



B-190198/WQM-II(RG)/CPCB/Sugar/70/2016-17

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24.06.2021

To,

M/s HPCL Biofuel Ltd. (Sugar Division)
Sugauli, East Chamaparan,
Bihar-845456

**MODIFIED DIRECTION UNDER SECTION 5 OF THE ENVIRONMENT
(PROTECTION) ACT, 1986**

WHEREAS, the Central Government has notified the standards for discharge of environmental pollutants from various categories of industries under the Environment (Protection) Act, 1986 and the rules framed there under; and

WHEREAS, the Ministry of Environment & Forests, Govt. of India, vide notification S.O.157(E) of 27.02.1996 has delegated powers vested under Section 5 of the Environment (Protection) Act, 1986 (29 of 1986) to the Chairman, Central Pollution Control Board (CPCB), to issue direction to any industry, Municipal Corporation, Municipal Council, Cantonment Board to any local or other Authority for the violation of emission and effluent standards notified under the Environment (Protection) Rules, 1986; and

WHEREAS, it is obligatory on the part of industries to install effluent treatment plants (ETPs) to comply with the effluent discharge standards as notified under the Environment (Protection) Act, 1986 and the Rules framed thereunder and also to meet the consent conditions granted by State Pollution Control Board (SPCBs) / Pollution Control Committees (PCCs); and

WHEREAS, M/s HPCL Biofuel Ltd. (Sugar Division), Sugauli, East Chamaparan, Bihar (hereinafter referred as 'the Unit') is involved in the process of sugar manufacturing from crushing of cane; and

WHEREAS, the Unit was inspected on 07/03/2018 by CPCB officials and following observations were made;

1. The unit was operational and produces white sugar by double sulphitation process and also co-generates power to the extent of 20MW by utilizing bagasse.
2. Effluent Treatment Plant (ETP) which is comprised of Bar screen, Oil and Grease Separator, Equalization Tank, Primary Clarifier, Aeration Tank, Secondary Clarifier, Tertiary treatment (Filtration units) was non-operational and discharging untreated effluent outside the premises
3. The unit was found discharging untreated effluent from sugar mill along with spent wash from its Distillery plant to outside premises without treatment which indicated non-compliance with effluent surface discharge norms prescribed under Environment (Protection) Rules, 1986.

4. Analysis of trade effluent sample discharged outside premises showed pH-4.57 as against norms of 5.5-9.0, BOD-77,120 mg/l against norms of 30 mg/l, COD-1,28,000 mg/l against norms of 250 mg/l and TSS-4,500 mg/l against norms of 30 mg/l, TDS- 1,13,800 mg/l against norms of 2100 mg/l which indicated non-compliance w.r.t. pH, BOD, COD TSS & TDS with the effluent surface discharge norms prescribed under Environment (Protection) Rules, 1986.
5. OCEMS was non-operational.

AND WHEREAS, CPCB issued closure direction dated 23/05/2018 under Section 5 of the Environment (Protection) Act, 1986 to the unit; and

WHEREAS, the Unit replied along with the adequacy assessment report prepared by NSI, Kanpur vide letter dt. 11/07/2018, which were examined, and following observations were made:

1. Flow meters to be installed at major unit operations to ascertain and control hot and cold-water requirement.
2. Flow meters to be installed at various fresh water consumption points.
3. The System for spray pond/process cooling tower overflow for sulphate removal was under erection.
4. The unit is having adequate Effluent Treatment Plant for 3500 TCD and effluent generation is estimated as 133 l/t for cane crushed; and

WHEREAS, CPCB through an Expert Committee comprising of experts from National Sugar Institute (NSI), Kanpur, Vasantdada Sugar Institute (VSI), IITs and representatives from sugar mills prepared a Charter for Water Recycling and Pollution Prevention (thereafter referred to as the Charter; and

WHEREAS, a meeting of sugar mills operating in Bihar, representatives of BSPCB and CPCB was held on 10/08/2018 under Chairmanship of Chairman, Bihar State Pollution Control Board, and the following decisions were made

1. Sugar Mills shall submit an action plan to CPCB by 20/08/2018 regarding the steps taken by them pertaining to the notices issued to them. Also, they shall submit action plan to implement recommendations of their adequacy assessment report.
2. All sugar mills shall ensure implementation of Charter and shall submit action plan to CPCB by 15/09/2018.
3. All sugar mills shall ensure the upgradation of their ETP within August, 2018 so as to ensure no interruption in functioning of the ETP in the following seasons.
4. All sugar mills shall maintain a logbook on ETP operations on a daily basis.
5. ETP shall be operational at all times and all bypass arrangements should be dismantled with immediate effect.
6. MLSS in aeration tanks should be maintained at 2000-2500 mg/l.
7. All sugar units shall set up environmental laboratories for regular analysis of raw and treated effluent thereby ensuring proper functioning of the ETP.

