

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

OA No. 1137 of 2024

(IA No. 229 of 2025)

Neclam Rani & Ors

..... Applicant

Vs

State of Punjab & Ors

..... Respondent

Reply to IA No. 229 of 2025 by way of affidavit of Er. Gurmit Singh, Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana on behalf of respondent no. 3 in compliance to order dated 15.04.2025.

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

RESPECTFULLY SHOWETH:

Preliminary Submissions:

- 1) That the above-mentioned case is pending for adjudication before the Hon'ble National Green Tribunal and is listed for hearing on 25.04.2025.
- 2) That the respondent Punjab Pollution Control Board has filed replies dated 21.01.2025, 14.02.2025, 17.03.2025 and 11.04.2025 in the present case mentioning therein the relevant facts of the case.
- 3) That the respondent no.4 industrial unit namely M/s Bharti Scientific Dyers, Village Meharban Road, Rahon Road, Ludhiana has filed IA No. 229 of 2025 for reopening of the unit claiming to have taken

additional measures for treatment of effluent for due compliance with environmental norms.

- 4) That after consideration, this Hon'ble Tribunal was pleased to pass an order dated 15.04.2025 thereby directing the Punjab Pollution Control Board to visit the unit of respondent no. 4, verify the same and file reply to the above said IA. specifically mentioning as to whether the modification made will be adequate for treatment of effluent for due compliance with environmental norms.
- 5) That the present reply is being filed in IA No. 229 of 2025 in compliance to order dated 15.04.2025 of this Hon'ble Tribunal.
- 6) That in compliance to order dated 15.04.2025, the industrial unit of respondent no. 4 M/s Bharti Scientific Dyers, Village Meharban, Rahon Road, Ludhiana was visited by the officer of the Punjab Pollution Control Board on 19.04.2025 in the presence of the representative of respondent no. 4. The industrial unit was not in operation due to disconnection of electricity supply on the directions of the Punjab Pollution Control Board. The observations of the visiting officer are mentioned below:
 - a) The dyeing machinery which was earlier sealed by the Board were lying sealed.
 - b) The industry has planted new plants in plantation area by replanning existing damaged (fallen) trees.
 - c) Plantation area was maintained as per Karnal Technology as proper ridges and furrows were provided in the plantation area and there was no wild growth of grass and bushes in the plantation area. Plantation area provided by the industry is adequate to handle the discharge for which previous consent to operate under Water Act, 1974 was granted to the industry.
 - d) All the components of ETP were in operational conditions. Now industry has upgraded the aeration facility in collection tank by removing / replacing choked diffusers.

- e) The industry has improved chemical dosing / mixing arrangement by upgrading zig-zag baffles and mechanized mixer.
- f) The industry has changed inlet mechanism of settling tank to increase the retention time in settling tank, which will help to improve settling.
- g) The industry has replaced filter media of the activated carbon filters to improve treatment quality.
- h) The measures taken by the industry to improve wastewater treatment quality are principally adequate but their actual efficiency can be adjudged only after collecting effluent samples but the same could not be collected due non operation of industry because of disconnection of electric connection of the unit.

A copy of the visit report prepared by the visiting officer during visit on 19.04.2025 is enclosed as **Annexure R-3/A** for kind perusal.

- 7) That the visiting officer has reported that the remedial measures taken by the industry (respondent no.4) to improve wastewater quality are principally adequate, but the actual efficiency can be only be adjudged after collection and analysis of sample of effluent which could not be taken during the visit on 19.04.2025 because the industry was not in operation as the electricity supply was lying disconnected.
- 8) That the remedial measures and modification made by respondent no. 4 M/s Bharti Scientific Dyers, Village Meharban, Rahon Road, Ludhiana are principally adequate for treatment of effluent for due compliance with environmental norms. Hence, the operation of the industrial unit can be allowed so as to check the adequacy of the treatment system after analysis of sample of effluent.
- 9) That in view of the above facts, this Hon'ble Tribunal may pass appropriate orders.

