

**IN THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
APPEAL NO. 16 OF 2020**

**IN THE MATTER OF:**

Rukmini Chemicals Ltd. ...Appellant

VERSUS

Uttar Pradesh Pollution Control Board ...Respondent

**Objections of Appellant to UPPCB's Report dated 28.07.2022**

PAPER BOOK  
(PLEASE SEE INSIDE FOR INDEX)



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Place: New Delhi  
Date: 18.08.2022

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**Objections of Appellant to UPPCB's Report dated 28.07.2022**

1. The Appellant's erstwhile director (Mr.K.K. Jain) has been acquainted with a copy of the Report dated 28.07.2022 filed by the Uttar Pradesh Pollution Control Board (UPPCB) in the captioned case pursuant to the Order dt.12.11.2021 of this Hon'ble Tribunal in the captioned appeal.

2. At the outset it requires to be mentioned that Appellant is no longer in existence. By way of Gazette Notification dt.03.12.2020, issued pursuant to Public Notice dt.16.09.2020, the Registrar of Companies declared the Appellant company as being struck off the Register of Companies. Consequently, the Appellant stands dissolved under Section 248, Companies Act, 2013. True Copy of the relevant extracts of the Gazette Notification dt.03.12.2020 is annexed herewith as **Annexure A**.

3. However, without prejudice to the legal position drawing from such dissolution, for the sake of completeness, the erstwhile Director of the

Appellant – Kuldip Kumar Jain has preferred the Objections set forth herein, to the UPPCB's Report dated 28.07.2022.

4. It is relevant to note that even before preparation/filing of the Report dt.28.07.2022, the UPPCB had issued a Demand Notice dt.14.04.2022, assessing Appellant's liability as Rs. 46,89,51,039 on the basis of a deemed contribution of chromium waste of 10421.134 MT. Appellant has already filed IA No.128/2022 on 23.05.2022 in the captioned appeal before this Hon'ble Tribunal, challenging the said notice.

5. The Report dt.28.07.2022 filed by the UPPCB appears to be by way of afterthought considering that they had already issued Demand Notice dt.14.04.2022 without any scientific basis and in blatant violation of this Hon'ble Tribunal's Order dt.12.11.2021. The Report deserves to be rejected on this preliminary ground. Without prejudice, and for the sake of completeness, the answering deponent has however furnished the present objections, dealing with the merits of the Report dt.28.07.2022.

6. The UPPCB's Report dated 28.07.2022 contains the following factual assertions:

A. Assessment of contribution of chromium waste is based on the "production capacity of the industry".

B. Pursuant to this Hon'ble Tribunal's Order dt.12.11.2021, the replies of four of the noticees, *i.e.*, Khanna Vivek Chemical Pvt. Ltd. Unichem

India, IGS Chemicals Pvt Ltd., Rahman Industries Ltd., were found satisfactory and accordingly, the proceedings against these units were revoked.

C. None of the appellants before the Hon'ble NGT have furnished record of Form-1 and Form 13. The inspection report of Regional Officer, Kanpur Dehat/Kanpur Nagar of relevant period shows that the concerned industries have time and again, thrown their generated hazardous waste unscientifically outside their industry premises.

D. Therefore, the concerned industries were responsible for the dumping of hazardous waste and their liability is to be apportioned as per production and operation period.

7. On this basis, the UPPCB has entered the following conclusion against the Appellant herein:

Name & address of industry:	<i>M/s Rukmani Chemicals Pvt. Ltd. Rania, Kanpur Dehat</i>
Production capacity (MTD):	<i>3.5</i>
Operational Period:	<i>31.08.96 to Oct. 2005 NOC dated 31.08.96(110 month)</i>
Assessed quantity of dumped Chromium waste as per percentage of production (MT):	<i>About 15.021 percent of total waste based on production capacity (Chromium Waste 9300.346 MT.</i>
Revised Assessed quantity of	<i>9300.346+[15.021</i>

dumped Chromium waste after assessment of stored quantity in the premises (M.T.):	<i>*4652 (28.092+8.779+ 4.682+15.021+5.7 74)]=10421.134</i>
Revised Environmental Compensation	<i>46,89,51,039</i>

**8.** The aforesaid findings and conclusions contained in UPPCB's Report dt.28.07.2022, are incorrect, whimsical, capricious, and arbitrary. In the succeeding paragraphs, Appellant's erstwhile director sets out his objections to the report.

#### **Whimsical fluctuating assessments**

**9.** As per the Order dt.28.05.2020 (originally impugned in appeal), the UPPCB declared that that the Appellant was responsible for dumping **10372.9MT** and assessed liability thereon as **Rs.46,67,80,837**. The said assessment was stayed by this Hon'ble Tribunal on 04.01.2021 and the UPPCB thereafter gave Report dt.30.09.2021 stating that the Appellant had dumped **8168.162 MT** of chromium waste and must pay **Rs.36,75,67,299**. Even this assessment was found faulty, as evident from this Hon'ble Tribunal's Order dt.12.11.2021. Now, in the third instance, the UPPCB's Report dt.28.07.2022 has come out with the story that the Appellant is

responsible for dumping **10421.134MT** of chromium waste and liable to pay **Rs.46,89,51,039**. For ease of reference, the figures are tabulated below:

<b>Order dt.28.05.2020</b>	<b>Report dt.30.09.2021</b>	<b>Report dt.28.07.2022</b>
10372.9MT Rs.46,67,80,837	8168.162 MT Rs.36,75,67,299	10421.134 MT Rs.46,89,51,039

**10.** In all three instances, there is no scientific or rational basis for calculation. The chromium dumps in question are in existence since 1976 (as recorded by the Hon'ble Tribunal in various judicial orders). Yet, the dump of 62225 metric ton has been sought to be divided only among a few units, including Appellant that operated only between 1998-2004 on the basis of "production capacity".

**11.** It is relevant that the Order dated 15.11.2019 as passed in OA Nos.985-986/2019 speaks of chromium dumps and water pollution **at two sites:** (i) Rania, Village Khan Chandpur, District Kanpur Dehat (ii) Rakhi Mandi, Kanpur Nagar, which have been in existence since 1976. The said order records that the CPCB had filed a report on 30.10.2019 stating that both the contaminated sites located at Khan Chandpur and Rakhi Mandi require remediation of groundwater. The damages of Rs.280 crores (approx.) was apparently assessed as estimated cost for remediation of **both areas**. However, UPPCB has apportioned the waste only among the units in Kanpur Dehat in each instance.