8. All sugar mills shall employ dedicated technicians for operating and regular maintenance of ETP and shall also ensure that the technicians are given proper training on ETP maintenance and lab analysis on regular basis.
9. To ensure proper training of the environmental technicians all sugar mills shall facilitate training of 5 employees.
10. All sugar mills may establish an Environment Management Cell at their level consisting of concerned officials in order to ensure compliance with environmental standards at industry level itself.

AND WHEREAS, CPCB received the compliance status of the Charter vide letter dated 01/10/2018; and

WHEREAS, CPCB issued direction dated 06/11/2018 under section 5 of the Environment (Protection) Act, 1986 to the Unit to comply with the following directions before commencement of crushing season 2018-2019;

1. The unit shall start its sugar manufacturing operation only after obtaining valid consent from the Bihar State Pollution Control Board and shall not resume operation of Distillery unit/alcohol /ethanol production.
2. The unit shall implement the observations & recommendations of the adequacy assessment report of ETP.
3. The unit shall install sealed flow meter along with running hours meter on bore wells so as to ascertain usage of fresh water for various uses.
4. The unit shall install flow meters at major areas of cold and hot water consumption.
5. The unit shall install flow meters for measuring generation of effluent from various prominent areas.
6. The unit shall maintain logbook for individual process unit for recording daily water consumption and effluent generation also.
7. The unit shall carry out colour coding of pipelines carrying recycled process water and fresh process water.
8. The Unit shall commission mechanical sludge handling system of adequate capacity.
9. The unit shall carry out analysis of effluent discharge parameters notified under Environment (Protection) Rules, 1986 and logbook shall be maintained on daily basis.
10. The unit shall submit the implementation status of the Charter in the form of Affidavit and the documentary proof of the completion of the work as committed in the action plan.
11. The unit shall submit implementation status of the Charter and performance adequacy audit of ETP including actual assessment of water consumption and effluent generation duly validated by reputed expert institute namely NSI Kanpur, VSI Pune, IITs during crushing season & submit the report to CPCB within 60 days of resumption of operation.
12. The unit shall seek permission for resumption of distillery operational separately from CPCB.

AND WHEREAS, the unit was inspected on 28/03/2019 by team of CPCB officials and following observations were made;

1. The Unit and ETP were operational.

2. Valid Consent to Operate (CTO) for discharge and emission is available from 01/10/2018 to 30/09/2023, but Hazardous waste authorization was not available.
3. Analysis result of ETP outlet showed pH-5.7 against the norms of 5.5-8.5, **BOD-2484 mg/l** against norms of 100 mg/l, **COD-4024 mg/l** against the norms of 250 mg/l, **TSS-135 mg/l** against norms of 100 mg/l, **TDS-4088 mg/l** against norms of 2100 mg/l, which indicated non-compliance w.r.t to BOD, COD, TSS and TDS against land discharge norms prescribed under Environment (Protection) Rules,1986.
4. Leakage of untreated effluent through boundary wall of ETP of the unit was found and analysis result of the same showed pH-7.8, **BOD-3632 mg/l**, **COD-5061 mg/l**, **TSS-3490 mg/l**, **TDS-3740 mg/l**, which indicated discharge of untreated effluent which was non-compliance w.r.t BOD, COD, TSS and TDS against surface effluent discharge norms prescribed under Environment (Protection) Rules,1986.
5. There was no segregation between industrial effluent drain and storm water drain.
6. The unit has not installed any separate collection tank/drum for collection of oil and grease from oil skimmer.
7. Industry effluent was found flooded everywhere in ETP area and housekeeping was poor.

