

**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. 32, M/s Super Dyeing	1 – 5
2.	Supporting Affidavit	6 – 7
3.	<u>ANNEXURE R-1:</u> A copy of the latest detailed and reasoned response to the HSPCB Show Cause Notice along with all the relevant annexures.	8 – 42
4.	Vakalatnama and Board Resolution	43 – 44
5.	Copy of Aadhar Card	45
6.	Proof of Service	46

2123

FILED THROUGH:

Sb

Archana yadav

Shivani chawla

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

Chinmay

Rhythm

[CHINMAY DUBEY] & [RHYTHM KATYAL]

Advocates for Respondent No. 32- M/s Super Dyeing

8A, Sagar Apartments, 6-Tilak Marg,

New Delhi-110001.

Mob.: 9888884445

Date: 09.05.2025

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

**OBJECTIONS TO THE REPORT OF THE JOINT COMMITTEE ON
BEHALF OF RESPONDENT NO. 32, M/S SUPER DYEING**

MOST RESPECTFULLY SHOWETH:

1. That the present objections are being filed on behalf of M/s Super Dyeing, Respondent No. 32, 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 02.01.2025. As per the order dated 08.01.2025, the Answering Respondent has been impleaded as Respondent No. 32 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of the answering respondent, and certain findings therein are based on erroneous assumptions, miscalculations, and an outdated compliance assessment.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 12.08.2024, 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 suspected dilution, pH variation, and effluent parameter exceedance..
- 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 maintains appropriate treatment infrastructure and records. The allegations regarding parameter reductions fail to take into account the characteristics of the process and treatment efficiencies. These issues were duly explained in the detailed reply to the HSPCB, and the respondent continues to maintain all relevant operational records and data.
- 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 holds a valid Consent to Operate (Air and Water) and Hazardous Waste Authorization, both valid up to 30.09.2025. The answering respondent has also applied for a No Objection Certificate (NOC) from the Haryana Water Resources Authority (HWRA) and the same is under process.
- 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. 32- M/s Super Dyeing
8A, Sagar Apartments, 6-Tilak Marg,
New Delhi-110001.
Mob.: 9888884445

Date: 09.05.2025
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, Pardeep Kumar S/o Babu Ram, aged about 43 years R/o Agroha Kunj, Sector-13 Rohini, Sector-7 North West Delhi-110085, do hereby solemnly affirm and stat as under:

1. That I am the authorized signatory of Respondent No. 32, M/s Super Dyeing, having its office at Plot no 498 Barhi, 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.
2. 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.

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



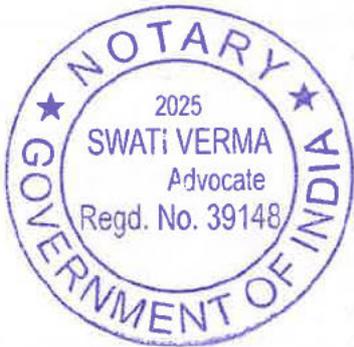
SUPER DYEING
Rasheed Singh
Partner
DEPONENT

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 Delhi on this 25 day of February, 2025.

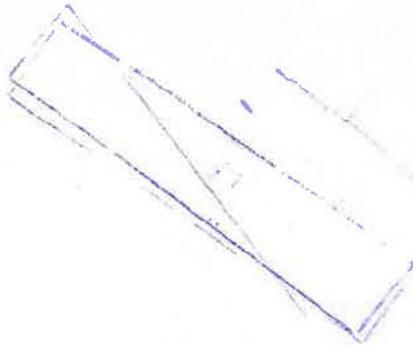
SUPER DYEING
Rasheed Singh
Partner
DEPONENT



Register Entry No... 105
Dated... 25 FEB 2025

ATTESTED
Swati
NOTARY PUBLIC
DELHI (INDIA)

25 FEB 2025



SUPER DYEING

**PLOT NO. 498, PHASE-II, HSIIDC, INDUSTRIAL ESTATE BARHI
DISTT. SONEPAT (HARYANA) - 131101**

E-mail : superdyeing2022@gmail.com

Ref. No.

Date.....

Date: 10.02.2025

WITHOUT PREJUDICE

To
The Regional Officer
Haryana State Pollution Control Board (HSPCB)
Sonipat

**SUBJECT: REPLY TO SHOW CAUSE NOTICE NO.
HSPCB/SR/2025/2635 DATED 02.01.2025.**

Respected Sir,

This is in reference to the Show Cause Notice (SCN) No. HSPCB/SR/2025/2635 dated 02.01.2025, issued to M/s Super Dyeing located at Plot No. 498, PH-2, HSIIDC Barhi, District Gannaur, Sonipat, Haryana 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 SCN raises specific allegations, which are addressed in detail as follows:

A. BACKGROUND OF THE COMPANY

- a. M/s Super Dyeing is engaged in the lawful business of textile processing and dyeing, operating with a valid Consent to Operate (CTO) issued by the Haryana State Pollution Control Board (HSPCB). The unit adheres to all prescribed environmental

Partner

SUPER DYEING
Pardeep Singh

Received
Sun 10 Feb 2025
HARYANA STATE POLLUTION CONTROL BOARD
Sector-15, Part-II

SUPER DYEING

regulations and operates in full compliance with the conditions stipulated under the CTO.

- b. The unit strictly adheres to all prescribed environmental regulations and operates in full compliance with the conditions stipulated under the CTO.
- c. The unit maintains a Primary Effluent Treatment Plant (PETP) that is fully operational and efficiently processes effluent to meet the prescribed discharge standards.

B. RESPONSE TO OBSERVATIONS

I. Response to Para 1 –

- a. That our unit maintains proper records of fresh water consumption in accordance with prescribed norms.
- b. That the logbook format has been updated to enhance clarity and ease of reference, ensuring seamless compliance monitoring. A copy of the updated logbook format is annexed herewith as **Annexure A.**
- c. That our water consumption data remains in adherence with the applicable standards, and there is no indication of any discrepancy in record-keeping.

II. Response to Para 2

- a. That our unit operates a fully functional PETP system, designed to treat effluents in accordance with prescribed discharge norms.
- b. That the pH levels of our effluent are maintained within the permissible range, and any deviation observed in the inspection report appears to be due to improper sampling, testing

inconsistencies, or external factors beyond our control. A copy of the latest effluent analysis report from an accredited laboratory is annexed herewith **as Annexure B.**

- c. That our process does not involve any dilution with fresh water, and the allegation suggesting otherwise is unfounded. The reduction in pollution parameters such as BOD and COD is a result of effective effluent treatment, not dilution.
- d. That the compliance of our treatment process is regularly verified through accredited laboratory reports, which confirm adherence to discharge standards. A copy of the compliance verification reports is enclosed as **Annexure C.**

III. Response to Para 3

- a. That our unit maintains a proper and updated logbook recording effluent generation and discharge in accordance with prescribed norms.
- b. That the effluent generation data is systematically recorded and verified to ensure accuracy and compliance with regulatory standards. A copy of the effluent generation logbook is annexed herewith as **Annexure D.**
- c. That our logbook format is structured to provide clear and traceable records, and there is no discrepancy in maintaining effluent generation records.
- d. That in light of the above, the observation that the logbook is not properly or correctly maintained is incorrect and does not reflect the actual operational records of our unit.

IV. **Response to Para 4**

- a. That our unit has installed flow meters at both the PETP inlet and outlet, ensuring accurate measurement and monitoring of effluent discharge. Photographic evidence of installed flow meters is enclosed herewith as **Annexure E.**
- b. That the effluent disposal data recorded in our logbooks is systematically maintained and reflects accurate measurements of effluent generation and discharge. A copy of the effluent disposal logbook is annexed herewith as **Annexure F.**
- c. That there is no dilution in the effluent treatment process, and the inference drawn in the notice is incorrect. To ensure complete clarity, the ETP pipelines have been color-coded, differentiating between the inlet effluent line, treated water line, filtration line, and sludge disposal line. Photographic evidence of the color-coded ETP pipelines is enclosed as **Annexure G.**
- d. That the observed variance in disposal and generation figures does not indicate dilution but rather accounts for process-related factors such as evaporation, retention within the treatment process, and sludge formation.
- e. That our effluent treatment process adheres to prescribed regulatory norms, and all recorded disposal data is consistent with industry standards and operational realities.
- f. That in light of the above, the allegation of possible dilution is unfounded and does not accurately reflect the operational functioning of our unit.

