

BEFORE THE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE, BHOPAL
ORIGINAL APPLICATION NO. 143 OF 2024

IN THE MATTER OF:

JODHPURA SANGHARSH SAMITI

.....APPLICANT

VERSUS

UNION OF INDIA & ORS

.....RESPONDENTS

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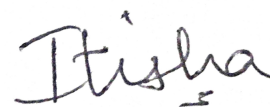
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Dated;- 10.01.2025

BEFORE THE NATIONAL GREEN TRIBUNAL
CENTRAL ZONE, BHOPAL
ORIGINAL APPLICATION NO. 143 OF 2024

IN THE MATTER OF:

JODHPURA SANGHARSH SAMITIAPPLICANT
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**RESPONSE ON BEHALF OF THE APPLICANT TO THE FACTUAL
ACTION TAKEN REPORT DATED 27.08.2024**

MOST RESPECTFULLY SHOWETH:

1. That the Applicant has filed the above titled Original Application under Section 14 and 15 of the National Green Tribunal Act, 2010 raising "*substantial questions relating to environment*" arising out of operation of limestone mining (10.50 MTPA) with a crusher (capacity of 1600 TPH) in Jodhpura village, Kotputli, Jaipur, Rajasthan in violation of:
 - a. The conditions of Environmental Clearance (hereinafter "EC") dated 17.08.2006,30.04.2010,16.01.2023 granted under the EIA Notification, 2006
 - b. The conditions of the consent (hereinafter "Consent") to operate dated 07.04.2022 granted under the Air (Prevention and Control of Pollution) Act, 1981 and Water (Prevention and control of Pollution) Act, 1974
 - c. The crushers in the mine lease area is also set up in violation of the Guidelines issued by the Rajasthan State Pollution Control Board (RSPCB) dated 05.06.2018 and the directions of the Hon'ble Supreme Court and this Hon'ble Tribunal.

2. That the limestone mines are situated at close proximity to human habitation and two crushers pose a severe threat to the life, property and health of the villagers of Village Jodhpura. Due to the close proximity of the activity of limestone mines and crushers, the villagers are facing the impacts like:

- a) Damage to the houses because of blasting activity undertaken in the limestone mine caused as a result of severe ground vibration.
- b) Damage to the walls, floors, roofs of Government Primary School, Kotputli because of severe ground vibrations from blasting.
- c) Constant threat of collapse from the damaged houses and resultant loss to human life and property.
- d) Loud and thundering noise from the blasting activity and the ground vibrations similar to earth quake tremors, and the untimely blasting at day or night time creating fear and panic among the children and residents of village of Jodhpura
- e) Constant noise pollution from the operation of the crushers in close proximity.
- f) Large-scale air pollution caused by the operation of the limestone mine and crushers.
- g) Impact on health of villagers because of deterioration of air quality.
- h) Depletion and contamination of groundwater of village Jodhpura. The samples from the groundwater have been found with high nitrate concentrate of 211mg/l6, making it unfit for drinking purpose.
- i) Gross violation to the Right to Life of the villagers of Jodhpura, to live in pollution free environment and to live with dignity Constitution.

3. That the Hon'ble Tribunal vide order dated 01.07.2024 admitted the above titled matter and constituted a Joint Committee to undertake site

visit and submit a factual action take report. The relevant portion of the Order dated 01.07.2024 is reproduced below for reference:

"5. We deem it just and proper to call a report on the matter in issue, in present application, from a Joint Committee consisting of:-

(i) One representative from the Chief Secretary, State of Rajasthan, (Rajasthan) having sufficient knowledge in the field of environmental or mining.

(ii) One representative from the Member Secretary, Rajasthan State Pollution Control Board, (Rajasthan)

(iii) One representative from the Director General of Mines and Safety, State of Rajasthan, (Rajasthan)

(iv) One Representative from the Central Pollution Control Board, (Rajasthan)

6. The Committee is directed to visit the place and submit that factual and action taken report within six weeks. The State PCB will be the nodal agency for coordination and logistic support."

