

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

ORIGINAL APPLICATION NO. 622/2024

IN THE MATTER OF:

VARUN GULATI

...APPLICANT

VERSUS

STATE OF HARYANA AND ORS.

...RESPONDENTS

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FILED THROUGH:

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Archana yadav

Shivani Chawla

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

Chinmay

Rhythm

[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 25- M/s Shree Sidhi Vinayak Texcolors Pvt. Ltd.

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 15.05.2025

E-mail: siddharth.batra@satramdass.com

Place: New Delhi

Phone: 011 4704 6111

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

ORIGINAL APPLICATION NO. 622/2024

IN THE MATTER OF:

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**OBJECTIONS TO THE REPORT OF THE JOINT COMMITTEE ON
BEHALF OF RESPONDENT NO. 25, M/S SHREE SIDHI VINAYAK
TEXCOLORS PVT. LTD.**

MOST RESPECTFULLY SHOWETH:

1. That the present objections are being filed on behalf of M/s Shree Sidhi Vinayak Texcolors Pvt. Ltd., Respondent No. 25, 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. 25 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of the answering respondent, and certain findings therein are based on erroneous assumptions, miscalculations, and an outdated compliance assessment.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 on 14.08.2024, 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 02.01.2025, was issued by the Haryana State Pollution Control Board (HSPCB). The inspection report and the SCN allege non-compliance on certain grounds, including an alleged high reduction in TDS indicating dilution with freshwater, and marginal deviation in pH values.
- 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 latest detailed and reasoned 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 allegation of dilution and submits that the effluent generated by the unit is routed to the CETP via a dedicated pipeline after necessary filtration. The inspection report does not establish any direct causal link between the answering

respondent's PETP operations and the alleged pollution in Drain No. 6. The claim of dilution is based on assumption, and the observed reductions in COD/BOD indicate effective treatment, not dilution.

- 4.4. That Joint Committee Report alleges that there is non-compliance due to high reduction in pollution parameters which has been apprehended as dilution with fresh in PETP among various other allegations.
- 4.5. That it is submitted that the answering respondent has installed flow meters at all required locations, and the logbooks are duly maintained and available for verification. The observation regarding dilution based on reduction in TDS is unsubstantiated and based on assumption, without accounting for the efficiency of the PETP. The alleged marginal deviation in pH has already been clarified and addressed in the reply to the Show Cause Notice, and does not reflect persistent non-compliance.
- 4.6. That the answering respondent has consistently implemented stringent compliance measures to ensure that operations remain in accordance with the prescribed norms. The respondent maintains proper records of water and effluent data, ensuring that all logbooks related to freshwater consumption and effluent generation are updated regularly.
- 4.7. That the answering respondent further submits that its facility is equipped with a 12-hour capacity equalization tank, which ensures homogenization of wastewater before further treatment. Since the primary source of TDS is the dye bath and the remaining baths used are predominantly for washing with lower TDS concentrations, the mixing process itself results in an overall reduction in TDS. This operational mechanism is intrinsic to the unit's PETP and entirely negates the assumption of dilution through freshwater addition.

- 4.8. That the answering respondent holds a valid Consent to Operate (CTO) issued by HSPCB, which remains in force until 30.09.2027, and a valid Hazardous Waste Authorization also up to 30.09.2027. The answering respondent has obtained a NOC from the Haryana Water Resources Authority (HWRA), bearing No. HWRA/NOC/IND/R/2024/1197, valid from 10.06.2024 to 10.06.2025. The respondent has also been granted authorization for the generation, collection, storage, and transportation of hazardous waste under the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.
- 4.9. 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.
- 4.10. 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.
- 4.11. 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.

- 4.12. 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.
- 4.13. 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. 25- M/s Shree Sidhi Vinayak Texcolors Pvt. Ltd.
8A, Sagar Apartments, 6-Tilak Marg,
New Delhi-110001.
Mob.: 9888884445

Date: 15.05.2025
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.