V. **Response to Para 5 – Allegation Regarding Reduction in BOD & COD and Possible Dilution**

- a. That our effluent treatment process is designed to ensure a high level of pollutant reduction through a combination of advanced treatment technologies, including physico-chemical treatment, biological treatment, and filtration processes.
- b. That the reduction in BOD from 765 mg/l to 3 mg/l (99.6%) and COD from 3039 mg/l to 49 mg/l (98.4%) is a direct result of the effectiveness of our treatment process and does not indicate dilution. A copy of the accredited laboratory report confirming the reduction in BOD & COD levels is annexed herewith as **Annexure H.**
- c. That our treatment system includes multi-stage processing mechanisms such as flocculation, sedimentation, activated carbon filtration, and other scientifically proven methods to achieve the necessary reduction in BOD & COD.
- d. That the assumption that such reduction is not possible through physico-chemical treatment alone does not account for our unit's advanced treatment setup, which has been periodically tested and optimized to ensure maximum pollutant removal.
- e. That our compliance with discharge norms is supported by accredited laboratory reports, which confirm the efficiency of our effluent treatment system in achieving the required standards. A copy of the latest effluent analysis report is enclosed herewith as **Annexure I.**

- f. That in view of the above, the inference that dilution has taken place before discharge is incorrect and does not accurately reflect the operational practices followed by our unit.

VI. **Response for Para 6:**

- a. That the allegation regarding the unregulated use of alum is incorrect and not supported by any substantive data.
- b. That the effluent treatment process is designed to maintain prescribed pH levels, and the observed pH variation in the inspection report is likely due to external factors such as sampling inconsistencies or variations in influent composition, rather than any improper chemical dosing.
- c. That the PETP system operates under strict monitoring, ensuring that all treatment chemicals, including coagulants, are used in a controlled and regulated manner in compliance with prescribed norms. A copy of the chemical usage logbook, documenting regulated alum dosages, is annexed as **Annexure J.**
- d. That the mere presence of aluminium ions in the effluent does not indicate any regulatory breach, as alum is a commonly used coagulant in effluent treatment processes and is utilized within permissible limits to facilitate coagulation and sedimentation.
- e. That there is no unauthorized dilution, and the treated water complies with applicable discharge standards, as verified through accredited laboratory test reports. A copy of the latest pH analysis report is annexed herewith as **Annexure K.**

- f. That we request independent verification of sampling protocols to address any discrepancies and ensure an accurate assessment of compliance status.

C. RESPONSE TO RECOMMENDATIONS MENTIONED IN THE SHOW CAUSE NOTICE

1. **Adjustments in alum dosage and other operations parameters may be necessary to manage pH and sulphide level effectively.**
 - a. That our unit ensures that alum dosage is regulated in accordance with prescribed operational parameters to maintain pH levels within the permissible range.
 - b. That our process does not involve any unregulated addition of alum, and the pH levels are consistently monitored through real-time equipment to ensure compliance.
 - c. That records of alum usage and pH monitoring are systematically maintained and available for verification. A copy of the pH monitoring logbook is annexed herewith as **Annexure L**.
2. **Unit should avoid any type of dilution of the effluent.**
 - a. Our unit ensures that no dilution of effluent occurs at any stage of treatment. The effluent treatment process is strictly regulated, and all discharge parameters are consistently monitored to comply with prescribed norms.
3. **Unit should properly maintain logbook for freshwater usage/ abstraction, inlet and outlet flow meter readings, energy meter readings and sludge generation.**

- a. Our unit maintains detailed and accurate logbooks for freshwater usage, abstraction, inlet and outlet flow meter readings, energy meter readings, and sludge generation. These records are systematically updated and available for verification, ensuring compliance with prescribed norms. A copy of the updated logbooks for freshwater abstraction, flow meter readings, and sludge generation is annexed herewith as **Annexure M.**

4. Unit should not discharge any effluent without treatment

- a. Our unit ensures that no effluent is discharged without proper treatment. The PETP system is fully operational and effectively treats effluents before disposal, ensuring adherence to all prescribed discharge norms. A copy of the latest effluent discharge compliance report is enclosed as **Annexure N.**

5. Unit shall install OCEMS at PETP outlet and provide connectivity to the CPCB/ SPSCB Server.

- a. That our unit has already installed the OCEMS at the PETP outlet and provided connectivity to the CPCB/SPCB server. Compliance with this requirement should not be construed as an admission of any past non-compliance, as our unit has always adhered to prescribed regulatory standards. A copy of the OCEMS installation and connectivity confirmation report is enclosed herewith as **Annexure O.**

D. SUBMISSION OF PERFORMANCE SECURITY AND WATER TESTING FEE

- a. That our unit has duly deposited the performance security amounting to **Rs. 1,00,000/-** vide UTR No. **HDFCN202502151515** dated **21.01.2025** and the water testing fee of **Rs. 4,500/-** vide UTR

No. **HDFCN52025012115189620** dated **21.01.2025**. Copies of the payment receipts are enclosed herewith for reference. Copies of the payment receipts are enclosed herewith as **Annexure P** for reference.

- b. Additionally, we have submitted an updated logbook format to ensure systematic record-keeping and compliance. We request the Hon'ble Board to take this on record and approve the same. A copy of the revised logbook format is annexed herewith as **Annexure Q**.

E. CTO APPROVAL CONTRADICTS ALLEGATIONS OF NON-COMPLIANCE

- a. That **Section 27 of the Water (Prevention & 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 31.03.2026**, confirming that our facility was found compliant at the time of renewal. A copy of the **CTO issued by HSPCB on [insert date of issuance of notice]** is enclosed as **Annexure-R**.
- c. That if **non-compliance existed**, as alleged, the **CTO should not have been renewed**, making the issuance of **SCN legally untenable**.

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

- a. That our unit has applied for renewal of Permission Certificate from the Haryana Water Resources Authority (HWRA) for groundwater extraction.
- b. That groundwater extraction is regulated and legally approved, and any allegations regarding unauthorized water use are unfounded.

G. **PROCEDURAL DEFECTS IN THE SHOW CAUSE NOTICE**

- a. **Delay in Issuance of SCN:** That the unit was inspected on 07.08.2024, while the Show Cause Notice (SCN) was issued on 02.01.2025, more than five months later. Such an extraordinary delay raises serious doubts about the validity of the findings and undermines the reliability of the observations made during the inspection. Environmental compliance assessments are meant to be conducted in real-time, and such a prolonged delay prevents the unit from effectively responding to any observations that may have been rectified or changed over time.
- b. **Failure to Provide Accredited Test Reports:** The Environment (Protection) Act, 1986, mandates that industries must be provided with test reports promptly. However, despite the serious nature of the allegations, no accredited test report from the Board's laboratory has been shared with Girja Dyeing, thereby denying the unit an opportunity to verify the authenticity of the findings. The failure to provide laboratory reports prevents the unit from independently verifying whether the alleged observations regarding water consumption, dilution, or effluent characteristics are scientifically and procedurally valid.
- c. **Non-Adherence to Regulatory Timelines:** The allegations raised in the SCN are based on a comparison with standard water

consumption figures, rather than specific evidence of non-compliance. The SCN itself acknowledges that different washing cycles and types of garments impact water consumption, yet the allegations fail to consider operational variations in different dyeing and washing processes. Furthermore, the five-month delay in issuing the SCN disregards any operational improvements or efficiency measures implemented by the unit during this period.

- d. **Failure to Consider Water Recycling Practices:** The SCN does not factor in the water recycling and reuse measures implemented by the unit. Girja Dyeing operates a system where a significant portion of water is recycled and reused to minimize fresh water consumption. The allegation that the unit is consuming higher water than standard values fails to account for the efficiency of water reuse mechanisms, thereby making the comparison misleading and incomplete.

H. ABSENCE OF PROPER SAMPLING PROTOCOLS

- I. That the sampling and testing data cited in the Show Cause Notice are disputed on the following legal and procedural grounds:
 - a. **Lack of Transparency in Sample Collection:** The SCN does not provide details regarding the exact methodology and protocol followed during sampling. Girja Dyeing does not operate a ZLD system; however, the presence of wastewater during the inspection does not conclusively establish non-compliance. The Board has not provided sufficient evidence regarding whether proper procedures were followed in sample collection and analysis.
 - b. **Unclear Basis for Allegations:** The SCN claims non-compliance based on effluent characteristics, yet the allegations fail to take into

account operational realities. The unit has consistently operated within regulatory guidelines, and the absence of proper sampling records makes the allegations unverified. The Board has not clarified whether the findings are based on an accredited laboratory test or mere visual inspection.

- c. **Absence of Accredited Test Reports:** The Environment (Protection) Act, 1986, mandates that industries must be provided with accredited test reports to verify compliance status. However, no accredited laboratory report has been shared with Girja Dyeing, denying the unit the opportunity to assess the accuracy of the alleged findings. Without this, the allegations remain unsubstantiated.
- d. **Failure to Account for Operational Realities:** The unit's effluent treatment data confirms that no unauthorized dilution or bypassing of effluent has occurred. The allegations regarding high TDS levels are based on selective sampling and do not consider the ongoing treatment process. The Board has failed to explain whether the results were influenced by sampling errors, equipment calibration issues, or procedural lapses.

