

N.D.H.:01.07.2025

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

**ORIGINAL APPLICATION NO.480 OF 2024**

**IN THE MATTER OF:**

MR. VINAY CHHILLAR AND ANOTHER ..... APPLICANTS

VERSUS

HARYANA STATE POLLUTION CONTROL  
BOARD & OTHERS ... RESPONDENTS

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**Place:** New Delhi

**Date:** 25.06.2025

FILED BY:



(GAURAV AGARWAL)

Advocate for Respondent No.4 and 14

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**BEFORE THE HON'BLE NATIONAL GREEN  
TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 480 OF 2024**

**IN THE MATTER OF:**

VINAY CHILLAR AND ANOTHER .....APPLICANTS

VERSUS

HARYANA STATE POLLUTION  
CONTROL BAORD AND OTHERS .....RESPONDENTS

**REPLY ON BEHALF OF RESPONDENT NO. 4,**

**M/S INDER SINGH BHAGWAN SINGH & COMPANY**

**AND RESPONDENT NO. 14, M/S JSR BHATTA COMPANY.**

1. That the present OA is filed by the Applicant alleging that the Respondents brick kiln are set up illegally without proper approvals and being operated without obtaining proper consent and causing air pollution and soil degradation. It is further alleged that the said answering Respondents are using coal dust and plastic waste as fuel causing high pollution.
2. That this Hon'ble Tribunal considering the issue involved in the case directed issuance of notice by order dated 24.05.2024. On the next date of hearing Hon'ble Tribunal granted time to the answering Respondents to file their response to the OA.
3. That the answering Respondents herein has been read over and explained in Hindi the contents of the entire Original Application and is, thereafter, giving a reply to the allegations made therein. The answering Respondents raises a preliminary objection to the Original Application being not maintainable as the same is not filed in compliance with Rule 8(1) of the NGT Practice And

Procedure Rules 2011, as the memorandum of Application is not properly verified, nor the affidavit is sworn in terms of O. 19 R. 3 of CPC.

4. That, without prejudice to the preliminary objections, on merits of the case, at the outset all allegations made in the Original Application are denied and not admitted except to the extent expressly admitted herein. The allegations made in the Original Application are not only false but is an attempt to abuse the process of law of this Court by the Applicants in order to gain illegal financial benefit from the answering Respondents.
5. That Respondent no. 4 is brick kiln in name of M/s Inder Singh Bhagwan Singh and Company which is a proprietorship concern situated at vill. Bamnoli tehsil Bahadurganj, Jhajjar Haryana. The Respondent No. 14 arrayed as respondent in Original Application as Pawan Bhatta is a brick kiln in name of M/s JSR Bhatta Company, vill. Kanonda. Jhajjar, Haryana and it is also a proprietorship concern. Both the said Respondents are being run by the deponent Kulbir Singh.
6. That Respondent no. 4 was set up as much as 20 years back. The said Respondent was established after obtaining licence from the State government under the Haryana Control of Brick Supplies Order 1972. The Respondent no. 4 was granted licence no. 204 BKJ and the said license has regularly been renewed from time to time. A true copy of the duplicate licence of M/s Inder Singh Bhagwan Singh and Company dated 11.01.2022 is ANNEXURE A-1

7. That similarly Respondent no. 14 was set up in 2009 almost 16 years back. The said Respondent was established after obtaining licence from the State government under the Haryana Control of Brick Supplies Order 1972. The Respondent no. 4 was granted licence no. 549 BKJ and the said license has regularly been renewed from time to time. A true copy of the licence of M/s JSR Bhatta and Company dated 01.02.2009 is **ANNEXURE A-2**
8. That since the introduction of the GST the Respondent no. 4 and 14 are operating having registered under the GST. Both the answering Respondents have got themselves registered under the GST since 2020 and 2017 respectively. Hence, the allegations in Original Application that the said brick klins are unaccounted and unregistered is false and a concocted narration of fact. A true copy of the GST Registration Certificate of Respondent no. 4 and 14 dated 20.10.2020 and dated 28.07.2018, respectively is **ANNEXURE A-3.**
9. That in respect of the allegations that the answering Respondents are operating without proper consent from the HSPCB, it is submitted that the allegations are false and clear attempt to mislead this Tribunal. The answering Respondents have CTO dated 24.01.2022 and 06.01.2023 and are operating in strict compliance of the same. A true copy of CTO dated 24.01.2022 and 06.01.2023 of Respondent no. 4 and 14, respectively is **ANNEXURE A-4**

