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BEFORE THE NATIONAL GREEN TRIBUNAL

SOUTHERN ZONE BENCH AT CHENNAI

Original Application No. 131 of 2020 (SZ)

1. M. Jayachandran
Son of Murugesan Naidu
Gangaiamman Kovil Street,
Puliyankannu- Navlock Village,
Ranipet, Ranipet District – 632 401.
9789052084; saisathyajith@gmail.com

2. B. GopiSathiyarajan
Son of S. Balan,
No. 4/36B, Bajanai Koil Street,
Thandalam – Ranipet, Ranipet District – 632401
9789052084; saisathyajith@gmail.com

...Applicants

Vs.

1. The Ministry of Environment
Forest and Climant Change, Rep by its Secretary
3rd Floor, Prithvi Wing
Indira Parvayaran Bhawan
JorBagh, New Delhi – 110003
Phone. No. + 91 11 24695262, 24695265,
24695132
Email- secy-moef@nic.in

2. The State of Tamil Nadu
Rep.by.its Secretary
Environment and Forest Department
Secretariat, Fort.St. George, Chennai 600 108
Phone No:- 044 25671511
Email Id:- forsec@tngov.in

3. The District Collector,
District Collectorate
District Institution of Education and Training
(DIET) Campus,
Kellys Road, Navalpur,
Ranipet – 632401
Email: collr-rpt@gov.in
Phone No. – 8300310130

4. The Sub-Collector
Cum Revenue Divisional Officer,
Office of the Revenue Divisional Officer
Ranipet – 632 401.
Email : rdorpt.tnvlr@gmail.com
Phone No. – 9445000416

5. The Member Secretary
Tamil Nadu Pollution Control Board
No. 76, Mount Salai, Guindy, Chennai 600 032
Phone No.- 04422353145
E-mail- tnpcb-chn@gov.in

6. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Ranipet, Tamil Nadu



Phone Number:- 044-27174524
 Email ID:- deetnpcbvlr2018@gmail.com

7. The Chief Engineer,
 Public Works Department, WRO
 State Ground and Surface Water Resource Data
 Centre,
 Tharamani, Chennai -- 600 113
 Phone No. 044 28410402
 Email- cegwchennai@gmail.com

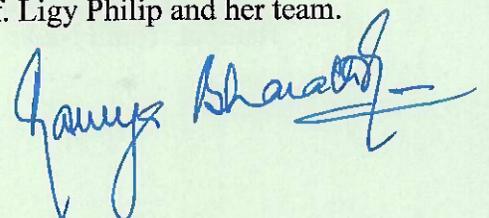
8. M/s. Thirumalai Chemicals Limited
 Rep. by its Chairman & Managing Director
 25-A, SIPCOT Industrial Complex,
 Ranipet, Tamil Nadu – 632 403
 Ph. No:- 91471 244441
 Email Id:- mail@thirumalaichemicals.com

...Respondents

AFFIDAVIT ON BEHALF OF THE 8TH RESPONDENT TO PLACE ON RECORD THE

I, Ramya Bharathram, aged about 49 years, representing the 8th Respondent, having office at 5th Floor, SPIC House, 88, Mount Road, Chennai 600 032, do hereby solemnly affirm and sincerely state as follows:-

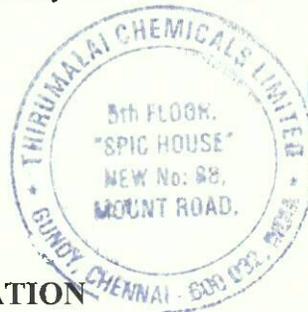
1. I am the Managing Director and CFO of the 8th Respondent (the “**Answering Respondent**”) and as such well acquainted with the facts of the case and competent to swear to the present Affidavit.
2. The present Affidavit is being filed to place on record the Status Report on Environmental Audit of Thirumalai Chemicals Ltd, October, 2021 prepared by Prof. Ligy Philip and her team, Environmental and Water Resource Engineering Division, Department of Civil Engineering, Indian Institute of Technology, Madras (“**Adequacy Report**”).
3. Vide Report dated 11.02.2021, the Joint Committee constituted by this Hon’ble Tribunal had *inter alia* directed the Respondent No.8 Unit to carry out adequacy test by an independent govt academic/research institution like IIT Madras and to certify that the unit has achieved 100% ZLD capacity, after commissioning of upgraded ETP.
4. Accordingly, the upgraded ETP was commissioned on 15th June 2021, pursuant to which the Adequacy Report has been prepared and issued by Prof. Ligy Philip and her team.



5. Vide Order dated 08.11.2021, this Hon'ble Tribunal had *inter alia* directed the 8th Respondent Unit to submit the compliance report regarding the implementation of the ZLD in their Unit. Accordingly, the Status Report on Environmental Audit of Thirumalai Chemicals Ltd, October, 2021 is annexed herewith as Annexure "A".
6. In the above circumstances and further to the Order dated 08.11.2021, it is humbly submitted that this Hon'ble Tribunal consider and take on record the Report on Environmental Audit of Thirumalai Chemicals Ltd. and pass appropriate orders including setting aside the findings arrived at by the Joint Committee to the extent set out hereinabove and thus render justice.

Dated at Chennai on this the 8th day of December, 2021.

Counsel for 8th Respondent



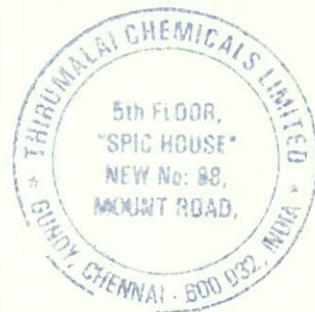
Ramya Bharathram
8th Respondent

VERIFICATION

I, Ramya Bharathram, wife of V. Bharathram, aged about 49 years and having office at 5th Floor, SPIC House, 88, Mount Road, Chennai 600 032, do affirm that I am the Authorised Signatory of the Answering Respondent and hereby verify that the contents of this reply are true and based on legal advice, and that I have not suppressed any material fact.

Date: 8th December, 2021

Place: Chennai



Ramya Bharathram
8th Respondent

