

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH, NEW DELHI

Original Application No. 1132 Of 2024

IN THE MATTER OF:

Deepak

...Applicant

Versus

State of Haryana

...Respondents

Reply on behalf of respondent no. 24 (Deepak Builders and Engineers
India Pvt. Ltd.)

New Delhi

Dated: 10/07/25

THROUGH



J.K. SHARMA

Advocate for respondent no. 24

C-180 A, First Floor,

Defence Colony,

New Delhi-110024

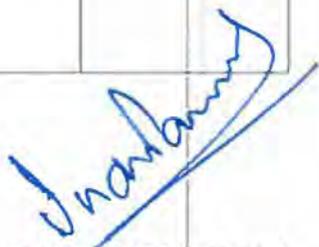
Email: jksharmaadvocate@gmail.com

Mob: 9868410873/9654186128

INDEX

S.R. NO.	PARTICULARS	PAGE NO.
1.	REPLY ON BEHALF OF RESPONDENT NO. 24 (DEEPAK BUILDERS AND ENGINEERS INDIA PVT. LTD.)	1-3
2.	ANNEXURE P1 COPY OF RENT AGREEMENT.	4-13
3.	ANNEXURE P2 COPY OF SHOW NOTICE FOR CLOSURE DATED 18.11.2024 OF HARYANA STATE POLLUTION CONTROL BOARD.	14-15
4.	ANNEXURE P3 COPY OF CLOSURE DIRECTIONS ENDST NO. HSPCB/KAR/2024/5075-79 DATED 20.11.2024.	16-17
5.	ANNEXURE P4 COPY OF RESPONDENT FOR DISMANTLE OF BATCHING PLANT ALONG WITH PHOTOGRAPH DATED 20.11.2024.	18-29
6.	ANNEXURE P5	

	COPY OF BOARD RESOLUTION ALONGWITH VAKALATNAMA.	30-31
7.	ANNEXURE P6 COPY OF RESPONDENT LETTER FOR DISMANTLE DATED 28.05.2025.	32



RESPONDENT NO. 24

New Delhi

Dated: 10/07/25

THROUGH



J.K. SHARMA

Advocate for respondent no. 24

C-180 A, First Floor,

Defence Colony,

New Delhi-110024

Email: jksharmaadvocate@gmail.com

Mob: 9868410873/9654186128

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL**PRINCIPAL BENCH, NEW DELHI**Original Application No. 1132 Of 2024IN THE MATTER OF:

Deepak

...Applicant

Versus

State of Haryana

...Respondents

MOST RESPECTFULLY SHOWETH:

M/s Deepak builders and Engineers India Limited was in process of setting up a batching plant at the location Village Kutana, Tehsil Ballah, District Karnal, Haryana with the intention of commencing the operation to do the work for Indian Oil Corporation Ltd. Panipat (P-25 Expansion project) For which the applicant company enters into the lease agreement along with the farmer on dated 22.07.2022.

That as stated, the said operation was for a very short period of time that are as follow: -

SR.NO	MONTH	NUMBER OF DAYS OF OPERATION
1.	MAY 2024	3
2.	JUNE 2024	17

3.	JULY 2024	14	
4	AUGUST 2024	18	
5	SEPTEMBER	19	
6	OCTOBER	15	

It is submitted that even in the complaint as filed by the concerned department and the photographs attached there too, no such activities had been found even it mentioned in the report also that the plant is closed. It is further submitted that during the course of that, it is important to point out here and it is submitted that even at the time of the visit by the department that the plant was not operational and it was almost in the dismantle form. The intimation of Dismantling of Batching Plant along with photographs has already been submitted with your department on 10-12-2024. Further, after intimating that the contract of land agreement is going to expire on 28.05.2025, we had also initiated for dismantle of full Batching plant.

The penalty that had imposed and made subject matter of the complaint is liable to be recalled as it is imposed unilaterally and no penalty may be imposed.



RESPONDENT NO. 24

305

P/3

New Delhi

Dated: 10/07/25

THROUGH



J.K. SHARMA

Advocate for respondent no. 24

C-180 A, First Floor,

Defence Colony,

New Delhi-110024

Email: jksharmaadvocate@gmail.com

Mob: 9868410873/9654186128

हम, सिलेन्द्र पुत्र बहाल सिंह पुत्र मखन सिंह निवासी कोताना उपतहसील बल्ला जिला करनाल फरीक अब्बल व Deepak Builder's & Engineers India Private Limited ग्राम नजदीक लोदी क्लब शहीद भगत सिंह नगर लुधियाना पिन कोड 141012, मार्फत जी.एम. हरनाम सिंह खोसा आधार नं० 9327.8236 8139 Authorised Signatory फरीक दायम हैं जो कि भूमि वाका ग्राम कौताना रकबा तादादी 6 कनाल 14 मरले जिल्लाकी तफसील इस प्रकार है कि :—(1)खेवट नं० 11 किले 60 कुल रकबा 265 कनाल 11 मरले का $\frac{134}{5311}$ भाग बकदर 6 कनाल 14 मरले बरुर्वे जमाबन्दी साल 2019-20 के अनुसार के अनुसार मलकियत फरीक अब्बल की है। उक्त रकबा हर प्रकार से पाक व साफ है। अतः फरीक अबल ने अपना उपरोक्त रकबा सहित हक हकूक रास्ता आने जाने हकूक नहरी चाही हकूक खाल मोगा पानी नहरी हकूक हर किस्म मतलका उक्त भूमि बराये Deepak Builder's & Engineers India Private Limited के सैड,लेवर क्वाटर व चार दिवारी व ऑफिस हेतू बराये मियाद 3 वर्ष तारिख 22/08/2022 से 22/08/2025 तक के लिए बदले मुबलिक जर लीज 2 50,000/-रु० (दो लाख पचास हजार रुपये) प्रति एकड सालाना लीज की दर से मुलधन 2,10,937.5/-रुपये (दो लाख दस हजार नो सैन्तीस रूपये पचास पैसे पचास) पास फरीक दायम Deepak Builder's & Engineers India Private Limited को इस्तेमाल के लिये लीज पर दे दी है। उपरोक्त जर लीज राशी प्रति वर्ष समय पर फरीक अब्बल फरीक दायम से अकाउंट में आर.टी.जी.एस. या आनलाईन ट्रांसफर द्वारा हर साल के 22 अगस्त से 30 अगस्त तक प्राप्त करता रहेगा और प्रति वर्ष 10%राशी (वैसिक राशी)मे बढातरी की जायेगी। कब्जा उपरोक्त रकबा के मुरब्बा नं० 25 के किला नं० 8/2(6-0),9/2 (6-0),13(8-0)18 (6-0),19/1/2(1-0) पर 6 कनाल 14 मरले पर जाकर फरीक अब्बल ने फरीक दायम का कायम करा दिया है (रपट नं० 350/28-6-2007 की अनुपालना फरीक दायम करने के लिये वाध्य होगा) व बराये इस्तेमाल फरीक दायम उक्त भूमि पर साफ सुथरी मिट्टी डालके इस्तेमाल कर सकेगा,विलीडिंग बना सकेगा,चार दिवारी बना सकेगा,विजली कनेक्शन ले सकेगा,पानी कनेक्शन,टेलीफोन कनेक्शन,सी.एल.यु. सब लीज, व किसी भी विभाग से किसी भी प्रकार की एन.ओ.सी. ले सकेगा व पेड नही काटेगा व मिक्सर प्लांट लगायेगा व जैसे भूमि लीज पर लेगा वैसे पाक व साफ व खेती लायक करके वापिस देगा ता मियाद लीज डीड दोनो फरीकान के वारसान तमाम शर्तों में पाबंध रहेंगे फरीक दायम व फरीक अब्बल अपनी सहमति से लीज डीड कैंसल करा सकते है बाद मियाद 3 वर्ष फरीक दायम उक्त भूमि से वेदखल हो जायगा और कब्जा वापीस फरीक अब्बल को देने का पाबंध रहेगा और फरीक अब्बल की उक्त भूमि फक करने का पाबंध रहेगा और और सरकारी भूमि आधिकरण की सुरत में दोनो फरीकान उपरोक्त लीज डीड को फक कराने के पाबंध रहेंगे। इसलिए यह लीज डीड अपने होश हवाश में सुन व समझ कर जहरीर करा दिया है कि सन्द रहें और समय पर काम आवें। तारिख 22/08/2022

