

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE BENCH,  
AT CHENNAI.  
ORIGINAL APPLICATION NO. 9 OF 2022**

**IN THE MATTER OF:-**

**PISATI INDIRA REDDY AND ANR**

**....APPLICANTS**

**VERSUS**

**UNION OF INDIA AND 32 OTHERS**

**...RESPONDENTS**

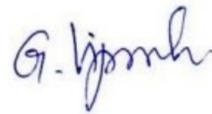
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**THROUGH**



**G STANLY HEBZON SINGH**



**G VIGNESH**



**V ANANTHA KRISHNAN**

**COUNSEL FOR 29<sup>th</sup> RESPONDENT**

No.1, Nallathambi Road, Pammal,  
Chennai-600 075.

Email: team.legacylaw@gmail.com

Mobile No: 99401 78702

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE BENCH,  
AT CHENNAI.

ORIGINAL APPLICATION NO. 9 OF 2022

**IN THE MATTER OF:-**

**1. PISATI INDIRA REDDY,**

W/o Late P.Ram Reddy,  
Aged About 64 years occ: Organic farmer,  
R/o H.No. 183, Sadashiva Heavens,  
PeddaAmberpet village, Abdullapurmet Mandal,  
Ranga Reddy district, Telangana -501505.  
Mobile No:9391013054  
Mail: [Indiraramayogi@gmail.com](mailto:Indiraramayogi@gmail.com)

**2. AKITI NIKHIL KUMAR REDDY**

S/o Akiti Rama Krishna Reddy,  
Age About 26 years, H.No.2-6,  
Chinna Ravirala, Abdullapurmet Mandal,  
RangareddyDist, Telangana-501505.  
Mobile No. 9666905777  
Mail: [advaravan@gmail.com](mailto:advaravan@gmail.com)

...APPLICANTS

VERSUS

**1. UNION OF INDIA,**

Rep. by its Secretary,  
Union Ministry of Environment, Forest &CC,  
Indira Paryavaran Bhavan,  
New Delhi-110003.  
Phone: 011 24695262,24695265  
Mail: [secy-moef@nic.in](mailto:secy-moef@nic.in) and 32 Others

...RESPONDENTS



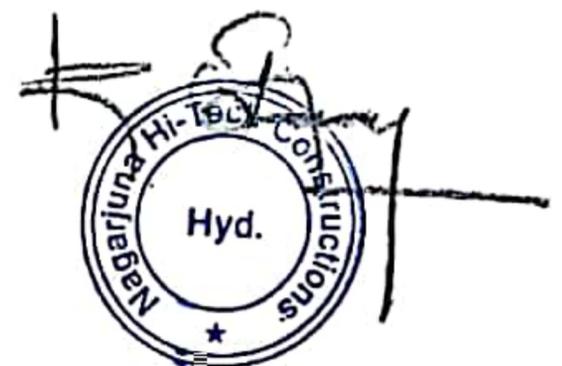
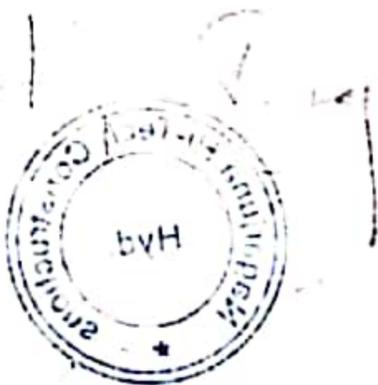
**ADDITIONAL COUNTER AFFIDAVIT FILED ON BEHALF OF**  
**RESPONDENT NO.29**

I, K. JANGA REDDY Son of Late Yadi Reddy aged about 61 years, Rep by its Proprietor of M/s **Nagarjuna Hy-tech Constructions** Hot Mix Plant in Sy.no 78, Desmukhi Village H.No 17-1-391/5/577, Singareni Colony, Saidabad, Hyderabad, Telangana-500059, do hereby solemnly affirms and sincerely state as follows:-

1. I respectfully submit that, I am the 29th Respondent herein i.e., M/s. **Nagarjuna Hy-Tech Constructions** and as such I am well acquainted with the facts of the case.
2. At the outset, I deny each and every averment, allegation, statement, raised in the above titled application, as being wholly baseless, misconceived, contrary to facts and records, devoid of substance, and unsustainable either in law or on facts, except to the limited extent of those matters which are specifically and expressly admitted herein

**Business activity of the Respondent No.29:-**

3. It is to submit that the Respondent No.29 herein is engaged in the business of operating independent Hot Mix Plant at Sy.No 78/A, 78/A/1, Deshmukh(v), Pochampally(M), Yadadri Bhuvanagiri District.



