

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

OA No. 1137 of 2024

IN THE MATTER OF:

Neelam Rani

.....Applicant

Versus

State of Punjab

.....Respondent

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JALANDHAR

DATED: 19/2/2025

COUNSELS FOR THE RESPONDENT NO.4


 (Adv. Ajay Sharma/Adv. Sankalp Sagar)

ADVOCATES

Mobile No. 9878439805 / 9988427726

Email(s): 006ajaysharma@gmail.com

sankalpsagar@icloud.com



For BHARTI SCIENTIFIC DYERS


 Proprietor

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

OA No. 1137 of 2024

IN THE MATTER OF:

Neelam Rani

.....Applicant

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State of Punjab

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Reply by way of affidavit regarding compliance of Sh. Tilak Raj, Proprietor M/s Bharti Scientific Dyers, Village Meharban, Rahon Road, Ludhiana -Respondent No 4

I, the above named deponent do hereby solemnly affirm and declare as under :-

Respectfully Showeth :-

1. That the deponent is a proprietor of M/s Bharti Scientific Dyers having an Industrial Unit in Village Meharban, Rahon Road, Ludhiana and as such is conversant with the facts of the case and is competent to file the present reply by way of an affidavit.
2. That the applicant has filed the complaint/application with this Hon'ble Tribunal against the water & air pollution caused by the industrial unit of the deponent. The aforesaid complaint/application is treated as the present OA No. 1137 of 2024.
3. The deponent at the outset most respectfully submits that the action taken by the Punjab Pollution Control Board as well as the Joint Committee are absolutely unlawful, unjustified and against the provisions of the Water (Prevention and Control of Pollution) Act, 1974 (here-in-after referred to be as "Act of 1974"). The said action is even against the orders of the Tribunal dated 18.11.2024. The deponent reserves the right to challenge the aforesaid orders



For BHARTI SCIENTIFIC DYERS

Tilak Raj

Proprietor

passed by the PPCB dated 17.01.2025 (Annexure E-G, Page No.19-23) under appeal u/s 33-B of the Act, 1974.

4. The relevant part of order dated 10.02.2025 is reproduced here-in-under :-

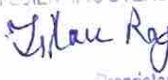
3. Replies/responses by respondents no.1 to 4 be filed within two weeks.

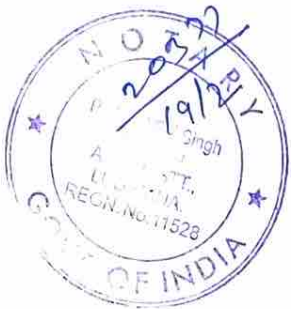
5. In its reply/response respondent no. 4 shall specifically mention measures taken by it for remedying previous violations pointed out PPCB and for compliance with environmental norms.

5. The deficiencies as reported time to time (11.04.2023 onwards) by Punjab Pollution Control Board (PPCB) had been duly corrected which are explained as under:

- a. The industry shall upgrade the Air Pollution Control Device (APCD) System.
- b. Only authorised boiler fuel to be used to ensure no black smoke is emitted.
- c. No stagnation should occur in plantation area.
- d. Sludge drying capacity to be increased.
- e. To maintain discharge standards as per the Environment Protection Act, 1986.

The corrections regarding the above points had also been verified by Joint Committee's visit on 12.12.2024 as reported in Short Reply of District Magistrate Ludhiana dated 21.01.2025 (Annexure-R, Page No.62). The results for reference have been stated and reproduced as below:

For BHARTI SCIENTIFIC DYERS

 Proprietor



Parameter	Observation
Stack Height	>100 ft
APCD	Working and in place
Black Smoke	Not detected and authorised boiler fuel being used

2. The analysis report of the air emission sample collected from the stack of Air Pollution Control Device (APCD) installed with the Boiler furnace of capacity 07 TPH of the industry is tabulated below:

Sr. No	Point of Sample Collection	Parameters	Results	Prescribed Standard
1	Port hole on stack after APCD (Boiler @ 07 TPH + Water Ball @ 02 TPH)	Particulate Matters (mg/Nm ³) at 12% CO ₂	486 mg/Nm ³	500 mg/Nm ³

The sample was found within the permissible limits.

Regarding more effective functioning of trade effluent treatment plant M/S Eros Consultants had been approached and the steps suggested by latter have also been incorporated (**Annexure-A**) herewith. The adequacy of trade effluent treatment plant to treat 360KL/day has already been submitted by deponent in short reply dated 06.02.2025 (**Annexure-R-4/2, Page No. 39-50**). The same has also been affirmed in the observations of Joint Committee Report submitted by District Magistrate on 13.02.2025 (**para 2, Page No. 61**).

7. Sludge drying capacity has also been increased and now there are 3 sludge beds instead of 1.
8. Only authorised fuel (rice husk/agro waste) is being used.