4. That in pursuance of the Order, the Joint Committee submitted a report which was uploaded on the website of this Hon'ble Tribunal on 27.08.2024.

5. That the Joint Committee Report (at Page 12) provides recommendations on the basis of the observations made in the Report.

These recommendations are as follows:

Based on the aforesaid observations, the joint committee recommends followings:

i. A committee consisting of District Administration, Industry representative and villagers may be constituted by the Hon'ble NGT in order to plan and/or discuss about the resettlement and rehabilitation issue as per NPPR, 2003 for village Jodhpura, as per condition no. 2 (A-xvii) of Environmental Clearance was accorded to unit by MoEF and CC, GoI vide letter dated 17.08.2006.

ii. Public Works Department may be asked to submit the factual report regarding the formation of cracks due to the operation of industry and the compensation may be granted to the affected people/houses after evaluation, if the damage is caused due to the blasting operation of the unit.

iii. District Administration may be asked to audit the works done by the industry under Corporate Social Responsibility for transparency and may continue the auditing periodically in order to restore the confidence of the villagers."

6. That it is clear from the above recommendations of the Joint Committee constituted by this Hon'ble Tribunal that the villagers are required to be rehabilitated. It is therefore submitted that this Hon'ble Tribunal may

pass appropriate directions in the present matter, on the basis of the recommendations made in the Joint Committee Report.

7. That however, the Applicant wishes to point out some factual errors in the Report to which the Applicant herein is filing the present Response. The following are the contentions raised in the Joint Committee Report to which the Applicant herein is responding to:

- a. Incorrect distance of the limestone mines and the two crushers from human habitation and Government Primary School shown in the Joint Committee Report;
- b. The report of the PMO, Govt. B.D.M. Hospital, Kotputli (annexed as Annexure-18 with the Joint Committee Report) which shows the details of people who have undergone medical check-up, however, was exclusive to employees and their family members and villagers of Mohanpura- Jodhpura were not medically examined.
- c. The factual status report of the Assistant Mining Engineer (annexed as ANNEXURE A-12 with the Joint Committee Report) which admits that the cracks in the buildings were due to vibration, but also states that the reason could be structural defects and old age of the buildings.
- d. That adequate measures have been undertaken by Respondent No. 8 to suppress air and noise pollution in the area.
- e. Experimental blasting activities which were undertaken during the Joint Committee visit show that no adverse impact is caused due to the blasting activities of the mine.

RESPONSE ON BEHALF OF THE APPLICANT

A. The Joint Committee Report has failed to ascertain the exact distance of the mine lease area and crushers from human habitation and Government Primary School

8. That the Joint Committee Report has stated that crusher no. 1 is located a distance of 600 metres from the Government Primary School (at Page 5) and crusher no. 2 is located a distance of 200 metres from the Government Primary School (at Page 6).
9. It is submitted that the Joint Committee has erred in ascertaining the exact distance of the limestone mines and crushers from habitation and the government primary school and has therefore, failed in establishing the impact of such proximity on the air, water and health of the villagers.
10. That the Applicant by way of following table will show that the Joint Committee failed to take into account the letters of Sub-Divisional Magistrate, Kotputli dated 18.01.2023 (*A-16 of OA*) and Tehsildar, Kotputli dated 22.02.2024 (*A-21 of OA*) which clearly state that the limestone mines and the two crushers are located in close proximity with habitation and primary school. These facts can also be verified on ground and substantiated through the use of Google Earth images, as has been done by the Applicant (*Annexure A-1, A-2 and A-3 of OA*). It is submitted that the village of Jodhpura falls within the mining lease area of 548.78 ha and lies in close proximity to the limestone mines and two crushers. The Joint Committee Report has relied upon the Reports of Assistant Mining Engineer (at Page 7) and Directorate General of Mines Safety (at Page 9) but has failed to take into account the information put forward by the Applicant.