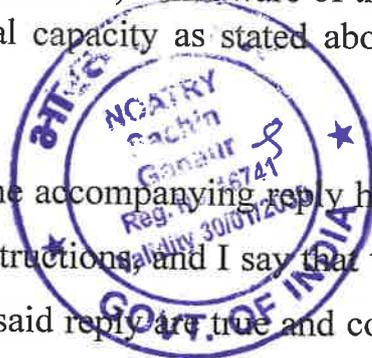
...Respondents

AFFIDAVIT

I, Hitesh Kakwani S/o Sushil Kumar Kakwani, aged about 36 years R/o house no- 33, H4/5, Suvidha Kunj, Pritampura, North west delhi-110034, do hereby solemnly affirm and stat as under:

That I am the authorized signatory of Respondent No. 25, M/s Shree Sidhi Vinayak Texcolours Pvt Ltd., having its office at B-1716, Second Floor, Jalebi Chowk Shastri Nagar, Delhi-110052. Working Address: Plot No-495, Hsiidc, Phase-II, Barhi, Industrial Area, Sonipat-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.

1. 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.
2. I say that the documents / annexure produced along with the reply are true copies of its originals.



1385
25/07/2024

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.

Jitesh Ushwan
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 25 day of February, 2025.

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.

Jitesh Ushwan
Director

DEPONENT



1387
25/2/25

ATTESTED
Sachin Ganaur
NOTARY
Ganaur Distt. Sonipat

SHREE SIDHI VINAYAK TEXCOLOURS PVT. LTD

Regd. Office	:	B-1716, Second Floor, Shastri Nagar, Delhi, North West Delhi-110052, GST No. 07AAPCS4450C1ZD
Head Office.	:	DSM 551, Fifth Floor, DLF Tower, Shivaji Marg, Moti Nagar, West Delhi -110015 CIN No.U17120DL2011PTC214874, Tel. No. 011-42638328
Haryana Plant Add	:	Plot No. 495, Phase-2, industrial Area, HSIIDC Barhi, Sonipat Haryana-131101 GST No. 06AAPCS4450C1ZF
Punjab Plant	:	Lalru-Samalheri Road, Village Samalheri,, khasra no. 291 to 301, SAS NAGAR, Tehsil Dera Bassi, District S.A.S Nagar, Mohali.(In, DERA BASSI, Daper, SAS Nagar, Punjab, 140506 GST No: 03AAPCS4450C1ZL

Date: 03.02.2025

To,

ANNEXURE R-1

Regional Officer
Haryana State Pollution Control Board,
Sonipat Region, Sonipat.

Subject: REPLY TO THE SHOW CAUSE NOTICE DATED 02.01.2025.

Respected Sir,

This is in reference to the Show Cause Notice dated 02.01.2025, 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 Show Cause Notice alleges non-compliance regarding pH levels, effluent dilution, and discharge norms observed during the inspection conducted on 14.08.2024 by the Joint Team of CPCB and HSPCB in connection with OA No. 622/2024 (Varun Gulati v. State of Haryana & Ors.) pending before Hon'ble NGT, New Delhi.

In response, we respectfully submit the following clarifications on legal grounds:

A. BACKGROUND OF THE COMPANY

1. Our unit is engaged in the dyeing, bleaching, and washing of yarn and operates with a valid Consent to Operate (CTO) up to 30.09.2027. We have always been a law-abiding and environmentally responsible entity that strictly adheres to the pollution control norms prescribed by the Central and State Pollution Control Boards (CPCB & SPCB).
2. We have implemented biological treatment systems, flow meters, and comprehensive logbooks to monitor freshwater usage, effluent generation, and treatment. Our commitment to sustainability and compliance is evident in our operational practices.

B. ALLEGATIONS REGARDING NON-COMPLIANCE WITH DISCHARGE NORMS

I. REPLY TO PARA 1- PH COMPLIANCE

- a. That the pH level recorded at the PETP outlet was 9.4, which is only marginally above the prescribed limit of 9.0. Such a minor exceedance does not amount to a substantive non-compliance warranting closure or prosecution.
- b. That our unit follows a biological treatment process, where pH stability is crucial for maintaining bacterial efficiency. Minor fluctuations in pH are natural in biological treatment systems, and such variations do not indicate regulatory non-compliance.
- c. That our facility is equipped with an automated chemical dosing system that continuously regulates pH levels. Our logbook records and in-situ pH monitoring systems confirm consistent compliance, and latest analysis reports dated 17.08.2024, 17.08.2024, and 22.08.2024 show pH values well within the prescribed limits.
- d. That any observed variation may be due to minor sampling or testing inconsistencies rather than an actual exceedance.
- e. That our pH levels are now fully optimized, and we are open to re-sampling and ready to give performance guarantee as required by you.
- f. That given the negligible deviation and subsequent corrective action, this observation does not justify coercive regulatory measures such as closure or prosecution.