AND WHEREAS, The Hon'ble National Green Tribunal (NGT), Principal Bench in the matter of OA No. 593/2017 (WP (CIVIL) No. 375/2012), Paryavaran Suraksha Samiti & Anr. Vs. Union of India & Ors. directed Central Pollution Control Board (CPCB) that "*The CPCB may take penal action for failure, if any, against those accountable for setting up and maintaining STPs, CETPs and ETPs. CPCB may also assess and recover compensation for damage to the environment and said fund may be kept in a separate account and utilized in terms of an action plan for protection of the environment*"; and

WHEREAS, in compliance of above quoted Hon'ble NGT order, cases to be considered for levying penalty are discharges in violation of consent conditions/ non-compliance with the directions, such as direction for closure due to non-installation of OCEMS/ non-adherence to the action plans submitted/ intentional avoidance of data submission or data manipulation by tampering OCEMS; and

WHEREAS, CPCB issued circular dated 28/05/2019 for amendment in policy to maintain uniformity in action towards imposing environmental compensation (EC) for sugar mills which prescribes as under;

1) $EC = PI \times N \times R \times S \times L$

Where, EC is Environmental Compensation in ₹, PI = Pollution Index of Industrial Sector (80), N = Number of days of violation took place R = A factor in Rupees for Penalty (250), S = Factor for scale of operation (1.5) and LF = Location Factor (1)

- 2) Number of days (N) calculated as date of start of current crushing season to 1) date of issue of direction or 2) date of compliance reported by CPCB or SPCB or 3) date of closing of crushing season (whichever is earlier among 1-3 in case SCN is confirmed).
- 3) Period considered for EC calculation for both crushing seasons is as follows:
 - a) Last crushing season: Date of inspection to date of closing of crushing season
 - b) Current crushing season: Double of EC calculated for current crushing season (2 x EC for full crushing season.)

AND WHEREAS, as per the methodology for assessing penalty and environmental compensation, the environmental compensation levied to the unit was calculated as **Rs. 8,70,000/-** (Eight Lakhs Seventy Thousand Only) for the non-compliance period (07/03/2018 i.e. date of inspection to 04/04/2018 i.e. date of closing of crushing season), for the crushing season 2017- 18; and **Rs. 82,80,000/-** (Rupees Eighty-Two Lakhs Eighty Thousand Only) for the non-compliance period (05/12/2018 i.e. date of start of crushing season to 21/04/2019 i.e. date of closing of crushing season), for the crushing season 2018- 19; the calculation details are as under;

EC for the crushing season 2017-18

$$\begin{aligned} &= PI \times N \times R \times S \times LF \\ &= 80 \times 29 \times 250 \times 1.5 \times 1 \\ &= \text{Rs. 8,70,000/-} \end{aligned}$$

EC for the crushing season 2018-19

$$\begin{aligned} &= PI \times N \times R \times S \times LF *2 \\ &= 80 \times 138 \times 250 \times 1.5 \times 1 * 2 \\ &= \text{Rs. 82,80,000/-} \end{aligned}$$

Total EC amount = (EC for the crushing season 2017-18) + (EC for the crushing season 2018-19)

$$= \text{Rs. 8,70,000/-} + \text{Rs. 82,80,000/-} = \text{Rs. 91,50,000/-}$$

AND WHEREAS, CPCB issued direction dated 28/05/2019 under section 5 of the Environment (Protection) Act, 1986 to the unit to comply with the following directions before commencement of crushing season 2019-2020;

1. The unit shall remain closed and not operate without seeking permission from CPCB.
2. The unit shall deposit **Rs 91,50,000/-** (Rupees Ninety one lakhs and fifty thousand only) within 15 days in CPCB account towards environmental compensation.
3. The unit shall dismantle the bypass arrangements and stop discharge of untreated/partially treated effluent discharge immediately.
4. The unit shall repair all seepage and leakages to stop effluent discharge outside and unit shall ensure single point discharge for effluent within 45 days.
5. The unit shall submit adequacy assessment of treatment facility by reputed govt. institute; including work completion report regarding implementation of the recommendations of the adequacy report within 45 days.
6. The unit shall seek permission from CPCB after compliance of the above directions, for resumption of operation; and

WHEREAS, the unit's replies vide letters dated 19/06/2019, 24/06/2019, 10/09/2019 and 11/09/2019 were examined and following observations were made:

1. The unit was reported to be closed from 22/04/2019.
2. The unit has submitted adequacy assessment of treatment facility by NSI, Kanpur; including work completion report regarding implementation of the recommendations of the adequacy report which indicated that ETP is adequate.
3. Unit has submitted environmental compensation of **Rs. 94,17,731.51/-** (Rs. 91,50,000/- with 12 % simple interest) on 09/09/2019 and informed CPCB vide letter dated

M/s HPCL Biofuel Ltd. (Sugar Division), Bihar
10/09/2019. Subsequently, the unit informed CPCB that they have deposited levied EC under protest through RTGS vide letter dated 11/09/2019.