Activity	Place	Minimum Distance as per the Joint Committee Report	Minimum distance as per Assistant Mining Engineer Report (<i>Annexure 12 of Report @ Page 7</i>)	Minimum distance as per Directorate General of Mines Safety (<i>@ Page 9 of Report</i>)	Letters of Sub-Divisional Magistrate, Kotputli (<i>A-16 of OA</i>) and Tehsildar, Kotputli (<i>A-21 of OA</i>)
Limestone mine	Habitation	-	200mtr	232mtr	232 mts
	Primary School	-	550 mtrs (public structures)	-	Less than 300mtrs

Crusher No.1	Habitation	-	-	-	286mtrs
	Primary School	600mtrs	-	-	-
Crusher No.2	Habitation	Close proximity	-	-	110-165mtrs
	Primary School	200mtrs	-	-	82 mtrs

11. That it is submitted that the measured distance from the limestone mines to the human habitation is 232mtrs and to the Government primary school is less than 300mtrs. The Joint Committee also failed to verify the distance from the Crusher No.1 to the human habitation, which is less than 500 metres and that of crusher No.2 which is only 82mts and less than 130 mtrs from human habitation. Due to such close proximity, the villagers are facing issues like cracks in the walls, floors, doors of houses, due to the uncontrollable blasting activities, there is a threat of collapse of residential houses, Government Primary School, Kotputli, and large scale air pollution due to the fugitive dust emissions. However, the Joint Committee has failed to find the accurate distance of the same.

B. The medical camp undertaken by Respondent No. 8 was exclusively for the employees working in M/S Ultratech limestone mines and no medical examination for the villagers was conducted

12. That the Joint Committee in Annexure-18 of its Report has attached a medical report of PMO, Govt. B.D.M Hospital, Kotputli which contains a list of people who were medically examined in a medical camp conducted by Respondent No.8, M/S Ultra Tech Cement. It is submitted by the Applicant that the list of people who were medically examined are only employees working in the company of Respondent No. 8 and villagers of Mohanpura-Jodhpura were not made part of the medical camp.

13. That furthermore, the Joint Committee is trying to mislead this Hon'ble Tribunal by stating that Respondent No. 8 has undertaken work under Corporate Social Responsibility and conducted medical camps for the villagers.
14. It is the submission of the Applicant that no such medical camp was conducted by Respondent No. 8 for the villagers of Mohanpura-Jodhpura and no medical examination of any of the villagers took place. The medical camp was conducted for the employees and their family members who are residing at the nearby villages.

C. The formation of cracks in the buildings is due to vibrations, as admitted in the Report and not due to old age of the buildings

15. That the Joint Committee Report has relied upon the factual status report of the Assistant Mining Engineer (at Page 7) to state that the cracks in the buildings were due to construction defects, due to vibration and in some of the cases due to the old age nature of the houses:

viii. In accordance with the letter dated 11/01/2023 from Assistant Engineer, Public Works Department, Kotputli, a team was constituted by the SDM vide his letter dated 13/12/2022 to verify and check the damages to the nearby houses/structures in the Jodhpura Village.

*ix. The aforementioned team inspected, on dated 27/12/2022 and 30/12/2022, and **during inspection it was observed by the team that the cracks in some of the houses were due to the construction defects, due to vibration and in some of the cases due to the old age nature of the houses.***

x. In accordance with the letter dated 15/10/2008 from Land Acquisition Officer cum Sub-Divisional Officer, Kotputli, the award amount of Rs. 13,43,42,698/- was decided to acquire the land of area 213.7750 Hectares

of Villages Mohanpura, Kujota, Mahrampur Rajput, Mahrampur Nawab of Tehsil-Kotputli, District – Kotputli-Behror (then District-Jaipur).