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

- a. That a detailed analysis of our logbooks and water consumption records clearly establishes that the unit has consistently operated within the prescribed freshwater consumption limits as per regulatory guidelines.

- b. That the allegation of dilution is based on mere assumption rather than verified data, as no evidence has been provided to substantiate the claim that excess freshwater has been added to the effluent. Since our total freshwater usage remains within the approved limits, the possibility of dilution simply does not arise.
- c. That dilution, by its nature, would require a disproportionate influx of fresh water, which is neither reflected in our operational records nor supported by any technical findings. The unit's Effluent Treatment Plant (ETP) is designed to function efficiently through advanced treatment processes rather than any reliance on dilution.
- d. That the compiled data sheet from our logbooks, already submitted as part of this response, unequivocally demonstrates that our effluent discharge levels are aligned with industry norms and do not indicate any dilution.
- e. That in light of these facts, it is respectfully submitted that the observation regarding dilution requires reconsideration, as it does not accurately reflect the operational and compliance status of the unit.

J. ADVERSE SOCIO-ECONOMIC IMPACT OF ANY COERCIVE ACTION

- a. **Impact on Employment:** That the closure of Girja Dyeing would result in the displacement of numerous employees, many of whom are sole earners for their families. A sudden stoppage of operations would adversely impact livelihoods and cause significant financial distress to workers and their dependents.

- b. **Severe Financial and Business Disruptions:** That any restrictive action would severely impact production, contractual obligations, and financial sustainability, affecting local suppliers and vendors who rely on regular operations for economic stability.
- c. **Disruption to Local Economy:** That vendors, suppliers, and ancillary businesses directly reliant on Girja Dyeing's operations would suffer significant financial losses, thereby disrupting the local economy and creating a cascading effect on multiple industries.
- d. **Principle of Proportionality:** That the principle of proportionality must be carefully considered before any coercive regulatory action is taken, ensuring that corrective measures are reasonable, fair, and balanced, keeping in mind economic repercussions and compliance efforts.

K. OUR REQUEST AND LEGAL POSITION

In light of the foregoing, it is respectfully submitted that:

- a. The **Show Cause Notice be withdrawn**, as the allegations contained therein are **unfounded, legally unsustainable, and contrary to the unit's established compliance record**.
- b. Due consideration be given to the unit's **valid CTO, regulatory approvals, operational PETP, and adherence to prescribed discharge norms**, which affirm the unit's commitment to environmental compliance.
- c. A **fair and independent re-inspection** be conducted to ascertain the current operational status of the **PETP and evaporator**, if deemed necessary.

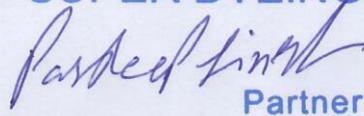
- d. An **independent third-party verification** of the effluent treatment process be permitted, at the unit's cost, to conclusively establish compliance with statutory discharge norms.

It is, therefore, humbly prayed that the Show Cause Notice be set aside in the interest of justice, fairness, and in recognition of the unit's ongoing compliance with environmental regulations.

We reaffirm our commitment to adhering to environmental regulations and assure compliance with all applicable norms. We look forward to your favorable consideration.

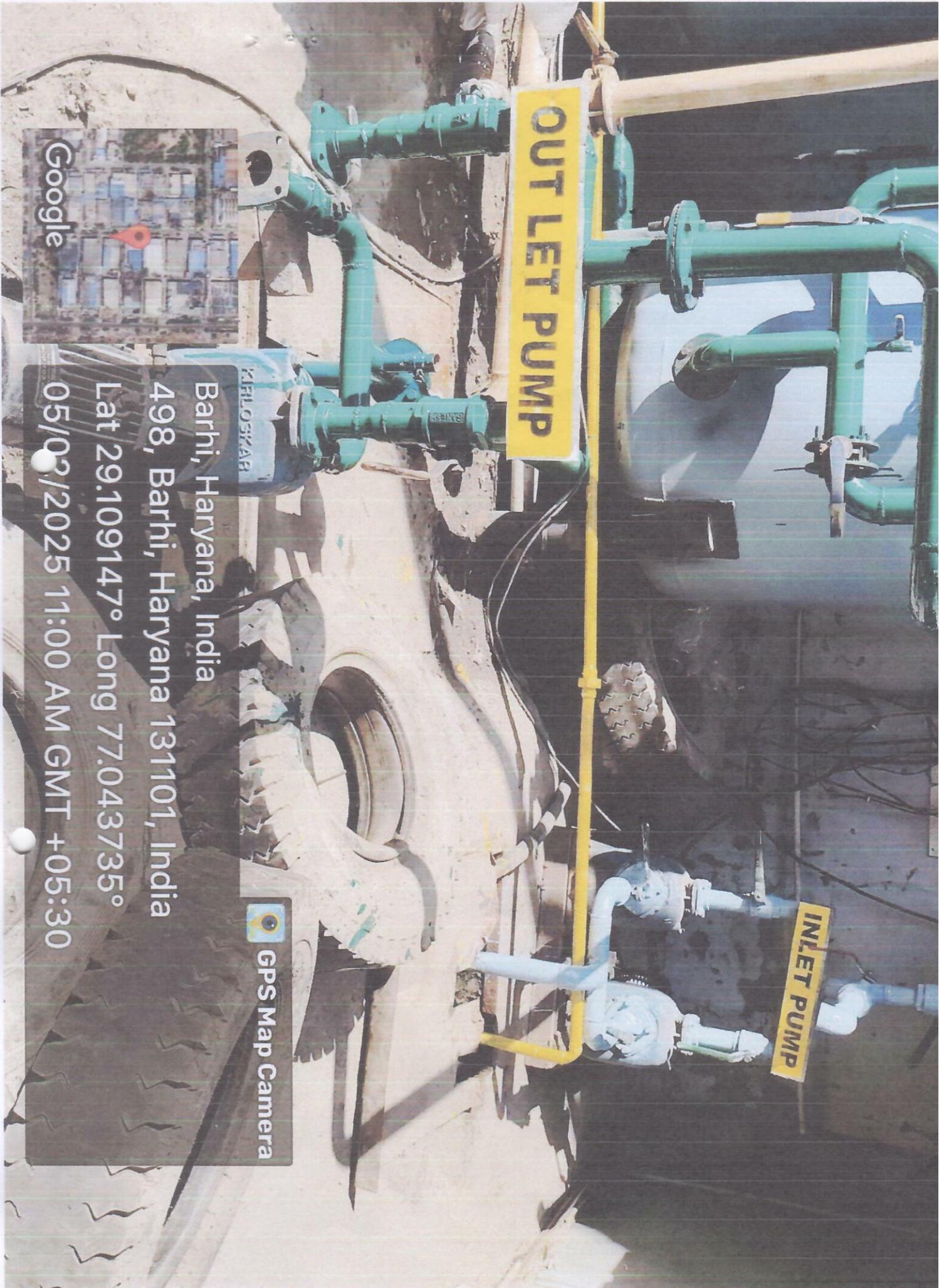
Thank you.

Yours faithfully,

SUPER DYEING

Partner

For M/s Super Dyeing
[Authorized Signatory]

Plot No. 498, PH-2, HSIIDC Barhi, District Gannaur, Sonipat, Haryana



Google

Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109147° Long 77.043735°
05/02/2025 11:00 AM GMT +05:30

 GPS Map Camera



GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109147° Long 77.043709°
05/02/2025 11:37 AM GMT +05:30



INLET FLOW METER

OUTLET FLOW METER

GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109124° Long 77.043745°
05/02/2025 11:39 AM GMT +05:30

Google



GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109065° Long 77.043713°
05/02/2025 11:06 AM GMT +05:30