II. REPLY TO PARA 2 & PARA 3 – ALLEGATION OF EFFLUENT DILUTION WITH FRESHWATER & BIOLOGICAL TREATMENT IN PETP

- a. That we categorically deny the allegation that effluent dilution with freshwater has taken place in our unit. The reduction in Total Dissolved Solids (TDS) is a natural outcome of our equalization and treatment processes, not due to any unauthorized dilution.
- b. That our facility is equipped with a 12-hour capacity equalization tank, which ensures homogenization of wastewater before further treatment. Since our major TDS source is the dye bath, while the other 4-5 baths are primarily washing baths with significantly lower TDS, the mixing process naturally reduces the overall TDS concentration without requiring any dilution with freshwater.

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.

Antesh Kumar

Director

- c. That during the joint inspection conducted by CPCB and HSPCB, no physical evidence of dilution or unauthorized freshwater addition was found at our facility. The inspection report does not indicate any bypass system or artificial dilution mechanism, thereby making the allegation baseless.
- d. Moreover we have given ample time for chemical reaction with polyelectrolyte which further reduces the TDS & hence no dilution is there
- e. That in light of the above, the allegation of dilution is based on assumption rather than factual verification, and should be reconsidered.

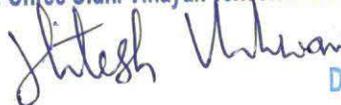
C. WATER CONSUMPTION DATA DOES NOT REFLECT USAGE OF FRESHWATER FOR DILUTION

- a. That a thorough review of our logbooks and recorded water consumption data confirms that our unit has consistently operated within the prescribed freshwater consumption limits.
- b. That the allegation that extra freshwater was added to effluent is based on assumption rather than verified data. Since our total freshwater usage remains within approved limits, the possibility of dilution simply does not arise.
- c. That dilution, by its nature, requires an excess influx of fresh water, which is not reflected in our operational records. Our Effluent Treatment Plant (ETP) functions efficiently through advanced treatment processes rather than any form of dilution.
- d. That in light of this, we request a reconsideration of this observation as it does not accurately reflect the operational reality of our facility.

D. PROCEDURAL DEFECTS IN THE SHOW CAUSE NOTICE

- a. **Lack of Jurisdictional Clarity:** The SCN fails to specify the precise statutory violations, rendering it vague and legally untenable.
- b. **Violation of Natural Justice:** No supporting scientific reports or detailed evidence have been furnished, violating Audi Alteram Partem (Right to be Heard).
- c. **Delay in Issuance of SCN:** The inspection was conducted in August 2024, but the SCN was issued in January 2025, affecting its credibility and validity.

For Shree Sidhi Vinayak Textcolours Pvt. Ltd.


Director

- d. **Disproportionate Action Proposed:** The SCN threatens closure and prosecution for minor or rectifiable deviations, which is contrary to the principle of proportionality.

E. **CTO APPROVAL CONTRADICTS ALLEGATIONS OF NON-COMPLIANCE**

- a. That Section 27 of the Water (Prevention and Control of Pollution) Act, 1974, states that a Consent to Operate (CTO) cannot be granted to a non-compliant unit.
- b. That our unit's CTO was renewed and remains valid until 30.09.2027, confirming that our facility was found compliant at the time of renewal. A copy of the Consent to Operate from 01.10.2022 to 30.09.2027 issued by Haryana State Pollution Control Board on 25.06.2022 is annexed herewith as **Annexure -A.**
- c. That if non-compliance existed, as alleged, the CTO should not have been renewed, rendering the SCN legally contradictory and untenable.

