

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

(Original Application No. 797 of 2024)

IN THE MATTER OF:

Gautam

..... Applicant

Versus

State of Uttar Pradesh & Ors.

..... Respondents

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Place: **NEW DELHI**

Date: **15/10/25**

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**ADDITIONAL REPLY /RESPONSE FILED BY THE RESPONDENT
NO.9 i.e. TEHRI PULP & PAPER LTD.**

MOST RESPECTFULLY SHEWETH:

1. That the present Additional Reply/Response has been filed by the Respondent No.9 i.e. Tehri Pulp & Paper Ltd. [hereinafter referred to as the “answering Respondent”]. That the answering Respondent is a company registered under the Companies Act, 1956 having its manufacturing Unit at: 9th Km Stone, Bhopa Road, Muzaffarnagar (U.P.) – 251 001 and is engaged in the business of manufacturing & sale of Kraft paper using waste paper as raw material.
2. That on 21.02.2025, the answering Respondent has already filed its Reply in this present Original Application and has also filed several documents along-with the said Reply dated 21.02.2025. That the answering Respondent craves leave & indulgence of this Hon’ble Tribunal that the contents of the said Reply dated 21.02.2025 filed by the answering Respondent and the documents filed along-with the said Reply dated 21.02.2025 may be treated as part & parcel of this present Additional Reply and the same are not repeated herein for the sake of brevity.
3. That this Hon’ble Tribunal, vide Order dated 17.12.2024, appointed Mr. Rahul Khurana (Advocate) as Amicus Curie in the present matter. That

the Ld. Amicus Curie visited the manufacturing units of the answering Respondent on 08.02.2025 and, thereafter, the Ld. Amicus Curie filed his Report on 21.02.2025 before this Hon'ble Court.

4. **EXPLANATIONS W.R.T. THE OBSERVATIONS MADE BY THE LD. AMICUS CURIE IN HIS REPORT DATED 21.02.2025:**

That the Ld. Amicus Curie has visited the unit of the answering Respondent on 08.02.2025 along-with UPPCB officials. That the Ld. Amicus Curie filed a Status Report dated 21.02.2025, which is available on the website of this Hon'ble Tribunal. That the findings w.r.t. the unit of the answering Respondent is contained from Page No. 891 to 921 of the said Status Report dated 21.02.2025. That a perusal of the said Status Report dated 21.02.2025 filed by the answering Respondent shows that the answering Respondent is a compliant unit.

(a) That the Ld. Amicus Curie, at Page No. 891 of the said Status Report dated 21.02.2025, has observed that RDF was unsegregated MSW and, therefore, there was foul smell near RDF in form of mixed solid waste. In this regard it is submitted that RDF is now properly segregated under the newly constructed shade and there is no foul smell near RDF. Photographs of the RDF Handling Yard, Shredder for RDF, RDF collecting area, RDF Storage Yard and Way to the Boiler are collectively annexed as **Annexure: A (Colly)**.

(b) That the Ld. Amicus Curie, at Page No. 891 of the said Status Report dated 21.02.2025, has observed that two trommel machines were found, however, the trommel machines were not operational at the time of visit. In this regard it is submitted that some sound was observed in the bearing of the said trommel machines, therefore at the time of the visit of the Ld. Amicus Curie mechanical job was under progress. That after the completing of

the said mechanical job, the said trommel machines are now operational. Photographs of the Trommel Machine and its conveyer are collectively annexed as **Annexure: B (Colly)**.

- (c) That further, the Ld. Amicus Curie, at Page No. 917 of he said Status Report dated 21.02.2025, has observed that tube settler was not in operation. In this regard it is submitted that tube settler are operational after cleaning up and proper housekeeping is maintained in entire ETP area. Photographs of the Tube Settler and house keeping of the ETP area are collectively annexed as **Annexure: C (Colly)**.