For BHARTI SCIENTIFIC DYERS

 Proprietor



9. Plantation has been developed as per Karnal Technology Systems and is maintained for the discharge of 120KL/day (**Annexure-R, Page No.63**).
10. The consent for trade effluent discharge had been reduced from 200 KL/day to 120 KL/day as per consent granted by PPCB (**Annexure-R3/K, Page No.129**) on 07.11.2024 upto 06.05.2025.
11. The results as detected during the visit of Joint Committee on 12.12.2024 (**Annexure-R, Page No. 62-63**) as per Environment Protection Act, 1986, Schedule I, serial 6 ,9 out of 11 parameters against the said serial no. are meeting the norms only 2 parameters (BOD and COD) were marginally high. BOD 30mg/l against 55mg/l and COD 279mg/l against prescribed limit of 250 mg/l had been reported by PPCB (**Annexure-R, Page No. 62-63**) which will be duly met with after following the procedure as per **Annexure B** attached herewith.
12. The overall compliances/infrastructure regarding Effluent Treatment/Disposal System (self-plantation) is being annexed at **Annexure-C** attached herewith.
13. The deponent craves leave of this Hon'ble tribunal to file reply at this stage while reserving his rights to file a detailed reply at a later stage if required and directed by this Hon'ble tribunal.

Prayer:-

Therefore, in the light of the aforesaid, submissions made in the present reply it is most respectfully prayed:-

- (i) that the present complaint/OA be dismissed;
- (ii) the report of the Joint Committee regarding water sampling (trade effluent) and action taken thereof be totally disregarded and not considered as the same is absolutely

For BHARTI SCIENTIFIC DYERS,

Tilak Ray
Proprietor



unjustified, unlawful, arbitrary and against the provisions of the Water (Prevention and Control of Pollution) Act, 1974;

- (iii) the orders dated 17.01.2025 (Annexure E-G, Page 19-23) passed by the PPCB be set aside, and the respondent Punjab Pollution Control Board be directed to restore the industry's consent to operate along with the electricity connection. The industry shall be allowed to operate, and fresh samples of water (trade effluent) shall be collected at a convenient time after providing prior notice and an opportunity of hearing to the deponent.

Certified that the affidavit / S.P.A./G.P.A. Has been read over & explained to the deponent-executant who seemed correctly to understand the same at the time of making above there of

VERIFICATION



I, the deponent, do hereby solemnly affirm and declare that the contents of the above affidavit are true and correct to my knowledge and no part of it is false. No material has been concealed.

PLACE: Ludhiana

DATED: 19/2/2025

DEPONENT

I know deponent / Executant / Testifier personally. He / She has shown Thumb marked in my presence.

2877867263340

For BHARTI SCIENTIFIC DYERS
 Jitau Raj
 Proprietor

Attested By
 Prabhjot Pal Singh
 Advocate) NOTARY PUBLIC
 LUDHIANA (PB)
 19/2/2025

Annexure-A

EROSEROS ENVIROTECH PRIVATE LTD
(Formerly Eros Enviro-Tech)

Date: 25-01-2025

M/s Bharti Scientific Dyers
Village Meharban,
Rahon Road, Ludhiana.**SUB: - INSTALLATION, OPERATION AND ADEQUACY OF EFFLUENT
TREATMENT PLANT.**

Dear Sir,

Please refer your order on us for Visit and Study of the treatment plant. We had deputed our engineer accordingly and are submitting the following.

1. The unit is adequate for treatment of 360 KL of waste water arising out of pure polyester or acrylic yarn.
2. It is based on Physico Chemical Treatment method.
3. The plant is in operational conditions.
4. We are suggesting following
 - a. Please balance the flow and keep the flow uniform at all time.
 - b. Provide Mixing arrangements for poly electrolyte.
 - c. Please provide New Media and Carbon in Filter vessels.
 - d. Please put 4 Nos. Filtration Vessels in series so that flow from PSF to ACF - I, ACF - II and ACF - III.

Thanking you

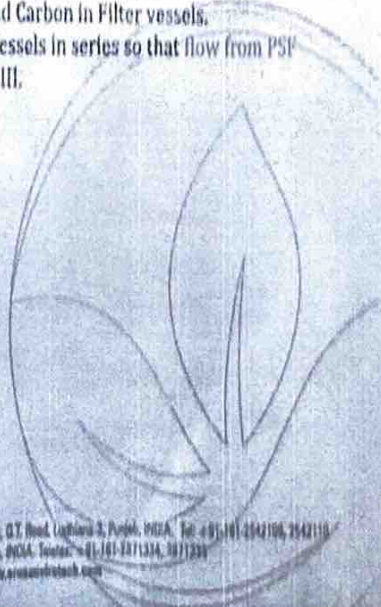
Yours faithfully,

For Eros Enviro-Tech (P) LTD



Director

F: Rajesh Maheshwari
(B.E. Chemical Engineering)
Managing Director



Regd. Office: 109-110, 1st floor, Sachti Complex 1, Dada Motra Building, Kaleri Nagar, G.T. Road, Ludhiana-3, Punjab, INDIA. Tel: +91-181-2542100, 2542110
 Works: Sidhwan Def Road, VPO Harnam, Ludhiana, Punjab, INDIA. Contact: +91-181-2271224, 2271225
 info@erosenvirotech.com | www.erosenvirotech.com

