

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE AT CHENNAI

Application No.125 of 2022

IN THE MATTER OF

KORATTUR LAKE PROTECTION PEOPLE'S MOVEMENT

..Applicant

VERSUS

State of Tamil Nadu,
Represented by its Secretary to Government
& Others

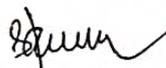
.Respondents

ADDITIONAL AFFIDAVIT FILED ON BEHALF OF THE 10TH RESPONDENT

I, S Kumar son of Mr P Selvaraj aged about 51 years and having address at No. 806, 63rd Street, 10th Sector, K K Nagar, Chennai -600 078 do hereby solemnly affirm and sincerely state as follows:

1. I am the General Manager – HR of the 10th Respondent Company and I am well acquainted with the facts of this case. I am duly authorized to swear this Affidavit on behalf of the Petitioner.
2. I submit that the 10th Respondent is filing this Additional Reply enumerating the hazardous waste storage and disposal practices followed in the 10th Respondent's unit at Ambattur.
3. At the outset it is submitted that the 10th Respondent has been compliant with all the waste management rules stipulated and updated from time to time. The Tamil Nadu Pollution Control Board has also done various inspections

For GODREJ & BOYCE MFG. CO. LTD.

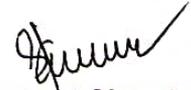

Authorised Signatory

pursuant to orders of this Hon'ble Tribunal and has not raised any objections with the manner in which the 10th Respondent stores and disposes hazardous waste.

4. The hazardous waste in the 10th Respondent's Unit at Ambattur is stored in a MS (Mild Steel) elevated bin with 4 legs, wherein the 4 legs are grouted to the floor and bin is at elevated height of 0.7meter. The overall size of the bin is 3 meters (length) * 3 meters (breadth) * 1 meter (height). I submit that the hazardous waste is stored in permitted industrial grade plastic bags which are tightly sealed and stored inside the MS bins so as to ensure that there is no spillage or leakage from the cover to the floor surface. The MS bin is kept in a secluded area, under a shed with all precautionary and warning signs wherein no rain water enters the shed.
5. The 10th Respondent has entered into a Hazardous Waste Disposal Agreement dated 01.08.2022 with Re-Sustainability IMW Solutions Limited (formerly known as Tamil Nadu Waste Management Limited), which ensures disposal of the hazardous waste collected at regular intervals.

In light of the above, it is humbly prayed that this Hon'ble Tribunal may be pleased to dismiss the present Application No.125 of 2022 as against the 10th Respondent and thus render justice.

For GODREJ & BOYCE MFG. CO. LTD.


Authorised Signatory
BEFORE ME

Solemnly affirmed and
Signed his name in my
Presence on this the 5th Day
Of September 2023 at Chennai

ADVOCATE: CHENNAI

**BEFORE THE HON'BLE NATIONAL
GREEN TRIBUNAL**

SOUTHERN ZONE AT CHENNAI

APPLICATION NO. 125 OF 2022

Korattur Lake Protection People's
Movement **...Applicant**

-Vs-

State of Tamil Nadu,

Represented by its Secretary to
Government & Ors **...Respondents**

ADDITIONAL REPLY

M/s. Ramasubramaniam & Associates

ROC No. 7351/15

Counsel for the Respondent

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