

**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 16<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,

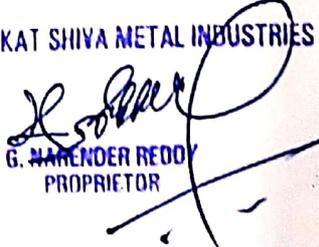
New Delhi-110003.

Phone: 011 24695262,24695265

Mail: [secy-moef@nic.in](mailto:secy-moef@nic.in) and 32 Others

...RESPONDENTS

...SRI VENKAT SHIVA METAL INDUSTRIES

  
G. NARENDR REDDY  
PROPRIETOR

**ADDITIONAL COUNTER AFFIDAVIT FILED ON BEHALF OF THE**  
**RESPONDENT NO.16**

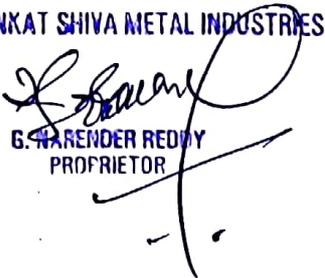
I, Guduru Narendar Reddy Son of Late Sambaasiva Reddy aged about 71 years, Rep by its Proprietor of **M/s. Sri Venkata shiva Metal Industry** Sy No. 56/A & 65/A, Deshmukhi H.No 1-5-577, Road No-3 New Maruthi Nagar Kothapet, Hyderabad Telangana – 500060, solemnly and sincerely affirms and make oath and state as follows:

1. I respectfully submit that, I am the 16th Respondent herein i.e., **M/s. Sri Venkata shiva Metal Industry** 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.16:-**

1. It is to submit that the Respondent No.16 herein is engaged in the business of operating an independent stone crusher at Sy No. 56/A & 65/A, Deshmuki, Pochampally mandal yadadri-Bhuvanagiri District Telangana

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**Allegations raised by the Applicant as against Respondent No.16**

2. I further submit that, the applicant has raised the following allegation as against the Respondent No 16 in paragraph 6(i) of the original application and the same is extracted below for the convenience of this Hon'ble Tribunal;

**H. Respondent No. 16, Sri Venkata Shiva Metal Industry. Sy, No 77,56,64, Desmukhi village pochampally Mandal, Yadadri-Bhuavangir**

*"After careful consideration of material facts of the case, the TSPCB Board hereby issued following directions to Crushing unit to comply within 10 days from the date of this order issued on 26-03-2021 & re-Issued. The Directions Again in the Month Of October 2021 for Not Complying the guidelines.*

- a) *The industry shall provide cladding to the vibrating screen so as to arrest the dust emissions.*
- b) *The industry shall cover the screen with M.S. Sheets so as to arrest the dust emissions.*
- c) *The industry shall provide an elevated closed bunker for collection of dust and the dust conveyor has to be fully covered with M.S. Sheets. Loading of dust shall be done directly into the trucks which should be brought below the bunker/ bins.*
- d) *The industry shall regularly carryout sprinkling of water at raw material loading and at transfer points to control dust emissions.*

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- e) *The industry shall construct wind breaking walls to prevent dust spreading to the surrounding areas.*
- f) *The industry shall construct metal roads within the premises.*
- g) *The industry shall carryout regular cleaning and wetting of the ground within the premises*
- h) *The industry shall develop greenbelt such that it shall not be less than 33% of total area, preferably along all sides of industry site, with width of not less than 5 meters of greenbelt.*
- i) *The suspended particulate matter measured between 3mtrs and 10mtrs from any process's equipment of a stone crushing unit shall not exceed 600 micrograms/m3.*
- j) *The industry shall take all precautionary and safety measures during process operations."*

**FINDINGS OF THE TELANGANA STATE POLLUTION CONTROL BOARD IN RESPECT OF RESPONDENT NO.16:**

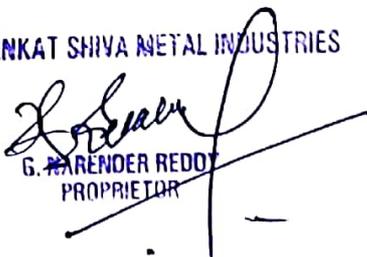
3. In response to the allegations raised by the applicant, the Telangana State Pollution Control Board has filed its report before this Hon'ble Tribunal on 20.04.2022. In the said report, at pages 25, 26 and 27, the TSPCB has clearly recorded the following observations, which are extracted hereinbelow:

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1. The Board has issued CFO of the Board to the industry vide order dated 04.10.2017 for manufacturing of Road Metal Stone Chips - 200 TPD which is valid upto 30.06.2022.
2. The industry has provided cladding to the primary crusher, secondary crusher, vibrating screen and conveyors to arrest the dust emissions.
3. The industry has covered the vibrating screen with M.S. Sheets to arrest the dust emissions.
4. The industry has provided elevated closed bunker for collection of The Dust.
5. The industry has provided water sprinklers at raw material loading point, and conveyors to control dust emissions.
6. The industry has provided wind breaking walls, with M.S. Sheets towards North, East and West side and provided Green cloth mesh towards South side along with boundary of the crusher
7. The industry has constructed metal roads/BT roads within the The premises.
8. The industry is using a water tanker for wetting of the ground and also provided water guns for suppression of dust.
9. The industry has developed greenery around the crusher.
10. The Board has reviewed the status of the industry in the External Advisory Committee meeting held at PSPCB Zonal

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Office, RC Puram on 25.09.2021. As per the recommendations of the Committee, the Board issued further directions to the Industry to comply vide order dated 11.10.2021 Annexure-3.

**11. The status of the compliance of the directions dated**

**11.10.2021 as follows:**

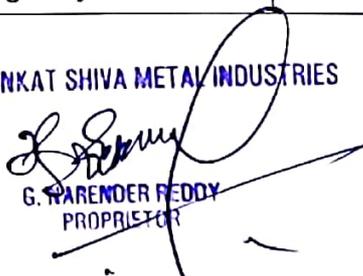
S.No	Directions	Compliance
1.	The industry in coordination with surrounding crushers shall in form an association and engage works for regular sweeping of the roads and sprinkling of water on the roads for controlling the fugitive dust emissions.	The industry has procured road other sweeping machine and other tanker co-ordination with other surrounding crushers and carrying out regular sweeping of the roads and water sprinkling on the roads for controlling the fugitive dust emissions.
2.	The industry shall ensure dust containment cum suppression system for the equipment.	The industry has provided water sprinklers at raw material loading point, and conveyors to control dust emissions.
3.	The industry shall provide/maintain cladding to the vibrating screen and crusher so as to arrest the dust emissions.	The industry has provided cladding to the primary crusher, secondary crusher, vibrating screen and to arrest the dust emissions.
4.	The industry shall regularly carry out sprinkling of water	The industry has provided water

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	at raw material loading and point, and conveyors to control at transfer points to control dust emissions.	sprinklers at raw material loading point, and conveyors to control the dust emissions.
5.	The industry shall construct wind breaking walls to prevent dust spreading to the surrounding areas.	The industry has provided wind breaking walls with M.S. sheets towards North, East and West side and provided Green cloth mesh towards South side along the boundary of the crusher
6.	The industry shall construct metal roads within the premises.	The industry has constructed metal roads/BT roads within the premises.
7.	The industry shall carry out regular cleaning and wetting of the ground within the premises.	The industry is using a water tanker for wetting of the ground and also provided water guns for suppression of dust.
8.	The industry shall not cause any air pollution/dust nuisance/odour nuisance in the surrounding environment.	Complied
9.	The industry shall not discharge any waste water	During inspection, no discharge of

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	outside the plant premises under any circumstances.	waste water was observed.
10.	The industry shall take all precautionary and safety measures during process operations.	Complied
11.	The industry shall maintain a good housekeeping in the premises. Maintained.	Maintained
12.	The industry shall develop a minimum of 5 mtrs width green belt all around the boundary of the unit and in vacant places with tall growing trees with wide leaf area. The area allocated for greenbelt shall not be less than 33% of total area of industry.	The industry has developed greenery around the crusher.
13.	The industry shall comply with ambient air quality standards of PM; TSPCB has conducted Ambient Air (particulate Matter size less than 10 um) 100 ug/m <sup>3</sup> , PMAs (Particulate Matter size less than 2.5 um) 60 ug/m <sup>3</sup> , SO <sub>2</sub> 80 ug/m <sup>3</sup> , NO <sub>2</sub> 80 ug/m <sup>3</sup> , outside the factory premises at periphery of the industry.	TSPCB has conducted ambient air Quality Monitoring on 10.03.2022 at NE direction and 03 mtrs distance of boundary wall of the industry. The PM10 value is 92 ug/m <sup>3</sup> as against the prescribed standard of 100 ug/m <sup>3</sup> which is meeting the standards. Analysis