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Reply on merits

- 1) That the contents of para no. 1 of the application need no reply.
- 2) That the contents of para no. 2 of the application are a matter of record.
- 3) That the contents of para no. 3 of the application relating to order dated 18.11.2024 passed by the Hon'ble Tribunal for the constitution of Joint Committee and calling a report from the Joint Committee are a matter of record.
- 4) That the contents of para no. 4 of the application are wrong hence denied that the industrial unit of respondent no.4 was arbitrarily closed by the Punjab Pollution Control Board u/s 33-A of the Water (Prevention and Control of Pollution) Act, 1974 with issuing any notice or hearing in violation of the principle of natural justice. The Punjab Pollution Control Board has already filed reply dated 14.02.2025 in compliance to order dated 10.02.2025 before this Hon'ble Tribunal and a copy of the same is enclosed as **Annexure R-3/B** (the annexures earlier enclosed with the reply dated 14.02.2025 are not being enclosed for the sake of brevity).
- 5) That the contents of para no. 5 of the application relating to the pendency of the matter before this Hon'ble Tribunal are a matter of record.
- 6) That in reply to the contents of para no. 6 of the application, it is submitted that the Board has filed further reply dated 17.03.2025 in compliance to order dated 10.02.2025. The copy of reply dated 17.03.2025 is enclosed as **Annexure R-3/C**.
- 7) That the contents of para no. 7 of the application have already been replied in para no. 4 above.
- 8) That the industry of the respondent no. 4 was closed by the Board after observing the violation of environmental norms. The details have

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been given in the reply dated 14.02.2025 enclosed herewith as **Annexure R-3/B**.

- 9) That in reply to para no. 9, it is submitted that the applicant is referring to the parameters of air samples whereas the violation was found in the wastewater sample which has not been referred by the applicant intentionally. The BOD and COD levels were found beyond the permissible limit in the analysis report of the effluent sample collected by the Joint Committee on 12.12.2024. The analysis report of effluent sample collected from the outlet of the ETP of the industry is tabulated below:

S.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 and Grease (mg/l)	8.2	10
7	Sulphides (mg/l)	1.8	2.0
8	Phenolic Compound	BDL	1.0
9	Amonical Nitrogen (mg/l)	16	50
10	Total Chromium (mg/l)	BDL	2.0
11	Sodium Absorption Ration (SAR)	8.9	26.0

- 10) That the contents of para no. 10 of the application are wrong hence denied that the Punjab Pollution Control Board has blatantly violated the principle of natural justice. The reply dated 14.02.2025 placed at **Annexure R-3/B** has already been filed by the Board.

- 11) That in reply to the contents of para no. 11 of the application, it is submitted that the sample was collected by the Joint Committee consisting of officers from PPCB and District Administration. During the visit on 12.12.2024 in the presence of the son of the proprietor of the industrial unit who has put his signature on the sample collection data sheet prepared by the visiting officer. A copy of sample collection data sheet is enclosed as **Annexure R-3/D**.
- 12) That the contents of para no. 12 of the application are correct and the same were verified by the officer of the Board during visit on 19.04.2025. The contents of para no. 6 of the preliminary submissions may kindly be read. The operation of the industrial unit can be allowed subject to the verification of adequacy of the treatment system after analysis of sample of effluent.
- 13) That the contents of para no. 13 of the application are correct and the same were verified by the officer of the Board during visit on 19.04.2025. The contents of para no. 6 of the preliminary submissions may kindly be read. The operation of the industrial unit can be allowed for verification of adequacy of the treatment system after analysis of sample of effluent for the same discharge, which was earlier allowed to the industry.
- 14) That the contents of para no. 14 of the application are denied being incorrect. The reply dated 14.02.2025 filed by the Punjab Pollution Control Board may kindly be perused which has been placed at **Annexure R-3/B**.
- 15) That the contents of para no. 15 of the application are denied being incorrect that the action of the Punjab Pollution Control Board was unlawful. The remaining contents of this para are prayer made by the applicant.
- 16) That the contents of para no. 16 of the application are denied being incorrect.
- 17) That the contents of para no. 17 of the application are a prayer.