10. That it is submitted that the Respondent no. 14 is allowed to operate on bio mass fuel 3 tons per day. The Respondent no. 14 has never operated on any other fuel than the allowed fuel. The Respondent no. 4 is since its establishment operating only on bio mass. However, the Respondent no. 4 which is allowed to use coal, 3 tons per day, has used coal dust in year 2023 under a misconception that it is form of coal and allowed fuel type. The HSPCB has, thereafter, taken action against the Respondent no. 4 and imposed environment compensation to the tune of Rs. 3,68,750/-. The Respondent no. 4 has paid the same amount on 28.06.2023 only and since then has not used any fuel other than coal as allowed and in permitted quantity only. A true copy of the proof of payment dated 28.06.2023 is **ANNEXURE A-5**.
11. That it is incorrect and false that the answering Respondents are operating on plastic waste as source of fuel. The Applicants have made bald assertions in the Original Application without any prima facie evidence or proof in support of his allegations. Hence, the same deserves to be rejected. So far as the allegations pertaining the plastic factories selling waste to brick klins it is submitted that the same is a vague and general allegation. The answering Respondents have neither bought any such plastic waste nor are using any such waste. The Applicants has failed to show that the answering Respondents are in any way connected to the sale of plastic waste by any of the alleged plastic factories.
12. That the further allegations relating to the discharge of water is misplaced and misleading. The answering Respondents does not discharge any water as the brick klins are not water intensive industry. Mainly, requirement of water is to make the clay with

soil and for drinking purpose. There is no discharge of the water from the brick kilns. The perusal of the CTO also shows that the mode of discharge and effluent parameters says 'NA'. Thus, no case is made out on the basis of the aforesaid allegations in Original Application.

13. That it is pertinent to mention at this stage that the Applicant herein has not approached this Tribunal with clean hands. It is incorrect and false to state that the Applicants have filed the Original Application with intention to secure a pollution free environment and for taking down the illegal brick kilns. In fact Applicant No. 1 is a blackmailer and has earlier approached the answering Respondents and other brick kiln owners demanding financial benefit to run brick kilns in the area. As the answering Respondents denied to bent down to illegal demand of the Applicant no. 1 the present false Original Application is filed abusing the process of law. A true copy of the affidavits made by some of the brick kilns owners dated 05.08.2024 is **ANNEXURE A-6.**
14. That it is also pertinent to mention that a police complaint was also filed against the said Applicant no. 1 along with call recording of extortion and the criminal case is pending against the Applicant no.1. In this respect the Hon'ble Supreme Court has held in case of **State of U.P. v. Uday Education and Welfare Trust, Civil Appeal No. 2407 -2412 of 2021 decided on 21.10.2022** that when the credentials and bonafides of a litigant approaching the learned NGT are seriously raised, the same cannot be ignored.

“99. We find that before a litigant is permitted to knock the doors of justice and seek orders which have far reaching effects of affecting the employment of thousands of persons, stopping investment in the State, prejudicing the interests of the farmers; the credentials and bonafides of the applicants must be tested. In the present case, there is scope to infer that the litigation could be at the behest of the existing WBIs who wanted to avoid competition and continue to get raw material at a cheaper rate. There is also scope to infer that it could be at the behest of the WBIs in the adjoining Yamuna Nagar district of Haryana where lakhs of tons of timber is exported from the State of Uttar Pradesh. There is scope to infer that it could be in the interest of middlemen who are engaged in exporting timber from Uttar Pradesh to Haryana. **We would, therefore, only request the learned NGT that, when credentials and bonafides of such litigants are seriously raised and when entertaining the grievance of such litigants, which is likely to adversely affect the rights of many, it should ensure the bonafides and credentials of such litigants.**”