लीज दाहिन्दा

सिलेन्द्र

S. S. S.

गवाह न०1-

गवाह न०2-

H. S. S.

लीज गहिन्दा

Deepak Builder's & Engineers India Private Limited

मार्फत जी.एम. हरनाम सिंह खोसा



Certified that the above was declared on solemn affirmation before me at Karnal by the deponent who was identified by Shri

Notary Public, Karnal (India)

22 AUG 2022



लीज डीड

जर लीज → 2,10,937.5/- रूपये एक मुश्त

स्टाम्प रूपये → 100/- रूपये

स्टाम्प क्रमांक न० → 1950

किते → 1

किस्म - कृषि भूमि

अवधी → 3 साल

वाका → कौताना

रकबा तादादी → 6 कनाल 14 मरला रकबा भूमि Deepak Builder's &

Engineers India Private Limited के इस्तेमाल हेतू।

वलजीत सिंह

● 1951

~~१९५१/२०२~~

~~मन्दीर~~

मन्दीर

~~मन्दीर~~

१९५१



अन... (विक्रम)
संस्कृत... (काल) ५१२

हम, मन्जीत सिंह पुत्र सिंगारा सिंह पुत्र मखन सिंह कोताना उपतहसील बल्ला जिला करनाल फरीक अब्बल व Deepak Builder's & Engineers India Private Limited ग्राम नजदीक लोदी क्लब शहीद भगत सिंह नगर लुधियाना पिन कोड 141012, मार्फत जी. एम. हरनाम सिंह खोसा आधार नं० 9327 8236 8139 Authorised Signatory फरीक दायम हैं जो कि भूमि वाका ग्राम कोताना रकबा तादादी 6 कनाल 14 मरले जिसकी तफसील हस प्रकार है कि :- (1) खेवट नं० 11 किते 60 कुल रकबा 265 कनाल 11 मरले का $\frac{134}{5311}$ भाग बखदर 6 कनाल 14 मरले बरुवे जमाबन्दी चाल 2019-20 के अनुसूच के अनुसार मलकियत फरीक अब्बल की है। उक्त रकबा हर प्रकार से पाक व साफ है। अतः फरीक अबल ने अपना उपरोक्त रकबा सहित हक हकूक रास्ता आने जाने हकूक नहरी चाही हकूक खाल मोगा पानी नहरी हकूक हर किस्म मतलफा उक्त भूमि बराये Deepak Builder's & Engineers India Private Limited के सैड, लेवर क्वाटर व चार दिवारी व ऑफिस हेतू बराये मियाद 3 वर्ष तारिख 22/08/2022 से 22/08/2025 तक के लिए बदले मुबलिक जर लीज 2 50,000/-रु० (दो लाख पचास हजार रूपये) प्रति एकड सालाना लीज की दर से मुलधन 2,10,937.5/-रूपये (दो लाख दस हजार नौ सैन्तीस रूपये पचास पैसे पचास) पास फरीक दायम Deepak Builder's & Engineers India Private Limited को इस्तेमाल के लिये लीज पर दे दी है। उपरोक्त जर लीज राशी प्रति वर्ष समय पर फरीक अब्बल फरीक दायम से अकाउंट में आर.टी.जी.एस. या आनलाईन ट्रांसफर द्वारा हर साल के 22 अगस्त से 30 अगस्त तक प्राप्त करता रहेगा और प्रति वर्ष 10% राशी (वैसिक राशी) में वढेतर की जायेगी। कब्जा उपरोक्त रकबा के मुरब्बा नं० 25 के किला नं० 8/2(6-0), 9/2(6-0), 13(8-0) 18(6-0), 19/1/2(1-0) पर 6 कनाल 14 मरले पर जाकर फरीक अब्बल ने फरीक दायम का कायम करा दिया है (रपट नं० 350/28-6-2007 की अनुपालना फरीक दायम करने के लिये वाध्य होगा) व बराये इस्तेमाल फरीक दायम उक्त भूमि पर साफ सुथरी मिट्टी डालके इस्तेमाल कर सकेगा, विलीडिंग बना सकेगा, चार दिवारी बना सकेगा, विजली कनेक्शन ले सकेगा, पानी कनेक्शन, टेलीफोन कनेक्शन, सी.एल.यु. सब लीज, व किसी भी विभाग से किसी भी प्रकार की एन.ओ.सी. ले सकेगा व पेड नही काटेगा व मिक्सर प्लांट लगायेगा व जैसे भूमि लीज पर लेगा वैसे पाक व साफ व खेती लायक करके वापिस देगा ता मियाद लीज डीड दोनो फरीकान के वारसान तमाम शर्तो में पाबंध रहेगें फरीक दायम व फरीक अब्बल अपनी सहमति से लीज डीड कैन्सल करा सकते है बाद मियाद 3 वर्ष फरीक दायम उक्त भूमि से वेदखल हो जायगा और कब्जा वापीस फरीक अब्बल को देने का पाबंध रहेगा और फरीक अब्बल की उक्त भूमि फक करने का पाबंध रहेगा और और सरकारी भूमि आधिकरण की सुरत में दोनो फरीकान उपरोक्त लीज डीड को फक कराने के पाबंध रहेगें। इसलिए यह लीज डीड अपने होश हवाश में सुन व समझ कर जहरीर करा दिया है कि सन्द रहें और समय पर काम आवें। तारिख 22/08/2022

लीज दाहिन्दा
मन्जीत सिंह
Limited

मन्जीत सिंह

हरनाम सिंह खोसा
लीज दाहिन्दा

Deepak Builder's & Engineers India Private

गवाह न01-

गवाह न02-



मार्फत जी. एम. हरनाम सिंह खोसा

Certified that the above was declared on soleman affirmation before me at karnal by the deponent who was identified by Shri

Notary Public, Karnal (India)