12. UPPCB has failed to comply with the Order dt.12.11.2021 of this Hon'ble Tribunal.No scientific reasons have been furnished for the determination of quantum of waste and consequent liability. The Report dt.28.07.2022 has made an estimate on the basis of "production capacity", which methodology has not been approved hitherto. The same methodology was hitherto followed by the UPPCB in its Notice dt.28.05.2020, Reply to Appeal dt. NIL November 2020, Report dt.30.09.2021 filed in the captioned appeal. However, the said methodology was not approved by this Hon'ble Tribunal, as would be apparent from the Orders dt.10.07.2020, 04.01.2021 and 12.11.2021.

### **Unexplained escalation in quantity**

13. The total quantity of waste as assessed in the UPPCB Impugned Order dated 28.05.2020, Report dated 30.09.2021 an Report dt.28.07.2022 is 62225 MT. On the contrary, in 2009, as per the intimation of UPPCB itself, the total waste was assessed as 45000 MT. True and Typed Copy of the UPPCB Letter dated 01.04.2009 is annexed herewith as **Annexure 'B'**. Appellant had objected to the said communication categorically raising the plea that the dump was pre-existing Appellant's operations. True Copy of the Letter dt.10.07.2009 is annexed herewith as **Annexure 'C'**. The matter was not further actioned. It appears that between 2009 and 2019, the 45000

MT has gone up to 62225 MT as per UPPCB's own inspection. Indisputably, Appellant had shut down in 2004. Therefore, assuming but not conceding Appellant bore any responsibility, it could not be responsible for the escalation in quantity.

**14.** UPPCB has not disclosed the waste quantity as it stood in 2004. It appears that UPPCB has permitted other establishments/operators to continue with dumping activity beyond 2009 but affixed responsibility thereto to the appellants in the present batch of cases.

#### **Arbitrary exclusions of favoured units**

**15.** There were various other entities operating chromium-based units in the concerned area but the UPPCB has found some or the other reason to exempt or absolve such units of liability and conveniently accepted whatever explanation has been provided by other units which were issued show cause notices.

**16.** In the Report dt.28.07.2022, the UPPCB has given a clean chit to Khanna Vivek Chemical Pvt. Ltd. Unichem India, IGS Chemicals Pvt Ltd., Rahman Industries Ltd., accepting the explanation was furnished by them. For example, in the case of one IGS Chemicals Pvt Ltd., as per the Report dt.28.07.2022, representation was apparently received on **08.04.2022** by UPPCB and on **09.04.2022** itself, UPPCB accepted the explanation

furnished. Further, for the 'favoured' units, it appears that UPPCB has accepted the explanation on the basis of "actual production", rather than installed capacity, however, a different yardstick of "installed capacity" or production capacity is adopted for appellants. However, none of the objections nor explanations of the appellants before this Hon'ble Tribunal have found favour with the UPPCB. The UPPCB's slanted and biased approach speaks for itself.

17. The estimated figures (of waste and liability) are for mere convenience of the UPPCB whose only objective appears to be that the total Environmental Compensation of Rs.280.01 Crores has to be divided up among some pre-determined target units (i.e., the Appellants before this Hon'ble Tribunal).

#### **Failure to consider relevant facts pertaining to production**

18. The Appellant had consumed limited quantity of chromium ore and generated only limited chromium waste which is nowhere close to the quantity alleged to be dumped. The Appellant had submitted certain details regarding production, including total waste generated between 1998-2004: 175.323 MT (stored inside premises at the relevant time). True Copy of the Table of Production Details and Year-wise Chart of Rukmini Chemicals is annexed herewith as **Annexure 'D'**.

19. The Appellant's factory premises and machinery was possessed on 25.08.2009 by the UP Finance Corporation under Section 29, State Finance Corporation Act, 1951. Therefore, assuming but not conceding Appellant bore any responsibility, it could have been towards the waste as it stood in 2004, not from 2009 and certainly not in 2019. However, UPPCB has not disclosed the waste quantity as it stood in 2004.

20. It is relevant that this Hon'ble Tribunal had itself taken cognizance of the objections filed, in the Order dt.12.11.2021. However, the Objections dt.08.11.2021 filed before this Hon'ble Tribunal have not been noticed, let alone considered by the UPPCB. Once again, this approach points to the biased and pre-determined mindset of the UPPCB.

**Irrelevant documents furnished as "basis"**

21. None of the documents filed with the Report dt.28.07.2022 indicate the quantum of waste alleged to be dumped by the Appellant to be anywhere close to 10421.134 MT. The barely legible documents filed (in Hindi) by UPPCB appear to pertain to a period *prior to closure of Appellant's unit in 2004*. As such, these documents nowhere support the UPPCB's conclusion as to responsibility of the Appellant in dumping to the extent of 10421.134 MT.

**22.** The basis (i.e., adverse materials) on which the UPPCB has purported to arrive at the quantum of waste and liability have thus not been furnished. The documents furnished bear little or no nexus to the exercise required to be carried out pursuant to this Hon'ble Tribunal's Order dt.12.11.2021.

**23.** Since the premises of the unit was transferred to a third party a long time ago, the Appellant's Ex-Director had repeatedly corresponded with UPPCB for checking the stored waste within the premises. Translated Copy of the Letters dt.23.04.2022, 25.04.2022 and 09.05.2022 are annexed herewith as **Annexure E**. UPPCB made correspondence to undertake inspection vide letter dt.09.06.2022 but did not do so, for reasons only known to them. Translated copy of the Letter dt.09.06.2022 of UPPCB is annexed herewith as **Annexure F**. However, the UPPCB did not undertake the appropriate inspection. Instead, an arbitrary figure of 10421.134 MT has been entered as the contribution of Appellant to the dump.

#### **Improper legal basis for calculation of damages**

**24.** The Report dated 28.07.2022 has relied upon a formula prepared by the CPCP under the Hazardous and other Waste (Management and Transboundary Movement) Rules, 2016 being,

*"Environmental Compensation (EC) = Q X ERF X R where 'Q' is observed quantity of waste; ERF is environmental risk factor and R is environmental compensation factor @ Rs.30000."*

**25.** This formula, as issued under the 2016 Rules, cannot retrospectively apply qua an alleged violation ending in 2004. Reliance is placed on Rule 1(2) of the 2016 which states that the Rules come into force on the date of their publication in the gazette (which is 04.04.2016). The 2016 Rules or guidelines issued thereunder, being subordinate legislation / executive instructions cannot carry retrospective effect for calculation of damages in respect of alleged dumping upto 2004. Of particular relevance is the 'R' factor taken @ Rs.30000, which benchmark of 2016 would have likely been different if the formulation was to apply for 2004.

**26.** Assuming but not conceding that the 2016 formula can be applied, the 'Q' factor (quantity of waste) has been incorrectly assessed, as a matter of fact, for the reasons already mentioned above. Going by UPPCB's own Letter of 01.04.2009, the maximum applicable penalty was much lesser with the disposal charge being Rs.1500 per tonne.

