

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

INDEX

| S no. | Particulars | Page No. |
|--------------|--|-----------------|
| 1. | Objections to the report of the joint committee on behalf of Respondent No. 103, M/s Dayanidhi Textiles Pvt. Ltd. | 1 – 6 |
| 2. | Supporting Affidavit | 7 – 8 |
| 3. | <u>ANNEXURE R-1:</u> A copy of the HSPCB Show Cause Notice and the latest response to the HSPCB Show Cause Notice along with all the relevant annexures. | 8 – 23 |
| 4. | Vakalatnama and Board Resolution | 24 – 25 |
| 5. | Copy of Aadhar Card | 26 |
| 6. | Proof of Service | 27 |

4093

FILED THROUGH:

Sb

Archana Yadav

Shivani Chawla

[SIDDHARTH BATRA], [ARCHANA YADAV] [SHIVANI CHAWLA]

Chinmay Dubey

Rhythm Katyal

[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 103- M/s Dayanidhi Textiles Pvt. Ltd.

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 16.05.2025

E-mail: siddharth.batra@satramdass.com

Place: New Delhi

Phone: 011 4704 6111

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

**OBJECTIONS TO THE REPORT OF THE JOINT COMMITTEE ON
BEHALF OF RESPONDENT NO. 103, M/S DAYANIDHI TEXTILES
PVT. LTD.**

MOST RESPECTFULLY SHOWETH:

1. That the present objections are being filed on behalf of M/s Dayanidhi Textiles Pvt. Ltd., Respondent No. 100, in compliance with the order dated 27.02.2025 passed by this Hon'ble Tribunal wherein the newly impleaded respondents were directed to file their objections to the Joint Committee Report dated 03.01.2025. As per the order dated 08.01.2025, the Answering Respondent has been impleaded as Respondent No. 100 along with other industries based on the Joint Committee Report.
2. That at the outset, it is submitted that the observations recorded in the Joint Committee Report do not fully reflect the compliance status of the answering respondent, and certain findings therein are based on

erroneous assumptions, miscalculations, and an outdated compliance assessment.

3. That the answering respondent has undertaken substantial investments in advanced environmental control measures to ensure strict adherence to all applicable environmental norms. The answering respondent denies any deliberate non-compliance and submits that the alleged deficiencies, if any, were either technical in nature or have already been rectified through corrective measures undertaken post-inspection.

4. **OBJECTIONS TO THE JOINT COMMITTEE REPORT**

- 4.1. That the answering respondent submits that an inspection was conducted in August 2024, and certain observations were recorded regarding the operation of its Primary Effluent Treatment Plant (PETP). The Answering Respondent further submits that a Show Cause Notice (SCN) dated 16.01.2025, was issued by the Haryana State Pollution Control Board (HSPCB).
- 4.2. That it is submitted that all of the above issues were raised in the Show Cause Notice issued by HSPCB, to which the answering respondent submitted a detailed and reasoned response. The answering respondent duly clarified its position and provided documentary evidence of its compliance to HSPCB. Therefore, the continued reliance on these findings is unjustified and does not accurately reflect the present compliance status of the unit. A Copy of the HSPCB Show Cause Notice and the latest response to the HSPCB Show Cause

Notice along with all the relevant annexures is annexed herewith and marked as **ANNEXURE R-1**.

- 4.3. That the answering respondent categorically denies the allegations regarding non-operation of the Primary Effluent Treatment Plant (PETP) and the improper handling of wastewater. The unit was undergoing scheduled maintenance and construction during the inspection, necessitating a temporary halt in PETP operations. The effluent generated prior to the temporary shutdown was safely stored in the collection pit and equalization tank for subsequent treatment upon resumption of PETP operations. It is further submitted that dry and wet processing activities observed during the inspection were limited to preparatory work, which does not generate effluent in real-time. The allegations of non-compliance are therefore based on an incomplete assessment of operational conditions.

- 4.4. That it has been alleged that the unit is performing wet blue to finished dyed leather processing but uses 6% Basic Chrome Sulphate (BCS), indicating chrome tanning or re-tanning without proper storage or chrome recovery. The answering respondent clarifies that the use of 6% Basic Chrome Sulphate (BCS) in shaved weight does not indicate primary chrome tanning but is part of an industry-standard re-tanning process. Chrome recovery is not required in the process, as the chrome liquor is entirely absorbed within the tanning process and is not discharged as effluent. The unit follows prescribed containment and disposal measures for chrome tanning waste, ensuring compliance with CPCB and HSPCB regulations.