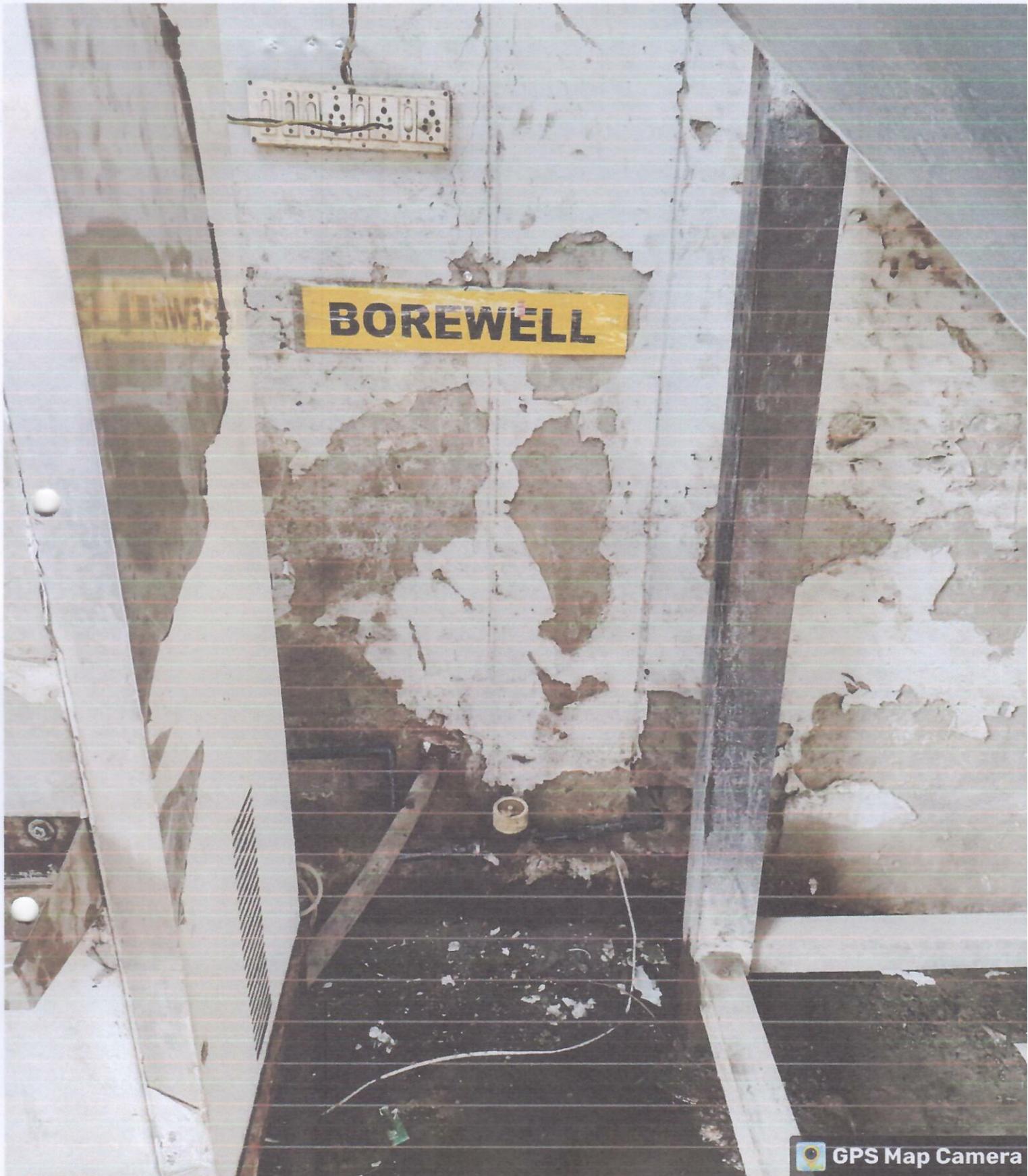
Google



GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109127° Long 77.043721°
05/02/2025 11:05 AM GMT +05:30



GPS Map Camera



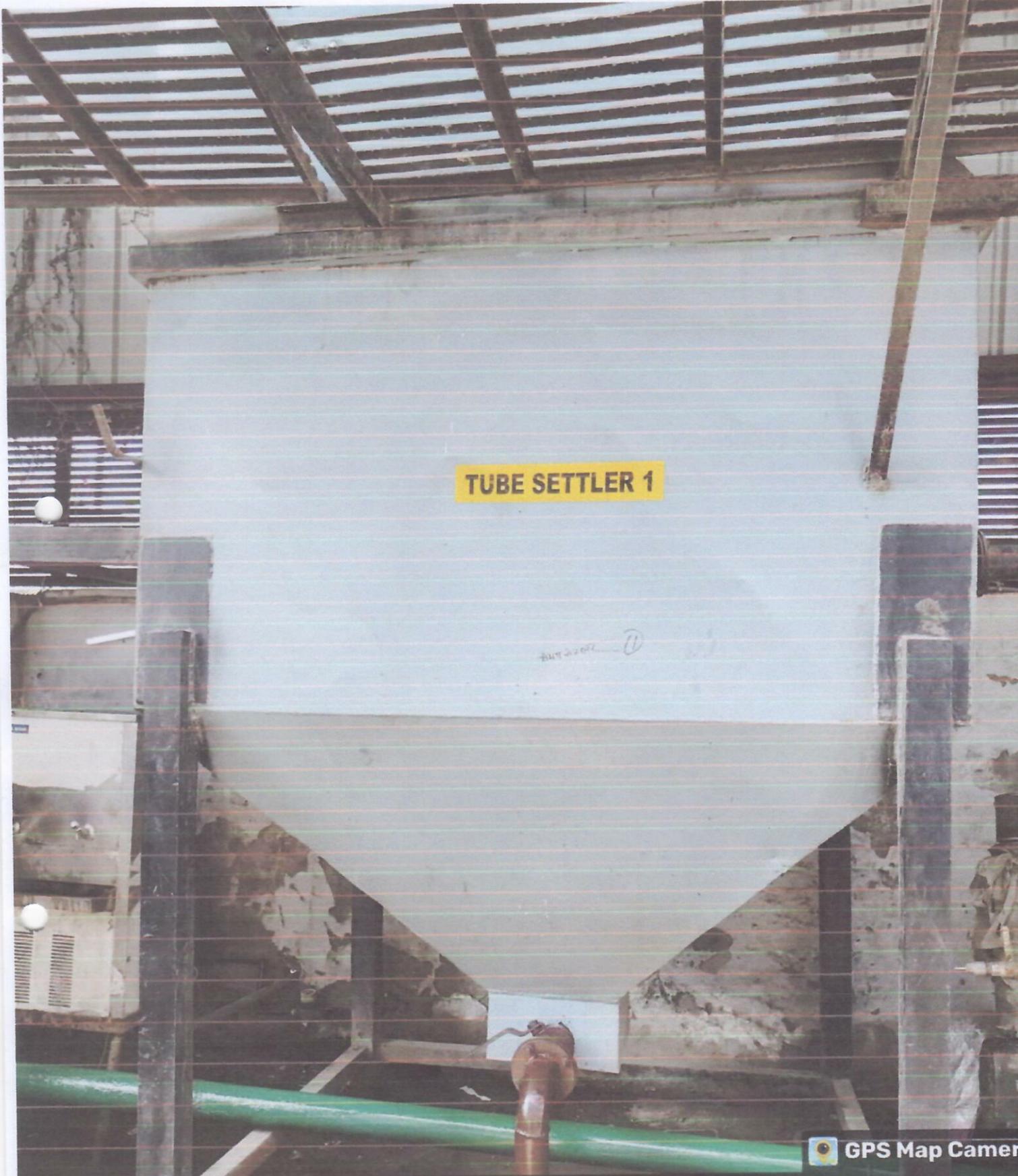
Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109075° Long 77.043714°
05/02/2025 11:08 AM GMT +05:30

TUBE SETTLER 2

GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109044° Long 77.043718°
05/02/2025 11:43 AM GMT +05:30



