

N.D.H.:23.10.2024

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI
ORIGINAL APPLICATION NO. 868 OF 2024**

IN THE MATTER OF:

SUMIT SAINI

..... APPLICANT

VERSUS

ALLOY STEEL AND CASTING

... RESPONDENT

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Place: New Delhi**Date:** 21.10.2024

FILED BY:

**(GAURAV AGARWAL)**

Advocate for Respondent No.1

GRV LEGAL
Advocates and Legal Consultants
O-703, Aditya Mega City,
VaibhavKhand, Indirapuram,
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BEFORE THE NATIONAL GREEN TRIBUNAL
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REPLY/OBJECTION ON BEHALF OF THE RESPONDENT
AGAINST THE DETAILED REPORT FILED BY THE
HARYANA STATE POLLUTION CONTROL BOARD

1. That by an order of this Tribunal dated 18.04.2024, HSPCB was directed to conduct an inspection and verify the factual compliance status qua all relevant aspects and to inform the Hon'ble Tribunal with the specific queries put to the HSPCB.
2. That the Respondent is a Partnership established in the year 2002 and has been engaged in the plywood industry and is amongst those 28 industries which were named in the order.
3. That it is incorrectly stated in the report of HSPCB that Respondent is generating fly ash. As the fuel used is wood waste hence it generates only wood ash which is approx. 20-35 kg depending upon the type of wood waste. The wood ash generated in the process is taken away by the local and farmers for filling and levelling purpose. Hence, the wood ash is disposed accordingly.
4. That the wood ash generated is not used by the Respondent, hence the same is stored in gunning bags. The said bags are

thereafter, taken away by locals and farmers after due verification by the Respondents. However, as the same is not a saleable product, separate/individual record is not kept of it's disposal to the locals.

5. That with respect to the nature and adequacy of plantation carried out it is submitted that the Respondents have planted abundant trees/plants in the premises. The HSPCB is not correct in submitting in the report that adequate plantation is not done
6. That regarding the NOC from the State Ground Water Authority, the Respondents had a valid NOC and before the expiry of the same the Respondent has already applied for its renewal however, the same is pending disposal at the end of the Haryana Ground Water Department but no objection/defect is notified in the said application till date. A copy of the Application for renewal of NOC dated NIL is **ANNEXURE R-1**
7. That may be pertinent to mention that Respondent is a manufacturing unit engaged in the present industry since past more than 22 years. The Respondent has always complied and followed each and every rule and law scrupulously. However, the Respondents states that in the event any further direction, if any is passed by this Tribunal, Respondent shall be obliged to follow the same as well. It is lastly submitted that considering the fact of compliance by the Respondent and the fact that Respondent is a source of livelihood to huge section

of society who are directly and indirectly engaged with the Respondent, this Tribunal may be pleased to dismiss the O.A with heavy cost to the Applicant.

Sunit Singla
Partner, Alloy Steel and Castings
Respondent

Through


(GAURAV AGARWAL)
Advocate for Respondent No.1

GRV LEGAL
Advocates and Legal Consultants
O-703, Aditya Mega City,
VaibhavKhand, Indirapuram,
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AFFIDAVIT

I, SUNIT SINGLA, aged about 41 years, S/o Khem Chand Singla R/o 1066, Sector-17, HUDA, Jagadhri, Yamunanagar, Haryana 135001, do hereby state on solemn affirmation as under:

1. That the deponent is the Partner of the Respondent in the present Original Application as such I am well conversant with the facts and circumstances of the present case and hence, competent to swear this affidavit.
2. That I have gone through the accompanying Reply from para 1 to 6 and say that the contents thereof are true and correct to the best of my knowledge and belief and I believe the same to be true.

That the Annexures R-1 o the reply are true copy of the photographs.

Solemnly affirmed on this day of _____, 2024 at Yamunanagar, Haryana.

For Alloy Steel & Casting

[Signature]
Partner
DEPONENT



VERIFICATION

Verified at Yamunanagar, Haryana on this day of _____, 2024 that the contents of my above affidavit are true and correct to my knowledge and no part of it is false and nothing material has been concealed therefrom.