- 4.5. That the answering respondent denies the allegation that wastewater was disposed of via tankers. The underground pit found during the inspection serves solely as a temporary storage point for effluent before its transfer to the PETP for treatment. Due to ongoing PETP maintenance at the time of inspection, excess wastewater was stored temporarily and was scheduled for treatment once PETP operations resumed. The pit is directly connected to the PETP.
- 4.6. That the sample collected from the underground pit during inspection showed a T. Cr. concentration of 153.2 mg/L, allegedly exceeding permissible limits. The answering respondent submits that this sample was taken from untreated wastewater that was awaiting processing in the PETP. It is incorrect to assess compliance based on untreated wastewater, as final discharge from the unit is subject to complete treatment before disposal to the Common Effluent Treatment Plant (CETP). The Independent third-party analysis reports from NABL-accredited laboratories confirm that final treated effluent meets all prescribed standards.
- 4.7. That the answering respondent holds a valid Consent to Operate (CTO) issued by HSPCB.
- 4.8. That any adverse order based on the findings of the Joint Committee Report would have severe financial implications and cause significant operational disruptions to the answering respondent. The unit employs a large workforce, and any disruption in operations would negatively impact the livelihoods of numerous employees and their families.

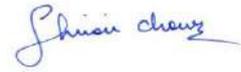
- 4.9. That in view of the above, the answering respondent prays that the findings in the Inspection Report be reconsidered, as they are based on mere assumptions rather than conclusive evidence of dilution. The answering respondent submits that corrective measures are already in place, ensuring ongoing compliance with all applicable environmental laws. Further, given that the CETP's inefficiencies contribute significantly to the overall compliance status, the answering respondent cannot be unfairly categorized as non-complying without a thorough and individualized assessment of its operational processes.
- 4.10. That in light of the foregoing submissions, the answering respondent categorically denies any allegations of non-compliance and submits that the findings of the Joint Committee Report and the subsequent classification of the answering respondent as non-complying are based on assumptions rather than conclusive evidence. The answering respondent has consistently adhered to prescribed environmental norms, holds valid statutory permissions, and has taken proactive measures to ensure compliance.
- 4.11. That in view of the discrepancies in the findings and the absence of a direct causal link between the answering respondent's operations and the alleged environmental violations, it is most respectfully prayed that the answering respondent be provided with an opportunity to cooperate with the authorities and implement any further recommendations, if necessary.

- 4.12. That the answering respondent remains committed to environmental sustainability, regulatory compliance, and responsible industrial operations and prays for a just and fair assessment of its compliance status.
5. The answering respondent further reserves its right to file additional pleadings or affidavits, if necessary, in response to any subsequent developments in the present proceedings.

FILED THROUGH:



[SIDDHARTH BATRA], [ARCHNA YADAV] [SHIVANI CHAWLA]



[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 103- M/s Dayanidhi Textiles Pvt. Ltd.

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 12.05.2025

Place: New Delhi

E-mail: siddharth.batra@satramdass.com

Phone: 011 4704 6111

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

O.A. No. 622 of 2024

IN THE MATTER OF:

Varun Gulati

...Applicant

Versus

State of Haryana & Ors.

...Respondents

AFFIDAVIT

I, Abhishek Ahuja S/o Mr. Ashok Ahuja, aged about 41 years R/o C-19, Kirti Nagar, New Delhi - 110015, do hereby solemnly affirm and stat as under:

1. That I am the authorized signatory of Respondent No. 10~~B~~, M/s Dayanidhi Textiles Pvt Ltd, having its office at Plot No. 491, HSIIDC, Industrial Estate, Phase-2, Barhi, Sonapat, Haryana - 131101, in the aforesaid Original Application, I am aware of the facts and circumstances of the case in my official capacity as stated above and hence, entitled to swear this affidavit.

That the accompanying reply has been drafted by my counsel under my instructions, and I say that the statements and submissions made in the said reply are true and correct to best of my knowledge based upon the records and my belief. I pray that the said reply to be treated as part and parcel of this Affidavit and the same is not being reproduced for the sake of brevity.

3. I say that the documents / annexure produced along with the reply are true copies of its originals.



1206
18/04

Dayanidhi Textiles Pvt Ltd

Abhishek Ahuja
Director

Dayanidhi Textiles Pvt Ltd

Abhishek Ahuja
Director

DEPONENT

VERIFICATION:

Verified that the contents of the above affidavit are true and correct to the best of my knowledge, belief and nothing material information has been concealed therefrom. No part of it is false.

Verified at Sonipat on this 19th day of February, 2025.

Dayanidhi Textiles Pvt Ltd

Abhishek Ahuja
Director

DEPONENT



1206
19/2/25

ATTESTED

[Signature]
NOTARY
Ganaur Distt. Sonapat

4102 ANNEXURE R-1

9



HARYANA STATE POLLUTION CONTROL BOARD
Plot No. 1, Sector-15, Part-II, Sonipat, Ph. - 0130-2236119,
E-mail ID: - hspcbrosr@gmail.com



No. HSPCB/SR/2025/ 2789

Dated: 16/11/25

To

M/s Dayanidhi Textiles Pvt. Ltd.,
Plot No. 491, Phase-II, HSIIDC, Barhi,
Distt. Sonipat

Sub: Show Cause Notice for Closure under section 33-A of Water Act, 1974, prosecution action under section 43/44 of Water Act, 1974, revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 and imposing environmental compensation as per order dated 22.12.2021.