TUBE SETTLER 1

498-2072 ①

GPS Map Camera



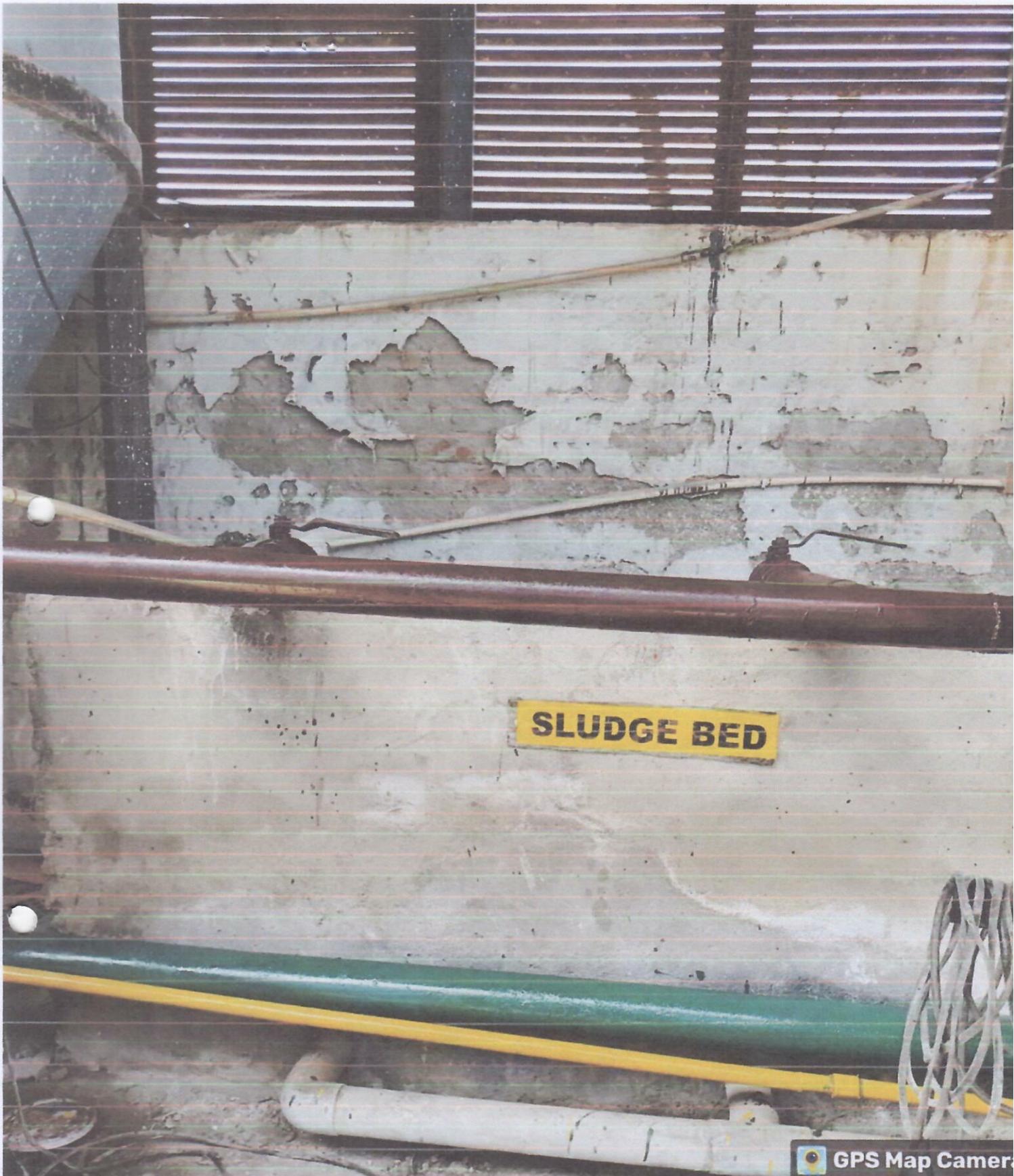
Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109059° Long 77.043735°
05/02/2025 11:42 AM GMT +05:30



GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109082° Long 77.043711°
05/02/2025 11:42 AM GMT +05:30



SLUDGE BED

GPS Map Camera



Barhi, Haryana, India
498, Barhi, Haryana 131101, India
Lat 29.109146° Long 77.043736°
05/02/2025 11:41 AM GMT +05:30

LPG BOOK OF SEWERAGE/ EFFLUENT TREATMENT PLANT

NAME AND ADDRESS OF UNIT:- PLOT NO 498 MONTH OF SEPT 2024

DATE	INLET PUMP		FLOW METER	CHEMICAL CONSUMPTION			PH TREATED MET. RED	ENERGY METER			SIGNATURE	REMARK
	ON	OFF		OUTLET	ALUM	LIME		POLY	ON	OFF		
01 September 2024	—	—	—	—	—	—	—	—	—	—	—	—
02 September 2024	8747.9	8767.6	10990.6	10KG	20KG	30000	7.6	16753	16780.3	10KG	Samsad	
03 September 2024	8762.6	8786.8	10948.1	10KG	20KG	30000	7.2	16780.3	16810.9	10KG	Samsad	
04 September 2024	8706.5	8800.7	10978.1	10KG	20KG	30000	7.5	16810.2	16835.7	7KG	Samsad	
05 September 2024	8805.7	8828.8	10999.8	10KG	18KG	30000	7.4	16835.7	16859.6	7KG	Samsad	
06 September 2024	8828.8	8845.9	11024.6	10KG	20KG	30200	7.6	16859.6	16890.2	7KG	Samsad	
07 September 2024	8845.9	8864.8	11049.9	10KG	20KG	30200	7.1	16890.2	16920.9	7KG	Samsad	
08 September 2024	—	—	—	—	—	—	—	—	—	—	—	—
09 September 2024	8864.8	8881.1	11077.1	10KG	20KG	30200	7.2	16920.9	16950.5	7KG	Samsad	
10 September 2024	8881.1	8904.6	11099.4	10KG	20KG	30200	7.4	16950.5	16974.7	7KG	Samsad	
11 September 2024	8904.6	8923.3	11126.3	10KG	20KG	30000	7.2	16974.7	16999.9	7KG	Samsad	
12 September 2024	8923.3	8942.5	11151.2	10KG	20KG	30200	7.6	16999.9	17029.3	7KG	Samsad	
13 September 2024	8942.5	8961.8	11179.1	10KG	20KG	25000	7.3	17029.3	17058.6	7KG	Samsad	
14 September 2024	8961.8	8980.4	11209.1	10KG	18KG	25000	7.5	17058.6	17088.9	7KG	Samsad	
15 September 2024	—	—	—	—	—	—	—	—	—	—	—	—
16 September 2024	8980.4	8999.6	11232.2	10KG	18KG	25000	7.6	17088.9	17118.6	7KG	Samsad	
17 September 2024	8999.6	9019.3	11264.8	10KG	20KG	25000	7.8	17118.6	17148.6	7KG	Samsad	
18 September 2024	9019.3	9040.8	11299.6	10KG	20KG	25000	7.6	17148.6	17194.2	7KG	Samsad	
19 September 2024	9040.8	9058.8	11314.2	10KG	20KG	25000	7.3	17194.2	17232.6	7KG	Samsad	
20 September 2024	9058.8	9077.8	11343.5	10KG	20KG	25000	7.6	17232.6	17270.5	7KG	Samsad	
21 September 2024	9077.8	9097.6	11373.6	10KG	20KG	25000	7.2	17270.5	17302.5	7KG	Samsad	
22 September 2024	—	—	—	—	—	—	—	—	—	—	—	—
23 September 2024	9097.6	9117.4	11404.2	10KG	20KG	25000	7.4	17302.5	17332.8	7KG	Samsad	
24 September 2024	9117.4	9136.8	11434.9	10KG	20KG	25000	7.6	17332.8	17362.6	7KG	Samsad	
25 September 2024	9136.8	9155.9	11464.2	10KG	20KG	25000	7.7	17362.6	17386.2	7KG	Samsad	
26 September 2024	9155.9	9175.6	11494.6	10KG	20KG	25000	7.4	17386.2	17422.3	7KG	Samsad	
27 September 2024	9175.6	9195.8	11522.3	10KG	20KG	25000	7.6	17422.3	17452.6	7KG	Samsad	
28 September 2024	9195.8	9215.2	11551.1	10KG	20KG	25000	7.3	17452.6	—	7KG	Samsad	
29 September 2024	—	—	—	—	—	—	—	—	—	—	—	—
30 September 2024	9215.2	9235.3	11581.2	10KG	20KG	25000	7.8	17452.6	17482.6	7KG	Samsad	