F. **PERMISSION CERTIFICATES FOR GROUNDWATER EXTRACTION FROM HWRA CONFIRM REGULATORY COMPLIANCE**

- a. That our unit has a valid Permission Certificate from the Haryana Water Resources Authority (HWRA) for groundwater extraction, which is renewed until 10.06.2025. A copy of the Permission Certificate from HWRA is annexed herewith as **Annexure -B.**
- b. That groundwater extraction is regulated and legally approved, and any allegations regarding unauthorized water use are unfounded.

G. **ADVERSE SOCIO-ECONOMIC IMPACT OF ANY COERCIVE ACTION**

- a. That the closure of our unit would result in the displacement of numerous employees, many of whom are the sole earners for their families.
- b. That any restrictive action would severely impact production, contractual obligations, and financial sustainability, affecting local suppliers and vendors.
- c. That vendors, suppliers, and ancillary businesses reliant on our operations would suffer significant financial losses, disrupting the local economy.

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.

Hitesh Khosla
Director

- d. That the principle of proportionality must be considered before any regulatory action is taken.

H. OUR REQUEST & LEGAL POSITION

In view of the above, we respectfully request:

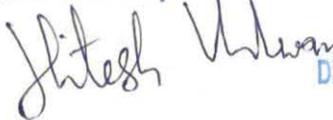
- a. Withdrawal of the Show Cause Notice, as it lacks substantive and procedural validity.
- b. Consideration of our compliance efforts, including CTO renewal, NOC approvals, and sustainable practices.
- c. A fresh and fair reassessment based on the present compliance status.

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

Thanking you,

Yours sincerely,

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.


Director

Name: Hitesh Kakwani

Designation: Director

Company Name: Shree Sidhi Vinayak Texcolours Pvt Ltd

Authorized Signatory

Contact: 9810277444



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/ : 313101722SONCTO24179297

Dated:25/06/2022

To.

M/s :SHREE SIDHI VINYAK TEXCOLOURS PVT. LTD.

PLOT NO. 495,HSIIDC, PHASE-II, BARHI, DISTT. SONEPAT

Subject: Grant of consent to operate to M/s SHREE SIDHI VINYAK TEXCOLOURS PVT. LTD..

Please refer to your application no. 24179297 received on dated 2022-05-16 in regional office Sonipat. With reference to your above application for consent to operate, M/s SHREE SIDHI VINYAK TEXCOLOURS PVT. LTD. is here by granted consent as per following specification/Terms and conditions.

Consent Under	BOTH
Period of consent	01/10/2022 - 30/09/2027
Industry Type	Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and colouring
Category	RED
Investment(In Lakh)	785.60999
Total Land Area(Sq. meter)	4050.0
Total Builtup Area(Sq. meter)	2000.0
Quantity of effluent	
1. Trade	400.0 KL/Day
2. Domestic	3.0 KL/Day
Number of outlets	2.0
Mode of discharge	
1. Domestic	Into HSIIDC sewer leading to CETP
2. Trade	Into HSIIDC sewer leading to CETP
Domestic Effluent Parameters	
1. NA	
Trade Effluent Parameters	
1. BOD	30 mg/l
2. COD	250 mg/l
3. TSS	100 mg/l
4. pH	6.0-9.0
5. O&G	10 mg/l
6. Amonical Nitrogen	50 mg/l

7. Sulphide	2 mg/l
8. Total Chromium	2 mg/l
9. Phenolic Compound	1 mg/l
Number of stacks	1
Height of stack	
1. Stack attached to boiler	30 meters
Emission parameters	
1. SPM	800 mg/m ³
2. SOX	600 mg/m ³
3. NOX	300 mg/m ³
Product Details	
1. YARN DYEING	2.0 Metric Tonnes/day
Capacity of boiler	
1. Steam boiler	4 Ton/hr
Type of Furnace	
1. NA	
Type of Fuel	
1. Coal	800 KG/day
Raw Material Details	
DYES	200 Kg/Day
ACTIC ACID	10 Kg/Day
SALT	500 Kg/Day
SAUSTIC	10 Kg/Day
SODA ASH	5 Kg/Day

*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.