22 AUG 2022



लीज डीड

जर लीज → 2,10,937.5/- रूपये एक मुश्त

स्टाम्प रूपये → 100/- रूपये

स्टाम्प क्रमांक न० → 1951

किते → 1

किस्म - कृषि भूमि

अवधी → 3 साल

वाका → कौताना

रकबा तादादी → 6 कनाल 14 मरला रकबा भूमि Deepak Builder's &

Engineers India Private Limited के इस्तेमाल हेतू।

मन्जीत सिंह

मन्जीत सिंह

पेज नं० 2

हम, वन्ता सिंह पुत्र मखन सिंह पुत्र लाम सिंह निवासी कोताना उपतहसील वल्ला जिला करनाल फरीक अब्बल व Deepak Builder's & Engineers India Private Limited ग्राम नजदीक लोदी क्लब भगत सिंह नगर लुधियाना पिन कोड 141012, मार्फत जी.एम. हरनाम सिंह खोसा आधार नं० 9327 8236 8139 Authorised Signatory फरीक दायम हैं जो कि भूमि वाका ग्राम कोताना रकबा तादादी 6 कनाल 14 मरले जिसकी तफसील इस प्रकार है कि :- (1) खेवट नं० 11 किते 60 कुल रकबा 265 कनाल 11 मरले का $\frac{134}{5311}$ भाग बकदर 6 कनाल 14 मरले बरुव जमाबन्दी साल 2019-20 के अनुसार के अनुसार मलकियत फरीक अब्बल की है। उक्त रकबा हर प्रकार से पाक व साफ है। अतः फरीक अब्बल ने अपना उपरोक्त रकबा सहित हक हकूक रास्ता आने जाने हकूक नहरी चाही हकूक खाल मोगा पानी नहरी हकूक हर किस्म मतलका उक्त भूमि बराये Deepak Builder's & Engineers India Private Limited के सैड, लेवर क्वाटर व चार दिवारी व ऑफिस हेतु वराये मियाद 3 वर्ष तारिख 22/08/2022 से 22/08/2025 तक के लिए बदले मुबलिक जर लीज 2 50,000/-रु० (दो लाख पचास हजार रुपये) प्रति एकड सालाना लीज की दर से मुलधन 2,10,937.5/-रुपये (दो लाख दस हजार नौ सैन्तीस रूपये पचास पैसे पचास) पास फरीक दायम Deepak Builder's & Engineers India Private Limited को इस्तेमाल के लिये लीज पर दे दी है। उपरोक्त जर लीज राशी प्रति वर्ष समय पर फरीक अब्बल फरीक दायम से अकाउंट में आर.टी.जी.एस. या आनलाईन ट्रांसफर द्वारा हर साल के 22 अगस्त से 30 अगस्त तक प्राप्त करता रहेगा और प्रति वर्ष 10% राशी (वैसिक राशी) में वढातरी की जायेगी। कब्जा उपरोक्त रकबा के मुख्या नं० 25 के किला नं० 8/2(6-0), 9/2(6-0), 13(8-0), 18(6-0), 19/1/2(1-0) पर 6 कनाल 14 मरले पर जाकर फरीक अब्बल ने फरीक दायम का कायम करा दिया है (रपट नं० 350/28-6-2007 की अनुपालना फरीक दायम करने के लिये वाध्य होगा) व वराये इस्तेमाल फरीक दायम उक्त भूमि पर साफ सुथरी मिट्टी डालके इस्तेमाल कर सकेगा, विलीडिंग बना सकेगा, चार दिवारी बना सकेगा, विजली कनेक्शन ले सकेगा, पानी कनेक्शन, टेलीफोन कनेक्शन, सी.एल.यु. सब लीज, व किसी भी विभाग से किसी भी प्रकार की एन.ओ.सी. ले सकेगा व पेड नही करेगा व मिक्सर प्लांट लगायेगा व जैसे भूमि लीज पर लेगा वैसे पाक व साफ व खेती लायक करके वापिस देगा ता मियाद लीज डीड दोनो फरीकान के वारसान तमाम शर्तो में पाबंध रहेगें फरीक दायम व फरीक अब्बल अपनी सहमति से लीज डीड कैन्सल करा सकते है वाद मियाद 3 वर्ष फरीक दायम उक्त भूमि से वेदखल हो जायगा और कब्जा वापिस फरीक अब्बल को देने का पाबंध रहेगा और फरीक अब्बल की उक्त भूमि फक करने का पाबंध रहेगा और और सरकारी भूमि आधिकरण की सुरत में दोनो फरीकान उपरोक्त लीज डीड को फक कराने के पाबंध रहेगें। इसलिए यह लीज डीड अपने होश हवाश में सुन व समझ कर जहरीर करा दिया है कि सन्द रहें और समय पर काम आवें। तारिख 22/08/2022

लीज दाहिन्दा
वन्ता सिंह



गवाह न01-

गवाह न02-

Deepak Builder's & Engineers India Private Limited

मार्फत जी.एम. हरनाम सिंह खोसा



Certified that the above was declared
on solemn affirmation before me at
Karnal by the deponent who was identified
by Shri

Karnal (India)

22 AUG 2022

1949

~~08/08/2022~~

~~_____~~

~~_____~~

~~_____~~

~~_____~~

Silinda

अना... ग्राम विक्रेता
सचिव... (कार्यालय) HR



P/ 11

लीज डीड

जर लीज → 2,10,937.5/- रूपये एक मुश्त

स्टाम्प रूपये → 100/- रूपये

स्टाम्प क्रमांक न० → 1949

क्रिटे → 1

क्रिस्म - कृषि भूमि

अवधी → 3 साल

वाका → कौताना

रकबा तादादी → 6 कनाल 14 मरला रकबा भूमि Deepak Builder's &

Engineers India Private Limited के इस्तेमाल हेतू।

Silendra
सिलेन्द्र

1950

22/08/2022

~~गण~~

~~आदि के अंगिका के~~

ए. उरुवा

अनंता
समस्तिका के अंगिका के

अनंता के अंगिका के

अनंता के अंगिका के

पेज नं० 2

हम, बलजीत सिंह पुत्र सिंगारा सिंह पुत्र मखन सिंह निवासी कोताना उपतहसील बल्ला जिला करनाल फरीक अव्वल व Deepak Builder's & Engineers India Private Limited ग्राम नजदीक लोदी क्लब शहीद भगत सिंह नगर बुधियावा पिन कोड 141012, मार्फत जी.एम. हरनाम सिंह खोसा आधार नं० 9327 8236 8139 Authorised Signatory फरीक दायम हैं जो कि भूमि वाका ग्राम कोताना रकबा तादादी 6 कनाल 14 मरले जिसकी तफसील इस प्रकाट है कि :- (1) खेवट नं० 11 किते 60 फुल रकबा 265 कनाल 11 मरले का $\frac{134}{5311}$ भाग बख्तर 6 कनाल 14 मरले बरुवे जमाबन्दी साल 2019-20 के अनुसाट के अनुसार मलकियत फरीक अव्वल की है। उक्त रकबा हर प्रकार से पाक व साफ है। अतः फरीक अव्वल ने अपना उपरोक्त रकबा सहित हक हकूक रास्ता आने जाने हकूक नहरी चाही हकूक खाल मोगा पानी नहरी हकूक हर किस्म मतलका उक्त भूमि बराये Deepak Builder's & Engineers India Private Limited के सैड, लेवर क्वाटर व चार दिवारी व ऑफिस हेतू बराये मियाद 3 वर्ष तारिख 22/08/2022 से 22/08/2025 तक के लिए बदले मुबलिक जर लीज 2 50,000/-रु० (दो लाख पचास हजार रूपये) प्रति एकड सालाना लीज की दर से मुलधन 2,10,937.5/-रूपये (दो लाख दस हजार नो सैन्तीस रूपये पचास पैसे पचास) पास फरीक दायम Deepak Builder's & Engineers India Private Limited को इस्तेमाल के लिये लीज पर दे दी है। उपरोक्त जर लीज राशी प्रति वर्ष समय पर फरीक अव्वल फरीक दायम से अकाउंट में आर.टी.जी.एस. या आनलाईन ट्रांसफर द्वारा हर साल के 22 अगस्त से 30 अगस्त तक प्राप्त करता रहेगा और प्रति वर्ष 10% राशी (वैसिक राशी) में वढोतरी की जायेगी। कब्जा उपरोक्त रकबा के मुब्बा नं० 25 के किला नं० 8/2(6-0), 9/2(6-0), 13(8-0) 18(6-0), 19/1/2(1-0) पर 6 कनाल 14 मरले पर जाकर फरीक अव्वल ने फरीक दायम का कायम करा दिया है (रपट नं० 350/28-6-2007 की अनुपालना फरीक दायम करने के लिये बाध्य होगा) व बराये इस्तेमाल फरीक दायम उक्त भूमि पर साफ सुधरी मिट्टी डालके इस्तेमाल कर सकेगा, विलीडिंग बना सकेगा, चार दिवारी बना सकेगा, विजली कनेक्शन ले सकेगा, पानी कनेक्शन, टेलीफोन कनेक्शन, सी.एल.यु. सब लीज, व किसी भी विभाग से किसी भी प्रकार की एन.ओ.सी. ले सकेगा व पेड नही काटेगा व मिक्सर प्लांट लगायेगा व जैसे भूमि लीज पर लेगा वैसे पाक व साफ व खेती लायक करके वापिस देगा ता मियाद लीज डीड दोनो फरीकान के वारसान तमाम शर्तों में पाबंध रहेंगे फरीक दायम व फरीक अव्वल अपनी सहमति से लीज डीड कैन्सल करा सकते हैं वाद मियाद 3 वर्ष फरीक दायम उक्त भूमि से वेदखल हो जायगा और कब्जा वापिस फरीक अव्वल को देने का पाबंध रहेगा और फरीक अव्वल की उक्त भूमि फक करने का पाबंध रहेगा और और सरकारी भूमि आधिकारण की सुरत में दोनो फरीकान उपरोक्त लीज डीड को फक कराने के पाबंध रहेंगे। इसलिए यह लीज डीड अपने होश हवाश में सुन व समझ कर जहरीर करा दिया है कि सन्द रहें और समय पर काम आवें। तारिख 22/08/2022