*xi. According to the Executive Engineer, PWD, Kotputli Circle letter dated 22/02/2024, **the visibility of cracks in the Village Jodhpura can be seen due to the age of these structures (approx. 40-60 years old), due to the ambient temperature fluctuations and due to the vibrations from blasting activity."***

16. That firstly, it is submitted that there is a clear observation in Para (ix) and (xi) reproduced above that the cracks were also due to vibrations, amongst other reasons.
17. That further, the Report states that the cracks are due to old age of the structures. In this regard, the Applicant wishes to submit that cracks are also visible in new buildings constructed in the village which can only appear due to ground vibrations from the blasting activities undertaken in close proximity of limestone mines. Even the anganwadi centre set up by Respondent No. 8 is showing cracks in the walls, due to vibrations from blasting activities. The following table will provide information on the recent constructions undertaken in the village area, that show cracks (photographs annexed as **ANNEXURE A-**):

Year of construction	Owner of the property
2017	Ram Niwas Yogi
2017	Kailash Yadav
2017	Nihal Singh Yadav
2017	Surendra Yogi
2017	Haridwari Lal Yadav
2020	Birdinath
2022	Gautam Surelia
	Anganwadi centre set-up by Respondent No. 8

18. That the village of Jodhpura falls within the mining lease area of 548.78ha and lies in close proximity to the limestone mines and the two

crushers. The Crusher no.1 is just 286mts from the human habitation and the crusher no.2 is 110mtrs away from the human habitation and just 82mtrs from the Government Primary School, Kotputli. The village of Jodhpura is just 232mtrs from the limestone mine and less than 300mtrs from Government Primary School, Kotputli. It is submitted that because of the close proximity of the limestone mines and the crushers, the houses of the residents of Jodhpura have been severely damaged owing to the ground vibrations.

D. No adequate pollution control measures have been adopted by Respondent No. 8 in limestone mine and crushers

19. That the Joint Committee Report stated that adequate measures have been undertaken by Respondent No. 8 to control pollution arising from the limestone mines.

20. That for crusher unit-1, the following is stated (at Page 5):

"v. The emission during feeding of limestone into the feeder that generates emissions, for which the industry has installed water sprayers fitted with automatic detectors. The feeder point is also provided with the flexible rubber seals to suppress the emissions.

vi. The emissions points of wobbler and crusher is attached/connected with the automatic Pulse-jet type Bag House which is ultimately connected with the ID fan and then to the stack of height 30 meters thereby minimizing the dispersion of process emissions into the ambient environment."

For crusher unit-2, the following is stated (at Page 6):

"v. The emissions points of wobbler and crusher is attached/connected with the automatic Pulse-jet type Bag House which is ultimately connected with the ID fan and then

to the stack of height 30 meters thereby minimizing the dispersion of process emissions, during limestone crushing, into the ambient environment.

vi. Metalled access roads have been provided for the movement of vehicles from the mines to the dug of the crusher, to prevent fugitive emissions during vehicular movement. vii. Water sprinkling with the help of tankers and fog canon was noticed on the access roads."

For mining lease, the following is stated (at Page 7):

"iv. Unit has provided permanent water sprinklers fitted on the access roads in in the mining lease to control and reduce fugitive emissions."

21. That the Applicant submits that the Joint Committee Report has failed to provide any justification for the deterioration of air quality in the Jodhpura region due to the pollution arising from the limestone mines and crushers. The Joint Committee was tasked with the responsibility of providing the ground status report. However, the Report does not delve into the issues relating to air pollution on ground and only provides a preliminary study of the issue.
22. That the real-time emission data installed in the plant premises, which is available on the website of Respondent No.4 (RSPCB) under the Online Continuous Emission Monitoring Systems, (OCEMS) clearly shows that the concentration of PM.10 and PM2.5 around the area is very high.
23. That the Applicant perused the historical data of particulate matter PM 10 and PM 2.5 from the time period of 01.10.2023 to 31.03.2024 and has found that the levels of PM 2.5 and PM 10 are higher than the standards set in NAAQS.

Copy of air quality data available on the website of Rajasthan Pollution Control Board for the time period of 01.10.2023 to 31.03.2024 is annexed herewith as **ANNEXURE A-**.