Specific Conditions :

1. Unit will run ETP and APCM regularly and maintained log books properly.
2. 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
3. That the unit will provide inter locking arrangement of DG set with ETP/APCM and shall have separate D.G. set to ensure regular and effective running of pollution control devices.
4. That the unit will not discharge any untreated effluent inside and outside its premises.
5. That the unit will not add any air polluting process/ machinery and also not to add any process which increases the water pollution load.
6. That the unit will comply with all the provisions of Hazardous Waste Rules.
7. That unit will comply the discharge standards notified vide Gazette Notification no. G.S.R. 35 (E) dt. 10.10.2016.
8. That the CTO so granted shall become invalid in case of violation of any of the above / any law of the land.
8. Unit will comply direction issued by CPCB vide No. CPCB/IPCI-VI/PNG/2862-2870 Dated 27.11.2020 & CAQM order F. No. A-110018/01/2021-CAQM/7847-7872 Dated:

18.05.2022 regarding using cleaner fuels, namely, natural gas (PNG/CNG), liquefied petroleum gas, bio-gas, propane, butane etc. and biomass.

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





हरीद्वार
हरीद्वार जल संसाधन प्राधिकरण
Government of Haryana
Haryana Water Resources Authority

PERMISSION CERTIFICATE FOR GROUND WATER EXTRACTION

Project Name:		SHREE SIDHI VINAYAK TEXCOLOURS PVT LTD									
Project Address:		PLOT-495, PHASE-2, BARHI INDUSTRIAL AREA, SONIPAT									
Village/MC:		Bari		Tehsil:		Ganaur					
District:		SONIPAT		State:		Haryana					
Pin Code:		--									
Communication Address:		PLOT-495, PHASE-2, BARHI INDUSTRIAL AREA, SONIPAT									
Address Regional Office:		Rear Building, 3rd Floor, HSVP, Sector-6, Panchkula									
1. NOC No.:		HWRA/NOC/IND/R/2024/1197									
2. Application No.:		HWRA/IND/R/2024/2128		3. Category:		Industry					
4. Project Status:		Renew		5. NOC Type:		Renew					
6. Ground Water Extraction Permitted:											
Ground Water For		m3/day		m3/year		Valid From		Valid Upto			
Fresh Water		400.00		114000.00		10/06/2024		10/06/2025			
Total		400.00		114000.00		--		--			
7. Details of Ground Water Extraction:		Total Existing No.:1				Total Proposed No.:0					
		DW		DCB		BW		TW			
Abstraction Structure*		--		--		1		--			
*DW - Dug Well;DCB - Dug cum Bore Well;BW - Bore Well;TW - Tube Well;DWLR - Digital Water Level Recorder											
8. Quantum of ground water recharge(m3/year)		--									
9. Number of Piezometers (Observation wells) to be constructed/ monitored & Monitoring mechanism		No. of Piezometers				Monitoring Mechanism					
		0				Manual		DWLR		Telemetry	
						0		0		0	

* Terms & conditions are at the back of this page.



Validity of this NOC shall be subject to compliance of the following mandatory conditions

This NOC for abstraction of ground water, shall be subject to the following terms and conditions