Whereas, the unit was inspected on 14.08.2024 by the Joint Team of CPCB and HSPCB in reference to OA No.622/2024 titled as Varun Gulati Vs State of Haryana & Ors. pending before Hon'ble NGT, New Delhi and the unit is involved in process of Leather garments and Skin Leather having CTO valid upto 30.09.2029.

Whereas, during inspection following deficiencies have been observed which need to be complied as per condition of CTO granted to the said unit: -

1. As per unit representative, plant was closed since 2 days due to construction work. Last operational day was 11.08.2024. During inspection it was observed that dry and wet process both were operational however, discharge from process were not observed. PETP unit was found non-operational and un-treated effluent was found stored in collection pit/equalization tank and all treatment units were found filled with wastewater/clear water
2. As per production flow chart the unit is performing wet blue to finished dyed leather process. However, unit is using 6% Basic Chrome Sulphate (BCS) of shaved weight which indicate that unit is performing either re-tanning or chrome tanning. Unit also doesn't have any specific chrome liquor storage area and Chrome recovery unit.
3. In sammying, splitting & shaving area at basement, an underground pit equipped with pump and filled with wastewater was observed. As per unit representative they are disposing it outside unit through tankers. No pipeline was observed from pit to PETP. The T. Cr. concentration was observed 153.2 mg/l in wastewater sample.

Therefore, you are hereby directed to show cause & explain within 15 days as to why closure action may not be taken against your unit u/s 33-A Water (Prevention and Control of Pollution) Act, 1974, prosecution action under section 43/44 of Water (Prevention and Control of Pollution) Act, 1974

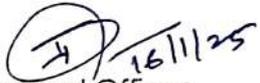
and revocation of consent u/s 27 of the Water (Prevention & Control of Pollution) Act, 1974 & u/s 21 (4) of the Air (Prevention and Control of Pollution) Act, 1981 besides initiation of legal action under the Acts for non-compliance of the relevant provisions of Environmental Acts/Rules/Laws.

In case you fail to reply/comply with the deficiencies mentioned above within above mentioned stipulated time period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant closure action against your unit under relevant Acts/Rules besides initiation of legal action under the relevant Acts/Rules without giving any further notice.

Whereas, for the above said violations you are liable to pay the Environmental Compensation in terms of the directions of Board issued letter no. HSPCB/PLG/2021/2343-2350 dated 22.12.2021 as assessed by the Board as per methodology defined therein.

Endst. No. HSPCB/SR/2025/

Dated:


Regional Officer,
Sonepat Region.
Ro

A copy of the above is forwarded to the Chairman, HSPCB, Panchkula for information, please.

Regional Officer,
Sonepat Region.

DAYANIDHI TEXTILES PVT LTD

10.02.2025

To

The Regional Officer
Haryana State Pollution Control Board (HSPCB)
Sector-15, Sonipat, Haryana

**SUBJECT: REPLY TO SHOW CAUSE NOTICE NO.
HSPCB/SR/2025/2789 DATED 16.01.2025**

**RE: HSPCB LETTER NO. HSPCB/SR/2025/2789 DATED 16-
01-2025**

Respected Sir,

1. This is in reference to the Show Cause Notice (SCN) issued under Section 33-A, 27, and 43/44 of the Water (Prevention and Control of Pollution) Act, 1974, and Section 21(4) of the Air (Prevention and Control of Pollution) Act, 1981. The Notice alleges non-compliance related to operational status, handling of Basic Chrome Sulphate (BCS), storage and treatment of wastewater, and effluent discharge.

At the outset, we wish to affirm our commitment to full environmental compliance and adherence to all applicable laws and regulations. We hereby submit our detailed response for your kind consideration.

REGISTERED OFFICE: 3704/17, FIRST FLOOR, HARDHIAN SINGH ROAD, KAROL BAGH, NEW DELHI-110 005
FACTORY ADDRESS: PLOT NO. 491, H.S.I.L.D.C, PHASE-II, BARHI, SONIPAT, HARYANA M.: 91-9711971199
E-MAIL: APLC2005@YAHOO.CO.IN, CIN : U17291DL2007PTC169772

Abishek Akreja
Director

2. BACKGROUND OF THE COMPANY

M/s Dayanidhi Textiles Pvt Ltd is a reputed and responsible industrial unit engaged in the processing of leather from wet blue to finished dyed leather. We have always adhered to sustainable practices and maintained robust environmental management systems in compliance with the norms prescribed by the HSPCB.

Our facility is equipped with a properly maintained Primary Effluent Treatment Plant (PETP) and operates in accordance with the Best Available Technology for wastewater management and chemical handling. We ensure compliance with the guidelines laid down by the CPCB and HSPCB, implementing modernized process controls to reduce pollution.