24. That it is relevant to mention that the permissible average 24hrs standard of PM10 is 100 and that of PM 2.5 is 60 as per the National Ambient Air Quality Monitoring Standards (NAAQMS). Prolonged exposure to the particulate matter at such high levels is very harmful to the human body and can cause severe health impacts. Due to the prolonged exposure of particulate matter the health of the villagers were severely affected resulting in contraction of various respiratory, skin and eye diseases.
25. That with respect to the health of people which is impacted by the air and noise pollution, the Chief Medical Officer BDM, District Hospital, Kotputli reported details about the number of people contracted with various diseases potentially due to the impact of fugitive dust emission and noise pollution vide its letter dated 22.03.2024 (annexed as ANNEXURE A-13 with the OA). It states that 53 people were diagnosed with eczema and allergy in the skin, and 21 was contracted with allergic conjunctivitis. Further, 30 of the villagers screened had hearing and ticking sounds coming from the ears possibly due to regular hearing of blasting sounds. Therefore, the observation of the Joint Committee that Respondent No. 8 is adhering to adequate pollution control measures is false and misleading.

E. The experimental blasting conducted does not ascertain the real impact of blasting activities as they were conducted at a farther distance as compared to the permitted distance

26. That the Joint Committee has stated (at Page 9) that Respondent No. 8 has permissions to undertake blasting activities within 300m and beyond 100m distance from any permanent building or structure of permanent nature:

*"Jodhpura village was located at a distance of about 232m from the present mine workings of the mine. Therefore, management has obtained permission under Regulation 164(1-B) (a) of the Metalliferous Mines Regulations, 1961 vide this Directorate's letter No. 360971/NWZ/Ajmer Region-1/Perm/2023/258045 dated 20.10.2023 (Copy enclosed as Annexure-II) on the basis of recommendations of scientific study conducted by AKS University, Satna (MP) and report submitted vide Ref. No GK/GKH/7130523282, to **conduct controlled blasting within 300m and beyond 100m distance from any permanent building or structure of permanent nature, not belonging to owner of the mine.**"*

27. That in this regard, the Joint Committee Report also records that to ascertain whether the blasting activities were causing cracks in buildings and nuisance to the villagers, experimental blasting activities were undertaken. It is the submission of the Applicant that even though the blasting permission is for areas as close as 100 metres, however, none of the experimental blasting were conducted in such close proximity, therefore, the conclusion of the Joint Committee that blasting activities do not cause an issue cannot be relied upon.
28. That the blasting activities were undertaken on 06.03.2024 at a distance of 320m and 400m from human habitation (at Page 10), on 29.07.2024 at 636m and 694m (at Page 10), on 06.08.2024 at 770m (at Page 10), on 06.08.2024 at 8000m (at Page 11), on 07.08.2024 at 755m (at Page 11) and on 07.08.2024 at 580m (at Page 11).
29. That these distances are not only beyond the permitted distances but also not at the locations where the Applicant has alleged blasting activities to be taking place which are causing cracks in buildings.
30. That the formation of cracks in the houses of the villagers are attributed to the blasting activities and the ground vibrations as there is no other identified reason for the cracks. In the absence of scientific certainty,

Respondent NO. 8 shall be liable for the damages as has been held by this Hon'ble Court in ***Balakrishnan Vyas v. State of Rajasthan O.A No. 288 of 2019***. The relevant part of the observation is reproduced below:

10. Thus, once it is found that there are cracks in the vicinity of mining using blasting and there is no identified other reason for the blasts, absence of scientific certainty to show that the blasting is the reason cannot be a ground to assume that no preventive or remedial measures are to be taken for protecting the environment and the inhabitants. Burden of proof is on the project proponent. There is no data to show that such cracks are happening in other areas where blasting is not taking place. On principle of res ipsa loquitur, blasting has to be taken as a cause for the cracks, as submitted by the State PCB in its initial report mentioned earlier which annexed the report from the Geological Survey of India that more than 375 buildings had suffered damage which appeared to be due to local shaking and vibration. Thus, the approach in the three Experts study mentioned above that in absence of clear scientific proof of correlation of blasting and cracks in housing, damage could not be attributable to the blasts is against the principles of Environmental law to be applied by this Tribunal and to 16 that extent the reports cannot be accepted. However, the Recommendations for expert supervision of the blasting operations and for rehabilitation of the affected victims are acceptable.