### **Laches**

**27.** The entire exercise is highly belated and hit by laches. The Appellant was non-functional for a very long time. It is now non-existent having been

dissolved. It had neither the resources nor materials to defend itself. The very process of requiring the Appellant to defend itself against alleged acts/omissions which relate back to two decades is untenable, hit by delay and laches.

**28.** The exercise undertaken by the UPPCB was quasi-judicial in nature. It has resulted in a serious civil liability. Even if there is no express provision of limitation for initiation of proceedings of compensation for environmental damage, the proceedings cannot be launched after 15 years of closure of the unit and in respect of dumps in existence since 1976 (well before the incorporation/existence of Appellant). Such proceedings, being quasi-judicial in nature, ought to have been initiated within a reasonable time as held by the Hon'ble Supreme Court in the following cases:

- (a) *Shalimar Works Ltd. v. Workmen*, AIR 1959 SC 1217, which holds that though the Industrial Disputes Act, 1947, does not prescribe limitation for reference of disputes, nonetheless disputes ought to be referred to the tribunal within a reasonable time-frame. Such interpretation was given though Section 10 of the Industrial Disputes Act in fact permits reference of industrial dispute “at any time”. This position reiterated in *Prabhakar v. Sericulture Department*, (2015) 15 SCC 1.
- (b) *Chhedi Lal Yadav v. Hari Kishore Yadav*, (2018) 12 SCC 527. A prayer for repossession of land was filed by farmers after a lapse of 24 years in

terms of Bihar Kosi Area (Restoration of Lands to Raiyats) Act, 1951. It was contended that the statute a welfare legislation and ought to be read so as to benefit the Raiyat farmers, in matters of delay. It was contended that there was no provision of limitation regarding suo moto exercise of power by the authority for restoration of land. The Supreme Court rejected the contention on the ground that even if there is no limitation against suo moto exercise of power, there cannot be any exercise of power after a long lapse of time. Similar position has been enunciated in *Collector v. D. Narsing Rao*, (2015 3 SCC 695).

**29.** Though the Interim Order dated 04.01.2021 of this Hon'ble Tribunal has expressed a prima facie view against the plea of limitation (on the ground that there is absolute liability under the "polluter pays" principle), it is respectfully submitted that even the doctrine of "absolute liability" premised on the "polluter pays" principle does not enable the Pollution Control Board to initiate proceedings for imposition of penalty beyond a reasonable time-frame.

**30.** For example, Section 15(3) of the NGT Act permits the apex authority in the field of environmental law enforcement - i.e., this Hon'ble Tribunal, to entertain applications for compensation within 5 years of the date of cause of action, as first accrued. This shows that there is **no** legislative intent to permit an open-ended and indefinite period for assessment/demand of

compensation on the doctrine of absolute liability. When such is the case for the apex body, it ought **not** to be implied that the State Pollution Control Board enjoys unlimited power to impose and assess damages for any length of time.

**31.** In the interim order dated 04.01.2021, the Hon'ble Tribunal relied on the judgement in *Hindustan Times v. UOI*, (1998) 2 SCC 242 to observe that limitation is not applicable to the case. However, the aforementioned precedent also takes note of the principle that the defence of delay can be availed where prejudice is pleaded and proved.

**32.** In the present case, prejudice has been consistently pleaded both before the authority (UPPCB) and this Hon'ble Tribunal. The Appellant's unit was shut in 2004. There was no production for 15+ years. The impugned proceedings of the UPPCB seeks to penalise Appellant for alleged dumping of waste from 1976 for which the UPPCB is not able to produce any record other than rely on hypothetical "production capacity". Petitioner was not even in existence from 1976. The dumps in question admittedly existed since 1976 while the Appellant operated only between 1998-2004. UPPCB has failed to disclose as to the quantity and extent of the dumps as they existed, prior to the operation of the Appellant. Appellant had never dumped any waste outside its premises during the brief period that it was in operation. As the matter is very stale and production has long ceased,

Appellant has found it extremely difficult to make its defence on facts. Appellant has been unable to marshal contemporaneous evidence of wrongdoing of other persons/third parties who may have been the actually entities responsible for the dumping in the areas concerned. Such prejudice is irreversible. Appellant relies on the principle enunciated in *State of Punjab v. Chaman Lal Goyal*, (1995) 2 SCC 570.

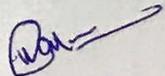
**33.** Furthermore, if any reliance is to be placed on the documents furnished with Report dt.28.07.2022, UPPCB was fully aware more than 15 years ago, of the alleged dumping, if any. It was thus capable of taking appropriate measures against the erring units at the relevant time that the alleged dumping was detected. It is unlawful and belated for UPPCB to levy environmental compensation 15 years after discovery of alleged violation.

**34.** Appellant's ex-director reiterates all other grounds and submissions hitherto made in the appeal, Objections dt.08.11.2021 filed before this Hon'ble Tribunal to UPPCB Report dt.30.09.2021 and IA No.128/2022 filed in the captioned appeal respect of UPPCB's Demand Notice dt.14.04.2022.

**35.** Appellant's ex-director respectfully submits that the Appeal may accordingly be allowed and the Impugned Order dt. 28.05.2020 and

Report dated 30.09.2021 set aside, insofar as the Appellant is concerned.

AND FOR THIS ACT OF KINDNESS THE APPELLANT AS IS DUTY BOUND SHALL EVER PRAY

<p>Filed on: 18.08.2022</p>	<p> KULDIP KUMAR JAIN (Ex-Director of Rukmini Chemicals Ltd)</p> <p> ADVOCATE FOR THE APPELLANT: SANTHOSH KRISHNAN</p>
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Rukmini Chemicals Ltd.

... Appellant

VERSUS

Uttar Pradesh Pollution Control Board

... Respondent

**AFFIDAVIT**

I, Kuldip Kumar Jain, age about 64 years, son of Late SC Jain, residing at 102, Shivalik Samriddhi Apartment, 7/168-B, Swaroop Nagar, Kanpur 208002 solemnly affirm and state as under:

1. I was the Director of the Appellant (now dissolved). I am conversant with the facts of the case in such capacity. I am thus competent to affirm this affidavit.
2. The facts set forth in the accompanying Statement of Objections are true to my knowledge based on the records of the Appellant. Legal submissions made in the Objections are based on legal advice received and believed to be true.
3. Documents annexed with the Statement of Objections are true/typed/translated copies of their respective originals.

**DEPONENT**

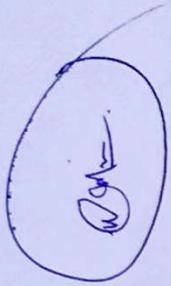


**VERIFICATION**

Verified on this \_\_\_ day of August 2022 at \_\_\_\_\_ that the contents of the foregoing affidavit are true and correct, to the best of my knowledge, information and belief. Nothing false is stated therein and no material fact concealed therefrom.