AND WHEREAS, personal hearing was held on 24/09/2019 in CPCB, Delhi and the unit represented the following viewpoints:

1. They have already deposited EC amount of Rs. 94,17,731 (with 12% interest); and

WHEREAS, CPCB constituted a Three-member committee vide office order dated 27/09/2017 having representative from CPCB, MoEF&CC and NMCG for examination and recommendation for revocation of the closure direction issued by CPCB; and

WHEREAS, the Three Member Committee in its meeting held on 24/09/2019 examined the unit's replies and recommended that the unit may be allowed to resume operation; and

WHEREAS, CPCB issued directions dated 23/10/2019 to the unit under section 5 of the Environment (Protection) Act, 1986 to comply with the following directions:

1. The unit may resume its operation only after obtaining the valid consent from Bihar State Pollution Control Board.
2. The unit shall submit performance assessment of Effluent treatment plant including analysis of treated effluents by the reputed government institute within 60 days of resumption of operation.
3. The unit shall inform CPCB about resumption of manufacturing operations.

AND WHEREAS, CPCB calculated EC for 36 sugar mills as per policy dated 28/05/2019 for observed noncompliance during inspections carried out during crushing season 2017-18 and 2018-19; and

WHEREAS, CPCB issued closure directions to 36 sugar mills during April-May, 2019 under Section 5 of the Environment (Protection) Act, 1986 along with levying Environmental Compensation (EC) calculated as per policy dated 28/05/2019 including M/s HPCL Biofuel Ltd., and

WHEREAS, some of the sugar mills filed appeals before Hon'ble NGT against order passed by CPCB requiring the appellants to pay environmental compensation, namely Appeal No. 34/2019(WZ) titled M/s Madhukar Sahakari Sakhar Karkhana Ltd. V. CPCB, Appeal No. 05/2019 titled Morinda Co-op. Sugar Mills Ltd. Vs. CPCB, and Appeal No. 23 of 2019(WZ) wherein the Hon'ble NGT stayed the action of CPCB. Thereafter, units namely Shri Vitthalsai SSK Ltd. And Bhairavnath Sugar Works Ltd. Approached Hon'ble NGT in Appeal No. 27/2019 (WZ) with Appeal No. 35/2019 (WZ) against the compensation levied by CPCB. The Hon'ble NGT Principal Bench, New Delhi in the aforementioned appeals passed an order dated 22/05/2019 directed that, "*CPCB may treat the impugned order as tentative and pass further appropriate order after permitting the affected parties to furnish their viewpoint.*" The Hon'ble NGT also directed that similar opportunity may also be given to other affected parties where such orders have been passed in similar cases.

M/s HPCL Biofuel Ltd. (Sugar Division), Bihar

AND WHEREAS, CPCB issued order dated 04/09/2019 regarding levying of EC for industries, which prescribes as under;

1. Prior to imposition of EC, a Show Cause Notice (SCN) for imposing EC along with an opportunity to reply/ hearing be given.
2. Methodology adopted for calculation of EC may be shared with the concerned industry/ agency if asked during hearing or through reply.
3. Unless there is substantial evidence, date of non-complying days would start w.e.f. date of non-compliance observed during inspection.
4. In Sugar industry, number of days of violation is calculated based on actual number of days operated during crushing season(s) based on Excise Form RT-8C submitted by the unit.
5. EC for non-compliance to CPCB's closure direction regarding installation & connectivity of OCEMS shall apply till establishment of initial uninterrupted data connectivity for all the specified parameters in all the permitted outlets /stacks, as verified by the IT division.
6. EC for the closure direction issued on the ground of non – compliance of prescribed discharge/ emission norms shall apply for the period between date of inspection & monitoring to date of closing of manufacturing operation.
7. Direction for closure or revocation and direction for imposition of EC to be dealt separately.