**FINDINGS OF THE TELANGANA STATE POLLUTION CONTROL BOARD IN  
RESPECT OF RESPONDENT NO.29;**

4. In response to the allegations raised by the applicant, the Telangana State Pollution Control Board has filed its report before this Hon'ble Tribunal on 20.04.2022. In the said report, at pages 20, the TSPCB has clearly recorded the following observations, which are extracted hereinbelow:

**a) The Board has issued CFO of the Board to the industry vide order dated 05.07.2018 for Manufacturing of Bitumen (Bituminous Black) – 250 TPD capacity which is valid up to 31.07.2023.**

**b) During the inspection, the industry was not in operation.**

**c) The main source of air pollution is the Hot Mix Plant. The industry has provided Bag filter to Hot Mix Plant to control air pollution.**

**d) The industry has provided water tanker for wetting of the ground for suppression of road dust.**

**e) The industry is complying except for maintaining of good housekeeping.**

5. In fact, the 29<sup>th</sup> respondent possesses valid Consent to Operate (CTO) granted by the TSPCB, Government of Telangana, in Sy.No 78/A, 78/A/1, Deshmukh(v), Pochampally(M), Yadadri Bhuvanagiri District, to run the



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plant under Order No. 57117/PCB/RO-NLG/CFO/2017/248, dated 13.09.2017 (ANNEXURE-1). Further, the said consent was duly renewed under the Auto Renewal system through Order No. 57117/PCB/RO-NLG/CFO/2018/594, dated 05.07.2018 (ANNEXURE-2).

6. It is further submitted that, the 29<sup>th</sup> respondent has lawfully taken over the Hot Mix Plant, which had originally been set up in the name of Amulya Infratech (India) Ltd., Hyderabad, situated in Survey No. 78/A/1, Deshmukhi Village of Bhoodan Pochampalli Mandal, Nalgonda District. The said area which was initially falling under Nalgonda District is now falls within the jurisdiction of Yadadri Bhuvanagiri District in Telangana State.
7. Additionally, the Gram Panchayat Authorities had accorded necessary No Objection Certificate for the said plant, vide Proceedings No. GPD/27/2011, dated 10.08.2011 (ANNEXURE-3). Based on the report of the Tahsildar and the Screening Committee, the Revenue Divisional Officer, Bhongir, had also granted a No Objection Certificate vide NOC No. A/446/2011, dated 10.01.2012 (ANNEXURE-4) for establishment of the plant.
8. I further submit that, as per the inspection report of the Telangana State Pollution Control Board (TSPCB), it was clearly observed that the Hot Mix Plant/Quarry was not in operation at the time of inspection. This establishes that the allegation of continuous functioning without consent or compliance is baseless. The respondent has ensured that operations are carried out strictly in accordance with the valid permissions and consents granted by



the competent authorities and no activity is undertaken in violation of the prescribed norms.

In the above submissions and the documents annexed herewith, it is most respectfully submitted that Respondent No.29 has obtained all necessary consents and permissions to operate the unit. The allegations in the present Original Application are false, incorrect, and contrary to the facts and circumstances of the present case, and are therefore liable to be dismissed in limine with exemplary costs.

### PRAYER

In view of the above, it is most respectfully prayed that this Hon'ble Tribunal may be pleased to:

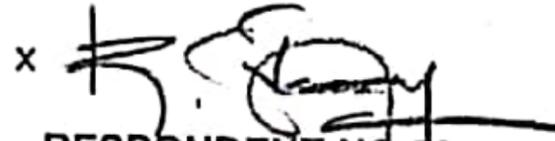
- a. Dismiss the above Original Application with exemplary costs insofar as the allegations raised against Respondent No.29 is devoid of merit, unsustainable both in law and on facts, and are based solely on presumptions and surmises.
- b. Pass such order or other order as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.


**VERIFICATION**

I, K. JANGA REDDY Son of Late Yadi Reddy aged about 61 years Rep by its Proprietor M/s **Nagarjuna Hy-tech Constructions** Hot Mix Plant In Survey Number 78, Desmukhi Village H.No 17-1-391/5/577, Singareni Colony, Saidabad, Hyderabad, Telangana-500059, do hereby verify that the contents of the above paragraphs are true and correct to the best of my knowledge and belief, and are based on legal advice and that I have not suppressed any material fact.