For BHARTI SCIENTIFIC DYERS,



Proprietor

Annexure-B

Results:

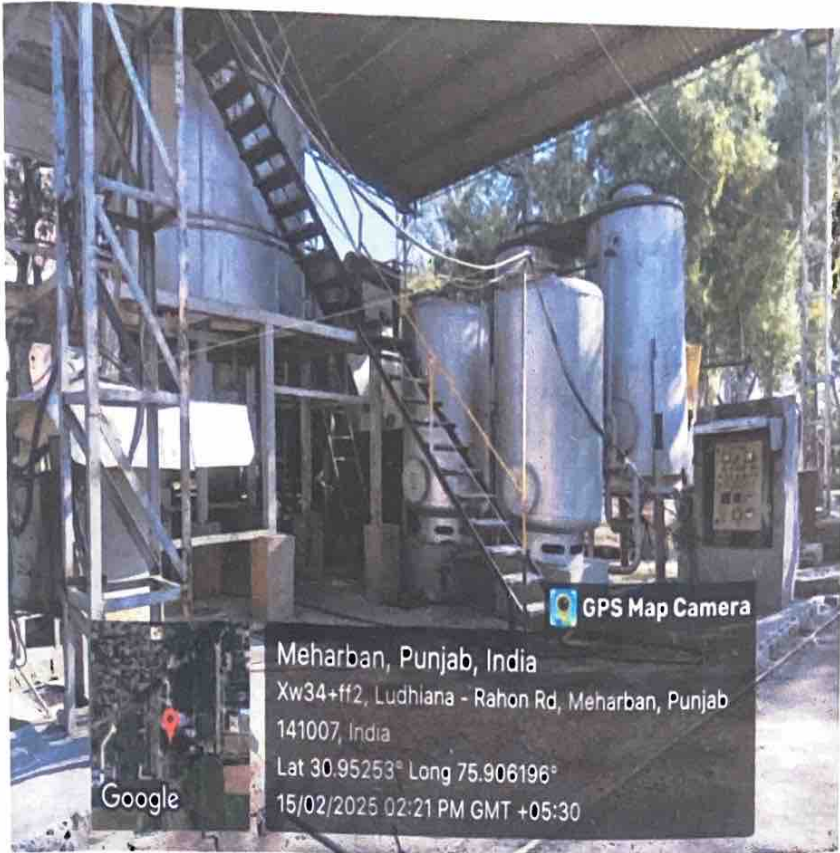
Sr. No	Parameters	Outlet of ETP	Prescribed Standard
1	pH	7.7	6.5-8.5
2	Total Suspended Solids (mg/l)	28	100
3	Total Dissolved Solids (mg/l)	1205	2100
4	Chemical Oxygen Demand (mg/l)	279	250
5	Bio-chemical Oxygen Demand (mg/l)	55	30
6	Oil & Grease (mg/l)	8.2	10
7	Sulphides (mg/l)	1.8	2.0
8	Phenolic Compounds (mg/l)	BDL	1.0
9	Ammonical Nitrogen (mg/l)	16	50
10	Total Chromium (mg/l)	BDL	2.0
11	Sodium Absorption Ratio (SAR)	8.9	26.0