LPG BOOK OF SEWERAGE/ EFFLUENT TREATMENT PLANT

NAME AND ADDRESS OF UNIT:- PLOT NO 498 MONTH OF DECEMBER 2024

DATE	INLET PUMP		FLOW METER	CHEMICAL CONSUMPTION			PH TREATED	ENERGY METER		SIGNATURE	REMARK
	ON	OFF		ALUM	LIME	POLY	MET. RED	ON	OFF		
01 December 2024	—	—	—	—	—	—	—	—	—		
02 December 2024	10090.3	10108.2	12776.8	10kg	20kg	250gr	7.3	18731.9	18762.8	7kg	sampled
03 December 2024	10108.2	10195.3	12799.3	10kg	20kg	250gr	7.2	18762.8	18791.5	7kg	sampled
04 December 2024	10125.3	10141.8	12522.5	10kg	20kg	250gr	7.3	18791.5	18825.4	7kg	sampled
05 December 2024	10141.2	10364	12846.1	10kg	20kg	250gr	7.6	18825.4	18856.7	7kg	sampled
06 December 2024	11036.4	11054	12870.2	10kg	20kg	250gr	7.3	18856.7	18886.1	7kg	sampled
07 December 2024	11072.4	11077.2	12894.5	10kg	20kg	250gr	7.7	18886.1	18914.2	7kg	sampled
08 December 2024	—	—	—	—	—	—	—	—	—		
09 December 2024	11079.2	11096.5	12919.3	10kg	20kg	250gr	7.6	18914.2	18943.5	7kg	sampled
10 December 2024	11096.5	11133.8	12943.5	10kg	20kg	250gr	7.7	18943.5	18965.1	7kg	sampled
11 December 2024	11133.8	11131.7	12967.3	10kg	20kg	250gr	7.3	18965.1	18996.2	7kg	sampled
12 December 2024	11131.7	11148.5	12990.5	10kg	20kg	250gr	7.5	18996.2	19027.8	7kg	sampled
13 December 2024	11148.5	11165.2	13015.6	10kg	20kg	250gr	7.7	19027.8	19057.6	7kg	sampled
14 December 2024	11165.2	11182.1	13039.3	10kg	20kg	250gr	7.3	19057.6	19087.3	7kg	sampled
15 December 2024	—	—	—	—	—	—	—	—	—		
16 December 2024	11182.1	11199.8	13064.1	10kg	20kg	250gr	7.4	19087.3	19105.8	7kg	sampled
17 December 2024	11199.8	11216.7	13084.2	10kg	20kg	250gr	7.3	19105.8	19134.7	7kg	sampled
18 December 2024	11216.7	11245.9	13104.5	10kg	20kg	250gr	7.6	19134.7	19165.9	7kg	sampled
19 December 2024	11245.9	11274.7	13128.6	10kg	20kg	250gr	7.8	19165.9	19194.8	7kg	sampled
20 December 2024	—	—	—	—	—	—	—	—	—		
21 December 2024	11274.7	11291.9	13151.7	10kg	20kg	250gr	7.5	19194.8	19224.3	7kg	sampled
22 December 2024	11291.9	11309.1	13176.3	10kg	20kg	250gr	7.3	19224.3	19254.8	7kg	sampled
23 December 2024	11309.1	11333.5	13199.2	10kg	20kg	250gr	7.7	19254.8	19284.2	7kg	sampled
24 December 2024	11333.5	11349.6	13224.2	10kg	20kg	250gr	7.5	19284.2	19314.3	7kg	sampled
25 December 2024	11349.6	11365.2	13249.5	10kg	20kg	250gr	7.1	19314.3	19344.8	7kg	sampled
26 December 2024	—	—	—	—	—	—	—	—	—		
27 December 2024	11365.2	11389.3	13274.5	10kg	20kg	250gr	7.4	19344.8	19374.9	7kg	
28 December 2024	11389.3	11409.8	13299.4	10kg	20kg	250gr	7.3	19374.9	19405.6	7kg	
29 December 2024	11409.8	11429.7	13324.3	10kg	20kg	250gr	7.4	19405.6	19435.3	7kg	
30 December 2024	11429.7	11449.5	13349.5	10kg	20kg	250gr	7.2	19435.3	19465.8	7kg	

NAME AND ADDRESS OF UNIT:- PLOT NO 498 MONTH OF NOVEMBER 2024

DATE	INLET PUMP		FLOW METER	CHEMICAL CONSUMPTION			PH TREATED MET. RED	ENERGY METER			SIGNATURE	REMARK
	ON	OFF		ALUM	LIME	POLY		ON	OFF	Shidge		
01 November 2024												
02 November 2024												
03 November 2024												
04 November 2024												
05 November 2024												
06 November 2024	9699.8	9718.3	12299.8	10kg	20kg	250gr	7.4	18099.3	18125.9	7kg	Sampal	
07 November 2024	9718.3	9736.4	12224.5	10kg	20kg	250gr	7.3	18125.9	18151.6	7kg	Sampal	
08 November 2024	9736.4	9754.3	12349.6	10kg	20kg	250gr	7.7	18151.6	18176.7	7kg	Sampal	
09 November 2024	9754.3	9773.8	12374.8	10kg	20kg	250gr	7.9	18176.7	18193.2	7kg	Sampal	
10 November 2024												
11 November 2024	9773.8	9791.3	12398.2	10kg	20kg	250gr	7.5	18193.2	18226.6	7kg	Sampal	
12 November 2024												
13 November 2024	9791.3	9811.3	12422.6	10kg	20kg	250gr	7.8	18226.6	18253.1	7kg	Sampal	
14 November 2024	9811.3	9831.7	12446.9	10kg	20kg	250gr	7.9	18253.1	18284.8	7kg	Sampal	
15 November 2024	9831.7	9850.3	12472.9	10kg	20kg	250gr	7.3	18284.8	18316.9	7kg	Sampal	
16 November 2024	9850.3	9868.1	12494.6	10kg	20kg	250gr	7.4	18316.9	18350.8	7kg	Sampal	
17 November 2024												
18 November 2024	9868.1	9886.3	12517.9	10kg	20kg	250gr	7.3	18350.8	18372.9	7kg	Sampal	
19 November 2024	9886.3	9903.8	12540.3	10kg	20kg	250gr	7.4	18372.9	18406.9	7kg	Sampal	
20 November 2024	9903.8	9921.6	12563.6	10kg	20kg	250gr	7.2	18406.9	18432.9	7kg	Sampal	
21 November 2024	9921.6	9939.3	12582.5	10kg	20kg	250gr	7.4	18432.9	18468.9	7kg	Sampal	
22 November 2024	9939.3	9957.6	12605.8	10kg	20kg	250gr	7.3	18468.9	18504.8	7kg	Sampal	
23 November 2024	9957.6	9978.9	12624.5	10kg	20kg	250gr	7.5	18504.8	18533.6	7kg	Sampal	
24 November 2024	9978.9	9998.5	12643.3	10kg	20kg	250gr	7.6	18533.6	18556.7	7kg	Sampal	
25 November 2024												
26 November 2024	10018.9	10018.9	12672.4	10kg	20kg	250gr	7.4	18556.7	18590.9	7kg	Sampal	
27 November 2024	10036.3	10036.3	12694.2	10kg	20kg	250gr	7.2	18590.9	18633.1	7kg	Sampal	
28 November 2024	10036.3	10054.1	12708	10kg	20kg	250gr	7.4	18633.1	18668.6	7kg	Sampal	
29 November 2024	10054.1	10072.8	12728.1	10kg	20kg	250gr	7.3	18668.6	18695.3	7kg	Sampal	
30 November 2024	10072.8	10090.3	12752.4	10kg	20kg	250gr	7.5	18695.3	18736.9	7kg	Sampal	

LPG BOOK OF SEWERAGE/ EFFLUENT TREATMENT PLANT

NAME AND ADDRESS OF UNIT:- PLOT NO 498 MONTH OF JANUARY 2025

DATE	INLET PUMP		FLOW METER OUTLET	CHEMICAL CONSUMPTION			PH TREATED MET. RED	ENERGY METER		Shidge	SIGNATURE	REMARK
	ON	OFF		ALUM	LIME	POLY		ON	OFF			
01 January 2025								19465.5				
02 January 2025	11449.5	11469.7	13342.5	10kg	20kg	250g	7.3	19465.3	19496.2	7kg	Sanjeet	
03 January 2025	11469.7	11488.9	13360.8	10kg	20kg	250g	7.1	19496.2	19531.3	7kg	Sanjeet	
04 January 2025												
05 January 2025	11488.9	11509.6	13379.7	10kg	20kg	250g	7.3	19531.3	19562.8	7kg	Sanjeet	
06 January 2025	11509.6	11526.3	13398.1	10kg	20kg	250g	7.5	19562.8	19593.7	7kg	Sanjeet	
07 January 2025	11526.3	11527.6	13418.9	10kg	20kg	250g	7.3	19593.7	19624.9	7kg	Sanjeet	
08 January 2025	11527.8	11546.5	13443.7	10kg	20kg	250g	7.6	19624.9	19655.7	7kg	Sanjeet	
09 January 2025	11546.5	11577.9	13478.9	10kg	20kg	250g	7.9	19655.7	19685.2	7kg	Sanjeet	
10 January 2025	11577.9	11597.3	13499.2	10kg	20kg	250g	7.6	19685.2	19720.7	7kg	Sanjeet	
11 January 2025	11597.3	11617.4	13524.1	10kg	20kg	250g	7.5	19720.7	19755.8	7kg	Sanjeet	
12 January 2025												
13 January 2025	11617.4	11637.8	13549.3	10kg	20kg	250g	7.7	19755.8	19785.3	7kg	Sanjeet	
14 January 2025	11637.8	11657.1	13574.2	10kg	20kg	250g	7.3	19785.3	19820.4	7kg	Sanjeet	
15 January 2025	11657.2	11678.5	13599.1	10kg	20kg	250g	7.4	19820.4	19855.6	7kg	Sanjeet	
16 January 2025	11677.5	11697.8	13624.2	10kg	20kg	250g	7.3	19855.6	19895.2	7kg	Sanjeet	
17 January 2025	11697.8	11716.9	13648.7	10kg	20kg	250g	7.2	19895.2	19930.7	7kg	Sanjeet	
18 January 2025	11716.9	11736.9	13672.5	10kg	20kg	250g	7.5	19930.7	19960.8	7kg	Sanjeet	
19 January 2025												
20 January 2025	11736.9	11759.4	13696.6	10kg	20kg	250g	7.3	19960.8	19990.9	7kg	Sanjeet	
21 January 2025	11759.4	11776.3	13720.1	10kg	20kg	250g	7.2	19990.9	20016.2	7kg	Sanjeet	
22 January 2025	11776.3	11796.3	13720.8	10kg	20kg	250g	7.4	20016.2	20046.3	7kg	Sanjeet	
23 January 2025	11796.3	11816.6	13745.2	10kg	20kg	250g	7.6	20046.3	20076.3	7kg	Sanjeet	
24 January 2025	11816.6	11848.1	13775.2	10kg	20kg	250g	7.3	20076.3	20119.3	7kg	Sanjeet	
25 January 2025	11848.1	11878.4	13799.4	10kg	20kg	250g	7.2	20119.3	20151.6	7kg	Sanjeet	
26 January 2025												
27 January 2025	11878.4	11898.5	13824.3	10kg	20kg	250g	7.5	20151.6	20181.3	7kg	Sanjeet	
28 January 2025	11898.5	11918.3	13848.7	10kg	20kg	250g	7.6	20181.3	20215.9	7kg	Sanjeet	
29 January 2025	11918.3	11938.2	13874.1	10kg	20kg	250g	7.3	20215.9	20245.2	7kg	Sanjeet	