31. That therefore, Respondent No. 8 should be made liable for the damages caused to the houses of the villagers owing to the ground vibrations from the blasting activities.
32. That in the interest of justice, the Hon'ble Tribunal may consider the above submissions and objections on behalf of the Applicant for further adjudication of the matter.

33) Pass any other order as this Hon'ble Tribunal may deem fit in the facts and circumstances of the present case.


कैलाश यादव

जोधपुरा संघर्ष समिति
गांव-मोहनपुरा (जोधपुरा)
तह0 कोटपूतली
जिल0 **APPLICANT**-बहरोड
राजस्थान 303108

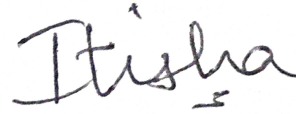
THROUGH



RITWICK DUTTA



RAHUL CHOUDHARY



ITISHA AWASTHI

ADVOCATES

COUNSELS FOR THE APPLICANTS

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New Delhi - 110048

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Email: dclaw160@gmail.com

VERIFICATION

Verified by Kailash Chand Yadav, aged about 39 years, S/O Laxmi Narayan, R/o at Village Jodhpura, Mohanpura, Jaipur, Rajasthan- 303108, do hereby verify that the contents of Paragraphs 1 to 33 are true to my personal knowledge and nothing material has been concealed therefrom.

कैलाश यादव

जोधपुरा संघर्ष समिति
गांव-मोहनपुरा (जोधपुरा)
तह0 कोटपूतली
जिल0 **APPLICANT**-बहरोड
राजस्थान 303108



BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
CENTRAL ZONAL BENCH AT BHOPAL
ORIGINAL APPLICATION NO. 143 OF 2024

IN THE MATTER OF:

JODHPURA SANGARSH SAMITI

...APPLICANT

VERSUS

UNION OF INDIA& ORS.

...RESPONDENTS

AFFIDAVIT

I, Kailash Chand Yadav, aged about 39 years, S/O Laxmi Narayan, R/o at Village Jodhpura, Mohanpura, Jaipur, Rajasthan- 303108, do hereby solemnly affirm and declareas under:

1. That I am the authorized representative of Applicant in the above titled Application, and hence well conversant with the facts and circumstances described in the present case and as such competent to swear this Affidavit.
2. That the contents of the accompanying Response are true and correct and nothing material has been concealed therefrom.

कैलाश यादव

जोधपुरा संघर्ष समिति
गांव-मोहनपुरा (जोधपुरा)
DEPONENT
कोटपूतली
जिला-कोटपूतली-बहरोड
राजस्थान 303108

VERIFICATION

Verified on this 3rd day of Jan-2025 2024 that the contents of the present Affidavit are true and correct to my knowledge and belief and nothing material is concealed therefrom.

कैलाश यादव

जोधपुरा संघर्ष समिति
गांव-मोहनपुरा (जोधपुरा)
DEPONENT
कोटपूतली
जिला-कोटपूतली-बहरोड
राजस्थान 303108

ATTESTED


03/01/2025
MUKESH KUMAR YADAV
Notary, Kotputli
Distt-Kotputli-Behror (Raj.)

ANNEXURE A-1

Haridwari Lal Yadav- 2017



Surendra Yogi- 2017



Gautam Surelia- 2017



Birdinath- 2020



Nihal Singh Yadav- 2017



Kailash Yadav- 2017



Ram Niwas Yogi- 2017



Anganwadi Centre, Jodhpura developed by Respondent No. 8







21

Rajasthan State Pollution Control Board

Industry Name : Ultra Tech Cement Limited-Kotputli
Address : V & P- Mohanpura-Tehsil
District : Jaipur
Category : Cement & Powerplant
Parameters : Plant_Boundary-PM10, Plant_Boundary-PM2.5
Report Format : Tabular
Criteria : daily
Date : From 2023/10/01 To 2024/03/31