For BHARTI SCIENTIFIC DYERS



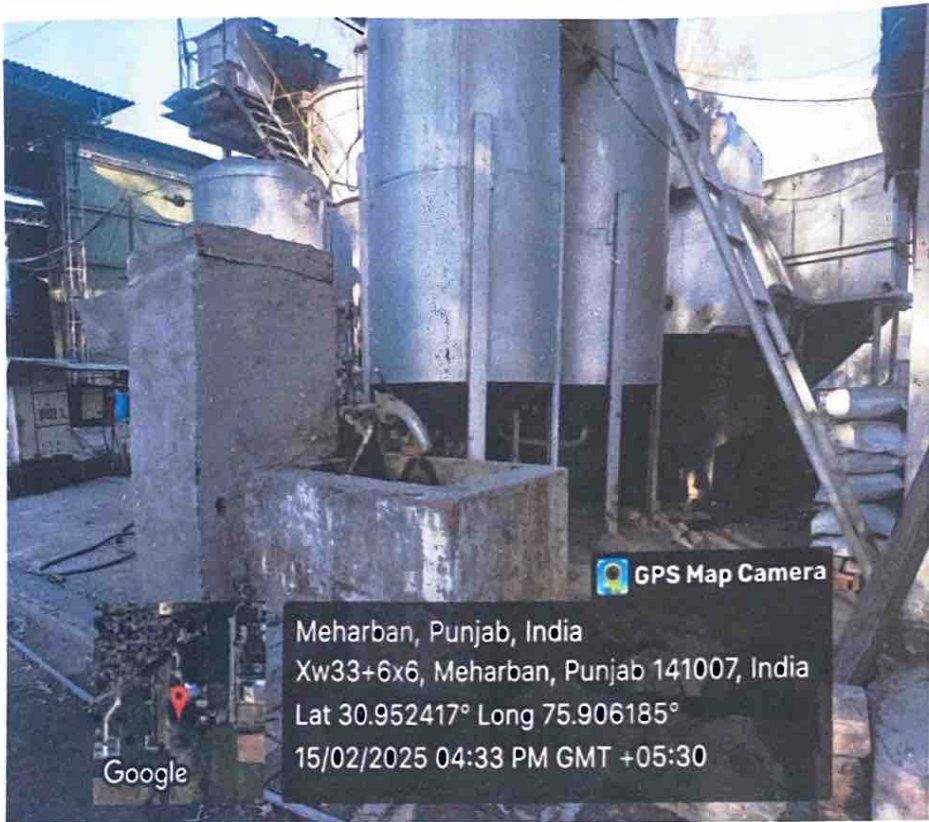
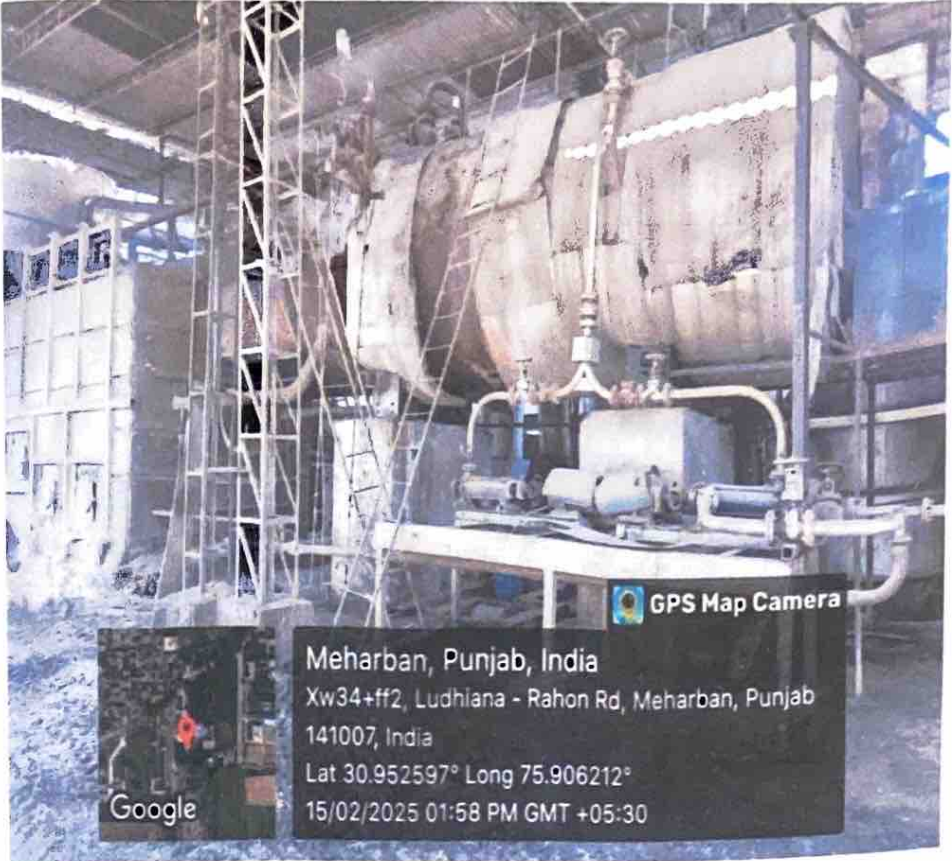
 Proprietor