15. That in light of the aforesaid this Tribunal shall enquire from the Applicant the source of funds for filing numerous applications before this Tribunal, reasons for not arraying as party other bick klins out of admittedly stated 400 brick klins in the region, reason for filing of petition with false facts without ascertaining from the HSPCB about the CTO of the answering Respondents.
16. That it is lastly submitted that the answering Respondent has always complied and followed each and every rule and law scrupulously. However, the answering Respondent states that in the event any further direction, if any is passed by this Tribunal, the answering Respondent shall be obliged to follow the same as well. It is lastly submitted that considering the fact of compliance by the answering Respondent and the fact that the answering Respondent is a source of livelihood to huge section of society who are directly and indirectly engaged with the answering

Respondents, this Tribunal may be pleased to dismiss the O.A. with heavy cost to the Applicants.

Kulbir Singh  
Proprietor,  
M/s Inder Singh and Bhagwan Singh and Company  
(Respondent no. 4)  
And  
M/s JSR Bhatta Company  
(Respondent no. 14)

Through

  
**(GAURAV AGARWAL)**  
Advocate for Respondent No. 4 and 14

GRV LEGAL  
Advocates and Legal Consultants  
O-703, Aditya Mega City,  
Vaibhav Khand, Indirapuram,  
Ghaziabad, U.P NCR- 201014  
Mob- 8802911392  
Email- gaurav@grvlegal.in

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO.480 OF 2024**

**IN THE MATTER OF:**

MR. VINAY CHHILLAR AND ANOTHER

..... APPLICANTS

VERSUS

HARYANA STATE POLLUTION CONTROL  
BOARD & OTHERS

... RESPONDENTS

**AFFIDAVIT**

I, KULBIR SINGH, aged about 44 years, S/o Shri Ram Snehi, R/o House No. 583, Pahladpur (15-R), District Sonipat, Haryana-131402, do hereby state on solemn affirmation as under:

1. That the deponent is the Proprietor of the answering 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 16 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.
3. That the Annexures R-1 and R-6 to the reply are true copy of the documents.

Solemnly affirmed on this \_\_\_ day of June, 2025 at Sonipat, Haryana.



**VERIFICATION**

Verified at Sonipat, Haryana on this \_\_\_ day of June, 2025 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.

*[Signature]*  
DEPONENT

*[Signature]*  
DEPONENT

**ATTESTED**  
*[Signature]*  
Mukesh Kumar Saini  
Advocate & Notary  
Bahadurgarh Jjr (Hr.)

Duplicate Licence issued against TC No. 0089194112 dt. 11-01-2022

FORM- B

**THE HARYANA CONTROL OF BRICKS SUPPLIES ORDER, 1972**

Licence under clause 6 of the Haryana Control of Bricks Supplies order

Licence No. 204-BKJ  
District - Jhajjar

Name :- M/s Inder Singh Bhagwan Singh & Co. VPO Bamnoli Teh B.Garh Distt.  
Jhajjar

Through :- (Prop) Sh. Kulbeer S/o Sh. Ram Snehi

Postal Address :- Sh. Kulbeer S/o Sh. Ram Snehi R/o 10/87, Pocket 10, Sec-21  
Rohini Delhi is Licence to M/s Inder Singh Bhagwan Singh & Co. VPO Bamnoli Teh  
B.Garh Distt. Jhajjar, Manufacture, sell or supply bricks at there mentioned the address  
of the place of Business Killa No 26//9, 10, 11 in Village Bamnoli Teh Bahadurgarh  
Distt Jhajjar.

- Sd-  
District Food & Supplies Controller  
Jhajjar

**Note:** Description of 'Bricks' according to clause 2 (a) of the East Punjab control of  
Bricks Supplies Act, 1949, is as under.

'Bricks' means any piece of burnt clay having a geometrical shape fired in a kiln.