3. RESPONSE TO SPECIFIC ALLEGATIONS

3.1. Allegation Regarding Operational Status of the Unit

Observation in SCN: The unit was stated to be non-operational for two days due to construction, yet dry and wet processing activities were observed. No discharge from the process was noticed. PETP was non-operational, with untreated effluent stored in the collection pit.

Response:

3.1.1 The unit was indeed undergoing construction and maintenance during the inspection, which required temporary halting of PETP operations.

3.1.2 The observed dry and wet processing activities were limited to preparatory work, which does not generate effluent in real-time.

Dayanidhi Textiles Pvt Ltd

Abishek Akujra

- 3.1.3 The Effluent generated prior to the shutdown was stored safely in the collection pit and equalization tank to be treated once PETP resumed operation.
- 3.1.4 The PETP was not operational at the time of inspection due to construction activities, not due to non-compliance.

3.2. Allegation Regarding Chrome Tanning and Re-Tanning Process

Observation in SCN: The unit is performing wet blue to finished dyed leather processing but uses 6% Basic Chrome Sulphate (BCS), indicating chrome tanning or re-tanning without proper storage or chrome recovery.

Response:

- 3.2.1. The use of 6% BCS in the shaved weight does not indicate primary chrome tanning; rather, it is used for re-tanning purposes, which is a legally permitted process. Chrome recovery was not required in our process since chrome liquor is not directly discharged but absorbed in the tanning process.
- 3.2.2. As per industry norms, chrome tanning waste must be contained properly, and our unit has been following standard containment and disposal procedures in compliance with CPCB regulations.

3.3. Allegation Regarding Underground Pit and Effluent Disposal

Observation in SCN: An underground pit equipped with a pump was found filled with wastewater, and as per the unit representative, the wastewater was being disposed of via tankers instead of being connected to the PETP.

Response:

Dayalohi Textiles Pvt Ltd

Abishek Ahuja

3.3.1. The underground pit serves as a temporary collection point for effluent before treatment. Due to ongoing PETP maintenance, excess wastewater was stored temporarily and scheduled for treatment upon reactivation of PETP.

3.3.2. We did not dispose of the water through tankers. The pit water is directed to the Primary Effluent Treatment Plant (PETP), where it undergoes treatment before being discharged to the Common Effluent Treatment Plant (CETP). The pit pipeline is directly connected to the PETP.

3.4. Allegation Regarding High T. Cr. Concentration in Wastewater Sample

Observation in SCN: The sample from the underground pit showed T. Cr. concentration of 153.2 mg/L, exceeding permissible discharge limits.

Response:

3.4.1. The wastewater in the pit was not yet treated and was awaiting processing in the PETP, meaning the sample was not representative of final discharge.

3.4.2. Our previous discharge records from NABL-accredited laboratories confirm that final treated effluent complies with prescribed standards. The copy of third-party analysis reports from accredited labs is enclosed as Annexure-1, demonstrating compliance with T. Cr. discharge norms.

4. COMPLIANCE WITH HSPCB RECOMMENDATIONS

4.1. The notice assumes non-compliance without considering temporary shutdowns and ongoing maintenance activities.

Dayanidhi Textiles Pvt Ltd

Abhishek Ahuja

- 4.2. Our CTO remains **valid**, and the notice does not acknowledge that PETP operations were temporarily halted for construction. The copy of the latest CTO is annexed hereto as Annexure-2.
- 4.3. The sample tested was from untreated wastewater, and final treated effluent meets prescribed standards, as per third-party reports.
- 4.4. No direct evidence of dilution was presented; our treatment system operates within standard industry norms.
- 4.5. Previous CPCB inspections have validated our operations and confirmed compliance with pollution control regulations

5. **TIMING OF THE NOTICE AND CURRENT COMPLIANCE STATUS**

The inspection in question took place in July/August 2024, whereas the present notice was received only in January 2025. While we fully acknowledge the regulatory authority's right to issue such notices, it is essential to consider that compliance status evolves over time. Assuming but not admitting that there were any concerns at the time of inspection, our unit has since taken proactive steps to rectify any potential issues. Consequently, the findings of the inspection may no longer be reflective of the current operational reality.

Furthermore, our unit undergoes annual inspections by the Central Pollution Control Board (CPCB), in which we have consistently been found compliant with all environmental norms. These inspections reaffirm that our ETP functions efficiently, effluent discharge remains within permissible limits, and no dilution of effluent with freshwater occurs. The past records of these inspections further validate our adherence to pollution control measures and negate the allegations raised in the show cause notice.