ANNEXURE-C



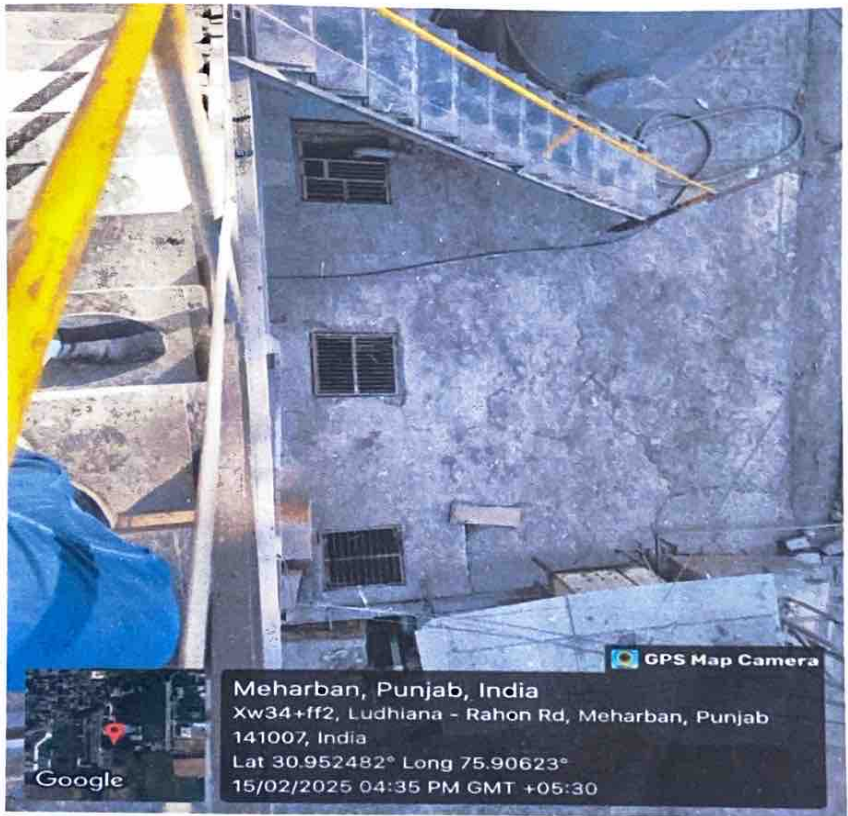
For BHARTI SCIENTIFIC DYERS

Dr. Harvraj
Proprietor