Renewal Endorsement

Date from which Renewal applicable	Date of expiry	Signature of issuing authority	Remarks
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Attested  
Licence Renewed upto 31-03-2023

District Food & Supplies Controller  
Jhajjar

Licence Renewed upto 31-3-2024

D.F.S.C.  
Jhajjar

Licence Renewed upto 31-3-2025

D.F.S.C.  
Jhajjar





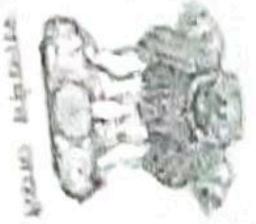
Government of India  
Form GST REG-06  
[See Rule 10(1)]

Registration Certificate

Registration Number : 06ATSPS0897A4Z8

1.	Legal Name	KULBIR SINGH			
2.	Trade Name, if any	INDER SINGH BHAGWAN SINGH & COMPANY			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	VILLAGE BAMNOLI, TEHSIL BAHADURGARH, BAMNOLI, Jhajjar, Haryana, 124505			
5.	Date of Liability				
6.	Period of Validity	From	20/10/2020	To	Not Applicable
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority				
Signature					
Name					
Designation					
Jurisdictional Office					
9.	Date of issue of Certificate	20/10/2020			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					

This is a system generated digitally signed Registration Certificate issued based on the deemed approval of application on 20/10/2020 .



06ATSPS0897A4Z8

GSTIN

Legal Name

KULBIR SINGH  
INDER SINGH BHAGWAN SINGH & COMPANY

Trade Name, if any

0

**Details of Additional Places of Business**

**Total Number of Additional Places of Business in the State**



Annexure B

GSTIN

06ATSPS0897A4Z8

Legal Name

KULBIR SINGH

Trade Name, if any

INDER SINGH BHAGWAN SINGH &amp; COMPANY

**Details of Proprietor**

1



Name

KULBIR SINGH

Designation/Status

PROPRIETOR

Resident of State

Haryana

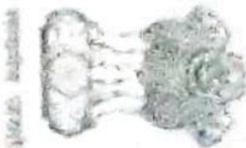


Government of India  
Form GST REG-06  
[See Rule 10(1)]

Registration Certificate

Registration Number : 06ATSPS0897A3Z9

1.	Legal Name	KULBIR SINGH			
2.	Trade Name, if any	J.S.R. BHATTA CO.			
3.	Constitution of Business	Proprietorship			
4.	Address of Principal Place of Business	Village Kanonda, Village Kanonda, Kanonda, Jhajjar, Haryana, 124507			
5.	Date of Liability	01/07/2017			
6.	Period of Validity	From	01/07/2017	To	NA
7.	Type of Registration	Regular			
8.	Particulars of Approving Authority				
Signature		Signature Not Verified Digitally signed by DS GOODS AND SERVICES TAX NETWORK 1 Date: 2018.07.28 01:55:11 IST			
Name					
Designation					
Jurisdictional Office					
9.	Date of issue of Certificate	28/07/2018			
Note: The registration certificate is required to be prominently displayed at all places of business in the State.					



GSTIN

06ATSPS0897A3Z9

Legal Name

KULBIR SINGH

Trade Name, if any

J.S.R. BHATTA CO.

**Details of Additional Places of Business**

Total Number of Additional Places of Business in the State 0



GSTIN 06ATSPS0897A3Z9

Legal Name KULBIR SINGH

Trade Name, if any J.S.R. BHATTA CO.

**Details of Proprietor**

1	Name	Kulbir Singh
	Designation/Status	Proprietor
	Resident of State	Haryana



**HARYANA STATE POLLUTION CONTROL  
BOARD**

SCF No. 42 & 43, Shopping Centre, Sector-6, Huda,  
Bahadurgarh Ph. 01276-243077 (O) Email:-

hspebrobdh@gmail.com

E-mail: hspeb@hry.nic.in

No. HSPCB/Consent/ : 313116122/IIACTOA19311911

Dated: 24/01/2022

To.

M/s :INDER SINGH BHAGWAN SINGH AND CO  
VILLAGE BAMMNOLI

Subject: Grant of consent to operate to M/s INDER SINGH BHAGWAN SINGH AND CO.

Please refer to your application no. 19311911 received on dated 2021-12-26 in regional office Bahadurgarh. With reference to your above application for consent to operate. M/s INDER SINGH BHAGWAN SINGH AND CO is here by granted consent as per following specification/Terms and conditions.

