

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

ORIGINAL APPLICATION NO. 16 of 2019

K. Gemini (Deceased)

... Applicant

Vs

**1. Union of India
And 3 others**

... Respondents

MEMO FILED BY THE 4TH RESPONDENT

M/s. Shree Law Services

T.Ravichandran

D.Sairam Kumar &

K.Deva Dakshan

Counsel for 4th Respondent

97899 86612

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

ORIGINAL APPLICATION NO. 16 of 2019

K. Gemini (Deceased)
Son of Kannupaiyan
5/1-34 Rettaipuliyamaram
Raman Nagar Post
Mettur Dam, Salem District 636 403

... Applicant

Vs

1. Union of India represented by
The Secretary to Government
Ministry of Environment, Forests & Climate Change
III Floor, Pritvi Wing
India Paryavaran Bhavan
Jor Bagh, New Delhi 110003
Email: secy-moef@nic.in
Phone No. 011 24695262 & 24695265
 2. The State of Tamil Nadu represented
By the Secretary to Government
Environment and Forests Department
Fort St. George, Chennai 600 009
Email: forsec@tn.gov.in
Phone No 044 25671511
 3. The District Environment Engineer
Tamil Nadu Pollution Control Board
Siva Tower, Post Box No 457
No.1/276 Meyyanur Main Road
Salem 636 004
Email: deetnpcbslm@gmail.com
Phone No.04257 2448526
 4. M/s Chemplast Sanmar Limited
Rep by its Director S Ramkumar
Veerakalpudur Village
Raman Nagar Post
Mettur Dam, Salem District 636 403
Email: snn1@sanmargroup.com
Phone No.04298 230381
- Respondents

MEMO FILED BY THE 4TH RESPONDENT

It is most respectfully submitted that:

1. As per the directions issued by this Hon'ble Tribunal, the Joint Committee inspected the plants of the 4th Respondent and filed Compliance Report dated Nil, e-filed on 14th July, 2021. The Joint Committee has filed further reports dated Nil, e-filed on 12.11.2021 and



the same was considered by this Hon'ble Tribunal in the last hearing dated 15.11.2021.

2. The status of compliance with regard to the recommendations of the Committee is set out in paragraph 2.1 of the Report. A perusal of the same would reveal that this Respondent has complied with all the requirements except Recommendation of the Committee at Serial No.6 which was to provide Continuous Ambient Air Quality Monitoring Station (CAAQM in four directions around Plants II, III, IV and V and Power Plant) and the plants shall monitor PM10, Nox, SOx, Chlorine and VOC. The Report states that this Respondent had agreed to complete the process by December, 2021.
3. This Respondent submits the said recommendation no. 6 has also been complied with and photographs with regard to compliance of the same are also submitted herewith. The other compliances referred to in the Joint Committee Report relate to the larger issue of study to be conducted by NGRI.

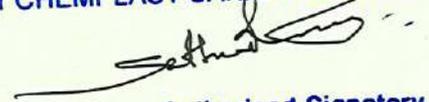
Therefore it is prayed that this Hon'ble Tribunal maybe pleased to record this memo and pass such or other further orders as deemed fit and thus render justice.

Dated at Chennai on this ^{2nd} day of December, 2021.



Counsel for 4th Respondent.

For CHEMPLAST SANMAR LIMITED



Authorized Signatory

4th Respondent





VOC
NOx
MGC
SO2
PM10

PANEL - CAAQMS





