Union Territory, Chandigarh for establishment of CBWTF on PLOT

NO. 182/9, PHASE I , INDUSTRIAL AREA, CHANDIGARH with Total area of 2080 Sq Yard **being violative of Guideline 7 of the Revised CPCB Guidelines 2020 which is mandatory and make it illegal.**

- 2. Extract of Guidelines of Development of Green Belt (Programme Objective Series: PAOBES/75/1999-2000) :** As per CPCB/MoEF guidelines, 33% of the total land area shall be kept as greenbelt to mitigate the hazardous emissions, toxic generated through incineration plants.

Hence, 33% of total land area is not developed as Green belt, which is also violation and illegal as per CPCB Guidelines.

- 3.** The Common Bio-Medical Waste Treatment Facility at Plot No. 182/9, Industrial Area, Phase- 1 Chandigarh operated by M/s Alliance Envirocare company Pvt. Ltd has maintained heights of its Stack around 30 meters only, thus the same is violation of one of the General Condition of Environmental Clearance dated 06/12/2017 instead of using increased stack height of 35 Meter as per prescribe condition.
- 4.** Bio-Medical Plastic Waste, Glass Waste, Metal Waste is being sold to vendors which are not scientific capable of handling and recycling the waste as per PWM Rules in contravention to Clause **7 of Treatment and** disposal of BMW Rules, 2016 where it is clearly stated that after autoclaving and shredding bio-medical plastic waste should be sent to authorize recycler of same state having valid consent and authorization / CPCB EPR authorization. Infected bio-medical waste without autoclaving and most part of bio-medical plastic waste without shredding is being sold to same vendor as mentioned in point no. 6 above, which need probe in this matter, as it is serious matter to public health. Continuous secret monitoring is required.
- 5.** Unscientific and unapproved Structure of Building to be checked and verified as per by laws of Chandigarh Land Department development authority including Clearances from Fire Department , Labour Departments , Ground Water Department.
- 6.** The directions issued by the Commission for Air Quality Management in National Capital Region and Adjoining Area had not been complied with for usage of Cleaner Fuel in Incinerator plant and DG Set.
- 7.** Authorization under Hazardous waste is not obtained for generation, storage of Incineration Ash, ETP Sludge or others. Being violative of Hazardous Waste Rules.

In this regard, vide Telephonic conversation and emails dated: 02-02-2024 & 01-02-2024, your office have requested me to join inspection team, however, due to medical Issue, I may not be able to present physically during inspection.

Therefore, I request to your kind office to inspect at your level without my presence and take remedial action on the objections raised point wise as above.

Lalit Gupta

Yours Sincerely,

Lalit Gupta

D-27/1, Gali No. -09, Johripur Delhi-110094

Mob No : 7011357492

Thanking You,