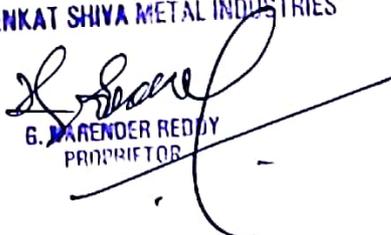
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		<i>Report is enclosed as Annexure-4.</i>
14.	<i>The industry shall comply with suspended particulate matter measured between 3 mtrs and 10 meters from any process equipment of a stone crushing unit shall not exceed 600 micrograms/m<sup>3</sup>.</i>	<i>TSPCB has conducted ambient air Quality Monitoring on 10.03.2022 at NE direction and 03 mtrs distance of boundary wall of the industry. The PM10 value is 92 ug/m<sup>3</sup> as against the prescribed standard of 100 ug/m<sup>3</sup> which is meeting the standards. Analysis Report is enclosed as Annexure-4.</i>

4. It is to reiterate that, the Telangana State Pollution Control Board, vide Order No. TSPCB/ZO/RCP/NLG/323/CFO/2017- dated 04.10.2017 **(ANNEXURE-1)**, issued **Consent for Operate (CFO)** in favour of 16<sup>TH</sup> Respondent in Sy No. 56/A & 65/A, Deshmuki, Pochampally mandal yadadri-Bhuvanagiri District Telangana, which is valid up to 30.06.2022, issued by the Member Secretary, TSPCB. It has been duly renewed from time to time in accordance with the other applicable laws, and remains valid,, thereby evidencing my continued compliance with all statutory requirements.
5. I further submit that, the Respondent No.16 has also obtained factory license from the Govt. of Telangana dated 01.01.2022 is annexed as

For SRI VENKAT SHIVA METAL INDUSTRIES

  
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(ANNEXURE-A2). These licenses, granted by the competent statutory authorities after due verification and satisfaction of all legal requirements, clearly establish that my operations are duly authorized and in strict compliance with the governing laws.

6. Furthermore, the Deputy Director of Mines & Geology, Hyderabad, by proceedings dated 28.08.2019, was pleased to grant me **Mineral Dealer Registration Licence** No. MDL7271179, valid for the period commencing from 28.08.2019 and expiring on 27.08.2024, in the name of **M/s. Sri Venkata shiva Metal Industry**, as evidenced by the true copy of the said license annexed hereto and marked as **(ANNEXURE 3)**.

On the foregoing submissions and the documents annexed hereto, it is most respectfully submitted that Respondent No.16 has fully complied with all directions issued by the TSPCB within the time prescribed in the notice. The present application, insofar as it raises allegations against the Respondent, merely reproduces the directions issued by the PCB, while the Applicant has overlooked the compliance report filed by the project proponent and failed to demonstrate that any non-compliance was continuous or beyond the time stipulated by the PCB. The allegations contained in the present Original Application are therefore false, incorrect, and contrary to the facts and circumstances of the case, and are liable to be dismissed in limine with exemplary cost.

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PROPRIETOR

**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.16 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, Guduru Narendar Reddy Son of Late Sambaasiva Reddy aged about 71 years Rep by its Proprietor **M/s. Sri Venkata shiva Metal Industry** Sy No. 56/A & 65/A, Deshmukhi H.No 1-5-577, Road No-3 New Maruthi Nagar Kothapet, Hyderabad Telangana – 500060, 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

For **SRI VENKAT SHIVA METAL INDUSTRIES**  
x   
**GUDURU NARENDAR REDDY**  
**RESPONDENT NO.16**  
PROPRIETOR



**TELANGANA STATE POLLUTION CONTROL BOARD**  
 Zonal Office, 25-35/11, Tulasi Reddy Complex, 2<sup>nd</sup> Floor,  
 Opp. Govt. ITI College, R.C.Puram, Sangareddy District - 502 032.  
 Phone : 08455 280477, website: tspcb.cgg.gov.in

**CONSENT ORDER RENEWAL - ORANGE CATEGORY**

**BY REGISTERED POST WITH ACKNOWLEDGEMENT DUE**

Consent Order No: TSPCB/ZO/RCP/NLG/323/CFO/2017-1697 Date: 04.10.2017.