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18) That the contents of para no. 18 of the application are a matter of record.

The remedial measures taken by respondent no. 4 (M/s Bharti Scientific Dyers) are principally adequate for treatment of effluent for due compliance with environmental norms. Hence, the operation of the industrial unit can be allowed subject to the verification of adequacy of the treatment system after analysis of sample of effluent.

It is, therefore, prayed that the application filed by the applicant may kindly be disposed of with appropriate orders in view of the submissions made herein above.

Date: 23-04-2025

Place: Ludhiana

Deponent



(Er. Gurmit Singh)
Environmental Engineer,
Punjab Pollution Control Board
Regional Office-3, Ludhiana

(On behalf of Respondent no. 3)

Verification

Verified that the contents of paragraphs 1 to 9 of the preliminary submissions and that of paragraphs 1 to 18 of the reply on merits by way of affidavit are true and correct to my knowledge as derived from the official record. No part of the above written statement is false and nothing material has been kept concealed or suppressed therein.

Date: 23-04-2025

Place: Ludhiana

Deponent



(Er. Gurmit Singh)
Environmental Engineer,
Punjab Pollution Control Board
Regional Office-3, Ludhiana

(On behalf of Respondent no. 3)

Name & address of unit → M/s Bharti Scientific Dyers, Rahon Road, Meharban, Ludhiana.

Date of visit: → 19/04/2025

Visiting officer: → Er. Bhisham, AEE

Person contacted → Mr Arsho Pruthi [Son of Prop]

Observations: → During visit unit was not in operation due to the disconnection of electric connection of the industrial premises.

→ The dyeing machinery, which was earlier sealed by the Board were lying sealed

→ The industry has planted plantation as per kernel technology with proper furrows and ridges & there was no wild growth of grass & bushes in plantation area.

→ Plantation area was well maintained & it is adequate to manage the discharge for which last CTO was granted to it.

→ All the components of ETP were in operational condition. Now industry has upgraded aeration facility in collection tank by removing/replacing choked diffusers.

→ The industry has improved chemical dosing/mixing arrangement by upgrading zig-zag baffles & mechanized mixer.

→ The industry has changed inlet mechanism of settling tank to increase the retention time in settling tank, which will help to improve settling.

→ The industry has replaced filter media of the activated carbon filter to improve treated quality.

→ The measures taken by the industry to improve wastewater treatment quality are principally adequate but their actual efficiency can only be ascertained after collecting effluent samples. But the same could not be collected due to non operation of industry because of disconnection of its electric connection.

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[Ref. of unit]

Bhishan
19/04/2025

[Visiting officer]

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

OA No. 1137 of 2024

Neelam Rani & Ors

..... Applicant

Vs

State of Punjab & Ors

..... Respondent

Reply of Er. Gurmit Singh, Environmental Engineer, Punjab
Pollution Control Board, Regional Office-3, Ludhiana on behalf of
respondent no. 3 in compliance to Order dated 10.02.2025.

RESPECTFULLY SHOWETH:

Preliminary Submissions:

- 1) That the above-mentioned case is pending for adjudication before the Hon'ble National Green Tribunal and is listed for hearing on 17.02.2025.
- 2) That the Hon'ble National Green Tribunal was pleased to pass an order dated 18.11.2024 in the above-mentioned case thereby constituting a joint committee comprising District Magistrate, Ludhiana and Punjab State Pollution Control Board to verify the

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facts with direction to file factual report. The District Magistrate, Ludhiana was nominated as Nodal Authority for coordination and compliance of the orders. In this regard, the relevant extract of Para no. 3,4 & 5 of the Order dated 18.11.2024 is reproduced below for kind perusal and reference:

- "3. In our view we find it appropriate to obtain to verify the facts before proceeding further in the matter and therefore, constitute a joint committee comprising District Magistrate Ludhiana and Punjab State Pollution Control Board.*
 - 4. The District Magistrate, Ludhiana will act as Nodal Authority for coordination and compliance of the orders.*
 - 5. Said Committee shall visit the site, collect relevant information and submit a factual report within one month."*
- 3) That in compliance to order dated 18.11.2024 of this Hon'ble Tribunal, the Deputy Commissioner, Ludhiana vide letter no. 25635-36/M.A dated 29.11.2024 requested the Sub Divisional Magistrate (East), Ludhiana and Environmental Engineer, Punjab Pollution Control Board, Ludhiana to visit the site, take necessary action and submit a comprehensive report. A copy of letter no. 25635-36/M.A dated 29.11.2024 is enclosed as **Annexure R-3/A**.
- 4) That the Joint Committee visited the site of M/s Bharti Scientific Dyers, Rahon Road, Ludhiana on 12.12.2024 and observed that:
- i. The industry is a dyeing industry engaged in the process of cloth and yarn dyeing. The industry is having valid consents to operate under the Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 for a period upto 06.05.2025.

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- ii. The industry as well as its effluent treatment plant which consists of Collection Tank → Chemical Dozing Tank → Flocculator → Tube Settler → Filters → Outlet were in operation and treated effluent was being discharged onto land for plantation developed in an area of 1.5 acre within premises of the industry.
- iii. During visit effluent samples were collected from the final outlet of ETP. As per analysis report of effluent sample, the concentration of various parameters outlet were found as pH = 7.7, TSS = 28 mg/l, TDS = 1205 mg/l, COD = 279 mg/l, BOD = 55 mg/l, O&G = 8.2 mg/l, Sulphide = 1.8, Phenolic Compound = BDL, Ammoniacal Nitrogen = 16, Total Chromium = BDL and Sodium Absorption Ratio = 8.9. As per the report the results of various parameters i.e. BOD (55) and COD (279) were found to be beyond the prescribed limit of 30 & 250 mg/l. As such the unit was found violating the provisions of the Water (Prevention and Control of Pollution) Act, 1974.
- iv. The industry has installed Fluidized Bed (FBC) boiler of capacity 07 TPH to meet with the steam requirement and cyclone separator followed by wet scrubber with water circulation and stack of height more than 100 feet above ground level has been installed as Air Pollution Control device. During visit, the Air Pollution Control device (APCD) was in operation and no black smoke was found discharged from the stack. Emission sample from the stack of Air Pollution Control device was

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collected and as per the sample analysis report concentration of SPM was found 486 mg/Nm^3 against the limit of 500 mg/Nm^3 , hence the result was found as per the norms.

- 5) That, due to the above violations, the Board has revoked the consent to operate granted to the industry under Water (Prevention & Control of Pollution) Act, 1974 vide letter no. 257 dated 17.01.2025 and had issued directions under section 33-A of the Water (Prevention and Control of Pollution) Act, 1974 to the industry vide letter no. 259 dated 17.01.2025 for closure and disconnection of electricity connection. A copy of letter no. 257 dated 17.01.2025 is enclosed as **Annexure R-3/B** and a copy of letter no. 259 dated 17.01.2025 is enclosed as **Annexure R-3/C**.
- 6) That accordingly the Punjab State Power Corporation Ltd. Authorities (PSPCL) were directed u/s 33-A of Water (Prevention & Control of Pollution) Act, 1974 vide letter no. 261-62 dated 17.01.2025 to disconnect the electricity connection of the industry. A copy of letter no. 261-62 dated 17.01.2025 is enclosed as **Annexure R-3/D**. The PSPCL authorities have disconnected the supply of the electricity available to the premises of the industry vide their office letter no. 88 dated 21.01.2025.
- 7) That further it is submitted that in compliance to Orders dated 18.11.2024, the Joint Committee submitted its report dated 21.01.2025 to the Hon'ble Tribunal. A copy of the Joint Committee report is enclosed as **Annexure R-3/E**.
- 8) That after consideration of the Joint Committee report, this Hon'ble Tribunal was pleased to pass an Order dated 23.01.2025 thereby impleading the State of Punjab through Principal Secretary Environment, Government of Punjab; District Magistrate, Ludhiana; Punjab Pollution Control Board (PPCB)

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through Member Secretary and M/s Bharti Scientific Dyers (Project Proponent) village Mcharban, Main Rahon Road, Ludhiana, as respondents no. 1 to 4 with direction to file reply.