1. NOC is granted to the applicant on the condition that local government water supply agencies are not able to supply the desired quantity of water. In case of supply of water from local agency the applicant shall immediately inform HWRA and reduce the abstraction of ground water accordingly.
2. The applicant shall adopt latest water efficient technologies to reduce dependence on ground water resources by 20% in three years. Compliance report in this regard shall be submitted yearly. The proof of reduction of dependence on ground water shall also be submitted half yearly i.e., at the time of deposit of water abstraction charges of the second quarter.
3. The applicant abstracting ground water between 100-500 kld shall undertake self-annual water audit and those abstracting ground water more than 500 kld shall undertake water audit through organisations authorised by Government of India or HWRA and submit audit reports at the time of renewal of the NOC.
4. Construction of observation well(s) (piezometer)(s) within the premises and installation of appropriate water level monitoring mechanism shall be mandatory for industries drawing or proposing to draw more than 500 kld of ground water and Monitoring of water level shall be done by project proponent. The piezometer (observation well) shall be constructed at a minimum distance of 25 m from the production well. Depth and aquifer zone tapped in the piezometer shall be the same as that of the pumping well wells Detailed guidelines for design and construction of piezometer is given on the portal. Monthly water level data shall be submitted to the HRWA through the web portal on quarterly basis.
5. The applicant with red category industries as per Haryana State Pollution Control Board shall store the harvested rainwater in surface storage tanks for use in the industry and shall not use the harvested rainwater to recharge ground water, further the applicants under this category shall ensure wellhead protection measures to prevent ground water pollution and will inform the compliance within 3 months.
6. Injection of treated/untreated wastewater/effluents into aquifer system is strictly prohibited.
7. The applicant drawing ground water in safe, semi-critical and critical assessment units shall be required to pay ground water abstraction charges on quarterly basis, applicable as per Tables 5.3A.
8. The applicant drawing ground water in over-exploited assessment units shall be liable to pay ground water restoration charges on quarterly basis, applicable as per Tables 5.3 B.
9. All the tube wells/ground water abstraction structures permitted shall be fixed with digital electromagnetic/ultrasonic water meters, by the industry at its own cost with telemetry system and monthly ground water abstraction data shall be recorded in a logbook. Compliance to this condition shall be reported within one month from the date of issue of this letter. Daily water meter readings to be recorded in a dedicated register and shall be submitted on the web portal to HWRA on quarterly basis or through centralized mechanism evolved by HWRA. The geotag photos of all the flow meters/water meters showing date and coordinates be uploaded on the portal for calculation of quarterly tariff. Without geotagged photos not showing date and coordinates will not be entertained.
10. The applicant, as per approved proposal, shall implement rainwater harvesting and ground water recharge measures within three months from the date of issuance of this NOC and undertake periodic maintenance of recharge structures. Photographs (with geo tag only) of the recharge structures etc. and compliance of completion of construction of the same along with copy of NOC shall be furnished immediately to the Haryana Water Resources Authority for verification, on the Email ID of the Authority (compliance - hwra@hry.gov.in)
11. The ground water chemical quality shall be monitored twice in a year during pre & post- monsoon period.
12. The monthly ground water level monitoring data in respect of piezometer shall be submitted quarterly to the Haryana Water Resources Authority on regular basis.
13. The applicant shall ensure proper recycling and reuse, including use for green belt, of wastewater after adequate treatment.
14. In case of renewal, application shall be submitted online within 90 days before the expiry of this NOC and abstraction of ground water, after expiry of NOC shall be illegal and liable for legal action as per law.
15. The applicant shall seek prior permissions from HWRA for any increase in daily quantum of groundwater abstraction (i.e. more than the permitted limit in the NOC).
16. Where the applicant granted NOC for abstraction of saline water and the existing well(s) is/are yielding fresh water, the same shall be sealed and new tube well(s) tapping saline water shall be constructed within 3 months of the issuance of NOC or from the date of seal of the fresh water tube well, as the case may be. The applicant shall be also ensuring safe disposal of saline residue, if any.
17. The applicant shall comply with the provisions of the Haryana Water Resources (Conservation, Regulation and Management) Authority Act, 2020, Rules, regulations, guidelines and directions issued thereunder. Non-compliance of these provisions shall be liable for the penalty as per the provisions of the Act, rules and regulations, guidelines and directions issued thereunder.
18. The applicant shall ensure the 100% reuse for non potable usage of self generated waste water after due treatment. He shall also ensure to reuse for non potable usage the Treated Waste Water (other than self generated) as per application and NOC terms & conditions
19. Since, this NOC has been issued on the basis of self-assessment by the applicant and without any site inspection, hence the Authority may inspect the site/unit and documents at any time. In case any material difference is found in the information submitted and the site conditions or documents, the Authority may suspend the NOC granted immediately and may revoke or modify the NOC after giving a notice to the applicant.
20. This NOC is subject to prevailing State Government rules/law of Courts orders related to construction of tube well, ground water withdrawal, construction of recharge or conservation structure/discharge of effluents or any such matters as applicable.
21. The applicant shall comply with the directions/conditions/instructions issued by any Court of law related to the matters concerned with the Authority.
22. The applicant shall report self-compliance duly signed by authorized person along with authorization letter by e-mail to Haryana Water Resources Authority quarterly as well as yearly basis after the issuance of NOC.
23. This NOC does not absolve the applicant of his obligation/requirement to obtain the necessary approvals from the statutory and administrative Authorities/Departments.
24. The issuance of this NOC does not imply that other statutory or administrative clearances shall necessarily be granted to the applicant by the concerned authorities. The concerned Authorities shall act as per their own procedure.
25. The applicant shall immediately inform the HWRA, if any change in the information provided by the applicant in the application form for seeking NOC.
26. This NOC shall not absolve the applicant from any penalty/punishment/environment compensation, which may have been imposed or may be imposed, for abstraction of groundwater during such period, before the issuance of this NOC.
27. In case of non-payment or delayed payment of ground water abstraction/restoration charges, a penal interest @ 18% shall be charged.
28. The necessary compliance shall be submitted to the Authority on the web portal of the Authority i.e. www.hwra.org.in or on the email id compliance-hwra@hry.gov.in.
29. In case validity period of the CTE/CTO expires during currency period of the NOC, then it will be responsibility of the project proponent to get it renewed well in time & submit renewed CTE/CTO within month after renewal of CTE/CTO by HSPCB, to HWRA. If the CTE/CTO has been suspended or rejected, project proponent is required to intimate the same to HWRA within a week of such rejection or suspension.
30. Applicant to comply IS:10500:2012 standards before use of abstracted ground water for drinking & domestic purposes.
- 31.