Consent Under	AIR
Period of consent	01/04/2022 - 31/03/2025
Industry Type	Brickfields ( excluding fly ash brick manufacturing using lime process)
Category	ORANGE
Investment(In Lakh)	48.700001
Total Land Area(Sq. meter)	12800.0
Total Builtup Area(Sq. meter)	2900.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	0.0 KL/Day
Number of outlets	0.0
<b>Mode of discharge</b>	
1. Domestic	NA
2. Trade	NA
<b>Domestic Effluent Parameters</b>	
1. NA	
<b>Trade Effluent Parameters</b>	
1. NA	
Number of stacks	1
<b>Height of stack</b>	
1. STACK ATTACHED TO GRAVITATIONAL SETTLING CHAMBER	30 METERS FROM GROUND LEVEL
<b>Emission parameters</b>	

1. SPM	250 mg/m <sup>3</sup>
2. NOX	mg/m <sup>3</sup>
3. SOX	mg/m <sup>3</sup>
<b>Product Details</b>	
1. BRICKS AND TILES	15000 Numbers/ day
<b>Capacity of boiler</b>	
1. NA	Ton/hr
<b>Type of Furnace</b>	
1. NA	
<b>Type of Fuel</b>	
1. Coal	3 Ton/day
<b>Raw Material Details</b>	
SOIL	45 Metric Tonnes/Day
WATER	8 Kilo Liters/Day

*Regional Officer, Bahadurgarh  
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. That the unit will abide by MoEF notification regarding fly ash notification regarding use of fly ash as per directions of Hon'ble Supreme Court/ High Court & ensure use of 25% of fly ash on weight to weight basis for manufacturing bricks as pre the latest direction issued by CPCB.
2. That if the unit will found using illegal fuel at any stage, CTO so granted will be revoked without giving any further notice beside taking action u/s 31A of Air Act.
3. The unit will not excavate brick earth or ordinary clay more than 1.5 meters from adjoining ground.
4. The unit will strictly comply with the directions of Hon'ble Courts/ NGT/CPCB/EPCA/Board issued from time to time.
5. Unit will abide with the decision of appeal pending before Hon'ble apex court. Unit will comply with the direction/conditions of EPCA/CPCB/MoEF issued from time to time failing which CTO so granted will be revoked without giving any further notice.
6. Unit will provide adequate sampling hole, platform and ladder as directed by CPCB on the chimney/Stack of Brick kiln.
7. The unit will pave the adjoining area of the Brick Kiln with Bricks as per the Directions of CPCB for controlling the fine dust emission.
8. Unit will submit the record regarding use of fly ash being obtained from thermal power plant in order to ensure compliance directions issued by CPCB.
9. The unit will not start its operation in violation of the Hon'ble NGT orders and Unit will comply Hon'ble NGT directions pertaining to brick kilns in Utkarsh Pawar in OA 1016/2019.
10. That the unit will not use the illegal fuel such as waste rubber, plastic etc.
11. The unit will comply with the directions of Food & Civil Supply and consumer affair dated 28.07.2017.
12. The unit will strictly comply with the directions of CPCB issued vide letter no.946 dated.14.11.17 for brick kilns.

DINESH

KUMAR YADAV

Regional Officer, Bahadurgarh

Digitally signed by DINESH  
KUMAR YADAV  
Date: 2022.01.24 14:00:05  
+05'30'

Haryana State Pollution Control Board.



# HARYANA STATE POLLUTION CONTROL BOARD

SCF No. 42 & 43, Shopping Centre, Sector-6, Huda,  
Bahadurgarh Ph. 01276-243077 (O) Email:-  
hspcbrobdh@gmail.com  
E-mail: hspcb@hry.nic.in

No. HSPCB/Consent/ : 313116123/JIAC/OA31793079

Dated:06/01/2023

To

M/s :M/s J. S. R. Bhatta Company  
Village Kanonda Distt. Jhajjar

Subject: Grant of consent to operate to M/s M/s J. S. R. Bhatta Company.

Please refer to your application no. 31793079 received on dated 2022-12-20 in regional office Bahadurgarh. With reference to your above application for consent to operate. M/s M/s J. S. R. Bhatta Company is here by granted consent as per following specification/Terms and conditions.