- 9) That thereafter the case came for hearing on 10.02.2025, when this Hon'ble Tribunal was pleased to pass an Order dated 10.02.2025, the relevant extract of which in para no. 4 to 6 is reproduced below for kind perusal and reference:

"4. In its reply/response respondent no. 3-PPCB shall specifically mention about previous inspections of respondent no. 4-Industry by PPCB, environmental violations committed by respondent no. 4 and also compliance status of respondent no. 4-Industry at the time of last order granting consent to operate to respondent no. 4 and shall also file copies of relevant documents alongwith its response.

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.

6. List on 17.02.2025 for further consideration."

- 10) That in compliance to Order dated 10.02.2025 of this Hon'ble Tribunal, the status of previous inspections and the action taken by the Board is summarized in the following paragraphs.
- 11) That briefly submitted M/s Bharti Scientific Dyers is a red category dyeing unit and was granted consent to operate under the Water (Prevention and Control of Pollution) Act, 1974. vide letter no. CTOW/Renewal/LDH3/2021/14307668 dated 25.07.2021 and under the Air (Prevention and Control of Pollution) Act, 1981 vide letter no. CTOA/Renewal/LDH3/2021/14307652

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dated 10.02.2021 for the dyeing of yarn @ 1000 kgs/day & dyeing of cloth @ 1500 kgs/day with disposal of trade effluent @ 200 KLD onto land for plantation after treatment through ETP and domestic effluent @ 2.0 KLD onto land for plantation after treatment through septic tank valid for a period upto 30.06.2025. The copies of the consent granted by the Board are enclosed as **Annexure R-3/F**.

12) That earlier a compliant filed by Gram Panchayat village Meharban against water and air pollution caused by M/s Bharti Scientific Dyers was received in the office of the Board at Ludhiana through the Government of Punjab, Department of Science, Technology and Environment vide letter no. STE-STE010/222/2024-STE4/817341 dated 05.04.2024. In order to verify the status of the compliant, the industry was visited by officers of the Board on 05.06.2024 when following observations were made: -

- i. The industry was engaged in the process of dyeing of fabric as well as yarn.
- ii. The industry has installed 07 soft flow machines of total capacity 2100 i.e. (1 x 150 Kg), (5 x 300 Kg), (1 x 450 Kg) and 18 cabinet Machines of total capacity 1140 i.e. (2 x 30 Kg), (14 x 60 Kg) & (2 x 120 Kg) inside the premises.
- iii. The industry has installed an ETP for the treatment of effluent generated from the dyeing process. During the visit ETP was in operation and effluent sample was collected from the outlet of ETP and the same was sent to the Boards lab for analysis. As per analysis report, the concentration of various parameters outlet are pH= 8.3, TSS =96 mg/l, TDS = 1319 mg/l, COD = 102 mg/l, BOD =20 mg/l, O&G = 5.6 mg/l, Sulphide = 5.8,

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Phenolic Compound = BDL, Ammonical Nitrogen = 6.2, Total Chromium = BDL & Sodium Absorption Ratio = 6.5, As per the report the results of one parameter i.e. Sulphide (5.8) is found to be beyond the prescribed limit of 2.0.

- iv. Treated effluent was being discharged onto land for plantation provided in 03 pockets having total area of about 1.5 acres. The plantation area was not maintained as per the Karnal technology as effluent was found stagnated in the entire plantation area in the shape of pond and most of the trees were fell down due to water logging. Wild growth of grass were also grown in the plantation area, plantation area was inadequate to manage the quantum of discharge.
- v. The industry has installed one boiler of capacity 7 TPH with water scrubber followed by dust collector as APCD and having stack of adequate height. During the visit industry was found using agro waste as fuel in its boiler and was emitting thick emissions from the stack. Air emission sample was also collected and as per the analysis report, concentration of SPM was found to be 751 mg/Nm³ against the limit of 500 mg/Nm³, hence was found beyond the prescribed limits.
- vi. The estimate generation of effluent from the installed machinery is much more than the discharge for which the industry had obtained consent to operate of the Board, therefore the plantation area developed by the industry was not adequate to manage the quantum of discharge.