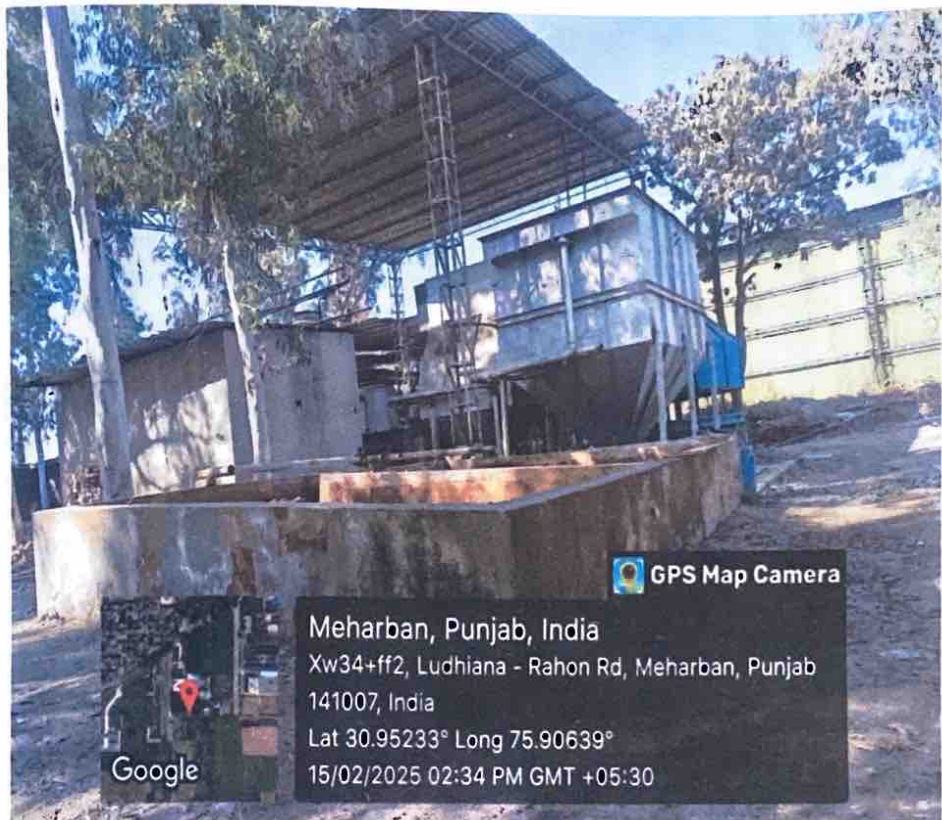
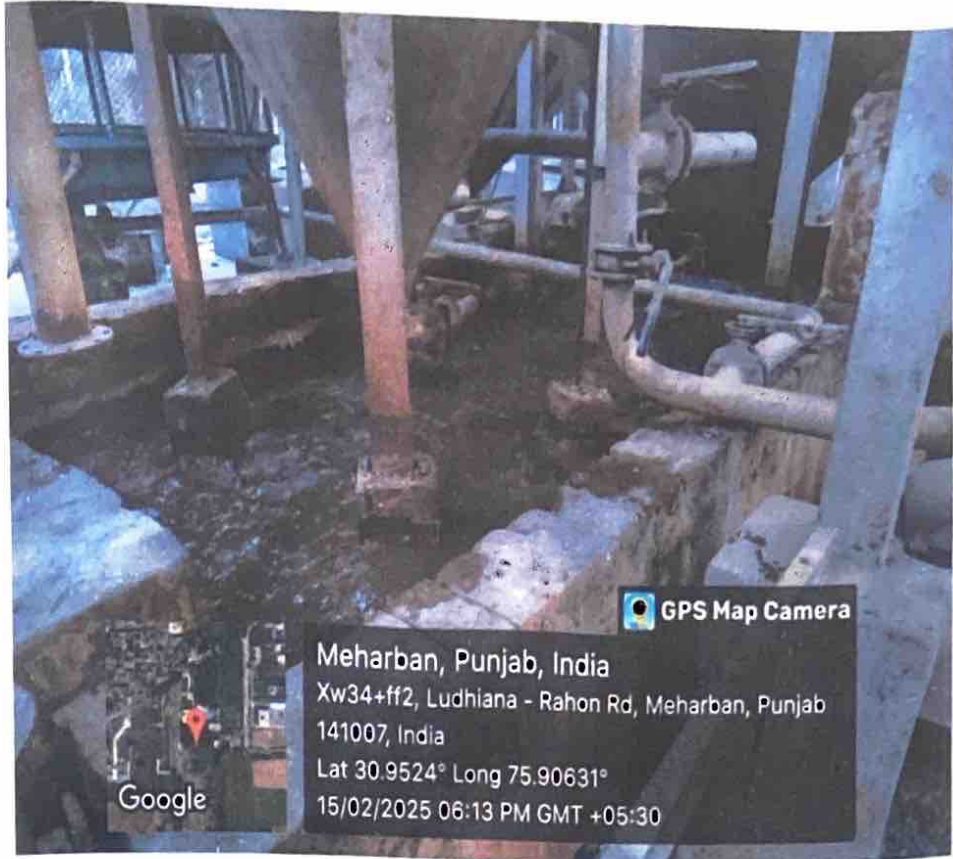
For BHARTI SCIENTIFIC DYERS