Consent Under	AIR
Period of consent	01/04/2023 - 31/03/2026
Industry Type	Brickfields ( excluding fly ash brick manufacturing using lime process)
Category	ORANGE
Investment(In Lakh)	47.5
Total Land Area(Sq. meter)	11000.0
Total Builtup Area(Sq. meter)	4100.0
<b>Quantity of effluent</b>	
1. Trade	0.0 KL/Day
2. Domestic	0.0 KL/Day
Number of outlets	0.0
<b>Mode of discharge</b>	
1. Domestic	NA
2. Trade	NA
<b>Domestic Effluent Parameters</b>	
1. NA	
<b>Trade Effluent Parameters</b>	
1. NA	
Number of stacks	1
<b>Height of stack</b>	
1. S T A C K A T T A C H E D T O G R A V I T A T I O N A L S E T T L I N G C H A M B E R	30.0 METERS
<b>Emission parameters</b>	

1. SPM	250 mg/m <sup>3</sup>
2. NOX	mg/m <sup>3</sup>
3. SOX	mg/m <sup>3</sup>
<b>Product Details</b>	
1. Bricks	14000 Numbers/ day
<b>Capacity of boiler</b>	
1. NA	Ton/hr
<b>Type of Furnace</b>	
1. NA	
<b>Type of Fuel</b>	
1. Bio Mass	3.0 TON PER DAY
<b>Raw Material Details</b>	
SOIL	15 Metric Tonnes/Day
WATER	25 Kilo Liters/Day

*Regional Officer, Bahadurgarh  
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. That the unit will abide by MoEF notification regarding fly ash notification regarding use of fly ash as per directions of Hon'ble Supreme Court/ High Court & ensure use of 25% of fly ash on weight to weight basis for manufacturing bricks as pre the latest direction issued by CPCB.
2. That if the unit will found using illegal fuel at any stage, CTO so granted will be revoked without giving any further notice beside taking action u/s 31 A of Air Act.
3. The unit will not excavate brick earth or ordinary clay more than 1.5 meters from adjoining ground.
4. The unit will strictly comply with the directions of Hon'ble Courts/ NGT/CPCB/EPCA/Board issued from time to time.
5. Unit will abide with the decision of appeal pending before Hon'ble apex court. Unit will comply with the direction/conditions of EPCA/CPCB/MoEF issued from time to time failing which CTO so granted will be revoked without giving any further notice.
6. Unit will provide adequate sampling hole, platform and ladder as directed by CPCB on the chimney/Stack of Brick kiln.
7. The unit will pave the adjoining area of the Brick Kiln with Bricks as per the Directions of CPCB for controlling the fine dust emission.
8. Unit will submit the record regarding use of fly ash being obtained from thermal power plant in order to ensure compliance directions issued by CPCB.
9. The unit will not start its operation in violation of the Hon'ble NGT orders and Unit will comply Hon'ble NGT directions pertaining to brick kilns in Utkarsh Pawar in OA 1016/2019.
10. That the unit will not use the illegal fuel such as waste rubber, plastic etc.
11. The unit will comply with the directions of Food & Civil Supply and consumer affair dated 28.07.2017.
12. The unit will strictly comply with the directions of CPCB issued vide letter no. 946

dated.14.11.17 for brick kilns.  
13. The unit will comply with all the directions of commission for air quality management issued from time to time.

Digitaly signed by SHAKTI  
SHAKTI SINGH SHAKTI  
Date: 10/12/2017 10:11:24  
Regional Officer, Bahadurgarh  
Haryana State Pollution Control Board.

## CONFIRMATION

received. NEFT is now available 365 days, 24 x 7 and works in settlement batches as per RBI guidelines.