5. That further, the officials of the Uttar Pradesh Pollution Control Board (UPPCB) [the Respondent No.3 herein] has inspected the manufacturing units of the answering Respondent on 11.07.2025 and, thereafter, filed its Response dated 22.07.2025 before this Hon'ble Tribunal.

6. **ANALYSIS OF THE RESPONSE DATED 22.07.2025 FILED BY THE RESPONDENT NO.3 i.e. UPPCB W.R.T. THE INSPECTION OF THE MANUFACTURING UNIT OF THE ANSWERING RESPONDENT DONE BY THE OFFICIALS OF THE RESPONDENT NO.3 ON 11.07.2025:**

- (a) That the answering Respondent have valid Consolidated CTO & Authorization (Air & Water Act) for both its units, which are valid (i) for Unit-1 till 31.12.2028 and (ii) for Unit-2 till 31.12.2026.
- (b) That with regard to the borewells, it is submitted that the answering Respondent has three borewells.
- (c) That the answering Respondent have valid NOC for ground water extraction for all of its borewells. That, however, the validity date in wrongly noted as 31.07.2025 in the said Response dated 22.07.2025 filed by UPPCB. That as a matter of fact the NOC for

ground water extraction for all of the borewells of the answering Respondent are valid till 30.03.2027, which are duly annexed as Annexure: R9/D (Colly) [Page No. 460 to 468] along-with the aforesaid Reply/Response filed by the answering Respondent on 21.02.2025.

- (d) That the answering Respondent has a full fledged Effluent Treatment Plants (ETPs) separately for both of its units.
- (e) That the parameters of the samples collected from the outlet of the both the ETPs of the answering Respondent were found within the prescribed norms.
- (f) That OCEMS are installed at the ETPs outlet which are connected with CPCB/UPPCB server and found operational.
- (g) That the answering Respondent has installed one boiler of capacity 52 TPH. That the answering Respondent uses RDF and Low Sulphur Coal/Biomass as fuel for its said boiler.
- (h) That the answering Respondent has provided stack of height 60 meter and dry pulse jet type filter, Electro Static Precipitator (ESP) as APCS.
- (i) That OCEMS are installed at stack which are connected with CPCB/UPPCB server and found operational.
- (j) That the answering Respondent has submitted the Stack Monitoring Report. That as per the analysis report, the specific parameters were found within the prescribed limits.
- (k) That record of the fly ash generation has been duly maintained by the answering Respondent.
- (l) That approximately 3.0 MT/day fly ash has been generated by the answering Respondent.
- (m) That the answering Respondent has an agreement with M/s Bulk Ash Supplier, Bhopa Road, Muzaffarnagar for disposal of fly ash in cement plants.

- (n) That record of the plastic waste generation has been duly maintained by the answering Respondent.
 - (o) That average 2.0 MT/day plastic waste has been generated by both the units of the answering Respondent.
 - (p) That the plastic waste generated by the answering Respondent has been supplied to M/s K.K. Duplex & Board Mills, Jansath Road, Muzaffarnagar for use in Waste to Energy plant boiler.
 - (q) That the answering Respondent has valid Hazardous Waste Authorization from UPPCB for both of its units, which are valid till 02.08.2027 and 26.07.2027.
 - (r) That the answering Respondent has an agreement with TSDF M/s Bharat Oil & Waste Management, Kanpur Dehat (U.P.).
7. That from the afore-mentioned facts, it is clear that the answering Respondent is a compliant unit and is operating its unit with all the necessary permissions, licenses, Consent to Operate and/or No Objection Certificates (NOCs). That the answering Respondent is duly following all the directions /guidelines issued time & again by the statutory authorities and is following all the law which are necessary to operate the industry.

PRAYERS:

In the facts and circumstances as stated above, it is therefore, most respectfully prayed that this Hon'ble Tribunal may graciously be pleased to:

- (i) Dismiss the captioned Original Application being O.A. No.797 of 2024 titled as "*Gautam Vs. State of Uttar Pradesh & Ors.*" in as far as it is related with the answering Respondent i.e. Respondent No.9 i.e. Tehri Pulp & Paper Ltd.;

- (ii) Pass such other/further order(s) as this Hon'ble Tribunal may deem fit and proper in the facts & circumstances of the case.