AND WHEREAS, in compliance to Hon'ble NGT order dated 22/05/2019, CPCB provided opportunity for personal hearing to 32 sugar mills on 18/09/2019 and 24/09/2019 to present their viewpoints excluding M/s HPCL Biofuel Ltd., Sugauli, East Champaran, M/s Majhaulia Sugar Industries Pvt. Ltd. (Jay Shree Sugar Mills Ltd.), Majhauriya, West Champaran; and M/s Harinagar Sugar Mills Ltd., West Champaran; who had already deposited their EC with CPCB and process for revocation was already initiated. Subsequently, order dated 04/09/2019 was issued according to which EC shall be levied from the date of inspection till the date of closing of manufacturing operation/compliance observed by CPCB/SPCB; and

WHEREAS, Officials of U.P. Co-operative Sugar Factories Federation Ltd., Secretary General of UPSMA, individual sugar mills asked CPCB to allow to deposit EC in ESCROW account for utilization of environmental management. Principal Secretary, Sugar Industry and Cane Development, UP Government vide DO no. 1934/46-2-19-38/2018 dated 17/09/19, also requested CPCB to waive off the environmental compensation considering the financial constraint of sugar mills, to enable them to use the same money for upgradation of pollution control measures in order to ensure compliance to environmental norms and also to allow the sugar mills to function efficiently; and

WHEREAS, CPCB issued office order dated 01/11/2019 regarding policy for levying EC on sugar mills which prescribed as under;

1. As special case in large interest of farmers and general public, the sugar mills, will have the option to deposit Environmental Compensation (EC) amount either in CPCB account or in an ESCROW account with Department of Sugar Industries, State Government for utilization of fund in environmental management, training programs, development of laboratory, upgradation of ETP, further implementation of charter etc.

ESCROW account shall be operated by Department of Sugar industries in State Government.

2. The Sugar Mills shall deposit the EC amount either in CPCB account or ESCROW account-within 15 days from receipt of direction, failing which a simple interest@ 12% shall be levied for the delay period.
3. In case of deposition of EC amount into ESCROW account, the individual sugar mill shall submit time bound action plan for utilization of the EC amount within 15 days and get it approved from CPCB for utilization in environmental management including augmentation/upgradation of ETP, implementation of charter, training programs etc. Approved plan shall be made available by industry to Department of Sugar Industries, State Government for releasing funds for which appropriate methodology shall be worked out by the State Government. Utilization of the funds shall be monitored by the State Government and reported to CPCB on monthly basis. Alternatively, if EC is deposited in CPCB account the amount will be spent by CPCB as per EC utilization policy as approved by Hon'ble NGT; and

WHEREAS, CPCB subsequently issued modified directions with recalculated EC amount as per order dated 04/09/2019 to 32 sugar mills for deposition of EC either in CPCB account or in ESCROW account to be operated by Department of Sugar Industries in State Government within 15 days from date of issuance of the direction. In case of delay in deposition of EC, simple interest @ 12% shall be levied for delay period; and

WHEREAS, out of 36 sugar mills, 32 mill deposited EC as per recalculated EC amount as per order dated 04/09/2019 and 03 sugar mills namely M/s HPCL Biofuel Ltd., Sugauli, East Champaran; M/s Majhauria Sugar Industries Pvt. Ltd. (Jay Shree Sugar Mills Ltd.), Majhauria, West Champaran; and M/s Harinagar Sugar Mills Ltd., West Champaran, had already deposited their EC as per policy dated 28/05/2019. Out of 32 sugar mill 25 mills deposited EC amount in ESCROW account and remaining 07 sugar mills deposited it in CPCB account.

AND WHEREAS, the unit vide letter dated 29/10/2019 informed CPCB that they have obtained valid consent from Bihar State Pollution Control Board and vide letter dated 07/01/2020 the unit has submitted action plan for sugar mill as directed by CPCB; and

WHEREAS, the unit submitted performance assessment report vide letter dated 15/03/2021 prepared by NSI, Kanpur during crushing season 2018-19, which was examined and following recommendations were given to the unit;

- 1) The capacity of ETP is adequate however, the installation of various flow meters at appropriate checkpoints such as cold water usage, hot water usage is yet to be installed.
- 2) The unit requires to develop better analytical facilities/ infrastructure for measuring important parameters viz. BOD, Sulphate, TSS and TDS etc.
- 3) Polishing unit for the excess condensate from the boiling house is yet to be installed.
- 4) The unit is required to create an "Environmental Cell" having adequate manpower duly qualified viz. graduated in environmental science or diploma in quality control & environmental science for analysis purposes & it is for operation of ETP.
- 5) The unit requires to re-validate the ETP after removing the short comings.