Dated at Chennai on this the 11th day of Dec, 2025

x   
RESPONDENT NO.29  




**TELANGANA STATE POLLUTION CONTROL BOARD**  
**REGIONAL OFFICE: NALGONDA**

H.No. 8-15, 1<sup>st</sup> Floor, Sri Lakshmi Complex, Near RTO Office, Sri Vinayaka Nagar, Hyderabad Road, Nalgonda-508 001

**CONSENT FOR OPERATION ORDER – FRESH – ORANGE CATEGORY**

Consent Order No. 57117/PCB/RO-NLG/CFO/2017 - 208 Date.13.09.2017

(Consent Order for Existing/New or altered discharge of sewage and/or trade effluents/outlet under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and amendments thereof, Operation of the plant under section 21 of Air (Prevention & Control of Pollution) Act 1981 and amendments thereof and Authorization / Renewal of Authorization under Rule 6 (2) of the Hazardous & Other Wastes (Management and Transboundary Movement) Rules, 2016

CONSENT is hereby granted under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974, under section 21 of Air (Prevention & Control of Pollution) Act 1981 and Authorization under Provision of Hazardous & Other Wastes (Management and Transboundary Movement) Rules 2016, (hereinafter referred to as 'the Acts', 'the Rules') and the rules and orders made there under to

M/s. Nagarjuna Hy-Tech Constructions,  
 Sy.No. 78/A,78/A/1, Deshmukh (V), Pochampally (M),  
 Yadadri Bhuvanagiri District.

(Hereinafter referred to as 'the Applicant') authorizing to operate the industrial plant to discharge the effluents from the outlets and the quantity of emissions per hour from the chimney as detailed below.

ii) **Outlets for discharge of effluents:**

Outlet No.	Description of outlet	Max. Daily discharge	Point of disposal
1	Domestic	0.3 KLD	Septic tank followed by soak pit

ii) **Emissions from chimneys:**

Chimney No.	Description of Chimney	Quantity of emissions in m <sup>3</sup> /hr. At peak flow
1	Stack attached to DG set of capacity 400 KVA	---
2	Hot Mix Plant of capacity 250 TPD	--

iii) **Hazardous Waste Authorization (Form-II) [See Rule 6(2)]:**

1. Number of Authorization and date of issue – 57117/PCB/RO-NLG/CFO/2017, Date: 13.09.2017.

2. The Occupier of, M/s. Nagarjuna Hy-Tech Constructions, is hereby granted an authorization to operate a facility for generation, collection, storage, transport, reuse and disposal of Hazardous Waste namely:

Sl. No	Name of the Hazardous waste	Stream	Quantity	Point of disposal
1	Used oil	--	50 LPA	Board's Authorized Recycler / Reprocessor OR TSDF i.e., M/s. Hyderabad Waste Management Project, Dundigal (V), Quthbullapur (M), RR District.

IV) This consent order is valid to manufacture the following products along with quantities only.

Sl. No.	Product	Quantity
1	Bitumen (Bituminous Black)	250 TPD

This Order is subject to the provisions of 'the Acts' and 'the Rules' and Orders made there under and further subject to the terms and conditions incorporated in the Schedule A & B enclosed to this Order.

This Consent Order shall be valid for a period ending with the 31st day of July, 2018.

*P. Jawahar*  
ENVIRONMENTAL ENGINEER  
ENVIRONMENTAL ENGINEER  
T.S. Pollution Control Board,  
Bhadrachalam District.

To  
M/s. Nagarjuna Hy-Tech Constructions,  
Sy.No. 78/A,78/A/1, Deshmukh (V),  
Pochampally (M),  
Yadadri Bhuvanagiri District.

Copy submitted to the JCEE, TSPCB, ZO, R.C.Puram, Sangareddy District for kind information.