(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.

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, (hereinafter referred to as 'the Acts', 'the Rules') and the rules and orders made thereunder to

M/s. Sri Venkata Shiva Metal Industries,  
 Sy No 56/A & 65/A,  
 Deshmukh (V), Pochampally (M),  
 Yadadri 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 chimneys as detailed below.

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

Outlet No.	Outlet Description	Max Daily Discharge	Point of Disposal
1	Domestic	0.5 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
-	--	---

This Consent Order is valid for manufacture of the following products along with quantities only.

S. No.	Products	Quantity
1	Road Metal Stone Chips.	200 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 shall be valid for a period ending with the 30<sup>th</sup> day of June, 2022.

To  
M/s Sri Venkata Shiva Metal Industries,  
Sy No 56/A 65/A 73/A 76/A 77/A,  
Deshmukh (V), Pochampally (M),  
Yadadri District.

**JOINT CHIEF ENVIRONMENTAL ENGINEER**



Factory Licence



## GOVERNMENT OF TELANGANA

## Department of Factories

## ACKNOWLEDGMENT OF ANNUAL LICENCE FEE PAYMENT

Registration Number	111032
Service Name	Payment of Annual Licence Fee
Factory Name	Sri Venkat Shiva Metal Industry
Address	-, deshmuki, Deshmukhi, Pochampalle, Yadadri
Licence Number	33561
<b>Fee Details</b>	
Arrears as on Date:29-12-2021 including Interest applicable (If Any)	0/-
Licence Fee Payable	120000/-
Adjustment on Licence Fee Payable as per the Amount already paid earlier	96000/-
Licence Fee Payable After Adjustment	24000/-
Interest on Licence Fee	0/-
Total Fee Paid	24000/-
Challan Number	6103135742
Payment Date	29-12-2021
Annual Licence Fee Valid From	01-JAN-2022
Annual Licence Fee Valid Upto	31-DEC-2022

77/A 15

ANNEXURE - A3



GOVERNMENT OF TELANGANA  
DEPUTY DIRECTOR OF MINES & GEOLOGY, HYDERABAD  
FORM - D  
MINERAL DEALER LICENCE  
(UNDER RULE - 2000)



Date:28.08.2019

Application No : MDL7271179

Mineral Dealer Licence is hereby granted to **Ms Sri Venkata Shiva Metal Industries** of **Road Metal** from his/their Mineral Dealer survey No **56/A and 65/A**, o/e. **6.520** (Ha) in **Deshmukhi** village of **B.Pochampally** Mandal of **YADADRI** District.

subject to the following terms & conditions and Mineral Dealer Details:

1. Name of the Dealer is **Ms Sri Venkata Shiva Metal Industries**
2. Father's Name /Application Type is **Individual**
3. Profession of the Dealer is
4. Mineral Dealer Licence is granted for **Processing, Storing, Selling, Trading**
5. Minerals/Ore will be purchased/procured from **Captive**
6. Payment of Application fee & Security deposit Transaction No. is **A060127**
7. The Mineral Dealer Licence is valid from this day **28.08.2019** and shall expire on **27.08.2024**.
8. Address of Applicant is **1-5-577, Road No.3, New Maruthi Nagar, Kothapet, Saroornagar (Village), Saroornagar (Mandal), RANGAREDDY (District)**.
9. Date of Application for this Registration is **28.05.2019**

*M. Venkateshwarlu*

Granted By.

Name : **M. Venkateshwarlu**

Designation : **Deputy Director of Mines & Geology**

Office : **HYDERABAD**

**Note** : This is a Digitally Signed Certificate, doesn't require physical signature.

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

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

**ADDITIONAL COUNTER AFFIDAVIT  
FILED BY 16<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 16<sup>th</sup> Respondent**