AND WHEREAS, CPCB constituted a 4-member committee vide office order no. MSCB/03/2017/930 dated 24/11/2020 to examine the representations against environmental compensation and to further strengthen the mechanism;

AND WHEREAS, a meeting of 4-member committee was held on 07/04/2021 to examine the matter where representative of law division also participated. The committee recommended that the revised policy dated 04/09/2019, evolved in line with Hon'ble NGT order dated 22/05/2019 in the matter of Shri Vitthalsai SSK Ltd. Vs CPCB along with other sugar mill may be considered in this case also; and

WHEREAS, as decided by the 4- member committee, environmental compensation of Rs. 94,17,731/- (Rs. 91,50,000/- towards EC and Rs. 2,67,761.51/- towards interest for delay period from 12/06/2019 to 08/09/2019) which was deposited by the unit on 09/09/2019 under protest, has been recalculated considering the EC policy dated 04/09/2019. Therefore, amount of environmental compensation for the period of non-compliance (date of inspection i.e. 28/03/2019 to end of crushing season i.e. 21/04/2019 for the crushing season 2018-19) has been re-calculated as Rs. 7,71,945/- (Rupees Seven lacs, seventy-one thousand, nine hundred and forty-five only) (Rupees 7,50,000/- towards EC and Rs. 21,945/- towards interest for delay period). Out of the total amount of environmental compensation deposited, the remaining amount of Rs. 86,45,786/- (Rupees Eighty-six Lacs, forty-five thousand, seven hundred and eighty-six only) shall be returned separately. The details of the calculation are as under;

$$\begin{aligned} \text{EC} &= \text{PI} \times \text{N} \times \text{R} \times \text{S} \times \text{LF} \\ &= 80 \times 25 \times 250 \times 1.5 \times 1 \\ &= \text{Rs. 7,50,000/-} \end{aligned}$$

NOW, THEREFORE, in view of the above mentioned observations and in exercise of the powers delegated to the Chairman CPCB, under section 5 of the Environment (Protection) Act, 1986, the directions dated 28/05/2019 hereby shall stand revised and the EC levied on the unit for non-compliance period from 28/03/2019 to 21/04/2019 during crushing season 2018-19 shall be Rs. 7,71,945/- (Rupees Seven lacs, seventy-one thousand, nine hundred and forty-five only) (Rupees 7,50,000/- towards EC and Rs. 21,945/- towards interest for delay period) which the unit has already deposited. The remaining amount of Rs. 86,45,786/- (Rupees Eighty-six Lacs, forty-five thousand, seven hundred and eighty-six only) shall be returned to the unit.

(Naresh Pal Gangwar)
CHAIRMAN

Copy to:

1. **Principal Secretary** : For kind information, please.
Sugarcane Industries,
Govt. of Bihar
Department of Sugarcane Development
Vikas Bhawan, New Secretariat, Patna-800015
2. **Member Secretary** : For kind information, please.
Bihar Pollution Control Board,
Parivesh Bhawan, Plot No. Ns-B/2
Patliputra Industrial Area,
Patliputra, Patna (Bihar) – 800023
3. **Joint Secretary (CP Division)** : For kind information, please.
Ministry of Environment, Forest & C.C
Prithvi Block, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi – 110 003
4. **The District Magistrate** : For kind information, please.
Gopalganj, Bihar-843327
5. **Regional Director** : For follow up and ensuring
Central Pollution Control Board, compliance
Regional Directorate
Southern Conclave, Block-502,
5th& 6th Floor, 1582, Rajdanga Main Road,
Kolkata – 700 107 (West Bengal)
6. In-charge F&A, CPCB : For refund of deposited EC
amount of Rs. 86,45,786/-
(Rupees Eighty-six Lacs, forty-five
thousand, seven hundred and
eighty-six only) to M/s HPCL
Biofuel Ltd., Sugauli, East
Champaran, Bihar
7. In-charge, IT Division, CPCB : With request to upload on CPCB
server.
8. Master file/Guard file WQM II, CPCB Delhi : For record.


(Prashant Gargava)
MEMBER SECRETARY