**TELANGANA STATE POLLUTION CONTROL BOARD**  
**REGIONAL OFFICE: NALGONDA**

P. JAWAHARLAL, M.Tech  
ENVIRONMENTAL ENGINEER

H.No. 8-15, 1<sup>st</sup> Floor  
Sri Lakshmi Complex, Near RTO Office  
Sri Vinayaka Nagar, Hyderabad Road  
Nalgonda-508001, Ph:08682-248005

**AUTO RENEWAL CONSENT ORDER**  
**BY REGISTERED POST WITH ACKNOWLEDGEMENT DUE**

Order No. 57117/PCB/RO-NLG/CFO/2018 - 594, Dt:05.07.2018

Sub: TSPCB – CFO – M/s. Nagarjuna Hy-Tech Constructions, Sy.No.78/A, 78/A/1, Deshmukh (V), Pochampally (M), Yadadri Bhuvanagiri District – Auto Renewal of Consent for Operation – Order issued – Reg.

Ref.: 1. CFO Order No. 57117/PCB/RO-NLG/CFO/2017 - 248, Date.13.09.2017.  
2. TSPCB Resolution No. 26 and Circular dated 19.11.2015 & 08.12.2015.  
3. Industry's online application No.675 dated 26.06.2018 for Auto Renewal of CFO along with Self certification.

\*\*\*\*\*

- 1) The Board hereby renews the Consent for Operation (CFO) of the industry, issued vide reference 1<sup>st</sup> cited, for a period upto **31.07.2023** under 25/26 of the Water (Prevention and Control of Pollution) Act, 1974 and Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 and rules made there under.
- 2) This consent is issued under the auto renewal system of the Board vide reference 2<sup>nd</sup> cited and as per the self certificate submitted by **M/s. Nagarjuna Hy-Tech Constructions, Sy.No.78/A, 78/A/1, Deshmukh (V), Pochampally (M), Yadadri Bhuvanagiri District** vide reference 3<sup>rd</sup> cited.
- 3) All conditions stipulated in the CFO order issued vide reference 1<sup>st</sup> cited holds good. The Board reserves right to review, modify, revoke conditions and vary the validity period of CFO of the Board.
- 4) In case of any false certification, non-compliance of conditions / directions and deficiency in furnishing the information by the industry, the Board can withdraw the auto renewed consent and take action under provisions of relevant Acts & Rules including forfeiture of Bank Guarantee submitted by the industry for Rs.10,000/-, BG.No.6/2018, dt.19.06.2018 with validity period upto 31.07.2023.
- 5) Under auto renewal system, the industry shall apply at least 30 days before the expiry of the existing consent order for further renewals.

*P. Jawaharlal*  
**ENVIRONMENTAL ENGINEER**

ENVIRONMENTAL ENGINEER  
T.S. Pollution Control Board,  
Regional Office, Nalgonda.

To  
M/s. Nagarjuna Hy-Tech Constructions,  
Sy.No.78/A, 78/A/1, Deshmukh (V),  
Pochampally (M), Yadadri Bhuvanagiri District.

Copy submitted to:

1. The Member Secretary, TSPCB, Board Office, Hyderabad for information.
2. The JCEE, TSPCB, Zonal Office, R.C. Puram for information.

## గ్రామపంచాయతి కార్యాలయము, దేశ్ముఖి.

మండలం : భూదాన్ పోచంపల్లి, జిల్లా : నల్లగొండ. (ఆం.ప్ర)



జి.పి.డి/27/2011

తేది.....

తేది. 10-08-2011

### నిరభ్యంతర ధృవీకరణ పత్రము (NOC)

శ్రీమతి శృతినాయిని భర్త రాజశేఖర్ రావుల మరియు శ్రీ జంగారెడ్డి కందాడి తండ్రి యాది రెడ్డి గారు M/s. అమూల్య ఇన్ఫ్రాటెక్ (ఇండియా) లిమిటెడ్, హైదరాబాద్ వారు గ్రామపంచాయతి దేశ్ముఖ్ పరిధిలోని సర్వే నెం. 78/అ/1 లో హాట్మిక్స్ ప్లాంటు స్థాపించుటకు అనుమతి కొరకు ధరఖాస్తు సమర్పించినారు. తేది. 20-07-2011 న గ్రామ పంచాయతి దేశ్ముఖ్ సమావేశము M/s. అమూల్య ఇన్ఫ్రాటెక్ (ఇండియా) లిమిటెడ్ హాట్మిక్స్ ప్లాంటు స్థాపించుటకు నిటువంటి అభ్యంతరము లేదని ఎకగ్రీవముగా తీర్మానించడమైనది.

కావున గ్రామపంచాయతి దేశ్ముఖ్ మండలం భూదాన్ పోచంపల్లి, జిల్లా నల్లగొండలోని సర్వే నెం. 78/అ/1 లలో M/s. అమూల్య ఇన్ఫ్రాటెక్ (ఇండియా) లిమిటెడ్ హాట్మిక్స్ ప్లాంటు స్థాపించుకొనుటకు నిరభ్యంతర ధృవీకరణ పత్రము జారీచేయడమైనది.