Gitan Raj
Proprietor



For BHARTI SCIENTIFIC DYERS

Zakir Raj
Proprietor

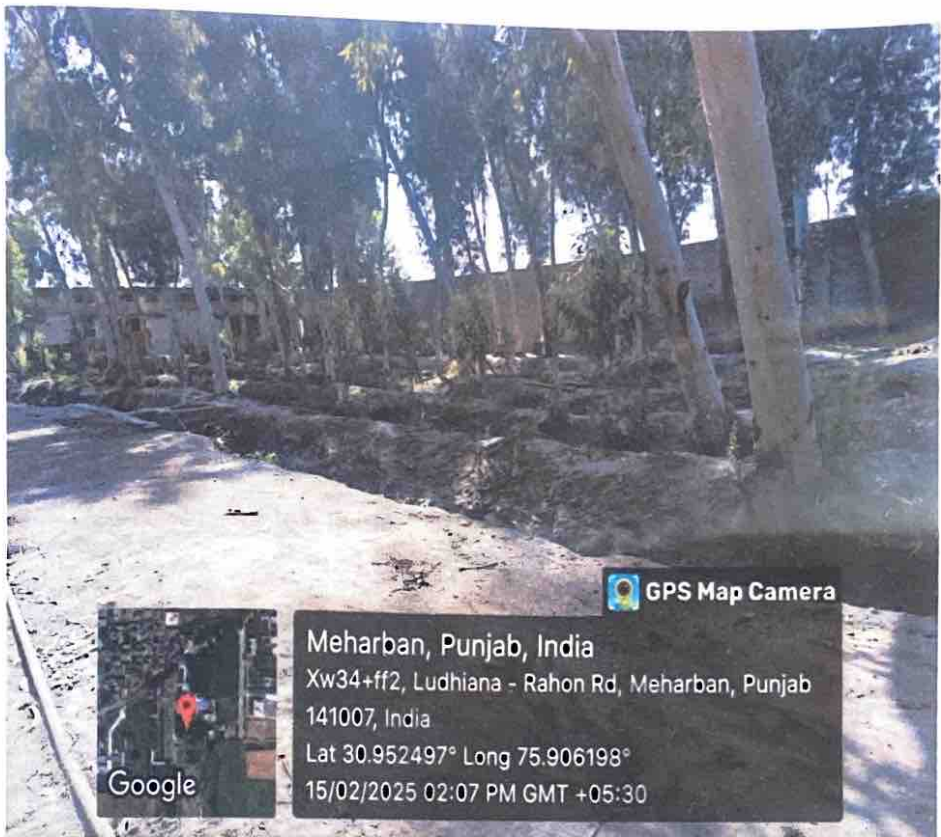
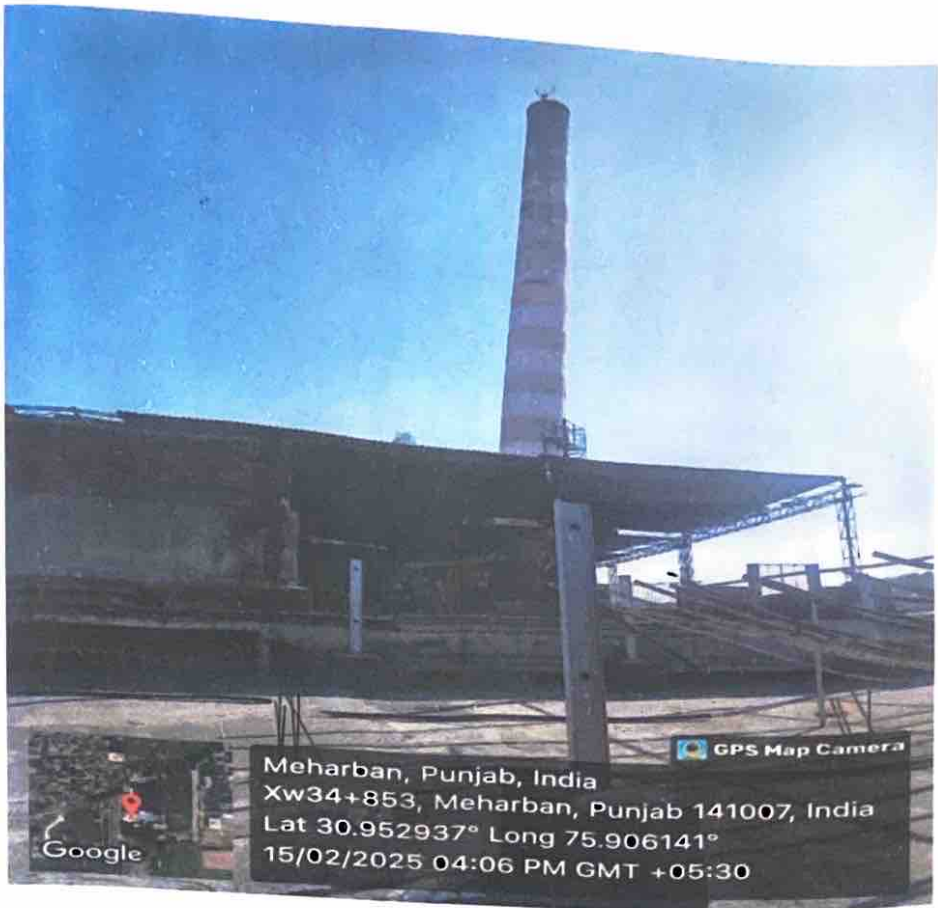


