

**BEFORE THE NATIONAL GREEN TRIBUNAL  
(SOUTHERN ZONE) CHENNAI**

**ORIGINAL APPLICATION No. 173 OF 2023**

**In the matter of:**

Rodda Ravi Kumar

..... Applicant (s)

Versus

State of Telangana & 7 Ors.

.....Respondent(s)

**REPLY FILED ON BEHALF OF RESPONDENT NO. 3, CENTRAL POLLUTION  
CONTROL BOARD**

I, H. D. Varalaxmi, D/o Shri H.S. Devaiah, Hindu, aged about 55 years and having office at the Regional Directorate – Chennai, Central Pollution Control Board, 2nd Floor, 77-A, Ambattur Industrial Estate, Chennai – 600 058, do hereby sincerely state as follows: -

1. That, it is humbly submitted that I am presently working as Scientist 'E' & holding charge of Regional Director (Chennai), Central Pollution Control Board (hereafter referred to as "CPCB") and have been duly authorized to file the reply on behalf of Respondent No. 3. I am fully conversant with the facts of the case and am competent and authorized to file the present reply.
2. That, CPCB is a statutory board which has been constituted under Section 3 of The Water (Prevention and Control of Pollution) Act, 1974. It performs the functions assigned under The Water (Prevention and Control of Pollution) Act, 1974 (hereinafter



  
**H.D. VARALAXMI, M.Tech**  
Regional Director  
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referred as Water Act, 1974), The Air (Prevention and Control of Pollution) Act, 1981 (hereinafter referred as Air Act, 1981) and The Environment (Protection) Act, 1986.

3. That, it is humbly submitted that the grievances made in the application is against M/s Orient Cement Ltd. and its head of manufacturing, i.e Respondent Nos. 7 & 8 who are alleged of causing water pollution by discharging polluted water into a Nalla in violation of conditions of Consent issued by Telangana State Pollution Control Board (hereinafter referred as TSPCB) and Environmental Clearance Condition accorded by Ministry of Environment Forest and Climate Change (hereinafter referred as MoEFCC).
4. That the averments made under the heading "Facts of the case" in Para 1 state about the applicant and his intention to file case against Respondent No. 7. Hence, require no comments from this Answering Respondent.
5. That the averments made under the heading "Facts of the case" in Para 2 provides general statements made by the Applicant about Respondent No. 1 to 6 and hence, require no comments from this Answering Respondent.
6. That the averments made under the heading "Facts of the case" in Para 3 state about the Respondent No. 7 and their activity and hence, require no comments from this Answering Respondent.
7. That the averments made under the heading "Facts of the case" in Para 4 to 7 state about the Consent and Authorisation obtained by the Respondent No. 7 and alleged violation of the Consent condition that "The industry shall not discharge any wastewater outside the plant premises" and further states about complaints made by the villagers against the industry for discharging into Nalla. In this regard it is humbly submitted that Telangana State Pollution Control Board (TSPCB), Respondent No. 6 herein, is empowered to implement the provisions of the Acts and take necessary action accordingly upon the violations.



*H.D. Varalaxmi*  
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8. That the averments made under the heading "Facts of the case" in Para 8 to 10 state about the alleged violation of Environmental Clearance (EC) condition by the industry and seeks to revoke the EC. In this regard, it is humbly submitted that EC is granted by MoEF&CC, Respondent No. 2 herein, and in case of violations, if any, action may be taken by the concerned authorities.
9. That the averments made under the heading "Facts of the case" in Para 11 allege about discharge of effluent in Nalla and the complaint made by the applicant to TSPCB. In this regard it is humbly submitted that Telangana State Pollution Control Board (TSPCB), Respondent No. 6 herein, is empowered to implement the provisions of the Acts and take necessary action in case of violations.
10. That the averments made under the heading "Facts of the case" in Para 12 the applicant has referred the case of MC Mehta Vs Union of India (WP 4677/1985) which is a matter of record, hence, require no comments from this Answering Respondent.
11. That the averments made under the heading "Ground" in Para 1 to 23 alleged about the pollution caused by the respondent industry, Provision of the Acts, Articles and various Court orders have been referred. In this regard the submissions made by this answering respondent in Para 7 to 9 are reiterated and may please be considered.
12. That this answering Respondent, CPCB, shall abide by any order or directions passed by the Hon'ble Tribunal in the instant case.



H.D. Varalaxmi

**DEPONENT**

**H.D. VARALAXMI**, M.Tech  
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## VERIFICATION

Verified at Chennai, on this 15<sup>th</sup> day of March, 2024 that the contents of the above reply are correct and true on the basis of the record of the case as maintained in the day-to-day affairs of the CPCB. Nothing has been concealed therefrom or mis-stated.



Counsel for CPCB



DEPONENT

**H.D. VARALAXMI**, M.Tech  
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