लीज दाहिन्दा

बलजीत सिंह

Limited

गवाह न01-

गवाह न02-

22 AUG 2022



Asker
लीज ग्राहिन्दा

Deepak Builder's & Engineers India Private

मार्फत जी.एम. हरनाम सिंह खोसा

Justified that the above was declared
on solemn affirmation before me at
Karnal by the deponent who was identified
by Shri

Notary Public, Karnal (India)

Amended P2

316

8/14

Regional Office, Karnal Region
Haryana State Pollution Control Board
Website - www.hspcb.gov.in | Mail ID - hspcb@haryana.gov.in

No. HSPCB/KAR/2024/52, 1-5

Dated: 18/11/2024

To
M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant),
Village Kutana, Tehsil Ballaha Assandh, Karnal.

Sub: - Show cause notice for Closure under section 31 - A of the Air (Prevention and Control of Pollution) Act, 1981 & under section 31 - A of the Water (Prevention and Control of Pollution) Act, 1974 and along with Imposition of Environmental Compensation as per HSPCB's Environmental Compensation Policy and Imposition of Environmental Penalty as per The Jan Vishwas (Amendment Of Provisions) Act, 2023 for violation of Section 21 and 22 of Air (Prevention and Control of Pollution) Act, 1981 & 25 and 26 of Water (Prevention and Control of Pollution) Act, 1974.

Whereas Graded Response Action Plan has been implemented to control Air Pollution in the whole Delhi-NCR.

Whereas, the Commission for Air quality Management in NCR and adjoining area/CAQM has issued Order/Direction vide letter No. vide No. 120017/27/GRAP/2021/CAQM /1092 dated 14th November, 2021.

WHEREAS, the Central Government has made the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981; and vide provisions of these Acts every water/air polluting industry/unit/operation/process is required to obtain consent to establish and consent to operate from the State pollution Control Board; and,

WHEREAS, for the purpose of protecting and improving the quality of environment and preventing and abating environmental pollution, the standards for discharge/emission of environmental pollutants from the industries, operations or processes have been specified under the Environment (Protection) Rules, 1986; and it is mandatory to every industry, operations or processes to keep their effluent/emission quality within the specified norms all the time; and

WHEREAS, M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant) at Village Kutana, Tehsil Ballaha Assandh, Karnal is a Ready mix cement concrete Plant;

WHEREAS, the process of the unit involves heavily environment polluting activities;

WHEREAS, under the Environment (Protection) Rules, 1986 standards for units are notified; and every unit shall strictly adhere to prescribed norms; and

WHEREAS, your unit was inspected by the JEE/Field Officer, HSPCB, Karnal Region on 17/11/2024;

WHEREAS at the time of the inspection the following shortcomings were found:

1. CTR/CTO from HSPCB have not obtained
2. PCB based DG not provided on 125 KVA.
3. Adequate APCM not provided.
4. RMC Plant found not in-operation during inspection.

THEREFORE you are hereby show caused for 15 days as to why closure action under section 33-A of Water (Prevention & Control of Pollution) Act, 1974 and under Section 31-A of Air (Prevention & Control of Pollution) Act, 1986 for the violations mentioned above should be taken against your unit.

In case you fail to comply with the deficiencies mentioned above within stipulated period it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant action against your unit under section 33 - A of the Water (Prevention and control of Pollution) Act, 1974 & Under section 31 - A of the Air (Prevention and control of Pollution) Act, 1986.

The same would be in addition to the Imposition of Environmental Compensation as per HSPCB's Environmental Compensation Policy; and Imposition of Environmental Penalty as per The Jan Vishwas (Amendment Of Provisions) Act, 2023.

This may be treated as most urgent

CC-

The Chairman HSPCB, Panchkula for kind information, please.


Regional officer
Karnal Region

No. HSPCB/KAR/2024/Illegible

Dated: 18/11/2024

To

M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant), Village Kutana, Tehsil Ballaha Assandh, Karnal.

Sub: Show cause notice for Closure under section 31-A of the Air (Prevention and Control of Pollution) Act, 1981 & under section 33 - A of the Water (Prevention and Control of Pollution) Act, 1974 and along with Imposition of Environmental Compensation as per HSPCB's Environmental Compensation Policy and Imposition of Environmental Penalty as per The Jan Vishwas (Amendment Of Provisions) Act, 2023 for violation of Section 21 and 22 of Air (Prevention and Control of Pollution) Act, 1981 & 25 and 26 of Water (Prevention and Control of Pollution) Act, 1974.

Whereas Graded Response Action Plan has been implemented to control Air Pollution in the whole Delhi-NCR.

Whereas, the Commission for Air quality Management in NCR and adjoining area/CAQM has issued Order/Direction vide letter No. vide No. 120017/27/GRAP/2021/CAQM/1092 dated 14th November, 2024.

WHEREAS, the Central Government has made the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution) Act, 1981; and vide provisions of these Acts every water/air polluting industry/unit/operation/process is required to obtain consent to establish and consent to operate from the State pollution Control Board; and,

WHEREAS, for the purpose of protecting and improving the quality of environment and preventing and abating environmental pollution, the standards for discharge/emission of environmental pollutants from the industries, operations or processes have been specified under the Environment (Protection) Rules, 1986; and it is mandatory to every industry, operations or processes to keep their effluent/emission quality within the specified norms all the time; and

WHEREAS, M/s Deepak Builders and Engineers India Pvt. Ltd, (RMC Plant) at Village Kutana, Tehsil Ballaha Assandh, Karnal is a Ready mix cement concrete Plant;

WHEREAS, the process of the unit involves heavily environment polluting activities;

WHEREAS, under the Environment (Protection) Rules, 1986 standards for units are notified; and every unit shall strictly adhere to prescribed norms; and

WHEREAS, your unit was inspected by the JEE/Field Officer, HSPCB, Karnal Region on 17/11/2024;

WHEREAS at the time of the inspection following shortcomings were found:-

1. CTL/CTO from HSPCB have not obtained.
2. ECD based DG set not provided on 125 KVA.
3. Adequate APCM not provided.
4. RMC Plant found not in-operation during inspection.

THEREFORE, you are hereby show caused for **15 days** as to why closure act illegible section 33-A of Water (Prevention & Control of Pollution) Act, 1974 and under 31-A of Air (Prevention & Control of Pollution) Act, 1981 for the violation illegible to be taken against your unit.