**DEPONENT**



18.8.22



Sworn before me this day at \_\_\_\_\_  
by Kundip Kumar Jain  
to whom the Contents of the affidavit  
have been read over and explained who  
is identified by Shree Sambhu Krishnan A  
Nath Commissioner Kanpur Nagar

Rohitosh Wasin  
Advocate

## ANNEXURE - 'A'

1462

THE GAZETTE OF INDIA, DECEMBER 19, 2020 (AGRAHAYANA 28, 1942)

[PART III—SEC. 1

Sl. No.	Name of Officer (Shri/Smt.)	Office in which charge taken over	Date of taking over Charge.
84.	Guru Prasad, Assistant Commandant (Ministerial) [IRLA-12008]	Dy. Inspector General of Police, Group Centre, Central Reserve Police Force, Gandhinagar.	30/06/2020(FN)

B. K. SHARMA  
DIG [ORG]

New Delhi, the 27th November 2020

No. O.II-4113/2017-Pers-DA-6—Consequent on acceptance of technical resignation by the competent authority, Dr. Ankam Srinivas, Medical Officer (Asstt. Comdt.) (IRLA-11218) of Composite Hospital, CRPF, Bhubaneswar has relinquished the charge of his post in the afternoon of 21/10/2020. Accordingly, his name is deleted from the rolls of the Force w.e.f. 21.10.2020 (AN).

B.S. GUJRAL  
DIG (Pers)

The 3rd December 2020

No. O.II-11615/2020-Pers(A/C)—Regret to notify that Sh. Nitin P. Bhalerao, Assistant Commandant (IRLA No. 11615) of 206 CoBRA Bn, CRPF, Karanpur, Jagdalpur, Chhattisgarh was Martyred on 28/11/2020 due to IED Blast during operational duty. Accordingly, he has been struck off from the strength of this Force with effect from the same date i.e. 28.11.2020 (AN).

B.S. GUJRAL  
DIG (Pers)

## DIRECTORATE GENERAL, CENTRAL INDUSTRIAL SECURITY FORCE

New Delhi-110003, the 1st December 2020

No. E-16013/RR-DG/2018-Pers-II/1684—On attaining the age of Superannuation, Shri Rajesh Ranjan, IPS (BH:1984), has relinquished the charge of the post of Director General, Central Industrial Security Force, New Delhi with effect from the afternoon of 30th November, 2020.

(Authority : MHA O.M. No. I-21019/02/2018-IPS.III dated 11.04.2018)

Sd./ILLEGIBLE  
Director General/CISF

The 2nd December 2020

No. E-16015/CISF/DIG-DEP-/PJ-IPS/2020-Pers-II/1685—The President is pleased to appoint Smt. Param Jyoti, IPS (RJ:2005) as Deputy Inspector General, Central Industrial Security Force, New Delhi in the Level-13A of Pay Matrix on deputation basis for a period of five years from the date of assumption of the charge of the post or till further orders whichever is earlier. The officer joined CISF HQrs. New Delhi on 23.11.2020 (FN).

The officer has been taken on strength in CISF w.e.f. 21.11.2020 (FN) as the officer relinquished the charge from the post of Director, Intelligence Training Academy, Jaipur w.e.f. 20.11.2020 (AN).

(Authority : MHA O.M. No. I-21016/15/2020-IPS.III dated 20.10.2020)

Sd./ILLEGIBLE  
Director General/CISFMINISTRY OF CORPORATE AFFAIRS  
(REGISTRAR OF COMPANIES)

In the matter of the Companies Act, 2013 and of the following companies

Kanpur-208001, the 3rd December 2020

No. LC/248(1)/2020/STK-7/2559—This is with respect to this office Public Notice No. 89 to 113 dated 16.09.2020, applications in form No. STK-2 filed by the respective companies and notice in STK-6 published on 24.10.2020. Notice is

Sl. No.	SRN	CIN	Company Name
684	H80306434	U80904UP2017PTC099347	RGS ENLIGHTENMENT PRIVATE LIMITED
685	R42316406	U74990UP2018PTC109083	RGS FILLING STATION PRIVATE LIMITED
686	H81076036	U18209UP2018PTC105584	RHUMBLINE EXIM PRIVATE LIMITED
687	R22342190	U51109UP1991PTC012881	RICHA SALES PRIVATE LIMITED
688	R35124197	U74120UP2013PTC057494	RIGHT ADVICE CONSULTANCY PRIVATE LIMITED
689	R29666823	U74999UP2017PTC089457	RIR PROJECT CONSULTANT PRIVATE LIMITED
690	H16947012	U74999UP2017PTC097395	RISARE HUNT PRIVATE LIMITED
691	H85952422	U74999UP2016PTC083452	RISING NEWS PRIVATE LIMITED
692	R00087908	U24304UP2018PTC111184	RJA AMOGH PHARMACARE PRIVATE LIMITED
693	H58768284	U80302UP2005PTC030389	RLS COLLEGE OF PROFESSIONAL STUDIES PRIVATE LIMITED
694	R21765532	U74120UP2016PTC076534	RMB OVERSEAS PRIVATE LIMITED
695	R48815567	U74999UP2018PTC109850	RMG AND ASSOCIATES PRIVATE LIMITED
696	R48617427	U45309UP2018PTC110650	RMG CONSTRUCTIONS PRIVATE LIMITED
697	R08435281	U01403UP2012PTC050238	ROBUST FARM TRADING PRIVATE LIMITED
698	R26412015	U60100UP2015PTC074031	ROHIRRIM DELIVERY INFOSYSTEMS PRIVATE LIMITED
699	R48455364	U74120UP2013PTC055879	RPI CONSULTANTS INDIA PRIVATE LIMITED
700	H78287901	U74120UP2012PTC051075	RRKS HOMEBUILD PRIVATE LIMITED
701	H65351918	U74120UP2015PTC069932	RSDIGI SALES PRIVATE LIMITED
702	R48658546	U70200UP2018PTC103554	RUDRABHOOMI INFRAESTATE PRIVATE LIMITED
703	R14392138	U24111UP1995PLC018543	RUKMINI CHEMICALS LIMITED
704	R35342054	U40300UP2017PLC094270	RURAL RENEWABLE INDIA LIMITED
705	R23537723	U72900UP2018PTC108099	RWIDTH CONSULTING PRIVATE LIMITED
706	H83451278	U52393UP2010PTC040693	S G ORNAMENTS PRIVATE LIMITED
707	R33626391	U72900UP2017PTC092736	S&D INVESTIGATION PRIVATE LIMITED
708	R31329527	U55204UP2010PTC040322	S. S. RESIDENCY PRIVATE LIMITED
709	R35736008	U23200UP1994PTC016997	S.E.W. OXYGEN PRIVATE LIMITED
710	R45824802	U74999UP2019PTC113022	S.J SHARDA POWER ELECTRICAL PRIVATE LIMITED
711	H92793538	U50102UP2012PTC053788	S.M.A. AUTOMOBILES PRIVATE LIMITED
712	R46191219	U45400UP2007PTC034212	SADABAHAR BUILDWELL PRIVATE LIMITED
713	R31350853	U72300UP2012PTC054181	SAGVIN TECHNOLOGIES PRIVATE LIMITED
714	R44520153	U15140UP1983PTC006352	SAHAI TRACTOR AUTOMOBILES PRIVATE LIMITED
715	R53536462	U14292UP2018PTC100022	SAHARANPUR MINERALS PRIVATE LIMITED
716	R46923645	U74999UP2018PTC106560	SAHYOG HR SOLUTIONS PRIVATE LIMITED
717	R36063246	U74120UP2009PTC037966	SAI ACADEMY PRIVATE LIMITED
718	R34924530	U45400UP2012PTC050120	SAI BABA INFRAESTATE PRIVATE LIMITED
719	R31436546	U01403UP2013PTC058674	SAISORTEX RICE INDUSTRIES PRIVATE LIMITED
720	H91888586	U74120UP2012PTC048652	SAMICS RESEARCH MATERIALS PRIVATE LIMITED
721	R35212299	U74999UP2017PTC090185	SAMRIDDHI CABS INDIA PRIVATE LIMITED
722	R24310500	U19129UP2017PTC099788	SAMUEL DANTE FASHIONS PRIVATE LIMITED
723	H81700775	U72300UP2013PTC057540	SANBRAIN GLOBAL PRIVATE LIMITED
724	R00524835	U67120UP2006PTC032116	SANGHITA SECURITIES PRIVATE LIMITED
725	H43353754	U74999UP2017PTC094269	SANS MEDIA TECHNOLOGY PRIVATE LIMITED
726	R33111253	U93030UP2012PTC051565	SANSKAAR ACCOMMODATIONS PRIVATE LIMITED
727	R07862931	U14220UP2012PTC052539	SANSKRUTY INTERCONTINENTAL PRIVATE LIMITED
728	R22263727	U17299UP2016PTC084376	SANVITEXILES PRIVATE LIMITED
729	R34997882	U18109UP2011PTC044845	SARA FASHIONS PRIVATE LIMITED
730	R34268425	U24233UP2014PTC067099	SARALTECH INDUSTRIES PRIVATE LIMITED
731	H89811145	U72900UP2016PTC088363	SAROHI TECHNOLOGIES PRIVATE LIMITED
732	R46410254	U45201UP2005PTC030828	SARV SHAKTI REAL ESTATE PRIVATE LIMITED