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vii. From the above facts, it is clear that the industry has installed much more machinery than the required and is having not adequate arrangements for the disposal of its entire waste water, as such, the industry is violating the provisions of the Water Act, 1974 and Air Act, 1981.

- 13) That it is relevant to mention here that earlier a similar complaint was received in the Board against the industry and the industry was found violating the Environmental Norms during the visit of 28.10.2022 and at that time the industry was given hearing before the Chief Environmental Engineer of the Board on 11.04.2023. In compliance to the decisions of the hearing, the industry has submitted detail of machinery installed with Liquor Ratio etc. but, the detail was wrong and misleading as the number of machines mentioned by industry in its detail is much lesser than the actual machinery found installed at site. Thus, the industry was found not complying with the decisions of hearing afforded on 11.04.2023.

It was further observed that the calculation of generation of effluent from the installed machinery is about 400 KLD, which is twice the discharge for which the industry had obtained consent to operate of the Board i.e. 200 KLD. Further, the plantation area required to manage the discharge of 450 KLD comes to around 5.5 Acre considering the discharge handling capacity as per Karnal technology, whereas the industry had provided plantation area of about 1.5 acres only. From the above facts, it is clear that the industry has installed much more machinery than the required and is having not adequate arrangements for the disposal of its entire waste water. Also, the industry is not meeting with the discharge standards as prescribed by the Board. As such, the industry was found violating

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the provisions of the Water (Prevention and Control of Pollution) Act, 1974. Hence, after consideration of the matter, the Competent Authority of the Board has decided to revoke the Consent to Operate under the Water (Prevention and Control of Pollution) Act, 1974 and to cancel the Consent to Operate under the Air (Prevention & Control of Pollution) Act, 1981. Accordingly, the Consent to Operate under the Water (Prevention & Control of Pollution) Act, 1974 was revoked vide letter no. 4989 dated 08.08.2024 and the Consent to Operate of the industry was cancelled under the Air (Prevention & Control of Pollution) Act, 1981 vide letter no. 4991 dated 08.08.2024. A copy of letter no. 4989 dated 08.08.2024 is enclosed as **Annexure R-3/G** and a copy of letter no. 4991 dated 08.08.2024 is enclosed as **Annexure R-3/H**.

- 14) That thereafter the Board had issued directions vide letter no. 5146-47 dated 16.08.2024 for closure of the industry without affording opportunity of hearing by recording the reason in writing that the industrial activity is endangering the environment and ecosystem. A copy of the directions issued vide letter no. 5146-47 dated 16.08.2024 is enclosed as **Annexure R-3/I**. On the directions given by the Board to the PSPCL authorities vide letter no. 5148-49 dated 16.08.2024, the electricity available to the premises of the industrial unit was disconnected. A copy of letter no. 5148-49 dated 16.08.2024 is enclosed as **Annexure R-3/J**.
- 15) That after making compliance of the directions of the Board and taking remedial measures the industry had applied for fresh Consent to Operate under Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981. After consideration, the Board has granted Consent to Operate to the industry under Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution)

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Act, 1981 for the short period of 06 months with certain terms and conditions vide letter no. CTOW/Fresh/LDH3/2024/27098827 dated 07/11/2024 and letter no. CTOA/Fresh/LDH3/2024/27101443 dated 07/11/2024 respectively and both the consents are valid upto 06/05/2025. The copies of the Consents to Operate granted to the industry are enclosed as **Annexure R-3/K**.