In case you fail to comply with the deficiencies mentioned above within stipulated period, it will be presumed that you have nothing to say in this regard and accept the status as mentioned above, which will warrant action against your unit under section 33 - A of the Water (Prevention and control of Pollution) Act, 1974 & under section 31-A of the Air (Prevention and control of Pollution) Act, 1981.

The same would be in addition to the Imposition of Environmental Compensation as per HSPCB's Environmental Compensation Policy and Imposition of Environmental Penalty as per The Jan Vishwas (Amendment Of Provisions) Act, 2023.

This may be treated as most urgent

320

CC:- The Chairman HSPCB, Panchkula for kind information, please.

Signature in English illegible dated 18/11/2024

Regional officer

Karnal Region

True typed copy



2nd floor, SCO- 78-79 above Punjab National Bank, Namastey Chowk, Karnal
Website - www.hspcb.org.in E-Mail Id- hspcbrokar@gmail.com



CLOSURE DIRECTIONS

The Commission for Air Quality Management in NCR and adjoining areas, vide Direction No. 83 dated 17th September, 2024, issued statutory direction for implementation of the revised schedule of the Graded Response Action Plan (GRAP), which is also available on the CAQM website (caqm.nic.in), as and when orders under GRAP are invoked.

The Sub-Committee for invoking actions under the GRAP in its earlier meetings held, had invoked actions under Stage-I, Stage II and Stage-III of the GRAP on 14th October, 2024, 21st October, 2024 and 14th November, 2024.

The Sub-Committee in its urgent meeting held on 17th November, 2024 further reviewed the air quality scenario in the region as well as the forecasts for meteorological conditions and air quality index of Delhi made available by IMD/IITM.

The Sub-committee observed that the AQI of Delhi was recorded at 44 I (Severe) at 4:00 P.M on 17.11.2024 (today) and has been gradually increasing further and has already reached Severe+ category, as the AQI clocked 447, 452 and 457 at 5:00 PM, 6:00 PM and 7:00 P.M respectively. Further, the average AQI for Delhi is expected to remain in this adverse range owing to heavy fog, variable winds, highly unfavorable meteorological and climatic conditions. Forecasts from IMD/IITM also indicate a likelihood of the AQI of Delhi to particularly remain in higher end of "SEVERE"/"SEVERE+" category in the coming days, owing to unfavorable climatic conditions.

Keeping in view the prevailing trend of air quality, in an effort to prevent further deterioration of the air quality, the sub-committee decided that All actions as envisaged under Stage IV of the GRAP i.e., 'Severe+' category (DELHI AQI > 450) be implemented in right earnest by all the agencies concerned in the NCR, with immediate effect, in addition to the stage I, II and III actions already in force.

Therefore, in an effort to prevent further deterioration of the air quality, the Sub Committee decided that ALL actions as envisaged under Stage IV of the GRAP -'severe+' Air Quality (DELHI AQI>450) be implemented in right earnest by all the agencies concerned in the NCR, in addition to the Stage-I, II and III actions already in force, from 8:00 A.M. of 18.11.2024 in the National Capital Region (NCR).

Whereas the unit M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant), Village Kutana, Tehsil Ballaha Assandh, Karnal was engaged in the process of Ready mix cement concrete which is covered under Green category as per policy order dated 04.12.2020 of the Board regarding categorization of industries and required prior Consent to Establish and Consent to Operate under Water Act, 1974 and Air Act 1981.

Whereas, the above said unit was inspected by Sh. Rohtash Dahya, JEE on 17.11.2024 during the patrolling of the area for implementation of the directions issued by commission under GRAP and he reported the following violations made by the above said unit: -

1. CTE /CTO from HSPCB have not obtained.
2. RECD based DG set not provided on 125 KVA.
3. Adequate APCM not provided.
4. RMC Plant found not in-operation during inspection.

Whereas, AQI of Karnal on dated 17/11/2024 was under Poor category and the above said violations made on the part of unit were not only violating the provisions of Air Act 1981 but also creating an emergent situation by contributing pollution in the environment causing further deterioration of the air quality.

322

Whereas the above said violations made on the part of the said unit are not only violating the provisions of Water Act 1974 and Air Act 1981 but also creating an emergent situation by contributing pollution in the environment causing further deterioration of the air quality up to Severe+ Category which is creating difficulties in breathing of the peoples residing in the nearby locations. Hence closure action against the above said activity is the need of hour in large public interest.

Whereas power were delegated to Regional Officers by board in its 187th meeting vide agenda item no. 187.12 (S) held on 17.02.2020 and orders were issued vide endst no. HSPCB/PLG/2020/1045-67 dated 19.03.2020 in partial modifications of the office order endst no. HSPCB/2005/2745-2753 dated 23.08.2005 of the board. Vide order dated 19.30.2020, it has been ordered to delegate the power to the Regional Officers of the Board in addition to power already delegated vide order dated 23.08.2005 for issuance of closure directions against the industrial sectors/units, found operating in violation of directions of the EPCA and as directed by Hon'ble Apex Court and Hon'ble NGT.

It is also pertinent to mention here that EPCA has been dissolved and Commission for Air Quality Management in NCR and adjoining areas (CAQM) had been constituted vide MoEF&CC notification dated 05.11.2020 for Air Quality Management in National Capital Region and Adjoining Areas for better co-ordination, research, identification and resolution of problems surrounding the air quality index and for matters connected therewith or incidental thereto.

Therefore, in view the above mentioned facts and in exercise of the powers conferred under section 33-A of the Water (Prevention & Control of Pollution) Act, 1974 and under section 31-A of the Air (Prevention & Control of Pollution) Act, 1981 and delegated by board in its 187th meeting vide agenda item no. 187.12 (S), directions are hereby issued to close down the operation of the above said illegal unit M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant), Village Kutana, Tehsil Ballaha Assandh, Karnal by sealing its plant and machinery & DG set along-with directions to stop the electricity supply of the above said unit, with immediate effect.

In addition to above, it is also intimated that non-compliance with the directions issued under section 33-A of the Water (Prevention & Control of Pollution) Act, 1974 and under section 31-A of the Air (Prevention & Control of Pollution) Act, 1981 is an offence under the provision of 33-A of the Water (Prevention & Control of Pollution) Act, 1974 and under section 31-A of the Air (Prevention & Control of Pollution) Act, 1981.

o/c
Regional officer
Karnal Region

Dated: 20 / 11 / 2024

Endst. No. HSPCB/KAR/2024/5075-79

A copy of the above is forwarded to the following for information and necessary action:-

1. The Chairman, Haryana State Pollution Control Board, Panchkula.
2. The Deputy Commissioner, Karnal.
3. The Superintending Engineer, UHBVN, Karnal to stop the electricity supply of said unit.
4. Sh. Rohtash Dahiya, JEE, Karnal. He is asked to ensure compliance of the closure order immediately. The JEE shall also initiate legal action and propose environment compensation as applicable, as per policy of the Board.
5. M/s Deepak Builders and Engineers India Pvt. Ltd. (RMC Plant), Village Kutana, Tehsil Ballaha Assandh, Karnal.

o/c
Regional officer
Karnal Region

o/c



CIN : U45309DL2017PTC323467

**DEEPAK BUILDERS &
ENGINEERS INDIA LIMITED**

Date: 10-Dec-2024

To,
The Regional Officer,
Karnal Region,
Haryana State Pollution Control Board,
2nd Floor, SCO-78-79 Above Punjab National Bank, Namaste Chowk,
Karnal Haryana.