Sl. No.	SRN	CIN	Company Name
960	R01258714	U72900UP2018PTC111062	XADAC DIGITAL SECURITY PRIVATE LIMITED
961	R30530240	U32309UP2017FTC092498	XIKE MOBILE (INDIA) PRIVATE LIMITED
962	R29438942	U70200UP2018PTC106752	XO PROJECTS PRIVATE LIMITED
963	R29910593	U74999UP2016PTC086358	XTRAA CLASSES LEARNING SOLUTIONS PRIVATE LIMITED
964	R35412907	U52609UP2018PTC100035	Y. R. J. INDIA MART PRIVATE LIMITED
965	R25769019	U70103UP2016PTC087980	YAGYA MITRA PRIVATE LIMITED
966	H80245434	U45101UP2018PTC108271	YARD SQUARE INFRA HEIGHTS PRIVATE LIMITED
967	H90415597	U45400UP2009PTC037897	YASH PROPBUILD PRIVATE LIMITED
968	R45562337	U36999UP2017PTC092748	YH GEMS AND JEWELS PRIVATE LIMITED
969	H80339625	U74900UP2013PTC055416	YOUTUKTUK TRAVELS PRIVATE LIMITED
970	H86229069	U70102UP2013PTC055185	YUVA BUILDTECH PRIVATE LIMITED
971	H87099297	U80904UP2014PTC066425	Z2A COACHINGWALA PRIVATE LIMITED
972	R04835674	U45309UP2017PTC089346	ZAMZAM GREENCITY PRIVATE LIMITED
973	H45766987	U45400UP2013PTC054601	ZASTECH CONSTRUCTION PRIVATE LIMITED
974	R36142339	U51101UP2016PTC075728	ZECOEX TECHSERVE PRIVATE LIMITED
975	R40263899	U72900UP2017PTC095711	ZIGAMES INFOTECH PRIVATE LIMITED
976	R36058329	U74999UP2017PTC098382	ZONE NET SOFTWARE PRIVATE LIMITED
977	H63480438	U40100UP2017PTC090903	ZONNE SOLAR TECHNOLOGIES PRIVATE LIMITED
978	H78276276	U74999UP2018PTC105530	ZORA COMMUNICATION PRIVATE LIMITED
979	R30607071	U74120UP2013PTC055400	ZYCHEMLIFE HEALTHCARE PRIVATE LIMITED
980	H78139870	U33309UP2018PTC100071	ZYNA VENTURES PRIVATE LIMITED

SUDHIR KAPOOR  
Registrar of Companies  
Uttar Pradesh

In the matter of LLP Act, 2008 and of the following LLPs

Bangalore-560034, the 1st December 2020

No. ROCB/LLP-Rule 37 Sub-Rule (3)/2020-58 LLPs—Notice is hereby given pursuant to Sub-Rule (3) of Rule 37 of Limited Liability Partnership Rules, 2009 that names of the following Limited Liability Partnerships which applied for strike off in Form LLP-24 with the office of Registrar of Companies, have this day been struck off from the register and the said LLPs are dissolved :—

Sl. No.	LLP No.	Name of LLP	SRN No. of form 24
1	AAG-4499	BRAIN SMART LABS LLP	M14320568
2	AAH-1650	HARNIT FOODS LLP	M14317648
3	AAG-3748	SANTALUM LLP	M14300495
4	AAJ-7924	UNICO AGGREGATES LLP	M14280291
5	AAJ-7925	UNICO CRUSHER LLP	M14280093
6	AAL-2426	FITNCALM LLP	M14221048
7	AAL-2336	YOGAMITRA TECHNOLOGY AND ALLIED SERVICES LLP	M14201222
8	AAC-3136	EDECOSYS SYSTEMS LLP	M14132799
9	AAM-1954	MY GREEN ENERGY SOLUTIONS LLP	M14116925
10	AAB-9705	LIMERICK VENTURES LLP	M14112551
11	AAN-2778	SPHEREBOX DISTRIBUTION LLP	M14077002
12	AAE-7698	CAMPANULA CONSULTING SERVICES LLP	M14066013
13	AAG-2571	APRANJE GLOBAL CONSTRUCTIONS LLP	M14060719