## FUND TRANSFER

Type of Transaction	NEFT
Amount	₹ 3,68,750.00
Beneficiary name	HSPCB Panchkula
Beneficiary Account No.	100053543757
IFSC	INDB0000164
Transaction Date	28 Jun 23 10:16 PM
Remarks	Inder Singh Bhagwan Singh Co
Transaction Reference Number	YESIB31790056166



Add a Standing Instruction (SI)

OK



शपथ-पत्र

RAKESH KUMAR  
Stamp Vendor  
Bahadurgarh

05/08/2024

Rishin Prakash C Sanyal

- 1-मैं Rishin भट्टा नाम श्रीवाहन प्रकाश सन्याल
- 2-मैं अपना भट्टा 29/12 इतने वर्षों से गांव ब-318 जिला झज्जर  
.....में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,  
फूड सप्लाई , माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन  
लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव  
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी  
भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि  
अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं  
आपके भट्टों को नहीं चलने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक  
04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में  
ऑडियो कॉल रिकॉर्डिंग रे रखी है ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।

Chand Singh

शपथकर्ता / भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा  
ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं  
गया है ।

दिनांक 05-08-2024

Chand Singh  
शपथकर्ता / भट्टा मालिक

ATTESTED  
MKS 5/8/24  
Mukesh Kumar Saini  
Advocate & Notary  
Bahadurgarh, Jhajjar (HR)





RAKESH KUMAR  
Stamp Vendor  
Bahadurgarh

13626

05/08/2024  
Kamrudi

शपथपत्रकर्ता Bhatta

- 1- मैं शिवजी राजु भट्टा नाम शिवजी मालिक
- 2- मैं अपना भट्टा 10 वर्ष इतने वर्षों से गांव कालावा जिला झज्जर  
में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,  
फूड सप्लाई, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन  
लेकर चला रहा हूं।
3. एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव  
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी  
भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि  
अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं  
आपके भट्टों को नहीं चलने दूंगा।
- 4- अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक  
04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में  
ऑडियो कॉल रिकॉर्डिंग रे रखी है।
- 5- यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं।



*Raksh Kumar*

शपथकर्ता/भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा  
ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं  
गया है।

दिनांक 05-08-2024

*Raksh Kumar*

शपथकर्ता /भट्टा मालिक

ATTESTED

*Mukesh Kumar Saini*

Mukesh Kumar Saini,  
Advocate & Notary  
Bahadurgarh, Jhajjar (HR).





RAKESH KUMAR  
Stamp Vendor  
Bahadurgarh

13622

05/08/2024

Dindar Singh Bhagwan Singh & Son  
Ramprasad

1-मैं कमलेश भट्टा नाम सुखदेव मलिक  
2-मैं अपना भट्टा 1099 इतने वर्षों से गांव बामनौली जिला झज्जर

में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग, फूड सप्लाई, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन लेकर चला रहा हूँ।

3. एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं आपके भट्टों को नहीं चलने दूंगा।

4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक 04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में ऑडियो कॉल रिकॉर्डिंग रे रखी है।

5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूँ।



मैं तसदीक करता हूँ कि उपरोक्त ब्यान मेरे इलम वा ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं गया है।

दिनांक 05-08-2024

शपथकर्ता / भट्टा मालिक

शपथकर्ता / भट्टा मालिक

ATTESTED

Mukesh Kumar Saini  
Advocate & Notary  
Bahadurgarh, Jhajar (HR)



29 RAKESH DIXIT  
Stamp Vendor  
Bahadurgarh

13627  
05/08/2024

Shankar Bhattar CV

1- मैं अनुराधा कुमार भट्टा नाम शंकरभट्टा क. राम  
2- मैं अपना भट्टा 5 वर्ष इतने वर्षों से गांव कानौली जिला झज्जर

.....में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,  
फूड सप्लाई , माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन  
लेकर चला रहा हूं ।

3. एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव  
बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता हैं यह व्यक्ति सभी  
भट्टा मालिकों से रंगदारी की मांग कर रहा हैं उसका यह कहना हैं कि  
अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं  
आपके भट्टों को नहीं चलने दूंगा ।

4- अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक  
04-08-2023 को दे रखी हैं इस शिकायत के साथ हम सबूत के रूप में  
ऑडियो कॉल रिकॉडिंग रे रखी हैं ।

5- यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।

Shankar Bhattar  
शपथकर्ता / भट्टा मालिक



सिद्धिक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा  
हाम के आधार से सही व ठीक हैं तथा इसमें कुछ भी छुपाया नहीं  
गया हैं ।