Respected Sir,

It is stated that we were already in the process of dismantling the RMC plant. Further, your department has closed down our RMC Plant. Now, we have dismantled the RMC plant after receiving a closure order from your department. We humbly request you not initiate any legal action against us as we have already dismantled our RMC plant.

Thanking You,

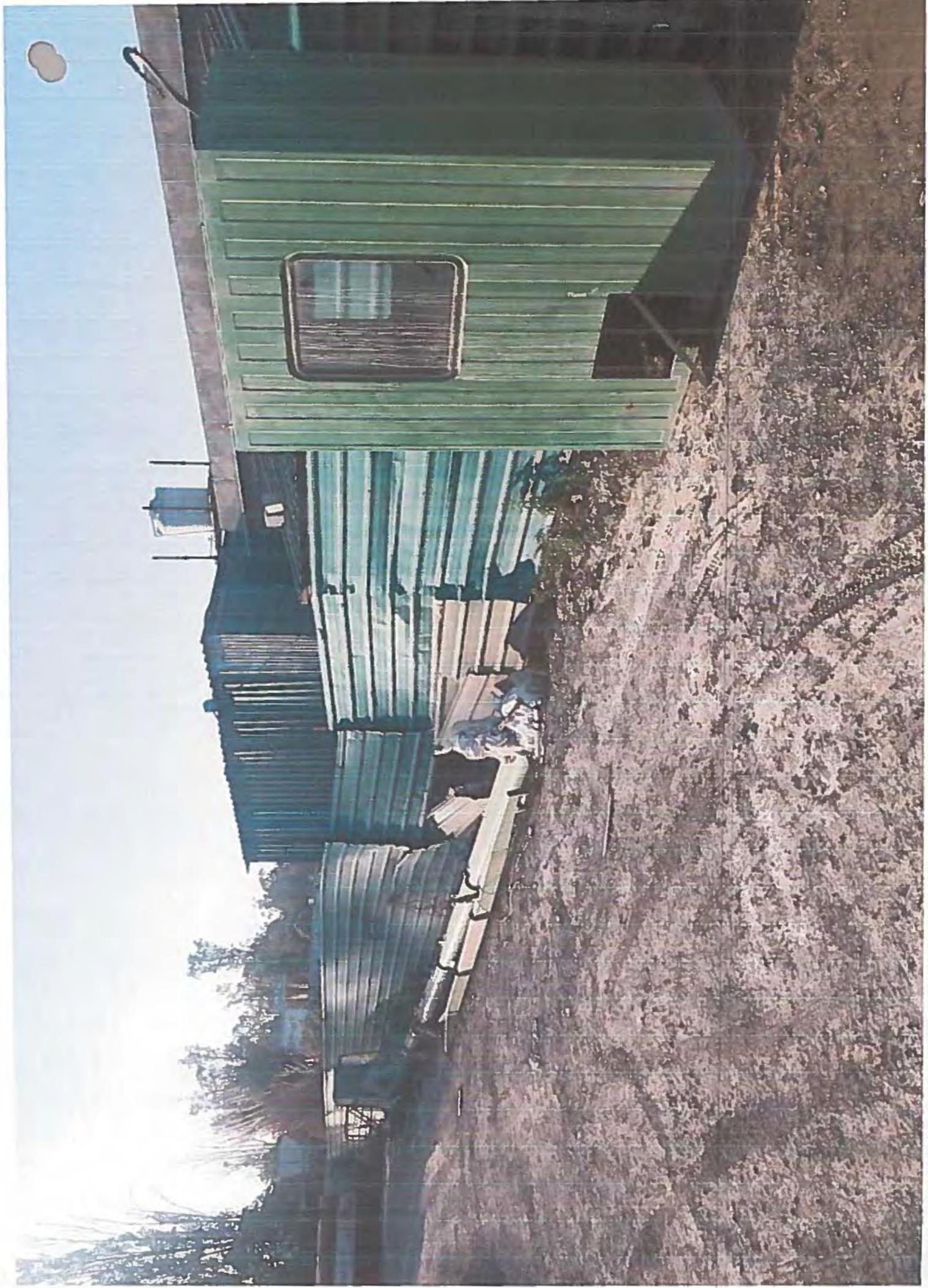
Yours Sincerely,
For Deepak Builders And Engineers India Ltd



(Authorised Signatory)