RealTime Data

Time	Plant_Boundary-PM10	Plant_Boundary-PM2.5
2023-10-01	230.68	88.47
2023-10-02	226.11	79.91
2023-10-03	255.15	78.71
2023-10-04	410.23	129.4
2023-10-05	205.53	60.45
2023-10-06	224.46	70.91
2023-10-07	137.39	43.8
2023-10-08	172.29	47.58
2023-10-09	165.86	47.96
2023-10-10	167.34	52.94
2023-10-11	173.31	67.45
2023-10-12	171.46	38.44
2023-10-13	165.34	39.3
2023-10-14	162.12	37.16
2023-10-15	129.33	31.9
2023-10-16	118.83	24.24
2023-10-17	82.94	19.53
2023-10-18	134.97	31.15
2023-10-19	195.41	33.75
2023-10-20	232.32	39.78
2023-10-21	302.11	38.48
2023-10-22	375.44	43.82
2023-10-23	452.73	39.96
2023-10-24	418.35	44.49
2023-10-25	257.88	41.2
2023-10-26	106.74	28.67
2023-10-27	125.74	34.21
2023-10-28	146.84	41.18
2023-10-29	116.63	37.67
2023-10-30	132.44	42.58
2023-10-31	145.46	52.29
2023-11-01	150.27	60.19
2023-11-02	161.74	55.41

Time	Plant_Boundary-PM10	Plant_Boundary-PM2.5
2023-11-03	193.33	74.64
2023-11-04	200.06	84.18
2023-11-05	192.6	66.8
2023-11-06	139.75	79.99
2023-11-07	231.86	68.53
2023-11-08	366.53	76.62
2023-11-09	199.92	49.05
2023-11-10	80.89	30.4
2023-11-11	158.63	43.39
2023-11-12	182.91	65.02
2023-11-13	184.97	65.08
2023-11-14	188.37	89.59
2023-11-15	228.5	128.59
2023-11-16	259.41	144.4
2023-11-17	172.6	82.79
2023-11-18	94.35	54.34
2023-11-19	129.66	51.41
2023-11-20	135.73	62.15
2023-11-21	270.04	87.53
2023-11-22	196.99	79.4
2023-11-23	106.63	42.12
2023-11-24	210.93	86.55
2023-11-25	238.94	106.76
2023-11-26	247.9	115.56
2023-11-27	256.64	85.21
2023-11-28	183.57	52.93
2023-11-29	220.84	61.81
2023-11-30	291.57	84.52
2023-12-01	226.4	70.41
2023-12-02	158.65	61.03
2023-12-03	146.25	52.18
2023-12-04	124.7	37.1
2023-12-05	174.17	57.61
2023-12-06	152.22	55.22
2023-12-07	160.45	57.15
2023-12-08	172.85	58.7
2023-12-09	165.87	57.9
2023-12-10	152.71	47.21
2023-12-11	138.68	45.47
2023-12-12	117.28	40.46
2023-12-13	144.39	48.76
2023-12-14	140.15	51.39
2023-12-15	15.62	69.18
2023-12-16	2.8	63.35
2023-12-17	2.8	47.54

Time	Plant_Boundary-PM10	Plant_Boundary-PM2.5
2023-12-18	2.8	66.19
2023-12-19	79.26	23.88
2023-12-20	180.5	60.45
2023-12-21	184.44	61.15
2023-12-22	146.76	53.33
2023-12-23	175.47	77.55
2023-12-24	89.88	83.04
2023-12-25	70.46	58.36
2023-12-26	142.02	54.75
2023-12-27	373.93	66.47
2023-12-28	279.78	51.02
2023-12-29	233.92	38.14
2023-12-30	183.87	37.36
2023-12-31	310.08	48
2024-01-01	111.16	59.97
2024-01-02	132.2	60.98
2024-01-03	95.15	48.22
2024-01-04	151.79	75.48
2024-01-05	69.39	46.53
2024-01-06	101.15	50.46
2024-01-07	109.5	52.45
2024-01-08	84.96	43.55
2024-01-09	61.63	32.17
2024-01-10	96.67	44.35
2024-01-11	134.99	53.44
2024-01-12	126.73	50.57
2024-01-13	145.64	56.57
2024-01-14	133.52	42.67
2024-01-15	134.09	24.33
2024-01-16	137.55	60.61
2024-01-17	103.07	52.77
2024-01-18	172.41	56.63
2024-01-19	74.12	38.63
2024-01-20	96	46.28
2024-01-21	109.41	49.12
2024-01-22	118.88	52.3
2024-01-23	150.01	45.65
2024-01-24	121.01	64.93
2024-01-25	174.94	35.66
2024-01-26	99.12	47.39
2024-01-27	151.39	54.22
2024-01-28	142.34	47.57
2024-01-29	113.32	55.63
2024-01-30	162.83	66.27
2024-01-31	166.05	76.49