పంచాయతి కార్యదర్శి

గ్రామ పంచాయతి దేశ్ముఖి

సర్పంచ్

గ్రామ పంచాయతి దేశ్ముఖి

శ్రీమతి శృతినాయిని భర్త రాజశేఖర్

మేనేజింగ్ డైరెక్టర్

ప్లాట్ నెం. 108, ఇంపీరియల్ మనార్,

ఇ.నెం. 6-3-865/1, అమీర్ పేట,

హైదరాబాద్-16.

# Gram Panchayat Office, Desamukhi.

Mandal : Bhudan Pochampally, District : Nalgonda (Am.P.)



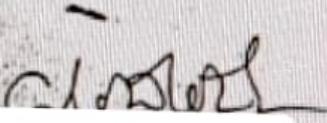
త.ప.డి/27/2011

That's it. 130-08-2011

## Show No Objection Certificate (NOC)

Mrs. Srutinaini's husband Rajasekhar Rao and Mr. Jangareddy Kandadi's father Yadi Reddy garu M/s. Amulya Infratech (India) Limited, Hyderabad under Gram Panchayat Deshmukh Survey No. In 78/A/1 application was submitted for permission to set up Hatmix plant. the date Gram Panchayat Desai meeting on 20-07-2011. M/s. It is unanimously decided that Amulya Infratech (India) Ltd. Patpel's cent has no objection.

So Gram Panchayat Deshmukh Mandal Bhudan Pochampally, District Nalgonda Survey no. In 78/1/1 M/s. Amulya Infratech (India) Limited Hot Mix Plant Issuance of no-objection certificate for establishment

  
Panchayat Secretary

Gram Panchayat Desamukhi

Mrs. Sruthinai's husband Rajasekhar is  
the Managing Director

Plot no. 108, Imperial Manor,  
E.No. 6-3-865/1, Ameerpet,  
Hyderabad 16.

O/o the Revenue Divisional Officer,  
Bhongir

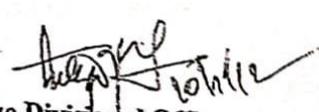
**NO-OBJECTION CERTIFICATE**

NOC. No. A/446/2011

Dated.10-01-2012.

Basing on the report of the Tahsildar, B.Pochampally Lr.No.B/4302/2010, Dt.21.12.2011, this is to certify that as per Chessala Pahani for the year 1955-58 the Sy.No.78 Admeasuring Ac. 16-15 gts situated at Deshmukhi village of B.Pochampally Mandal is a patta dry land. Out this to an extent Ac. 4-10 gts land was declared as Bhoodan land and the same is declared by the Bhoodan Yagna Bord Lr.No..BYB/A/96/2008, Dt. 08.12.2011.

Hence, the Screening Committee has decided to issue NOC in favour of the petitioners Sri. Chillara Jangaiah S/o Narsimha and Chillara Venkatesh S/o Narsimha both are resident of Deshmukhi Village to an extent of Ac.1-30 ½ gts dry land and to an extent of Ac. 1-30 ½ gts dry land total extent of Ac. 3-21 gts dry land in respect of land in Sy.No.78/AA situated at Deshmukhi Village of B.Pochampally Mandal.

  
Revenue Divisional Officer,  
Bhongir  
**BHONGIR**

To  
Sri. Chillara Jangaiah S/o Narsimha  
Sri.Chillara Venkatesh S/o Narsimha  
R/o Deshmukhi Village, B.Pochampally(M).

Copy to the Tahsildar, B.Pochampally Mandal.  
Copy to the Sub-Registrar, Bibinagar Mandal.

**BEFORE THE NATIONAL GREEN  
TRIBUNAL (SZ) BENCH  
AT CHENNAI**

**O.A.No. 09 of 2022 (SZ)**

**ADDITIONAL COUNTER AFFIDAVIT  
FILED BY 29<sup>TH</sup> RESPONDENT  
DATED 11.12.2025**

**M/s.**

**G STANLY HEBZON SINGH (3087/2009)**

**G VIGNESH (5568/2021)**

**V ANANTHA KRISHNAN (1031/2024)**

**Counsel For The 29<sup>th</sup> Respondent**