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: 9013082887, Email: vijay.kumar@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 ^{15th} day of ^{May} 2025

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

SS

Archana Yadav

[SIDDHARTH BATRA] [ARCHNA YADAV]

Shivani Chawla

Chinmay Dubey

Rhythm Katyal

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

Advocates

Client
For Shree Bidhi Vinayak Textolours Pvt. Ltd.
Atish Chohan
Director

SHREE SIDHI VINAYAK TEXCOLOURS PVT. LTD.

UNIT-I Address: plot- 495, PHASE-2, INDUSTRIAL AREA, HSIIDC, BARHI, SONIPAT.

(HARYANA).131101 (GSTIN: 06AAPCS4450C1ZF)

UNIT-II Address: Lalru-Samalheri Road, Vill. Samalheri, Kh. No-291 To 301, Tehsil Dera Bassi, Mohali, Punjab (140506) (GSTIN: 03AAPCS4450C1ZL)

Head Office : DSM 551, Fifth floor, DLF Tower, Sivaji Marg Moti Nagar, west Delhi-110015

Reg. Head Office: B-1716, 2nd FLOOR, JALIBEE CHOWK, SHASTRI NAGAR, DELHI – 110052.

Tel. 9810277444, 9810158197 email: kakwanihitesh@gmail.com, hiteshkakwani@ssvtgroup.com

Date: 25/02/2025

BOARD RESOLUTION/AUTHORIZATION LETTER

At a duly convened meeting of the Board of Directors of **Shree Sidhi Vinayak Texcolours Pvt Ltd**, held on **25-02-2025**, the following resolution was passed:

RESOLVED, that **Hitesh Kakwani**, Director of **Shree Sidhi Vinayak Texcolours Pvt Ltd**, be and is hereby authorized and empowered to sign, execute, and deliver all documents, agreements, and instruments related to Legal Matter, and to take any action necessary on behalf of the company in relation to the said matter.

FURTHER RESOLVED, that the actions and decisions of **Hitesh Kakwani** in executing documents or taking any action related to Legal Matter shall be considered binding upon the company.

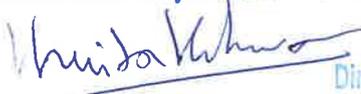
FURTHER RESOLVED, that **Hitesh Kakwani** is authorized to represent the company in all dealings, communications, and negotiations pertaining to the matter, and to sign any documents, contracts, or correspondence necessary to fulfill the requirements of the transaction.

This resolution shall remain in full force and effect until further notice or until revoked by the Board of Directors of **Shree Sidhi Vinayak Texcolours Pvt Ltd**.

RESOLVED FURTHER, that a certified copy of this resolution be provided to any third parties who may request proof of such authorization.

Signed:

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.


Director

Mr. Sushil Kumar Kakwani (Director)

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.