For BHARTI SCIENTIFIC DYERS
Zilken Ray
Proprietor

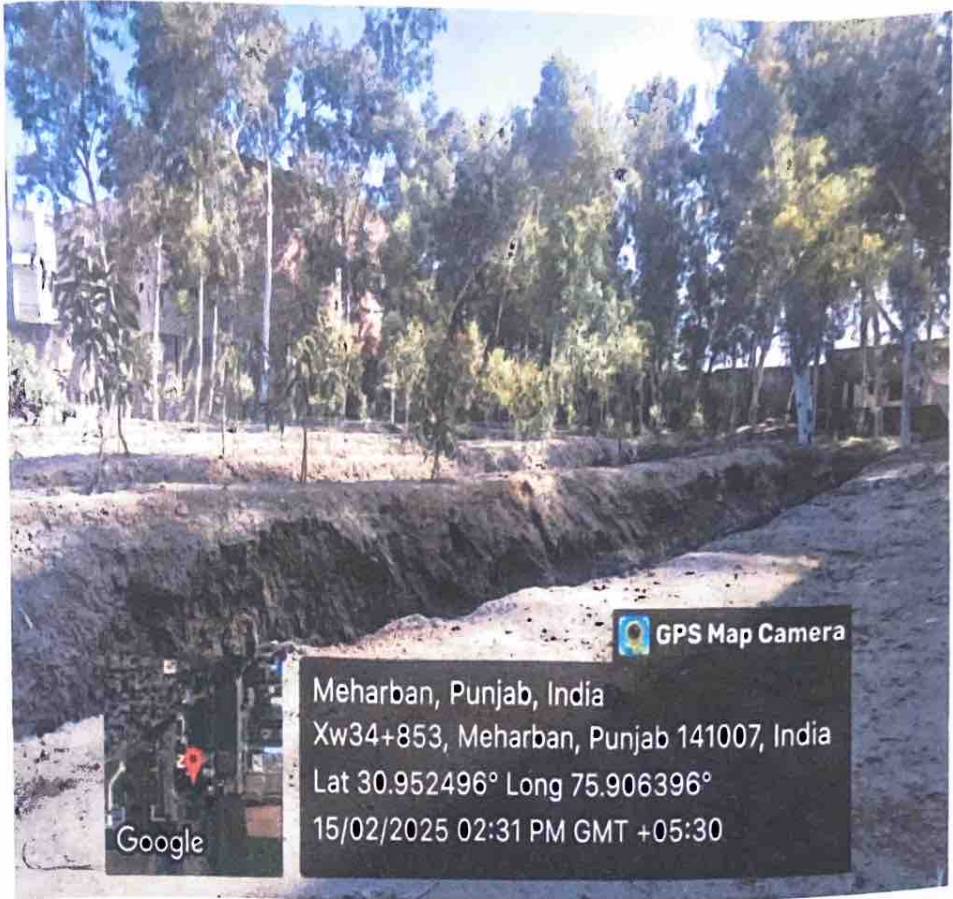


For BHARTI SCIENTIFIC DYERS

Jitendra Raj
Proprietor

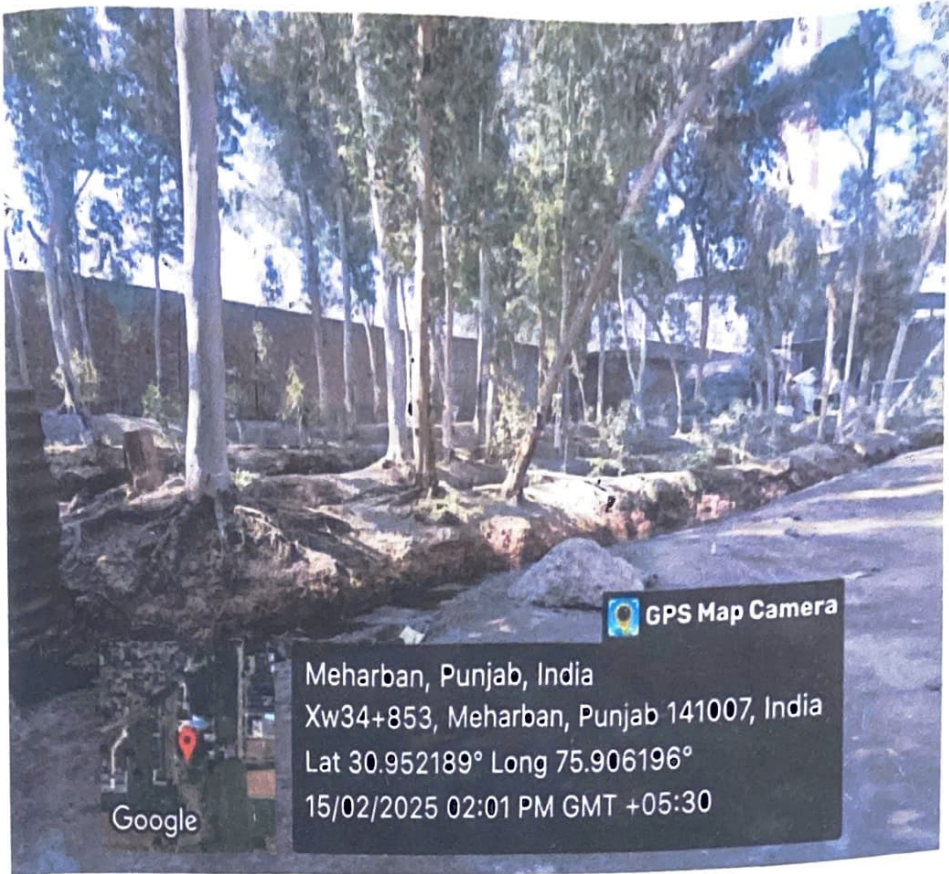


For BHARTI SCIENTIFIC DYERS
Iskhan Roy
Proprietor



For BHARTI SCIENTIFIC DYERS

Lilani Raj
Proprietor



For BHARTI SCIENTIFIC DYERS

S. Laxmi Raj
Proprietor