

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

IN

**ORIGINAL APPLICATION NO. 453 OF 2024**

(Under Section 18(1) read with Section 14 of the National Green Tribunal Act,  
2010 and Rule 8 of the NGT (Practice and Procedure) Rules, 2011)

**IN THE MATTER OF:**

Sampurna Nand

**...Original Applicant**

**VERSUS**

M/s RK Construction Company

**...Respondents**

**BRIEF NOTE ON BEHALF OF THE RESPONDENT NO. 1 I.E. RK  
CONSTRUCTION COMPANY**

TO,

THE HON'BLE CHAIRMAN AND HIS OTHER COMPANION  
MEMBERS OF THE NATIONAL GREEN TRIBUNAL, PRINCIPAL  
BENCH, NEW DELHI.

A HUMBLE APPLICATION OF  
THE APPLICANT ABOVE-NAMED:

**MOST RESPECTFULLY SUBMITS:**

1. That M/s R.K. Construction Company is a private enterprise registered with the Ministry of Micro, Small & Medium Enterprises having Udyam Registration no. UP-57-0001474, which is situated at Village Sonpur, Prajna – Bhagwat, Tehsil Chunar, District Mirzapur, Uttar Pradesh.

2. That with respect to the installation of borewell and UP Ground Water Authority, it is submitted that the Respondent has a 01 borewell unit of 06x06 inch of which the Respondent has the Ground Water Clearance Certificate from the UP Ground Water Authority. Thus, the Respondent does not use water from any outside tanker.
3. That with respect to the CCTV Installation, it is submitted that the Respondent crusher has 09 units of CCTV installed at various locations with relevant CP IP Cam to monitor the same.
4. That with respect to the green belt, it is submitted that the Respondent has duly developed proper green belt three-layer thick which contains, among others, plantations of *Arjun*, *Kesemiya*, *Plumeria Alba*, *Grevillea Rubusta*, *Erinthina Indica*, *Imali*, *Celodrendren* etc. The details of the total 1760 plantations are listed below:
  - **Arjun – 200 Tree**
  - **Imali – 250 Tree**
  - **Kesemiya – 50 Tree**
  - **Plumeria Alba – 110 Tree**
  - **Grevillea Rubusta – 50 Tree**
  - **Erinthina Indica – 50 Tree**
  - **Anthocephalus Cadamba – 50 Tree**
  - **Celodrendren (Shrubs) – 1000 Tree**
5. That with respect to the wind breaking wall, it is submitted that the Respondent has installed GI/MS/Brick wind breaking wall of height of 3-ft more than the highest node of the crusher along the periphery of crusher. The total length of boundary wall is around 760 meters and the wall is at approximately 4.27 meters height i.e. 14 ft.

6. That with respect to the source of mined material, it is submitted that the Respondent purchases the same from legally operating active mines in the area and uses the said product as raw material for its crusher plant.
7. That the compliance affidavit filed by UPPCB dated 29.10.2025 also reveals the positive status of complete Compliance by the Respondent.
8. That the Respondent undertakes water sprinkling (with adequate designed nozzles) to control process emission and dust suppression in scientific manner to maintain Ambient Quality as per CPCB norms.
9. That the plants and machinery of the industry such as primary jaw crusher, secondary jaw crusher, vibrating screens (waterfall), conveyer belts are covered and the ends of conveyor belts are also duly
10. That telescopic suit has been duly installed at the ends of the conveyor belts and the Respondent has installed the said telescopic suit at the ends of the conveyor belts.
11. That the CTO granted to the Respondent stipulated that green belt would be developed according to the guidelines issued vide Board Office Order No. H10405/220/2018/02 dated 16.02.2018, which have been duly complied by the Respondent.
12. That the Respondent has procured a valid permanent electricity connection (Connection No. CN0936017996) from Purvanchal Vidyut Vitran Nigam Ltd. and has been using only the electricity from the state department to operate the stone crusher.

13. That Separate energy meter for consumption of electricity used in water sprinkling and Water meter for measurement of quantity of water consumption are present.
14. That Respondent has duly installed all the pollution control devices which are perfectly operational and are being used by the Respondent. For example, the Respondent has installed telescopic suit at the end of conveyor belt.
15. The Respondent has also installed anti-smog guns for suppression of the dust in the premises of the Subject Crusher Unit. The applicant has also constructed breaking wall of 14 feet height as per the compliance of the conditions of the CTO, when the condition mandated only 12 ft.
16. That the Respondent has developed a good green belt in the requisite 33% of the total area in full compliance of the conditions prescribed by the UPPCB.
17. That the Respondent has installed closed metal sheet enclosures at dust emitting points. Additionally, all the openings provided for ventilation in the enclosures are covered.
18. That metallic road is installed inside the premises.
19. That the required 4 anti-smog gun are established as has been repeatedly informed by UPPCB as well through their reports. Further, the Hopper into which raw material is unloaded is also duly covered.
20. That It is submitted that the Respondent has been fully complied with all the terms and conditions of the CTO, the licenses and the provisions of law and in such view of the matter, this Hon'ble

Tribunal may be pleased to take the present Brief Note on record and treat it as part of record so that justice may be done.

Through



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