For TEHRI PULP AND PAPER LTD.



Authorized Signatory

RESPONDENT NO.9

THROUGH



ANUBHAV ANAND ARON, ABHINAV ANAND

(Advocates for the Respondent No.9)

A-901, Apex Golf Avenue, Sector-1,
Greater Noida (West), U.P. – 201 306

Mob: 9811764256, 9582416270

Email: abhinav.legal@gmail.com

Place: **NEWDEHR**
Date: **15/10/25**

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..... Respondents

AFFIDAVIT

1. Kishor Kumar Gupta aged about 62 years S/o Late Sh. Banwari Lal Gupta working as G.M. – Environment & Safety with Tehri Pulp & Paper Ltd. having its Unit at: 9th Km Stone, Bhopa Road, Muzaffarnagar (U.P.) – 251 001 (the Respondent No.9 herein) do hereby solemnly affirm state as under:-

1. That I am working as G.M. – Environment & Safety with Tehri Pulp & Paper Ltd. (the Respondent No.9 herein) and I am well conversant with the facts of the case, as such I am competent to swear this affidavit.

That the accompanying Additional Reply/Response has been drafted by my Counsel under my instruction and the content of the same have not been repeated herein for the sake of brevity and the same may kindly be read as part and parcel of the present Affidavit.

3. That I have read and understood the content of the accompanying Additional Reply/Response and present Affidavit and the same are true and correct to my knowledge and nothing material has been concealed there from.

For TEHRI PULP AND PAPER LTD.

DEPONENT

Authorised Signatory

VERIFICATION:

Verified at on this Tuesday of 14/10/2025 that the contents of the above affidavit are true and correct to the best of my knowledge and belief. No part of it is false and nothing material has been concealed therefore.

Kishor Kumar Gupta
G.M. – Environment & Safety
with Tehri Pulp & Paper Ltd.
Bhopa Road
Muzaffarnagar

For TEHRI PULP AND PAPER LTD.