10/12/24
Dispatcher
Haryana State Pollution Control Board
Karnal Region

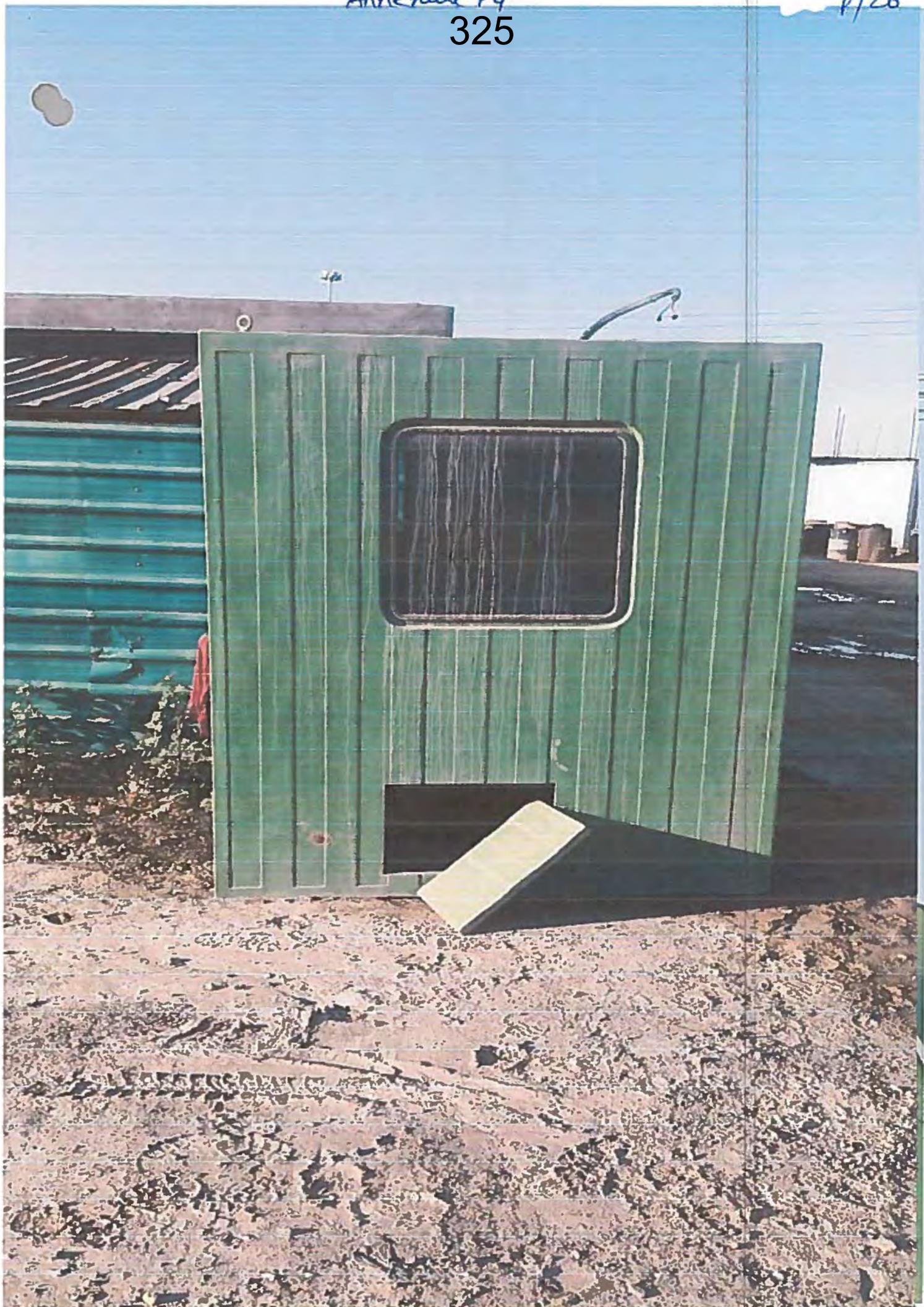




ATLANTA 74

325

4/20



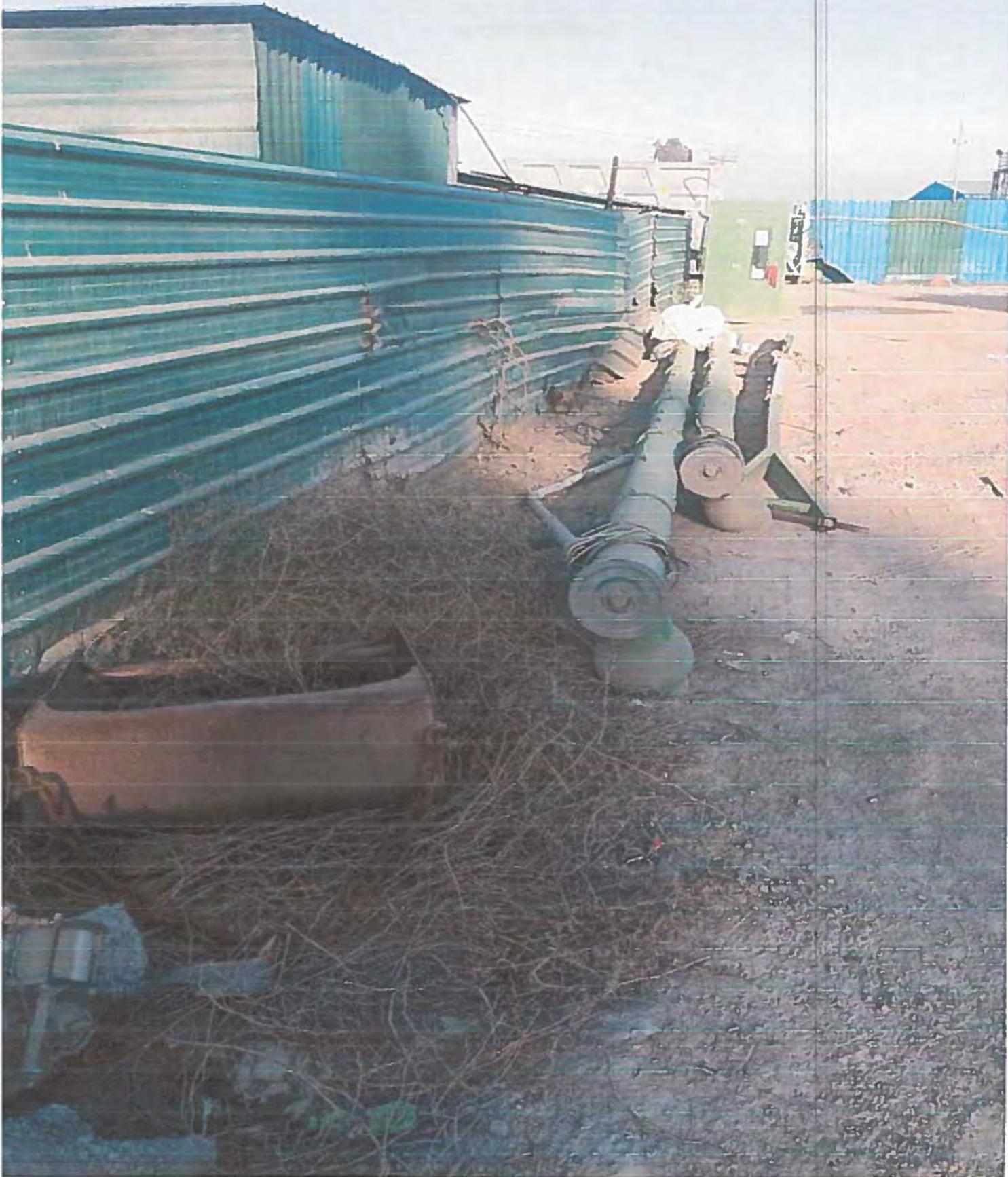
326



MARK 14

327

11 22





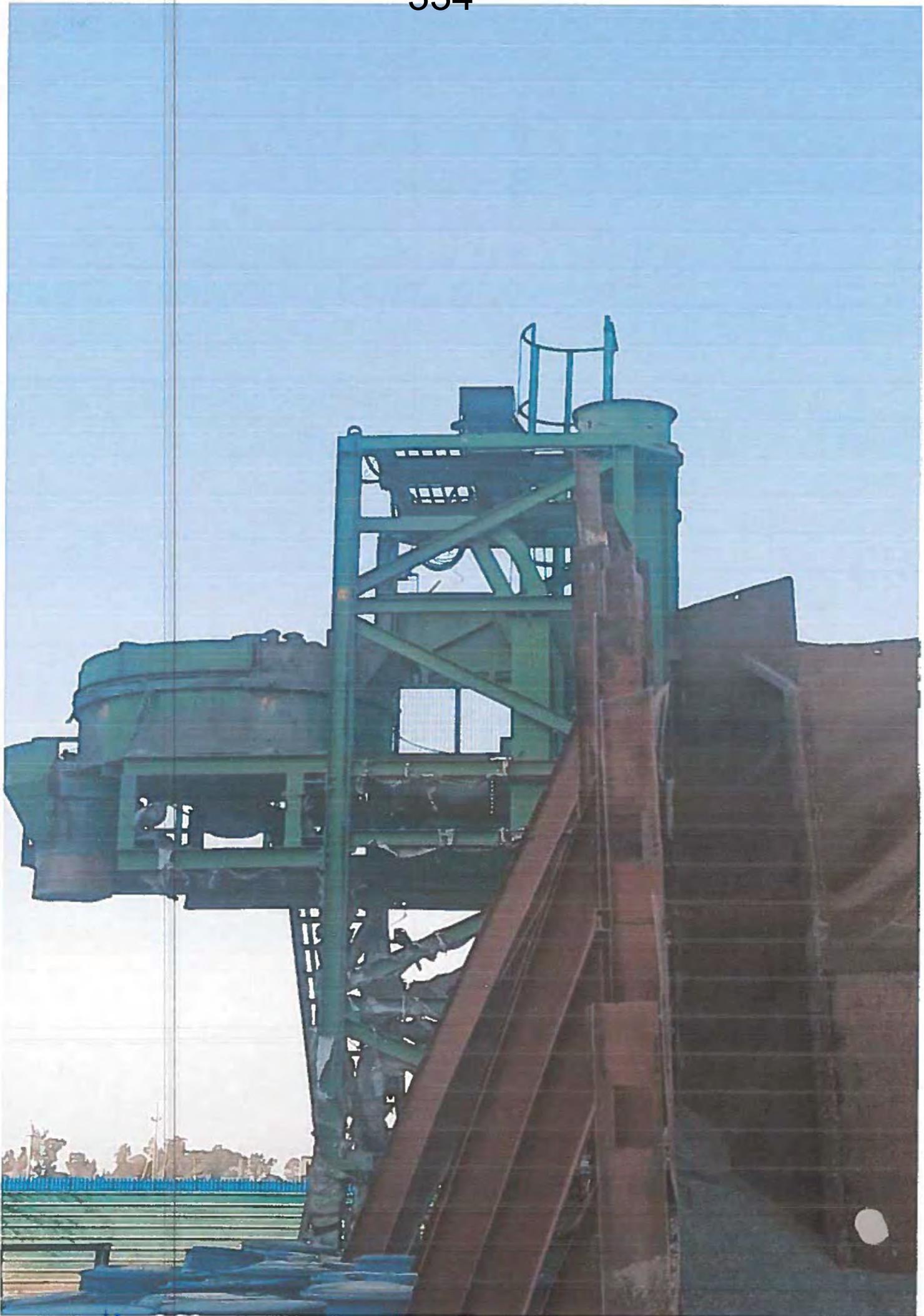












11.29

Amesbury



CIN : L45309DL2017PLC323467

**DEEPAK BUILDERS &
ENGINEERS INDIA LIMITED**

Ref. No. :