- 16) That it is relevant to mention here that as per the policy of the Board, the temporary restoration of electricity connection has to be restored on permanent basis after three-time monitoring of the industrial unit. However, a complaint has been received as explained in the preceding paragraphs of the reply and during inspection the industrial unit was found violating the environmental norms under the Water (Prevention and Control of Pollution) Act, 1974. Hence, the electricity connection of the industrial unit was disconnected without affording an opportunity of hearing to the industry.
- 17) That in further compliance to the Order dated 10.02.2025, the status of compliance of the conditions of consent granted by the Board under the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981 is enclosed in the form of Annexures herewith. The compliance status under the Water (Prevention and Control of Pollution) Act, 1974 is enclosed as **Annexure R-3/L** and the compliance status under the Air (Prevention & Control of Pollution) Act, 1981 is enclosed as **Annexure R-3/M**.
- 18) That the electricity connection of the industrial unit namely M/s Bharti Scientific Dyers was disconnected by the Punjab Pollution Control Board in view of the facts and circumstances narrated in the reply herein above. The reply is filed in compliance to Order

dated 10.02.2025 for kind consideration and appropriate order of the Hon'ble Tribunal.

Date: 14-02-2025

Place: Ludhiana

Submitted by

Mr.

(Er. Gurmit Singh)
Environmental Engineer,
Punjab Pollution Control Board
Regional Office-3, Ludhiana
(On behalf of Respondent no. 3)

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

OA No. 1137 of 2024

Neclam Rani & Ors

..... Applicant

Vs

State of Punjab & Ors

..... Respondent

Additional reply of Er. Gurmit Singh, Environmental Engineer, Punjab Pollution Control Board, Regional Office-3, Ludhiana on behalf of respondent no.3 in compliance to order dated 17.02.2025.

Respectfully showeth:

Preliminary Submissions:

- 1) That the subject cited case is pending for adjudication before the Hon'ble National Green Tribunal and is listed for hearing on 20.03.2025. The respondent Punjab Pollution Control Board has filed reply dated 14.02.2025 in compliance to order dated 10.02.2025 in the present case, but inadvertently, the remedial measures taken by the industrial unit in question namely M/s Bharti Scientific Dyers, Rahon Road, Ludhiana after the visit of the officers of the Board on 05.06.2024 has not been disclosed in the said reply.
- 2) That after consideration of the matter, this Hon'ble Tribunal was pleased to pass an order dated 17.02.2025 thereby directing the respondent Punjab Pollution Control Board to file additional reply in the case.
- 3) That in continuation of the reply dated 14.02.2025 filed by the Board, it is respectfully submitted that after the issuance of directions by the Board vide letter no. 5146-47 dated 16.08.2024 for closure of the industry, the industry M/s Bharti Scientific Dyers, Rahon Road, Ludhiana vide letter dated 29.10.2024 has submitted a request letter to the Board for renewal of Water

Consent mentioning that the industry has taken the following corrective measures:

- a. Our industry is a small-scale industry engaged in the dyeing of fabric and yarn.
- b. The installed machines are not in continuous operation, and different shades are dyed in different machines based on market demands.
- c. The effluent sample analysis revealed only one parameter-sulphide (5.8 mg/l) exceeding the prescribed limit. To rectify this, we have cleaned our equalization tank to ensure better treatment efficiency.
- d. A new plantation area of approximately 0.75 acres has been developed with fresh saplings, and the remaining plantation area has also been well maintained.
- e. The entire plantation area has now been developed following carnal technology, with no stagnant water. Fallen trees have been removed, and new saplings have been planted to improve the green cover.

A copy of request letter dated 29.10.2024 M/s Bharti Scientific Dyers, Rahon Road, Ludhiana is enclosed as **Annexure R-3/N**.

- 4) That considering the request of the industry for continued compliance with environmental norms and commitment towards sustainable operations, the Board has granted consent to operate to the industry under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 for the short period of 06 months with certain terms and conditions vide letter no. CTOW/Fresh/LDH3/2024/27098827 dated - 07.11.2024 and vide no. CTOA/Fresh/LDH3/2024/ 27101443 dated 07.11.2024, both valid upto 06.05.2025. The copy of consent to operate granted to the industry was enclosed with the reply dated 14.02.2025 earlier filed before this Hon'ble Tribunal as **Annexure R-3/K** and is again enclosed herewith as **Annexure R-3/O**.