For Alloy Steel & Casting

[Signature]
Partner
DEPONENT

ATTESTED
Sunit Chand (M.A., LL.B.)
Advocate/Notary
Distt. Courts Jagadhri (YNR)

15/10/24

ANNEXURE R-1

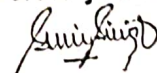
Government of Haryana
Haryana Water Resources Authority
Applications for Issue of Permission to Extract Ground Water

Application for Permission to Extract Ground Water for Industrial Use

Application No: HWRA/IND/N/2021/696 (Application Received Fee Paid)

I. General Information:	
Application Type Category/ Type of Application:	
(i) Name of Applicant:	SUNIT SINGLA
ID Proof Type	Aadhaar
ID Proof no	XXXXXX)X2320
Id Proof Document	Download
(ii) Designation of Applicant:	PARTNER
Authorization Letter in the name of SUNIT SINGLA (applicant)	Download
(iii) Name of Industry:	MS ALLOY STEEL AND CASTINGS
(iv) Registration number of Industry:	UDYAM-HR-19-0002137
(v) Location Details of the Industrial Unit	
Industrial Unit Address	ALLOY STEEL AND CASTINGS, KUNJAL JATTAN ROAD, VILLAGE DAMLA DIRTRICT YAMUNANAGAR, Haryana-135001
State:	Haryana
District:	YAMUNANAGAR
Tehsil:	Jagadhri
Block:	JAGADHRI
Village/MC:	Damla
Region:	over-exploited
(vi) Correspondence Address	
Complete Postal Address	ALLOY STEEL AND CASTINGS, KUNJAL JATTAN ROAD, VILLAGE DAMLA DIRTRICT YAMUNANAGAR, Haryana-135001
Mobile Number:	9996147373
E-Mail of Industry:	gati.alloysteel@gmail.com
(vii) Salient Features of the Industrial Activity:	
a. Type of Industry	Plywood and allied products
b. Industry fall under	Small
c. Is Water Intensive	No
d. Purpose of Abstraction	Other Use - INDUSTRIAL AND DOMESTIC USE
e. Groundwater utilization for	Existing Industry
f. Whether present industrial activity commenced after 23.12.2020	No
g. Whether there is expansion of this industry Unit after 23.12.2020 Involving increase in water requirement	No
h. Consent to Operate	Download

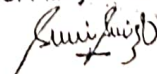
For Alloy Steel & Casting



Partner

		CTO/CTE Number : 313127023YAMCTO31932 203	Issue Date : 23/01/2023
i.	Validity Period of Consent to Operate	01/04/2023	31/03/2028
j.	Large industry/ MSME certificate/ proof	Download	
k.	Date of commencement	10/05/2008	
l.	Description	Ply wood Manufacturing including veneer laminate and other plywood products	
(viii)	Land use details of the existing/proposed Industrial unit premises		
	Ownership of the land(Enclose documents of ownership)	Download	
	Latitude	Longitude	
		30.428387	77.115542
	Location Map	Download	
	Total Land area(in sq m)		20740.00
	Rooftop area of buildings/sheds(in sq m)		1858.00
	Road/paved area(in sq m)		882.00
	Green belt area(in sq m)		0.00
	Open Land (in sq m)		18000.00
	Source of availability of surface water for Industrial use, if any	No	
	Townships/villages within 2 km radius of the Industrial unit	No	
2)	Detail of water requirement/ recycled water usage : (Please enclose flow chart of activities and requirement of water at each stage)		
	Flow Chart of activities and requirement of water	Download	
	Water Balance Chart with water requirement at each Stage.	Download	
	Upload Affidavit for Non/Partial supply of water from local government water supply agency (in case of ground water requirement less than 10 KLD).	Download	
	Upload NOC/Certificate for non/ partial supply of fresh water/ treated waste from the local government water supply agency.	Download	
	Quality of groundwater	Fresh Water	
	Name of NABL(Under Valid Certificate)	ASIA TEST LAB	
	Upload test report of groundwater quality from NABL accredited lab	Download	
	Whether there is expansion of existing industry involving increase in ground water abstraction after 23.12.2020	No	
(i)	Total water required(in m3/day)	20.00	Download
a.	Ground Water required(in m3/day)	20.00	
b.	Recycled Water usage(in m3/day)	0.00	
c.	Proposed/existing water supply from any agency(in m3/day)	0.00	
(ii)	Breakup of Water Requirement and Usage:		