2161

DATE	INLET PUMP		FLOW METERS		CHEMICAL CONSUMPTION			PH 15.0		METER		SIGNATURE	REMARK
	DBI	DBF	DB112	DB104	DB105	DB107	DB108	DB109	DB110	DB111			
01 August 2024	83334	83458	10283.6	1014	2014	2508	7.3	15967.6	16005.2	714		Control	
02 August 2024	83458	83607	103114	1018	2018	2508	7.3	16005.2	16038.7	714		Control	
03 August 2024	83607	83773	103325	1018	2018	2508	7.8	16038.7	16070.3	714		Control	
04 August 2024							7.2						
05 August 2024	83773	83942	103535	1018	2018	2024	7.6	16070.3	16099.8	714		Control	
06 August 2024	83942	84102	103736	1018	2018	3028	7.2	16099.8	16131.3	714		Control	
07 August 2024	84102	84262	103973	1018	2018	2508	7.4	16131.3	16164.7	714		Control	
08 August 2024	84262	84418	104188	1018	2018	2508	7.3	16164.7	16197.6	714		Control	
09 August 2024	84418	84633	10440.6	1018	2018	2508	7.6	16197.6	16229.3	714		Control	
10 August 2024	84633	8480.6	10461.3	1018	2018	2508	7.5	16229.3	16264.6	714		Control	
11 August 2024													
12 August 2024	8480.6	8496.7	10483.9	1018	2018	2506	7.6	16264.6	16298.2	714		Control	
13 August 2024	8496.7	8512.3	10505.6	1018	2018	2507	7.7	16298.2	16331.6	714		Control	
14 August 2024	8512.3	8527.8	10527.3	1018	2018	2509	7.8	16331.6	16363.8	714		Control	
15 August 2024													
16 August 2024	8527.8	8542.9	10549.9	1018	2018	2504	7.9	16363.8	16396.2	714		Control	
17 August 2024	8542.9	8557.9	10571.3	1018	2018	2504	7.7			714		Control	
18 August 2024													
19 August 2024													
20 August 2024	8557.9	8572.6	10593.9	1018	2018	2508	7.3	16396.2	16428.1	714		Control	
21 August 2024	8572.6	8588.2	10618.3	1018	2018	2508	7.1	16428.1	16458.9	714		Control	
22 August 2024	8588.2	8605.1	10635.1	1018	2018	2508	7.2	16458.9	16488.9	714		Control	
23 August 2024	8605.1	8621.7	10657.2	1018	2018	3028	7.6	16488.9	16520.3	714		Control	
24 August 2024	8621.7	8636.9	10679.3	1018	2018	2508	7.3	16520.3	16551.8	714		Control	
25 August 2024	8636.9	8651.4	10702.2	1018	2018	2508	7.2	16551.8	16581.6	714		Control	
26 August 2024													
27 August 2024	8651.4	8666.7	10724.5	1018	2018	2508	7.5	16581.6	16613	714		Control	
28 August 2024	8666.7	8682.1	10746.2	1018	2018	3028	7.6	16613	16638.1	714		Control	
29 August 2024	8682.1	8698.6	10768.1	1018	2018	2508	7.1	16638.1	16668.2	714		Control	
30 August 2024	8698.6	8715.9	10790.5	1018	2018	2508	7.7	16668.2	16698.5	714		Control	
31 August 2024	8715.9	8731.4	10812.2	1018	2018	3028	7.8	16698.5	16728.3	714		Control	

RECEIVED
HDFC Bank Tan
Name: Gurdeep Kumar Singh, Code: 010812

21 JAN 2025



Handwritten signature and scribbles

4500/-

Water loading fee

SUPER DYEING

Partner
Handwritten signature

Performance Security.

100000/-

HPFCM/20250121/51515

RECEIVED
21 JAN 2025
HDFC Bank Tan



HDFC Bank Tan



HARYANA STATE POLLUTION CONTROL BOARD

Star Complex, Opp. General Hospital, Delhi Road,
Sonapat Ph. 0130-2236119(O) Email:-

hspcbrosr@gmail.com

E-mail: hspcb@hry.nic.in

No. HSPCB/Consent/ : 313101722SONCTO27717138

Dated:11/10/2022

To.

M/s :SUPER DYEING

PLOT NO 498 PH-2 HSIIDC BARHI SONIPAT

Subject: Grant of consent to operate to M/s SUPER DYEING.

Please refer to your application no. 27717138 received on dated 2022-09-15 in regional office Sonapat. With reference to your above application for consent to operate, M/s SUPER DYEING is here by granted consent as per following specification/Terms and conditions.

Consent Under	BOTH
Period of consent	11/10/2022 - 30/09/2025
Industry Type	Yarn / Textile processing involving any effluent/emission generating processes including bleaching, dyeing, printing and colouring
Category	RED
Investment(In Lakh)	343.0
Total Land Area(Sq. meter)	4050.0
Total Builtup Area(Sq. meter)	2430.0
Quantity of effluent	
1. Trade	100.0 KL/Day
2. Domestic	5.0 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. pH	6.0-9.0
5. O&G	15 mg/l
6. SAR	26
7. Amonical Nitrogen	50 mg/l

SUPER DYEING

Pardeep Singh
Partner

8. Sulphide	2 mg/l
9. Total Chromium	2 mg/l
10. Phenolic compound	1 mg/l
Number of stacks	1
Height of stack	
1. Stack attached to TFH	30 meters
Emission parameters	
1. SPM	80 mg/m ³
2. NOX	50 mg/m ³
3. SOX	50 mg/m ³
Product Details	
1. DYEING OF FABRIC	5000 Numbers/ day
Capacity of boiler	
1. TFH	1500000 Kcalores/hr
Type of Furnace	
1. NA	
Type of Fuel	
1. Biomass	4.0 MT/day
Raw Material Details	
fabric	7000 Sqr/mtr
CHEMICALS	150 Kg/Day
FIXER	20 Kg/Day
HCL	0.06 Kilo Liters/Day
COLOUR	30 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 submit analysis reports of effluent & air emissions within 90 days after issuance of CTO.
2. Unit will comply the emissions standards laid down for boilers/TFH by CAQM/CPCB/Hon'ble Courts.
3. Unit will comply CAQM direction issued vide No. 65 and HSPCB direction vide order dated 21.07.2022 regarding standard list of approved fuels in NCR.
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 Acts.
5. That the unit will comply with all the provisions of Hazardous Waste Rules and will make agreement with GEPIL and Authorized recycler of the Board for scientific disposal of Hazardous Waste.
6. That the unit will install Electromagnetic flow meter on all the sources of Raw water and on the inlet & final outlet of the CTP and maintained the logbook of the same.
7. That the CTO expansion so granted shall become invalid in case of violation of any of the above / any law of the land.
8. Unit will renew its lease deed with HSIIDC within stipulated time period.
9. Unit will obtain

SUPER DYEING

R. S. S. S. S.

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: -

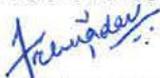
To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the Appellate Court including High Court subject to payment of fees separately for each court by me/us.