Dayanidhi Textiles Pvt Ltd

Abhishek Ahuja

6. FINANCIAL IMPACT ON LIVELIHOODS OF WORKERS

The closure of our unit would not only impact our company but also have far-reaching consequences on the livelihoods of numerous employees who depend on it. Our workforce comprises individuals from diverse socio-economic backgrounds, many of whom are the sole breadwinners for their families. A closure would lead to job losses, financial distress, and disruption of livelihoods for these workers, affecting their ability to provide for their families and sustain their daily lives. Additionally, local suppliers, vendors, and small businesses that rely on our operations would also face economic hardship. We humbly request that such wider social and economic implications be considered while evaluating the SCN.

Without prejudice to the submissions made above, we wish to humbly submit that we have internally conducted our own investigation into the matter. As per the recommendation stated in the Show Cause Notice, the necessary corrective measures, if any, have now been implemented. Therefore, there exists no reason for the closure of our industry or the imposition of any environmental compensation.

In light of the above, we request the following:

- a. Withdrawal of the SCN as the allegations are based on erroneous assumptions and lack of procedural compliance.
- b. Consideration of our compliance measures, including water conservation and cleaner technology adoption.
- c. Provision of a re-inspection opportunity with independent third-party validation to ensure fairness.

Wayanlabhi Textiles Pvt Ltd

Abhishek Ahuja

We reiterate our commitment to environmental compliance and look forward to a fair and just resolution of the matter.

Thanking you.

Dayanidhi Textiles Pvt Ltd
Abishek Ahuja
Director

TEST REPORT

NUMBER : DELC25001456
DATE : 07-Feb-2025

APPLICANT : **Dayanidhi Textiles Pvt Ltd**
Plot No. 491, Hsiidc, Industrial Estate,,
Phase-2, Barhi,, Sonipat, Haryana, 131101,
India
ATTN : **Manish**

Sample Description : TREATED WATER.

TESTED COMPONENT:
[1] TREATED WATER

Date Received/Date Test Started : 04 Feb 2025
Date Confirmation Received : -
Buyer Name : Not provided - MRSL
Style No : -
Order No : -
Color : NOT PROVIDED
Fiber Composition : -
End Use : -

TEST CONDUCTED : AS PER THE REQUEST OF THE APPLICANT. FOR FURTHER DETAILS PLEASE REFER TO ENCLOSED PAGE(S)

AUTHORIZED BY
FOR Intertek India Private Limited [Analytical - Gurgaon]



RAVINDRA S
LAB MANAGER - C&A

TEST REPORT

NUMBER : DELC25001456
DATE : 07-Feb-2025

CONCLUSION :

Total Chromium Oxide Content Test *

NOTE : M = MEETS REQUIREMENT, F = FAILS TO MEET REQUIREMENT
* = REQUIREMENT NOT PROVIDED, N/A = NOT APPLICABLE

1. Statement of conformity is based on the simple acceptance rule without using measurement uncertainty.
2. In this report results relate only to the item tested.
3. Laboratory reports the final test results in test report. Any additional information, if required will be provided on request.
4. Samples received in good condition.
5. Testing has been performed as per the applicant's request.
6. Sampling is not done by Laboratory.
7. Environmental conditions followed at the time of testing as per International methods/customer requirements.

REMARKS :

1. TESTING PERIOD: 02/04/2025 TO 02/07/2025.
2. CHROMIUM OXIDE CONTENT HAS BEEN REPORTED ON THE BASIS OF TOTAL CHROMIUM CONTENT.

TEST REPORT

NUMBER : DELC25001456
DATE : 07-Feb-2025

Test Conducted (As Requested By The Applicant)

1. Total Chromium Oxide Content Test

- TOTAL CHROMIUM OXIDE VIA ACID DIGESTION METHOD

[1]

0.169 mg/L

Requirement

-

REMARK :

BDL = BELOW DETECTION LIMIT

MG/L = MILLIGRAM/LITER

DETECTION LIMIT = 0.1 mg/L

END OF THE TEST REPORT

This report is made solely on the basis of your instructions and/or information and materials supplied by you. It is not intended to be a recommendation for any particular course of action. Intertek does not accept a duty of care or any other responsibility to any person other than the Addressee in respect of this report and only accepts liability to the Addressee insofar as is expressly contained in the terms and conditions governing Intertek's provision of services to you. Intertek makes no warranties or representations either express or implied with respect to this report save as provided for in those terms and conditions. We have aimed to conduct the Review on a diligent and careful basis and we do not accept any liability to you for any loss arising out of or in connection with this report, in contract, tort, by statute.

<http://www.intertek.com/terms>.



HARYANA STATE POLLUTION CONTROL BOARD

**Star Complex, Opp. General Hospital, Delhi Road,
Sonepat Ph. 0130-2236119(O) Email:-
hspcbrosr@gmail.com
E-mail: hspcb@hry.nic.in**



No. HSPCB/Consent/ : 313102924SONCTO71462623

Dated:02/08/2024

To.

M/s :M/S Dayanidhi Textiles Pvt Ltd
Plot No 491 HSIIDC Phase 2, Barhi, Distt. Sonipat, Haryana

Subject: Grant of consent to operate to M/s M/S Dayanidhi Textiles Pvt Ltd.