DEPONENT

Authorised Signatory

11/10/25

11/10/25



AFFIDAVIT 2025

1346953

Handwritten number 1346953 in a circle

Tehri Paper - Mzn
RDF collecting area



Tehri Paper - Mzn
RDF Handling Yard

1357

9



Tehri Paper - Mzn
RDF storage Yard



11

Tehri Paper - Mzn Shreder for RDF



Tehri Paper - Mzn
Way to the boiler



Tehri Paper - Mzn
Trommel Conveyer of RDF



Tehri Paper - Mzn
Trommel for RDF



ANNEXURE: (Coily)
1363

Tehri Paper - Mzr 15
Housekeeping in ETP
Area

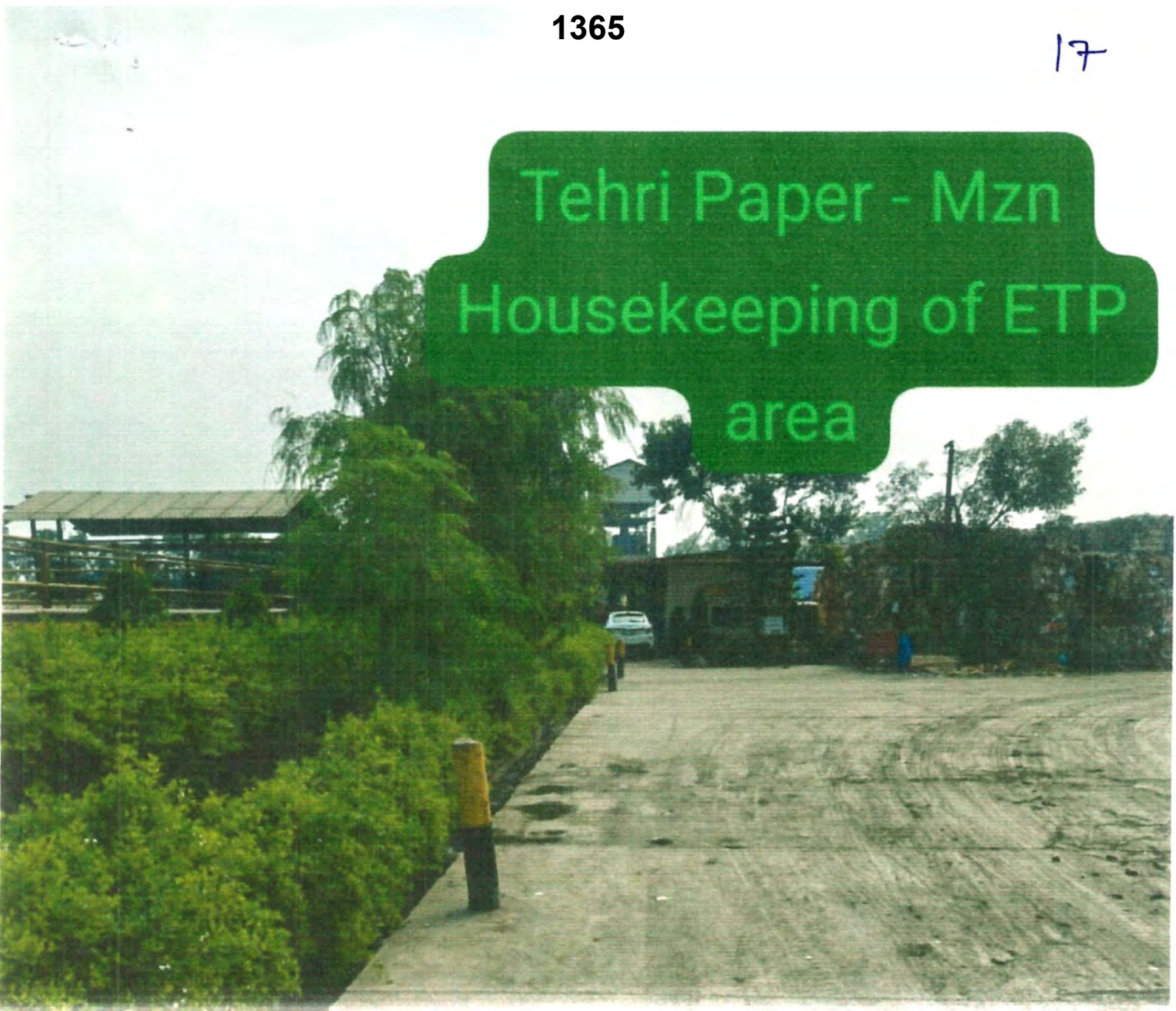


AERATION TANK, ETP-1
VOL. 4331M³ @
OPERATION 2004.02.15 4.30 PM
MR. BALRAJ, 02 4002
MANUFACTURING DEPARTMENT

Tehri Paper- Mzn
Housekeeping in ETP area