- 5) That the additional reply may kindly be read as part of reply dated 14.02.2025 earlier filed by the Board.
- 6) That the additional reply is hereby for kind perusal and appropriate orders of this Hon'ble Tribunal.

Submitted by



(Er. Gurmit Singh)

Environmental Engineer,
Punjab Pollution Control Board
Regional Office-3, Ludhiana

(On behalf of Respondent no. 3)

Date: 17-03-2025

Place: Ludhiana



PUNJAB POLLUTION CONTROL BOARD
Air & water Lab, E-648 B, 2nd Floor, Phase-5,
Focal Point, Ludhiana
DETAILS OF BE SUPPLIED FOR THE COLLECTION OF SAMPLE

PART-A

1. Name & Address of the Industry *M/S Bhask Scientific Dyers, Vill Mehraon, Ashu Road, Ludhiana.*
2. Raw material used *Fabric & yarn.*
3. i. Product *Dyed fabric & yarn.*
ii. Processes involved *Dyeing of fabric & yarn.*
4. i. Give the name of the processes in operation at the time of sampling *All were in operation.*
ii. The number of wastewater streams from different processes along with discharge of each. *one*
5. i. Quantity of industrial effluent discharge per hour (in liters)/m³/day. *-*
ii. Is the discharge of industrial effluent continuous on intermittent and it intermittent, date & time of its discharges *Continuous.*
iii. Is the quantity and quality of industrial effluent from different streams uniform through out or not. *Almost uniform.*
iv. Present method of disposal of industrial effluent. *On to land for plantation*
6. i. Working hours *12 hrs.*
ii. Closed day
7. Number of outlets through which industrial effluent is discharged/carried outside the industry. *one*
8. Name of the occupants/representative of the industry with designation present at the time of sampling. *Mr. Ashu Pruthi [Rep]*
9. Process not working at the time of sampling & why? *All were in operation.*
10. Parameters to be analyzed. *Output Parameter.*
11. Sample preserved for (tick)
 - i. Organic parameter (freezer below 4°C) *B₁ = pH, TSS, TDS, BOD, Colours, SAR*
 - ii. Metals (pH less than 2 with HNO₃) *B₂ = COD, Ammonical Nitrogen*
 - iii. Cyanide (pH above 10 with NaOH) *B₃ = phenolic compound*
 - iv. Oil & grease (separate 1 Lt. sample glass bottles & freeze) *B₄ = Soluble*
 - v. Others *B₅ = Tcr.*
12. Details visuals report of Water & Air *B₆ = ORG.*

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13. i. Name the components of the ETP which were working.
 Collection tank → Chemical dosing → Flocculation → Primary clarifier → Secondary clarifier → filters → Sludge

ii. If any component was not working why?

14. Date & time of collecting the sample 12/12/2024

15. Temperature in °C
 a) Air/Sample

16. Colour and odour of the sample Slightly yellowish.

17. Type of sample collected grab or composite. grab

18. Point of sample collection Outlet of ETP.

19. Remarks:-

During visit, ETP was in operation & effluent sample has been collected from final outlet of ETP leading to plantation area.

NOTE:-

- i. The samples of trade effluent of M/s _____ from the point mentioned at Sr. No. 18 above was collected in the presence of Sh. _____ occupier _____ representative of the industry/placed in dry empty container after explaining the provisions of section 21 of the Water (Prevention & Control of Pollution) Act, 1974 to them. No request to send the sample to the State Water Laboratory under section 52 (i) if the said Act has been made by occupier/representative of the industry. The sample was stirred and placed in dry bottle/dry bottles and sealed _____ hearing inscription of AEE.

- 1) Es. Bhishan AEE 3) Miss. Shree [Kish Tehsildar]
 2) Mr. Dalbir ASA 4) Mr. Ashu [Rep of unit]

ASW
 12/12/24.

Signature of the occupant/Representative of the Industry with Designation

Bhishan
 Signature of the Officer official collecting the sample

Received sealed/unsealed and preserved sample on _____ at _____ through Sh. _____

BOARD ANALYST
 Patiala