Please refer to your application no. 71462623 received on dated 2024-06-25 in regional office Sonipat. With reference to your above application for consent to operate, M/s M/S Dayanidhi Textiles Pvt Ltd is here by granted consent as per following specification/Terms and conditions.

| | |
|-------------------------------------|---|
| Consent Under | BOTH |
| Period of consent | 01/10/2024 - 30/09/2029 |
| Industry Type | Tanneries |
| Category | RED |
| Investment(In Lakh) | 414.09454 |
| Total Land Area(Sq. meter) | 4050.0 |
| Total Builtup Area(Sq. meter) | 3240.0 |
| Quantity of effluent | |
| 1. Trade | 48.0 KL/Day |
| 2. Domestic | 2.0 KL/Day |
| Number of outlets | 2.0 |
| Mode of discharge | |
| 1. Domestic | Into HSIIDC sewer leading to CETP |
| 2. Trade | Into HSIIDC sewer after treatment leading to CETP |
| Domestic Effluent Parameters | |
| 1. NA | |
| Trade Effluent Parameters | |
| 1. BOD | 500 mg/l |
| 2. COD | 1400 mg/l |
| 3. TSS | 1500 mg/l |
| 4. O&G | 15 mg/l |
| 5. pH | 6.0-9.0 |
| 6. TDS | 2100 mg/l |
| 7. Sulphides (as S) | 2.0 mg/l |

| | |
|--------------------------------------|-------------------|
| 8. Total Chromium (as Cr) | 2.0 mg/l |
| 9. Hexavalent Chromium | 0.1 mg/l |
| Number of stacks | 1 |
| Height of stack | |
| 1. NA | |
| Emission parameters | |
| 1. NA | |
| Product Details | |
| 1. Leather garments and skin leather | 2500 Numbers/ day |
| Capacity of boiler | |
| 1. NA | Ton/hr |
| Type of Furnace | |
| 1. NA | |
| Type of Fuel | |
| 1. NA | |
| Raw Material Details | |
| Wet Blue Leather | 1500 Numbers/Day |

HARYANA STATE

Regional Officer, Sonipat

Haryana State Pollution Control Board.

Terms and conditions

1. The applicants shall maintain good house keeping both within factory and in the premises. All hose pipelines valves, storage tanks etc. shall be leak proof. In plant allowable pollutants levels, if specified by State Board should be met strictly.
2. The applicant/company shall comply with and carry out directive/orders issued by the Board in this consent order at all subsequent times without negligence of his /its part. The applicant/company shall be liable for such legal action against him as per provision of the law/act in case of violation of any order/directives. Issued at any time and or non compliance of the terms and conditions of his consent order.
3. The applicant shall make an application for grant of consent at least 90 days before the date of expiry of this consent.
4. Necessary fee as prescribed for obtaining renewal consent shall be paid by the applicant alongwith the consent application.
5. If due to any technological improvement or otherwise this Board is of opinion that all or any of the conditions referred to above required variation (including the change of any control equipment either in whole or in part) this Board shall after giving the applicant an opportunity of being heard vary all or such condition and there upon the applicant shall be bound to comply with the conditions so varied.
6. The industry shall provide adequate arrangement for fighting the accidental leakages, discharge of any pollutants gas/liquids from the vessels, mechanical equipment etc. which are likely to cause environment pollution.