दिनांक 05-08-2024

Shankar Bhattar  
शपथकर्ता / भट्टा मालिक

**ATTESTED**  
Mukesh Kumar Sain  
Mukesh Kumar Sain,  
Advocate & Notary  
Bahadurgarh, Jhajjar (HR)

- 1-मैं Lakshya Debas भट्टा नाम Suman Bhatta Company
- 2-मैं अपना भट्टा 25 इतने वर्षों से गांव Mukundpur जिला Jhajjar  
 .....में सभी संबंधित विभागों से अनुमति जिनमें प्रदुषण विभाग,  
 फूड सप्लाय, माईनिंग विभाग इत्यादि शामिल हैं से एन.ओ.सी/प्रमिशन  
 लेकर चला रहा हूं ।
- 3.एक व्यक्ति जो अपना नाम विनय छिल्लर पुत्र जयबीर वासी गांव  
 बामनौली, जिला झज्जर फोन नम्बर 7357010709 बताता है यह व्यक्ति सभी  
 भट्टा मालिकों से रंगदारी की मांग कर रहा है उसका यह कहना है कि  
 अगर इस क्षेत्र में ईट भट्टे चलाने हैं तो मुझे पैसे देने होंगे अन्यथा मैं  
 आपके भट्टों को नहीं चलने दूंगा ।
- 4-अतः इस मार्फत हमने पूर्व में भी पुलिस विभाग में शिकायत दिनांक  
 04-08-2023 को दे रखी है इस शिकायत के साथ हम सबूत के रूप में  
 ऑडियो कॉल रिकॉर्डिंग रे रखी है ।
- 5-यह शपथ-पत्र मैं अपने होश हवाश में दे रहा हूं ।



*Lakshya Debas*

शपथकर्ता / भट्टा मालिक

तसदीक:- मैं तसदीक करता हूं कि उपरोक्त ब्यान मेरे इलम वा  
 ज्ञान के आधार से सही व ठीक है तथा इसमें कुछ भी छुपाया नहीं  
 गया है ।

दिनांक 05-08-2024

शपथकर्ता / भट्टा मालिक

**ATTESTED**  
*Mukesh Kumar Saini*

**Mukesh Kumar Saini,  
 Advocate & Notary  
 Bahadurgarh, Jhajjar (HR)**

IN THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, NEW DELHI  
ORIGINAL APPLICATION NO. 480 OF 2024

VAKALATNAMA

IN THE MATTER OF :

MR. VINAY CHHILLAR & ANOTHER

...Applicants

Versus

HARYANA STATE POLLUTION CONTROL BOARD & ORS.

...Respondents

KNOW ALL to whom these present shall come that I/We JSR BHATTA @ PAWAN BHATTA the above named Respondent No. 14 do hereby appoint SHRI GAURAV AGARWAL (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 execution 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. 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. The deposit, draw and receive money, 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 it 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 purposes. And I/We undertake that I/we or my/our duly authorized agent would appear in the Court on all hearings and will inform the Advocates for appearance when the case is called. And I/we 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 himself.

Dated this 28<sup>th</sup> day of MAY, 2025

Accepted, identified and satisfied about the due execution of the Vakalatnama

  
(GAURAV AGARWAL)  
Advocate  
UP/038872/2009

Memo Of Appearance

  
Applicant/ Respondent  
(Respondent No. 14)  
JSR Bhatta @ Pawan Bhatta  
Through Kulbir Singh

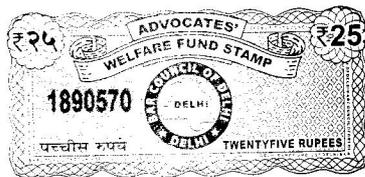
To  
The Registrar  
National Green Tribunal  
New Delhi  
Sir,

Please enter my appearance for the above named Petitioners/Plaintiff(s)/Appellant(s)/Respondent(s)/Defendant(s)/Caveator(s) Intervener(s) in the above mentioned Petition/Appeal/Suit/Reference.

Thanking you,

Yours Sincerely,

Dated : 06.2025



  
(GAURAV AGARWAL)  
Advocate