  
True Copy

EXHIBIT-7A

The Member Secretary,  
Central Pollution Control Board,  
East Arjun Nagar, Sahasra,  
Delhi - 110032

Subject: **imposing fine under Section 16(3) of the Hazardous Waste Rules, 1989 against Basic Chrome Sulphate (BCS) units of Kanpur Dehat.**

Kindly refer your letter no. B-29016 (SC)/1/06/HWMD/2118 dated 09-06-06 on the above subject. Six industries producing Basic Chrome Sulphate are operating at Khandpur Village, Raina, Kanpur Dehat for last fifteen years. They have dumped their Hazardous waste, containing Chromium in open ground of approx. 200 X 100 meter and not taking any treatment. The ground water and the soil of this area is therefore polluted. The Institute of Environmental Research, Kanpur has estimated the quantity to be dumped in open ground by these industries as given below:

1. M/s. Khandpur Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.
2. M/s. Khandpur Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.
3. M/s. Khandpur Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.
4. M/s. Waris Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.
5. M/s. Anand Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.
6. M/s. Rukmani Chemicals Pvt. Ltd., Khandchandpur, Raina, Kanpur Dehat.

It is also to mention that closure order has been issued to these industries under Hazardous Waste Rules and presently they are all in close.

These units have not agreed to dispose off the Hazardous Waste legally dumped by them into TSDI constructed at Kumbhari, Kanpur Dehat nor they are ready to equally share the expenditure. A Meeting between the representatives of these industries and T.S.D.F. operator was held in the presence of U.P. Pollution Control Board officials on 01.06.12.06 but these industries were not ready to pay Rs. 1500/Ton as required by T.S.D.F. operator at the time.

Total hazardous BCS waste lying at sites as per I.I.T.R. study report, is around 40,000 tonnes. Taking transportation, stabilization & disposal charges in Secured Land Cell @ Rs. 1,500/tonne, total Expenditure worked out is Rs. 6.75 crores and thus Fine charges for each industry will be Rs. 1.125 crore only (Rs. One Crore Twelve lacs and fifty thousand only).

Contd. ....

(2)

As evident from the above, these six industries which have illegally dumped Hazardous Waste at Rania, Kanpur Dehat are not realising their responsibility to rectify the harms done to the environment. They are least interested in shifting and proper disposal of the illegal Hazardous Waste dumped by them.

Therefore a fine of Rs. 1.125 crore is recommended on each of above Industries so that the expenditure incurred in lifting and disposal of Hazardous Waste at TSDF, Kumbhi, Kanpur Dehat can be recovered.

In the above circumstances, kindly give necessary approval for imposing the fine on these six industries under section 16(3) of the Hazardous Waste Rules, 1989 so that the fine can be imposed on the above defaulters and the fine money can be used for lifting the dump Hazardous Waste to TSDF.

Yours faithfully,

(Dr. C.S. Bhatt)  
Member Secretary

01.04.09

The Member Secretary,  
Central Pollution Control Board,  
East Arjun Nagar, Shahdara,  
Delhi-110032.

**Subject: Imposing fine under Section 16(3) of the Hazardous Waste Rules, 1969 against Basic Chrome Sulphate (BCS) units of Kanpur Dehat.**

Dear Sir,

Kindly refer your letter No. B-29016(SC)/1/08/HWMD/2018 dated 09.06.08 on the above subject. Six industries producing Basic Chrome Sulphate are operating at Kanpur Village, Raina, Kanpur Dehat for last fifteen years. They have dumped their hazardous waste containing Chromium in open ground of approx. 200 x 100 meter (illegible). The details of the industries are given below:

- 1.M/s CeruleanChemicals Pvt. Ltd. Khandchandpur, Raina, Kanpur, Dehat.
- 2.M/s ChandniChemicals Pvt. Ltd. Khandchandpur, Raina, Kanpur, Dehat.
3. M/sHilgersChemicals Pvt. Ltd. Khandchandpur, Raina, Kanpur, Dehat.
4. M/s Waris Chemicals Pvt. Ltd. Kanchandpur, Raina, Kanpur Dehat.
5. M/s AmeliaChemicals Pvt. Ltd. Khandchandpur, Raina, Kanpur, Dehat.
- 6.M/sRukmaniChemicals Pvt. Ltd. Khandchandpur, Raina, Kanpur, Dehat.

It is also information that closure order has been issued to these industries, under Hazardous Waste Rules (illegible).

These units have not agreed to dispose of the Hazardous Waste illegally disposed by them to TSDS constructed as Kumbhi, Kanpur Dehat nor they are ready to any share the expenditure. A Meeting between the representatives of those industries and T.S.D.F. operator was held in the presence of U.P. Pollution Control Board on 26.12.05 but these industries were not ready to pay Rs.1,500/Ton (illegible).

Total hazardous BGS waste wing at site as per I.I.T.R. study report, is around 45,000 tones, taking transportation, stabilization & disposal charges

in Secured Land @ Rs. 1,500 tonne, total Expenditure worked out is Rs.6.75 crores and thus Fine charges for each Industry will be Rs.1.125 crore only (Rs.One Crore Twelve lacs and fifty thousand only).

As evident from the above these six industries which have illegally dumped Hazardous Waste at Rania, Kanpur Dehat are not realizing their responsibility to rectify the harms done to the environment. They are least interested in shifting and proper disposal of the illegal Hazardous Waste dumped by them.

Therefore a fine of Rs. 1.125 crores is recommended on each of above Industries so that the expenditure incurred in lifting and disposal of Hazardous Waste at TSDF, Kumbhi, Kanpur Dehat can be recovered.

In the above circumstances, kindly give necessary approval for imposing the fine on these six industries under Section 16(3) of the Hazardous Waste Rules, 1989 so that the fine can be imposed on the above defaulters and the fine money can be used for lifting the dump Hazardous waste to TSDF.

Yours faithfully,

Sd/-  
(Dr. C.S. Bhatt)  
Member Secretary



**TRUE TYPED COPY**

## ANNEXURE - 'C'

**Address for communication :**10<sup>th</sup> July 2009

CERULEAN CHEMICALS PVT. LTD. ,  
128 CLYDE HOUSE, THE MALL,  
KANPUR – 208004 (UP)

TO,  
THE MEMBER SECRETARY,  
CENTRAL POLLUTION BOARD,  
EAST ARJUN NAGAR,  
DELHI.