For Alloy Steel & Casting



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Activity	Existing Requirement (m3/day)	Additional Proposed Requirement (m3/day)	Total Requirement (m3/day)	No. of Operational Days in a Year	Annual Requirement (m3/year)	
a. Industrial Activity	15.00	0.00	15.00	888	300	24000.00
b. Residential / Domestic	5.00	0.00	5.00		348	1740.00
c. Greenbelt Development / Environment Maintenance	0.00	0.00	0.00		0	0.00
d. Other Use	0.00	0.00	0.00		0	0.00
e. Grand Total	20.00	0.00	20.00			25740.00

Source of recycled water

NONE

(iii) Breakup of Recycled Water Usage:

	(m3/day)	(Days)	(m3/year)
(a) Total Waste Water Generated:	0.50	300	
(b) Quantity of Treated Water Available	0.00	0	
i). Reuse in Industrial Activity:	0.00	0	
ii). Reuse in Green Belt Development:	0.00	0	
iii). Any other use	0.00	0	0.00
(c) Total Treated Water Utilized:	0.00		
(d) Quantity and mode of disposal of unutilised effluent:	0.50	DOMESTIC EFFLUENT	

3. Details of existing and/ or proposed groundwater abstraction structures

(a) Groundwater Abstraction Structure-Existing

SNo.	Type/ Year of construction	Depth (meter) / Diameter (mm)	Depth to water level (meters below ground level)	Discharge (m3 per hour)	Operational hours (day)/ days/year	Mode of lift	Horse Power of pump	Whether fitted with water meter or not	Whether permission/ registered with HRWA / if so Details of permission
1	bore well/ 2008	120.00/ 50.00	90.00	10.00	2.00/ 300	1	3	Yes	No/

Source of fresh water requirement being met uptill now

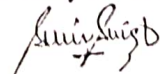
Affidavit duly attested by the Applicant regarding non-existence of tubewell

Likely date of operation of proposed tubewell

Quantum of ground water recharge(m3/year)

4022.00

For Alloy Steel & Casting



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Details of rainwater harvesting and artificial recharge measures for groundwater recharge in the premises. If the firm has proposed to take up rainwater harvesting and recharge outside the industrial unit premises, then provide NOC from the concern authority/agency where the harvesting measures are proposed, if already implemented, details may be furnished. (attach report on comprehensive & feasible Rainwater harvesting/recharge proposal).

Download

Whether the applicant has earlier applied for abstraction of ground water to any other Government Agency. N

SELF-DECLARATION stating that the applicant has not applied for abstraction of ground water to any other competent Authority/CGWA

Download

Water Efficient Technology will be adopted

Download

Consent of operate issued by HSPCB(CTO)

Download

Impact Assessment Report prepared by the accredited consultant : Submit IAR of existing / proposed groundwater withdrawal on the groundwater regime and socio-economic impacts report. Pro-forma for the report is given in Annexure IV of HWRA Guidelines dated 10.9.21. On top of the IAR, provide the Check List + Salient features of IAR, in the prescribed formats.

Certificate regarding non/ partial availability of fresh water/ treated waste water supply from the local government water supply agency

Download

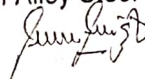
Any Other Document/Information

Download

Any Other Document/Information

Any Other Document/Information

For Alloy Steel & Casting



Partner

Self Declaration:-

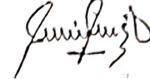
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1. I hereby declare that all the documents prescribed in the application form have been uploaded and no blank / another / irrelevant documents have been uploaded against specified documents. I am also aware that any false/ wrong submission /uploading of document will lead to rejection of my application without any notice.
2. I hereby certify that the contents of the above Application are true to the best of my knowledge and belief and that it conceals nothing and that no part of it is false. I understand that if any information furnished by me is found to be false, Haryana Ground Water Authority can take punitive action against me as per the extant rules. Further, I shall comply with all the terms and conditions of the permission/NOC to be granted by HWRA.

Date: 16/08/2024

Place: YAMUNAPUR

For Alloy Steel & Casting



Partner

Signature of Applicant with Office Seal

(SUNIT SINGLA)

(PARTNER)

a) Information of payment for Application Fee

Total Amount				
Mode of Payment		Online		
Reference No.	Transaction No.	Date	Amount	Status
HRWA1010127017045095	WHDF0306335065	30/09/2021	25000	Success

b) Information of payment for Tarrif Fee

Total Amount				
Mode of Payment				