Date :

CERTIFIED TRUE COPY OF RESOLUTION PASSED BY INTERNAL MANAGEMENT COMMITTEE OF DEEPAK BUILDERS & ENGINEERS INDIA LIMITED ('THE COMPANY') IN THEIR MEETING HELD ON SATURDAY, 15TH MARCH, 2025 AT 11:00 A.M. AT CORPORATE OFFICE, NEAR LODHI CLUB, SHAHEED BHAGAT SINGH NAGAR, LUDHIANA

“RESOLVED THAT the consent of the Board of Directors of the Company be and is hereby accorded to Mr. Inder Parkash s/o Late Sh. Tara Chand, having Aadhaar Card No. 663271129948, Authorised Signatory of the company to represent the Company and appear before National Green Tribunal Principal Bench, New Delhi, on behalf of the company in the case of Deepak Vs State of Haryana having Original Application no. 1132/2024.

FURTHER RESOLVED THAT Mr. Inder Parkash, Authorised Signatory be and is hereby authorised to engage any Advocate/Solicitors/Consultants and to submit Vakalatnama, statements, documents, evidences, declarations, etc. before National Green Tribunal Principal Bench, New Delhi for and on behalf of the Company.

FURTHER RESOLVED THAT Mr. Inder Parkash, Authorised Signatory be and is hereby authorized to sign all the documents, letters, etc. and to do all such acts, deeds and things as may be necessary, proper or expedient for the purpose of giving effect to this resolution.

RESOLVED FURTHER THAT certified copy of the above resolution be and is hereby given to the concerned authority for necessary action”.

Certified to be true copy

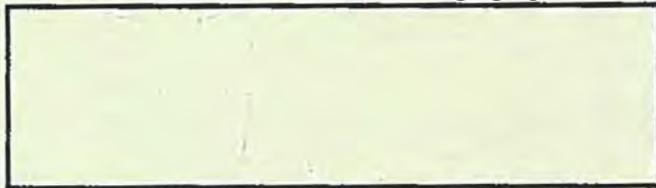
For Deepak Builders and Engineers India Ltd.

DEEPAK
KUMAR
(Deepak Kumar Singal) SINGAL
Managing Director
DIN: 01562688

Digitally signed by
DEEPAK KUMAR
SINGAL
Date: 2025.04.03
15:27:32 +05'30'

Corporate Office : Near Lodhi Club, Shaheed Bhagat Singh Nagar, Ludhiana -141 012 (Punjab) Tel.: +91-161-2560106
Mobile : +91-98759-09240 E-mail : info@deepakbuilders.co.in, deepakbuilders1987@gmail.com

Regd. Office : Ahluwalia Chambers, 1st Floor, Plot No.16 & 17, Local Shopping Centre, Madangir, Near Pushpa Bhawan,
New Delhi - 110 062



C.C. No.
FIR No.
U/S
P.S.

IN THE COURT OF Before The NGP Principal Bench, N. Delhi

Suit / Appeal No. Original Application No. 1132/24 JURISDICTION OF 201

In re :- Deepak

Plaintiff(s) Or Petitioner(s)
Appellant(s) Complainant(s)

VERSUS

State of Haryana & ors. Defendant(s) / Respondent(s) / Accused

KNOW ALL to whom these present shall come that I/ We INDER PARKASH ON
BEHALF OF RESPONDENT NO. 24

The above named _____ do hereby appoint

J. K. SHARMA ADVOCATE AND
DIMPLE SIRONI, C-180A, first floor,
Defence Colony, New Delhi
D-2901-22 (MOB# 9868410873, 9654186128)
E-MAIL: JKSHARMAADVOCATE@gmail.com

(herein after called the advocate/s to be my/our Advocate in the above-noted case authorize him:-

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

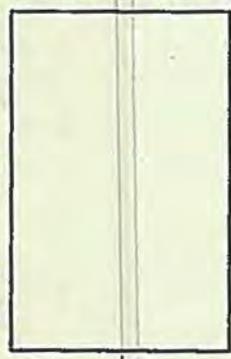
To sign file, verify and present pleadings, appeals cross-objections or petitions for executions review, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment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

To file and take back documents, to admit and/or deny the documents or 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 on paying separate fee.

To deposit, draw and receive money, cheques, case and grant receipts hereof 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 on the said case.



To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.

And I/ We the undersigned do hereby agree to ratify and confirm all acts done by the Advocate or his substitute in the matter as my/our own facts, as if done by me/us to all intents and purpose.

And I/We undertake that I/ We or my/our duly authorised agent would appear in court and all hearings and will inform the Advocate for appearance when the case is called.

And I/We undersigned do hereby agree not to hold the advocate of his substitute responsible for the result of the said case. The adjournment costs whenever ordered by the court shall be of the Advocate which he shall receive and retain for himself.

And I/We undersigned do hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settle is only for the above case and above Court. I/We hereby agree that once the fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us

IN WITNESS WHERE OF I/We do hereunto set my/our hand to these presents the contents of which have

been understood by me/ us on this _____ day of _____ 201

Accepted subject to the terms of the fees

[Signature]

[Signature]
Client

[Signature]
Client

Advocate

I identify the Signature/Thumb Impression of the Below Mentioned Person



CIN : L45309DL2017PLC323487

**DEEPAK BUILDERS &
ENGINEERS INDIA LIMITED**

Ref. No. :

Date :

The Regional Officer**Date: 27/05/2025****Haryana State Pollution Control Board****2nd Floor, SCO- 78-79, Namastey Chowk, Karnal-Haryana****Subject: Intimation for Dismantling of RMC Batching Plant**

Respected Sir,

M/s Deepak builders and Engineers India Limited was in process of setting up a batching plant with the intention of commencing the operation for work of Indian Oil Corporation Limited. The applicant company has arranged the land at the location Village Kutana, Tehsil Ballah, District Karnal, Haryana from farmers and enters into the lease agreement on dated 22.07.2022 which is going to be expired within next few weeks.

It is important to point out here and is submitted that even at the time of the visit by your department, the plant was not operational and it was almost in the dismantle form. The intimation of Partial Dismantling of Batching Plant along with photographs has already been submitted with your department on 10-12-2024.

As we are going to dismantle and remove the Batching Plant to vacate the rented site. This is for your kind information & necessary response.

Thanking You.

Yours sincerely,

For Deepak Builders & Engineers India Ltd.

Ghatak
C.M. Ghatak

[Handwritten signature]
28/05/25

Received
Haryana State Pollution Control Board
Karnal Region

Corporate Office : Near Lodhi Club, Shahad Bhagal Singh Nagar, Ludhiana -141 012 (Punjab) Tel.: +91-161-2560106
Mobile : +91-98759-09240 E-mail : info@deepakbuilders.co.in, deepakbuilders1987@gmail.com

Regd. Office : Ahluwalia Chambers, 1st Floor, Plot No.16 & 17, Local Shopping Centre, Madangir, Near Pushpa Bhawan,
New Delhi - 110 062