Time	Plant_Boundary-PM10	Plant_Boundary-PM2.5
2024-02-01	120.8	61.5
2024-02-02	105.66	34.98
2024-02-03	105.56	37.96
2024-02-04	90	36.47
2024-02-05	77.45	33.45
2024-02-06	91.29	33.89
2024-02-07	180.03	53.85
2024-02-08	114.44	31.39
2024-02-09	106.04	38.42
2024-02-10	149.06	50.38
2024-02-11	161.13	64.81
2024-02-12	178.83	71.19
2024-02-13	175.17	75.16
2024-02-14	173.46	75.77
2024-02-15	172.24	71.27
2024-02-16	202.34	64.44
2024-02-17	165.32	51.8
2024-02-18	134.24	42.26
2024-02-19	136.68	40.55
2024-02-20	132.71	32.26
2024-02-21	139.52	43.89
2024-02-22	92.03	33.98
2024-02-23	96.93	309.8
2024-02-24	107.53	310.02
2024-02-25	101.51	37.32
2024-02-26	98.3	40.61
2024-02-27	72.87	28.51
2024-02-28	100.3	34.27
2024-02-29	41.31	37.09
2024-03-01	48.89	34.5
2024-03-02	5.43	17.52
2024-03-03	3.49	50.09
2024-03-04	25.63	32.62
2024-03-05	85.75	27.44
2024-03-06	89.16	32.26
2024-03-07	111.67	39
2024-03-08	93.22	34.97
2024-03-09	91.33	31.61
2024-03-10	102.92	37.62
2024-03-11	117.35	42.61
2024-03-12	113.28	43.08
2024-03-13	128.44	34.99
2024-03-14	103.82	40.1
2024-03-15	73.35	23.71
2024-03-16	96.6	34.23

Time	Plant_Boundary-PM10	Plant_Boundary-PM2.5
2024-03-17	129.71	43.8
2024-03-18	118.72	20.39
2024-03-19	128.19	15.65
2024-03-20	132.29	45.29
2024-03-21	135.07	42.99
2024-03-22	130.65	39.86
2024-03-23	99.04	32.4
2024-03-24	154.88	39.94
2024-03-25	121.8	46.22
2024-03-26	117.95	33.78
2024-03-27	117.56	34.19
2024-03-28	101.61	31.35
2024-03-29	93.17	27.83
2024-03-30	149.56	37.19
2024-03-31	135.73	31.34



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Litigation . <litigation@dclawchambers.com>

**Copy of Rejoinder and Response on behalf of the Applicant in OA No. 143 of 2024
Jodhpura Sangharsh Samiti Versus Union of India & Ors.**

1 message

Litigation . <litigation@dclawchambers.com>

Mon, Jan 13, 2025 at 12:42 PM

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Cc: itishaawasthi@proton.me

Dear Sir/madam,

Please find attached- Copy of Rejoinder and Response on behalf of the Applicant in OA No. 143 of 2024 Jodhpura Sangharsh Samiti Versus Union of India & Ors.

Thanks & Regards
Counsel for the Applicant

3 attachments**Rejoinder DGMS.pdf**
808K**Response to Report on behalf of Applicant.pdf**
1490K**Rejoinder RPCB.pdf**
3660K