**RE: Hazardous waste of BCS manufacturing units at Khanchandpur  
Rania, Kanpur Dehat (UP)**

Dear sir,

This humble submission is with reference to the letter no. **F47150/c-2/HAZ/440/09 dt.. 01/04/2009** of UP Pollution Control Board, Lucknow (UPPCB) addressed to your good self on the subject:

1. That before writing to you for imposing fine on 6 units of Rania Kanpur Dehat. UPPCB did not give any opportunity to clarify our positions. The quantity and total fined amount stipulated in that letter are fictitious and malafide.
2. That the fine stipulated unit wise is incorrect in total as the said companies ran their units for different span of time. Further the capacity installed & utilized of each plant is different so the quantity of waste generation of individual unit will not be the same.
3. That at the said solid waste dump, the lot of waste was lying there before operation of these 6 units. The many BCS units were in operation before/during the operation of our units in Kanpur Nagar, Kanpur Dehat, Unnao & Fatehpur. That some waste dumped there maybe of units other than BCS factories.

4. That UPPCB was allotted 10.5 Hectares of land by Government free of cost in year 1994 at village Kumbhi, Kanpur Dehat for developing common secured land fill (CSLF) facility. It was the primary responsibility of UPPCB to arrange for CSLF at least for small scale industries like us in UP, but they did not nothing until 2003.
5. That after 10 years in the year 2003 3 Hectares land was leased to KANPUR PRADOOSHAN NIYANTRAN SAMTI (KPNS) to develop and construct CSLF facility. We are also member of KPNS and contributed a lot towards the construction of CSLF facility. KPNS completed the CSLF in the month of Oct 2005, which was intimated to UPPCB vide their letter dated 30/09/2005 (copy attached)

The construction of CSLF was carried out as per technical specification of National Productivity Council, guide lines of local administration and UPPCB. The Chairman of UPPCB also visited the site in May 2005 and appreciated the quality of work being done by KPNS.

That the KPNS also applied for authorization of the operation of the CSLF facility vide their letter dt 07/03/2005 (copy of application attached)

That the UPPCB had neither responded to the request of KPNS for operation of CSLF facility nor intimated to them in regard to deficiency, if any in the work done by them.

6. That without pointing out any shortcoming in the construction work of CSLF the factories were closed/ sealed in 2005, causing us severe financial crisis and unemployment to the workers.
7. That the lease of land to KPNS was terminated by UPPCB unilaterally on 4/10/2006 without giving any opportunity.
8. That if the CSLF was not up to the mark why the said CSLF was given to Bharat Oil & Waste Management Ltd. (BOWML) free of cost, who have no experience of such type of activities. The KPNS has not been compensated for handling over the CSLF facility to BOWML. The present cost of CSLF will be about Rs. 2 Crores.
9. That the authorization for disposal of solid waste in CSLF constructed by KPNS was not given, where as authorization for the same CSLF has been granted to BOWML.
10. That this discriminatory action of the UPPCB heavily damaged the environment, industrial production & social cause.
11. That our units are SSI Sick Units and are unable to bear any fine. Moreover the financial position worsened due to long closure of the units.
12. That howsoever, if the said CSLF Facility is handed over to KPNS we will clear the said site (dump). If CSLF is not handed over to KPNS

then Bharat Oil & Waste Management Ltd. should clear the site (dump) on their cost.

13. That before taking any action against us, we may please be given a chance of personal hearing also.

Our request may please be considered sympathetically in light of facts and figures furnished here in above in the interest of natural justice.

Thanking You,

Yours faithfully,

For Cerulean Chemicals (P) Ltd.,

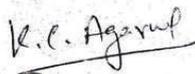
For Waris Chemicals (P) Ltd.,

  
(Director)

  
(Director)

For Hilgers Chemicals (P) Ltd.,

For chandani Chemicals (P) Ltd.,

  
(Director)

  
(Director)

For Amelia Textiles & Chemicals (P) Ltd.,

For Rulmani Chemicals (P) Ltd.,

  
(Director)

(Director)

Encl: As above.

Copy to: 1. The Minister of Environment (Govt. UP), Bapu Bhawan, Lucknow.  
2: The Member Secretary UPPCB, Lucknow.

  
True Copy

## ANNEXURE - 'D'

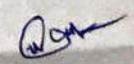
**RUKMANI CHEMICALS LTD**  
Araji 1451-1454, Visayakpur, Akbarpur, Kanpur Dehat

Production of Chromium Products, Consumption of Chromium Ore and Generation of Chromium Waste from 1997-98 to 2003-04.

Figures in M.T.

S. No.	Year	Sodium Dichromate	Basic Chrome Sulphate	Sodium Chromate	Sodium Sulphate	Total	Chrome Ore Consumed	Chromium Waste Generation
1.	1997-98	37.986	9.000	0.000	16.500	63.486	224.555	
2.	1998-99	69.582	111.850	7.650	0.000	189.082	356.235	
3.	1999-2000	2.000	131.950	0.000	69.990	203.940	128.485	
4.	2000-01	12.250	138.500	0.000	33.825	184.575	132.600	
5.	2001-02	29.200	399.050	0.000	1.100	429.350	336.190	
6.	2002-03	1.000	415.900	0.000	122.631	539.531	88.235	
7.	2003-04	2.000	430.100	0.000	156.409	588.509	136.290	
		<b>154.018</b>	<b>1636.350</b>	<b>7.650</b>	<b>400.455</b>	<b>2198.473</b>	<b>1402.59</b>	<b>175.323</b>

For Rukmani Chemicals Ltd

  
Director

  
True Copy

**ANNEXURE - 'E'****RUKMANI CHEMICALS LTD**

Araji 1451-1454, Visayakpur, Akbarpur, Kanpur Dehat

To,  
Honourable District Magistrate  
Maati,  
Akbarpur,  
Kanpur Dehat

Date 23/04/2022

**Sub: Regarding inspection of chromium dump stored in the premises of M/s Rukmini Chemicals Ltd in relation to dump of chromium sludge at Khanchandpur, Rania, Kanpur Dehat.**

Madam,

The undersigned has repeatedly informed you Regional Officer, Rania, Kanpur Dehat through his various letters that undersigned had not thrown chromium waste generated in the company anywhere outside the premises rather had stored it within factory premises on thick plastic sheets. Mr. Imran Ali, A.E., of Regional Office, Kanpur Dehat was directed to inspect the unit on 13/07/2021 but he could not inspect and verify the same as the physical possession of land, building and plant machinery was taken over by UP Financial Corporation on dt 25/08/2009 and was later sold to some buyer who did not allow Mr. Imran Ali to enter the premises and hence the inspection and verification could not be conducted. Hence it could not establish that the dump of generated chromium waste is lying within the factory premises. Regional Officer, Rania, Kanpur Dehat have been requested many times to reinspect the unit with appropriate force. wherein Regional Officer said that he will conduct the inspection when instruction is obtained from Honorable District Magistrate. Therefore, you are requested to instruct the Regional Officer, Raniya, Kanpur Dehat to inspect the premises of unit with appropriate force so that justice is made available to the undersigned so that the undersigned can send the chromium waste to

treatment plant like other units were allowed and the undersigned should not be penalised for the deed which he has not done.