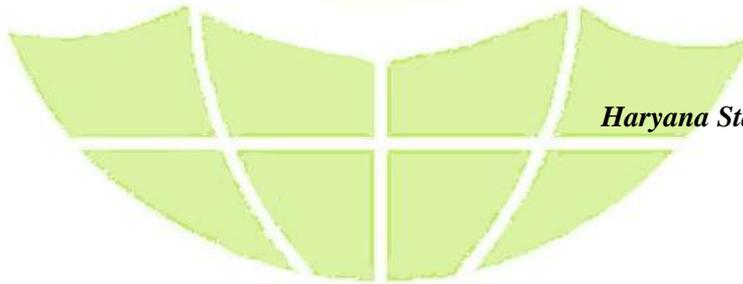
7. The industry shall comply noise pollution (Regulation and control) Rules, 2000.
8. The industry shall comply all the direction/Rules/Instructions as may be issued by the MOEF/CPCB/HSPCB from time to time.
9. The industry shall ensure that various characteristics of the effluents remain within the tolerance limits as specified in EPA Standard and as amended from time to time and at no time the concentration of any characteristics should exceed these limits for discharge.
10. The industry would immediately submit the revised application to the Board in the event of any change in the raw material in process, mode of treatment/discharge of effluent. In case of change of process at any stage during the consent period, the industry shall submit fresh consent application alongwith the consent to operate fee, if found due, which may be on any account and that shall be paid by the industry and the industry would immediately submit the consent application to the Board in the event of any change during the year in the raw material, quantity, quality of the effluent, mode of discharge, treatment facilities etc.
11. The officer/official of the Board shall reserve the right to access for the inspection of the industry in connection with the various process and the treatment facilities. The consent to operate is subject to review by the Board at any time.
12. Permissible limits for any pollutants mentioned in the consent to operate order should not exceed the concentration permitted in the effluent by the Board.
13. The industry shall pay the balance fee, in case it is found due from the industry at any time later on.
14. If the industry fails to adhere to any of the conditions of this consent to operate order, the consent to operate so granted shall automatically lapse.
15. If the industry is closed temporarily at its own, they shall inform the Board and obtain permission before restart of the unit.
16. The industry shall comply all the Directions/ Rules/Instructions issued from time to time by the Board.
17. Industry should adopt water conservation measures to ensure minimum consumption of water in their process. Ground water based proposals of new industries should get clearance from Central Ground Water Authority (CGWA)/ Haryana Water Resources (Conservation, Regulation and Management) Authority (HWRA) for scientific development of precious resource.
18. The industrial/non industrial sector projects shall develop green belt (as applicable) in its premises including periphery, entry and exit, as per notifications/conditions of EC/directions of MOEF/CPCB/SPCB/NGT/ any court of law. In case of stone crushers, hot mix plants, mineral grinding units, screening plants and brick kilns etc., the unit shall develop adequate green belt and erect barrier/barricade/boundary wall as applicable, as per notifications/directions of MOEF/CPCB/SPCB/NGT/ any court of law.
19. The unit shall develop paved or hard surfaced approach road to the site of unit (including the storage site, if it is at different place) from the nearest public road for transportation of raw material/final product.

Specific Conditions :

1. That the unit will obtained Authorization under HOWM Rules 2016 with in 30 days.
2. That the unit shall apply for renewal of CTO before 90 days of expiry of this CTO.
3. That the Unit will run ETP / APCM regularly and maintained log books properly .
4. That the unit shall keep all the parameters within the prescribed limits and shall comply with

all the Norms and Rules as prescribed in the Act

5. That the unit will provide inter locking arrangement of DG set with ETP/APCM and shall have adequate D.G. set to ensure regular and effective running of pollution control devices.
6. That unit will comply the industry specific standards as applicable and notified under E(P) Act from time to time.
7. That the unit will not add any air polluting process/ machinery and also not add any process which increases the water pollution load.
8. That unit will comply with the directions of CPCB/HSPCB/CAQM /Hon'ble NGT and any other authority / Court issued from time to time .
9. That the unit will install PTZ Camera with electromagnetic flow meter on all the points of reuse and recycle and connect them with the servers of HSPCB and CPCB as applicable.
10. That the unit will not use the area specified for green belt in layout plan for any other purpose .
11. That the unit will comply with the CAQM direction issued vide No. 65 & amended till date, HSPCB direction vide order dated 21.07.2022 regarding standard list of approved fuels in NCR and direction No. 76 dt. 29.09.2023 of CAQM regarding installation of retro-fitment of dual fuel/ECDs and fitment of RECDs certified by the authorized agencies on DG sets more than 19 kW.
12. That CTO so granted is without prejudice to the action taken for prosecution in respect of past violation committed by the unit and CTO so granted will have no effect on the prosecution case filed by the Board against such units for past violation in the Court under the relevant provisions of the Water Act, 1974 and/or Air Act, 1981.
13. That unit will deposit the Environmental Compensation as applicable and levied by HSPCB at any stage for the violations made by the unit even in past times.
14. That CTO so granted shall become invalid in case of violation of any of the above / any law of the land.



*Regional Officer, Sonapat
Haryana State Pollution Control Board.*

VAKALATNAMA

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH, NEW DELHI

ORIGINAL APPLICATION NO. 622 OF 2024

IN RE:-

VARUN GULATI

...APPLICANT

VERSUS

STATE OF HARYANA & ORS.

...RESPONDENTS

KNOW ALL to whom these presents shall come that I/We, undersigned the above named do hereby appoint,

**SIDDHARTH BATRA (P/1083/2004), ARCHNA YADAV (D/1837/2020), SHIVANI CHAWLA (D/2233/2019),
CHINMAY DUBEY (D/8141/2021) & RHYTHM KATYAL (D/3528/2022);**

Advocates

Satram Dass B & Co., 8A, Sagar Apartment, 6 Tilak Marg, New Delhi-110001

Mob: 988888 4445, Email: siddharth.batra@satramdass.com

(hereinafter called the advocate/s) to be my/our Advocate in the above noted case and authorize him: -

To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the Appellate Court including High Court subject to payment of fees separately for each court by me/us.

To sign file, verify and present pleadings, appeals, cross-objections or petitions for executions, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage. To file and take back documents, to admit and/or deny the documents of opposite party. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case. To take execution proceedings. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case. To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

And I/We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes. And I/We undertake that I/We or my /our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself. And I/We the undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/We hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this **12th** day of **May**, 2025

Accepted, identified and certified subjected to the terms of the fees.