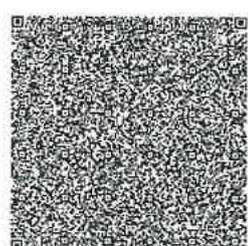
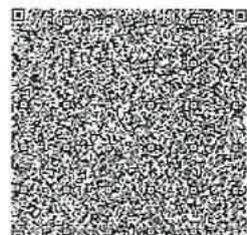

Director

Mrs. Kavita Kakwani (Director)

For Shree Sidhi Vinayak Texcolours Pvt. Ltd.


Director

Mr. Hitesh Kakwani (Director)

  <p>भारत सरकार Government of India</p> <p>भारतीय विशिष्ट पहचान प्राधिकरण Unique Identification Authority of India</p> <p>नामांकन क्रम/ Enrolment No.: 1325/11023/06804</p> <p>To हितेश ककवानी Hitesh Kakwani S/O Sushil Kumar Kakwani House No-33, H4/5 Suvidha Kunj Pitampura North West Delhi Delhi - 110034 9810277444</p> <p>Signature valid</p>  <p>आपका आधार क्रमांक / Your Aadhaar No. : 3431 VID : 9129 3092 9038 5668</p> <p>मेरा आधार, मेरी पहचान</p>	  <p>सूचना</p> <ul style="list-style-type: none"> ■ आधार पहचान का प्रमाण है, नागरिकता का नहीं। ■ सुरक्षित QR कोड / ऑफलाइन XML / ऑनलाइन ऑथेंटिकेशन से पहचान प्रमाणित करें। ■ यह एक इलेक्ट्रॉनिक प्रक्रिया द्वारा बना हुआ पत्र है। <p>INFORMATION</p> <ul style="list-style-type: none"> ■ Aadhaar is a proof of identity, not of citizenship. ■ Verify identity using Secure QR Code/ Offline XML/ Online Authentication. ■ This is electronically generated letter. <div style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> ■ आधार देश भर में मान्य है। ■ आधार कई सरकारी और गैर सरकारी सेवाओं को पाना आसान बनाता है। ■ आधार में मोबाइल नंबर और ईमेल ID अपडेट रखें। ■ आधार को अपने स्मार्ट फोन पर रखें, mAadhaar App के साथ। </div> <ul style="list-style-type: none"> ■ Aadhaar is valid throughout the country. ■ Aadhaar helps you avail various Government and non-Government services easily. ■ Keep your mobile number & email ID updated in Aadhaar. ■ Carry Aadhaar in your smart phone – use mAadhaar App.
  <p>भारत सरकार Government of India</p>  <p>हितेश ककवानी Hitesh Kakwani जन्म तिथि/DOB: 12/08/1988 पुरुष/ MALE</p> <p>Issue Date: 16/12/2011</p> <p>3431 VID : 9129 3092 9038 5668</p> <p>मेरा आधार, मेरी पहचान</p>	  <p>भारतीय विशिष्ट पहचान प्राधिकरण Unique Identification Authority of India</p> <p>पता: S/O सुशील कुमार काकवानी, हाउस न-33, एच4/5, सुविधा कुंज, पीताम्पुरा, उत्तर पश्चिम, दिल्ली - 110034</p> <p>Address: S/O Sushil Kumar Kakwani, House No-33, H4/5, Suvidha Kunj, Pitampura, North West Delhi, Delhi - 110034</p> <p>Download Date: 05/12/2022</p>  <p>3431 VID : 9129 3092 9038 5668</p> <p>1947 help@uidai.gov.in www.uidai.gov.in</p>

For Shree Sidhi Minyak Textcolours Pvt. Ltd.

Hitesh Kakwani
Director

2195

24



Archna Yadav <archna.yadav@satramdass.com>

Advance service copy of short reply on behalf of Respondent Nos. 25 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors

1 message

Archna Yadav <archna.yadav@satramdass.com>

Thu, May 15, 2025 at 3:54 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>, Vijay Kumar <vijay.kumar@satramdass.com>

Dear Sir,

PFA.

Advance service copies of short reply on behalf of Respondent No. 25 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proof of service.

Kind Regards

Archna Yadav
Senior Associate

Satram Dass B & Co.
8A Sagar Apartment, 6 Tilak Marg, New Delhi 110001, India
E-mail: archna.yadav@satramdass.com
Phone (o): +91 (0)11 47046111, 4746144
Webex : <https://meet155.webex.com/meet/archnayadav>

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