Tehri Paper - Mzn
Housekeeping of ETP
area

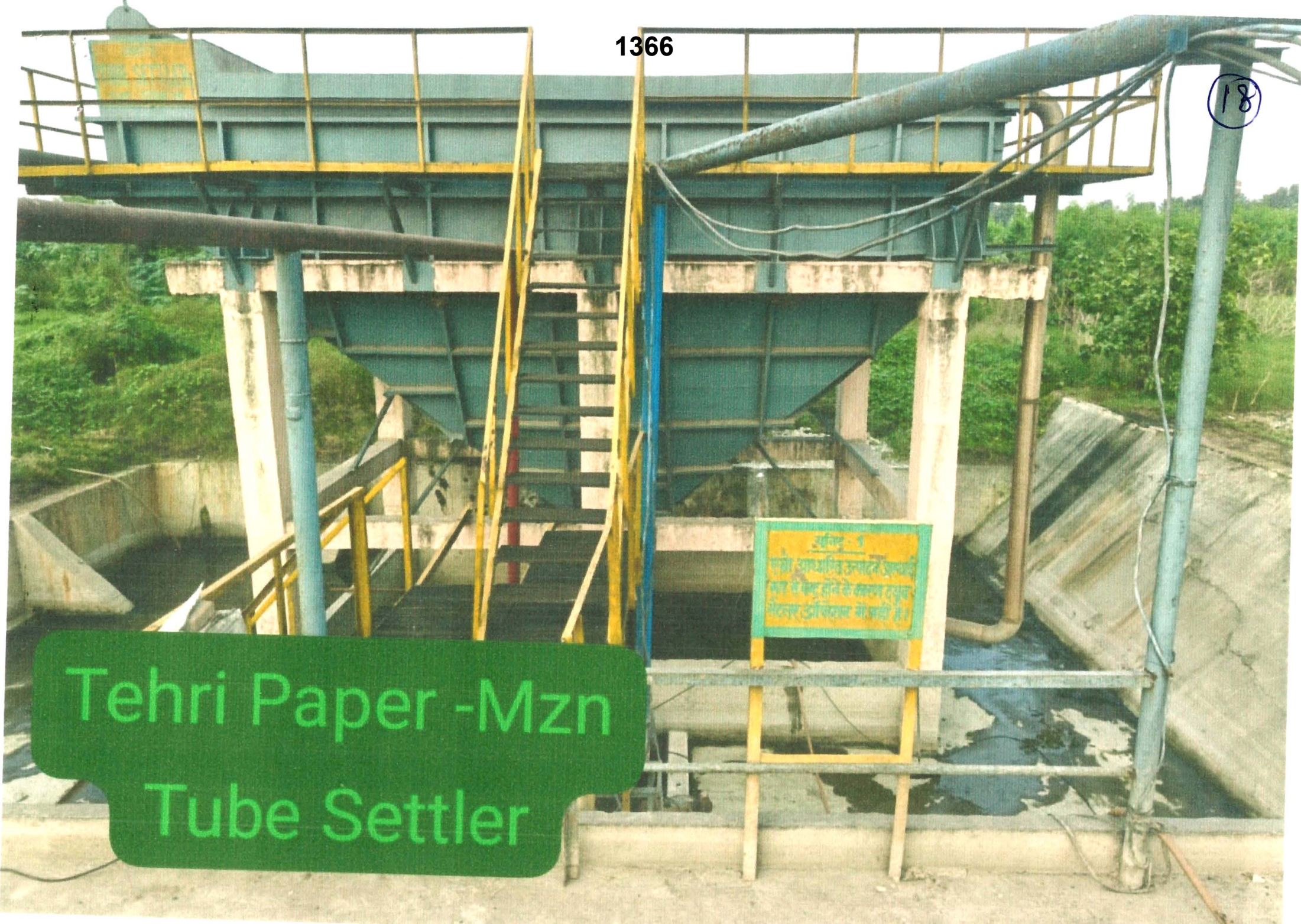


1366

18

अवधि - 1
सभी आधुनिक उपकरणों का उपयोग
करते हुए हीरे के समान शुद्ध
भंडार उपलब्ध में आती है।

Tehri Paper -Mzn
Tube Settler





Additional Reply Filed by respondent no.9

1 message

Kaushal Sharma <kaushal90.legal@gmail.com>

Wed, 15 Oct, 2025 at 5:11 pm

To: csup@nic.in, dmmuz@nic.in, ms@uppcb.in, upgwd.in@gmail.com, rkhuranalegal@gmail.com <rkhuranalegal@gmail.com>

Sir,

Kindly find the Pdf copy of Additional Reply Filed by respondent no.9 in OA no.797/2024.

Regards

Kaushal Sharma

C/Abhinav Anand Advocate

**Tehri Pulp & Paper Ltd.pdf**

8.8 MB