SB

Archna yadav

[SIDDHARTH BATRA] [ARCHNA YADAV]

Shivani chawla

Chinmay

Rhythm

[SHIVANI CHAWLA] [CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates

For **DAYANIDHI TEXTILES PVT LTD.**

Abhishek Ahuja
Director

DAYANIDHI TEXTILES PVT LTD

Ref No.....

Date.: 18.02.2025

BOARD RESOLUTION

Certified copy of an extract from the minutes of the meeting of the Board of Directors of M/S DAYANIDHI TEXTILES PVT LTD duly convened and at which a proper quorum was present, held on the 18.02.2025 at Company's Regd Address 3704/17, FIRST FLOOR, HARDHIAN SINGH ROAD, KAROL BAGH, NEW DELHI - 1100 05. We hereby certify that the following resolution of the Board of Directors of M/S Dayanidhi Textiles Pvt Ltd was passed at a meeting of the Board held on Date 18.02.2025 and has been duly recorded in the minute book of the company.

"RESOLVED THAT Mr. Abhishek Ahuja, Director of the Company be and is hereby authorized on behalf of Dayanidhi Textiles Pvt Ltd, to initiate, file, defend represent and conduct legal cases, proceedings, or claims any court of law, tribunal, or any other judicial or quasi-judicial authority in connection with the business or matter of the company."

"RESOLVED FURTHER THAT Mr. Abhishek Ahuja is authorized to sign, verify and submit all necessary documents, affidavits, pleadings, applications and undertakings and to appoint advocates solicitors and other professionals as may be required for proceedings."

"RESOLVED FURTHER THAT all actions taken by Mr. Abhishek Ahuja in connection with the above matters be and are hereby ratified and confirmed by the Company."

"RESOLVED FURTHER THAT a certified true copy of this resolution be provided to all concerned authorities as and when required for their records and reference."

For DAYANIDHI TEXTILES PVT LTD
Abhishek Ahuja
Director

For DAYANIDHI TEXTILES PVT LTD
Angki Ahuja
Director

Certified true copy

Dayanidhi Textiles Pvt Ltd
Plot no 491, Phase -2,
Barki, Senipat.

| | |
|--|--|
|  <p>भारत सरकार Government of India</p> |  |
| <p>अभिषेक आहुजा Abhishek Ahuja जन्म तिथि/ DOB: 15/04/1983 पुरुष / MALE</p> | <p>1656</p> |
| <p>मेरा आधार, मेरी पहचान</p> | |

Abhishek Ahuja

| | |
|--|--|
|  <p>भारतीय विशिष्ट पहचान प्राधिकरण Unique Identification Authority of India</p> | <p>1656</p> |
| <p>पता: आत्मज: अशोक आहुजा, कीर्ति नगर, ब्लॉक सी, रमेश नगर, पश्चिम दिल्ली, दिल्ली - 110015</p> | <p>Address: S/O: Ashok Ahuja, kirti nagar, block C, Ramesh Nagar, West Delhi, Delhi - 110015</p> |
| <p>1947</p> | <p>help@uidai.gov.in</p> |
| <p>www.uidai.gov.in</p> | <p>www.uidai.gov.in</p> |



Vijay Kumar <vijay.kumar@satramdass.com>

Advance service copies of short reply on behalf of Respondent Nos. 29, 46, 49, 60, 74, 89, 92, 103 & 106 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

1 message

Vijay Kumar <vijay.kumar@satramdass.com>

Mon, May 12, 2025 at 4:19 PM

To: Mansi Chahal <mansichahal104@gmail.com>, Varun Gulati <jansewajanhit@gmail.com>

Cc: Shivani Chawla <shivani.chawla@satramdass.com>, Chinmay Dubey <chinmay.dubey@satramdass.com>

Dear Sir,

PFA.

Advance service copies of short reply on behalf of Respondent Nos. 29, 46, 49, 60, 74, 89, 92, 103 & 106 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proo

 Paperbook -NGT REPLY- R46 Ram

Kishan_Redacted.pdf

 Paperbook -NGT REPLY-R29 SUCH

EXPORTS_Redacted.pdf

 Paperbook -NGT Reply-R49 Natraj Home

Furnishings_Redacted.pdf

 Paperbook -NGT Reply-R92 Papcoat_Redacted.pdf Paperbook- NGT Reply-R74 Spectrum

Washing_Redacted.pdf

 Paperbook- NGT REPLY-R106 SHREE KRISHNA

BUTTONS_Redacted.pdf

 Paperbook-NGT Reply-R60 Magnet

Industries_Redacted.pdf

 Paperbook-NGT REPLY-R89 PAXY

CHEM_Redacted.pdf

 Paperbook-NGT REPLY-R103

DAYANIDHI_Redacted.pdf

f of service.

Regards

Vijay Kumar
Office Manager