Thanking you,

Yours faithfully,

For Rukmini Chemicals Ltd

K. K. Jain

**RUKMANI CHEMICALS LTD**

Araji 1451-1454, Visayakpur, Akbarpur, Kanpur Dehat

To,  
Respected Member Secretary,  
UPPCB,  
Gomti Nagar,  
Lucknow

Date: 25/04/2022

**Sub: Regarding inspection of chromium dump stored in the premises of M/s Rukmini Chemicals Ltd in relation to dump of chromium sludge at Khanchandpur, Rania, Kanpur Dehat.**

Sir,

The undersigned has repeatedly informed you through his various letters that undersigned had not thrown chromium waste generated in the company anywhere outside the premises rather had stored it within factory premises on thick plastic sheets. Mr. Imran Ali, A.E., of Regional Office, Kanpur Dehat was directed to inspect the unit on 13/07/2021 but he could not inspect and verify the same as the physical possession of land, building and plant machinery was taken over by UP Financial Corporation on dt 25/08/2009 and was later sold to some buyer who did not allow Mr. Imran Ali to enter the premises and hence the inspection and verification could not be conducted. Hence it could not establish that the dump of generated chromium waste is lying within the factory premises. You have been requested many times to inspect the unit with appropriate force. The undersigned personally met with Regional Officer, Kanpur Dehat wherein Regional Officer said that he will conduct the inspection when instruction is obtained from head office of UPPCB. Therefore, you are requested to instruct the Regional Officer, Raniya, Kanpur Dehat to inspect the premises of unit with appropriate force so that justice is made available to the undersigned so that the undersigned

can send the chromium waste to treatment plant like other units were allowed and the undersigned should not be penalised for the deed which he has not done.

Thanking you,

Yours faithfully,

For Rukmini Chemicals Ltd

K. K. Jain

**RUKMANI CHEMICALS LTD**

Araji 1451-1454, Visayakpur, Akbarpur, Kanpur Dehat

To,  
Respected Regional Officer  
UPPCB,  
Kanpur Dehat

Date 09/05/2022

**Sub: Regarding inspection of chromium dump stored in the premises of M/s Rukmini Chemicals Ltd in relation to dump of chromium sludge at Khanchandpur, Rania, Kanpur Dehat.**

Sir,

The undersigned has repeatedly informed you and Chief Environment Office, Lucknow through his various letters that undersigned had not thrown chromium waste generated in the company anywhere outside the premises rather had stored it within factory premises on thick plastic sheets. Mr. Imran Ali, A.E., of Regional Office, Kanpur Dehat was directed to inspect the unit on 13/07/2021 but he could not inspect and verify the same as the physical possession of land, building and plant machinery was taken over by UP Financial Corporation on dt 25/08/2009 and was later sold to some buyer who did not allow Mr. Imran Ali to enter the premises and hence the inspection and verification could not be conducted. Hence it could not establish that the dump of generated chromium waste is lying within the factory premises. You have been requested many times to inspect the unit with appropriate force. Honourable District Magistrate madam has also directed you to inspect the premises vide her letter against our letter dated 23/04/2022.

Hence you are requested to inspect the premises with appropriate force so that so that justice is made available to the undersigned so that the

undersigned can send the chromium waste to treatment plant like other units were allowed and the undersigned should not be penalised for the deed which he has not done.

Thanking you,  
Yours faithfully,

For Rukmini Chemicals Ltd

K. K. Jain

Encl:

1. Detail of chromite ore purchased, finished goods produced and chromium waste generated.
2. Photocopy of our Letter dated 23/04/2022 given to Honourable district Magistrate.



**TRANSLATED COPY**

**ANNEXURE - 'F'**

Regional Office  
Uttar Pradesh Pollution Control Board  
280, NH-19, Raniyan, Kanur Dehat-209304

Letter No. 1177/RuH./R-149/22

Date: 09/06/2022

To,  
M/s Ambika Udyog  
Through Mr. Praveer Chaturvedi,  
Araji No. 1451, Visayakpur,  
Akbarpur, Kanpur Dehat.

**Sub: Inspection of Chromium Waste Dump within the premises of the unit.**

Sir,

Regarding above subject Mr. K. K. Jain, former Director M/s Rukmini Chemicals Ltd., Araji No. 1451, Visayakpur, Akbarpur, Kanpur Dehat through his application dated 06.06.2022 has notified that during the operation tenure of M/s Rukmini Chemicals Ltd., Araji No. 1451, Visayakpur, Akbarpur, Kanpur Dehat (Currently M/s Ambika Udyog) the chromium waste generated was stored in 80 ft x 60 ft x 6 ft pucca pit within the factory premises, which could not be lifted at that time as the premises was auctioned off. Since the said dump of chromium waste is of hazardous nature, therefore it has to be safely disposed off by sending it to TSDLF. In accordance, the verification of the chromium waste dump by way of inspection has been requested. Inspection of your unit is proposed to be conducted at 12 Pm on 16.06.2022 in your and Mr. K. K. Jain's presence. It is also proposed that during the inspection of the chromium waste dump a sample will be drawn which will be sent to lab.

Therefore, regarding above perspective, you are directed to be present during the time of inspection and provide full support.

Yours sincerely,

(J. P. Maurya)  
Regional Officer

CC:-sent to following for information and necessary action:

1. District Magistrate Madam, Kanpur Dehat.
2. Chief Environmental Officer (Sec-2), U. P. Pollution Control Board, Lucknow.
3. Sub-Divisional Magistrate, Akbarpur, Kanpur Dehat sent with request to provide appropriate police force at the time of inspection.
4. Mr. K. K. Jain, 7/167 Swaroop Nagar, Kanpur.



**TRANSLATED COPY**

Santhosh Krishnan <mail@skrishnan.in>

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**Rukmini Chemicals v. UPPCB NGT Appeal No.16/2020 (Objections to Report dt.28.07.2022)**

1 message

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**Santhosh Krishnan** <mail@skrishnan.in>  
To: pradeepmisra@yahoo.com

18 August 2022 at 16:16

To:  
Mr. Pradeep Mishra  
Advocate for UPPCB

Dear Sir,

Please find below the link to download the scanned copy of the objections proposed to be filed on behalf of the appellant Rukmini Chemicals in respect of UPPCB's Report dt.28.07.2022.

 [18.08.2022 Objections - Rukmini Chemicals Ltd. ...](#)

Please download the same at your earliest convenience as the link is not permanent.

**Santhosh Krishnan**  
Advocate

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*Notice: This message and attachments contain legally privileged confidential information. Please notify the sender immediately if you have received this e-mail by mistake and delete this e-mail from your system.*

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