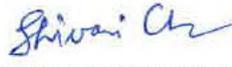
To sign file, verify and present pleadings, appeals, cross-objections or petitions for executions, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment 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 27 day of Feb, 2025

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

 
[SIDDHARTH BATRA] [ARCHNA YADAV]

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

SUPER DYEING
Client


Partner

SUPER DYEING

**PLOT NO. 498, PHASE-II, HSIIDC, INDUSTRIAL ESTATE BARHI
DISTT. SONEPAT (HARYANA) - 131101**

E-mail : superdyeing2022@gmail.com

Ref. No.

Date 24.02.2025

"RESOLVED THAT Mr. Pardeep Kumar is hereby authorized on behalf of M/s Super Dyeing, Plot no. 498, Phase-II, HSIIDC Barhi Sonipat Haryana to initiate, file, defend, represent, and conduct legal cases, proceedings, or claims in any court of law, tribunal, or any other judicial or quasi-judicial authority in connection with the business or matters of the company/firm.

RESOLVED FURTHER THAT Mr. Pardeep Kumar 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 such proceedings.

RESOLVED FURTHER THAT all actions taken by Mr. Pardeep Kumar in connection with the above matters be and are hereby ratified and confirmed by the company/firm.

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 and on behalf of

Super Dyeing **SUPER DYEING**

Partner

Neha

Partner

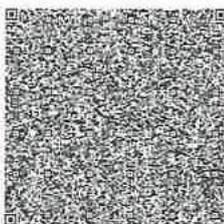



भारत सरकार
Government of India

भारतीय विशिष्ट पहचान प्राधिकरण
Unique Identification Authority of India

नामांकन क्रम/ Enrolment No.: 0648/51468/12378

To
परदीप कुमार
Pardeep Kumar
S/O Babu Ram,
139,
Agroha Kunj,
sector -13 Rohini,
VTC: Rohini Sector-7,
PO: Rohini Sector-7,
Sub District: Narela,
District: North West Delhi,
State: Delhi,
PIN Code: 110085,
Mobile: 9899804949



Signature Not Verified
Details shared by member
Authentication Authority of India
01/01/2018 14:24:47
0348

आपका आधार क्रमांक / Your Aadhaar No. :
[Redacted] 0348
VID : 9186 1864 5644 0312
मेरा आधार, मेरी पहचान



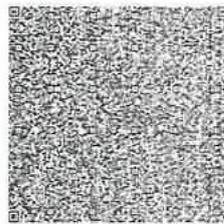

सूचना / INFORMATION

- आधार पहचान का प्रमाण है, नागरिकता या जन्मतिथि का नहीं। जन्मतिथि आधार नंबर धारक द्वारा प्रस्तुत सूचना और विनियमों में विनिर्दिष्ट जन्मतिथि के प्रमाण के दस्तावेज पर आधारित है।
- इस आधार पर को यूआईडीएआई द्वारा नियुक्त प्रमाणीकरण एजेंसी के ऑनलाइन प्रमाणीकरण के द्वारा सत्यापित किया जाना चाहिए या ऐप स्टोर में उपलब्ध एमआधार या आधार क्यूआर कोड स्कैनर ऐप से क्यूआर कोड को स्कैन करके या www.uidai.gov.in पर उपलब्ध सुरक्षित क्यूआर कोड रीडर का उपयोग करके सत्यापित किया जाना चाहिए।
- आधार विशिष्ट और सुरक्षित है।
- पहचान और पते के समर्थन में दस्तावेजों को आधार के लिए नामांकन की तारीख से प्रत्येक 10 वर्ष में कम से कम एक बार आधार में अपडेट करना चाहिए।
- आधार विभिन्न सरकारी और गैर-सरकारी फायदों/सेवाओं का लाभ लेने में सहायता करता है।
- आधार में अपना मोबाइल नंबर और ईमेल आईडी अपडेट करें।
- आधार सेवाओं का लाभ लेने के लिए एमआधार ऐप डाउनलोड करें।
- आधार/बायोमेट्रिक्स का उपयोग न करने के समय सुरक्षा सुनिश्चित करने के लिए आधार/बायोमेट्रिक्स लॉक/अनलॉक सुविधा का उपयोग करें।
- आधार की मांग करने वाले सहमति लेने के लिए बाध्य हैं।
- Aadhaar is proof of identity, not of citizenship or date of birth (DOB). DOB is based on information supported by proof of DOB document specified in regulations, submitted by Aadhaar number holder.
- This Aadhaar letter should be verified through either online authentication by UIDAI-appointed authentication agency or QR code scanning using mAadhaar or Aadhaar QR Scanner app available in app stores or using secure QR code reader app available on www.uidai.gov.in.
- Aadhaar is unique and secure.
- Documents to support identity and address should be updated in Aadhaar after every 10 years from date of enrolment for Aadhaar.
- Aadhaar helps you avail of various Government and Non-Government benefits/services.
- Keep your mobile number and email id updated in Aadhaar.
- Download mAadhaar app to avail of Aadhaar services.
- Use the feature of Lock/Unlock Aadhaar/biometrics to ensure security when not using Aadhaar/biometrics.
- Entities seeking Aadhaar are obligated to seek consent.

भारतीय विशिष्ट पहचान प्राधिकरण
Unique Identification Authority of India

पता:
S/O Babu Ram, 139, Agroha Kunj, सेक्टर -13 रोहिणी,
रोहिणी सेक्टर-7 रोहिणी सेक्टर-7, रोहिणी सेक्टर 7, उत्तर
रोहिणी,
दिल्ली - 110085

Address:
S/O Babu Ram, 139, Agroha Kunj, sector -13
Rohini, Rohini Sector-7, PO: Rohini Sector-7,
DIST: North West Delhi,
Delhi - 110085



[Redacted] 0348
VID : 9186 1864 5644 0312
मेरा आधार, मेरी पहचान

1947 | help@uidai.gov.in | www.uidai.gov.in




भारत सरकार
Government of India

भारतीय विशिष्ट पहचान प्राधिकरण
Unique Identification Authority of India

Aadhaar no. Issued: 30/08/2011



परदीप कुमार
Pardeep Kumar
जन तिथि/DOB: 01/01/1982
पुरुष/ MALE

आधार पहचान का प्रमाण है, नागरिकता या जन्मतिथि का नहीं। इसका उपयोग सत्यापन (ऑनलाइन प्रमाणीकरण, या क्यूआर कोड/ ऑफलाइन एक्सएमएल को स्कैनिंग) के साथ किया जाना चाहिए।
Aadhaar is proof of identity, not of citizenship or date of birth. It should be used with verification (online authentication, or scanning of QR code / offline XML).

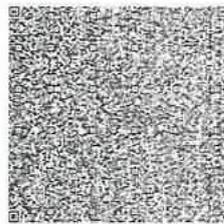
[Redacted] 0348
मेरा आधार, मेरी पहचान




भारतीय विशिष्ट पहचान प्राधिकरण
Unique Identification Authority of India

पता:
S/O Babu Ram, 139, Agroha Kunj, सेक्टर -13 रोहिणी,
रोहिणी सेक्टर-7 रोहिणी सेक्टर-7, रोहिणी सेक्टर 7, उत्तर
रोहिणी,
दिल्ली - 110085

Address:
S/O Babu Ram, 139, Agroha Kunj, sector -13
Rohini, Rohini Sector-7, PO: Rohini Sector-7,
DIST: North West Delhi,
Delhi - 110085



[Redacted] 0348
VID : 9186 1864 5644 0312
मेरा आधार, मेरी पहचान

1947 | help@uidai.gov.in | www.uidai.gov.in



Vijay Kumar <vijay.kumar@satramdass.com>

Advance service copies of short reply on behalf of Respondent Nos. 26, 32 & 35 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

1 message

Vijay Kumar <vijay.kumar@satramdass.com>

Fri, May 9, 2025 at 5:15 PM

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

Cc: Archana Yadav <archana.yadav@satramdass.com>, 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. 26, 32 & 55 in O.A. No. 622/2024 titled as 'Varun Gulati v. State of Haryana & Ors.'

Kindly treat the same as Proof of service.

Regards

 Paperbook NGT REPLY-R26 Vardhman
Creations_Redacted.pdf Paperbook NGT REPLY-R35 abycons textile
copy_Redacted.pdf Paperbook- NGT REPLY-R32 Super
Dyeing_Redacted.pdf**Vijay Kumar**
Office Manager8A Sagar Apartment
6 Tilak Marg
New Delhi - 110001
Landline - +91-11-47046111
vijay.kumar@satramdass.com

Satram Dass B & Co. made the following annotations

"This message and any attachments are solely for the intended recipient and may contain confidential or privileged information. If you are not the intended recipient, any disclosure, copying, use, or distribution of the information included in this message and any attachments is prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments. Thank you."