

**BEFORE THE NATIONAL GREEN TRIBUNAL-SOUTHERN BENCH**

**O.A No. 195 of 2016**

Tandur Citizens Welfare Society,  
Reg. No.714/2016,  
Rep. by its President,  
Rajgopal Sarda,  
Rangareddy District. Telangana

...Original Applicant

Vs

Government of Telangana,  
Represented by its Secretary,  
Environment and Forest Department,  
Hyderabad and Ors.

...Respondents

**ADDITIONAL AFFIDAVIT FILED ON BEHALF OF THE 10<sup>th</sup> RESPONDENT**

I, Adinarayana Rao.Y S/o Jagapathi Rao, aged about 45 years having office situated at P.B. No. 07, Sy. No. 51, Tandur Mandal, Vikarabad District & Corporate Office at 93, Santhome High Road, Karpagam Avenue, R.A.Puram, Chennai 600 028, do solemnly swear and sincerely state as follows:

1. I am the Chief Mangaer (Legal) of the 10<sup>th</sup> Respondent in the Original Application No. 195 of 2016 and as such I am well versed in the facts of this case and competent to swear this affidavit.
2. I state that the 3<sup>rd</sup> Respondent herein had filed a report before this Hon'ble Tribunal, dated 02.12.2020. The contents of the same report have been recorded by this Hon'ble Tribunal in its order dated 03.12.2020.
3. I state that the 3<sup>rd</sup> Respondent observes in paragraph 4 of page 2 of its report that the applicant herein is complying with the directions/conditions of its Consent to Operate and is meeting Environmental standards. The same has been observed in paragraph 3 of the order of this Hon'ble Tribunal in O.A. No. 195 of 2016 dated 03.12.2020.
4. I state that the aforementioned report prescribed certain general directions, to be complied with by the 10 Respondent, at Paragraph 11 (page 7) of its Report. I state that these directions are being complied with, along with periodical inspection mechanisms. The same is brought out in the table below:

S. No	Direction	Compliance Status
I	The industry shall comply with the CFO&HWA conditions of the Board scrupulously.	The applicant is complying with the CFO&HWA conditions and the compliance status is regularly submitted to TSPCB.
II	The industry shall regularly operate the Air Pollution Control Equipment i.e., RABH, Bag filters, ESP's, Dust Collectors etc. to control the fugitive emissions.	Efficient Air Pollution Control Equipment's such as Bag Houses, ESP's & nuisance bag filters are installed and are in continuous operation for controlling the emissions.
III	The industry shall take all precautionary measures for control of fugitive dust emissions from clinker stock pile.	Precautionary measures such as closed roof sheds are constructed for clinker storage. (Clinker Stock pile) Curtain wall is constructed all around the clinker stock pile (CSP) for control of fugitive emissions. Bag filters are provided at CSP tops & regular maintenance carried out for controlling of fugitive emissions
IV	The industry shall maintain bag filters at all silo tops, material transfer points and at various other sources of fugitive emissions.	Silo tops, raw material hoppers, and material transfer points are provided with bag filters and regular maintenance is carried out for controlling of fugitive emissions
V	The industry shall maintain the Online Continuous Stack Emission Monitoring system (OCSEMS) with data recorder facility for the stacks of kiln, Cooler and other major stacks of the cement plant, with connection of the data to the servers of CPCB & TSPCB.	Online Continuous Stack Emission Monitoring system (OCSEMS) has been installed for all major stacks (Kiln, Cooler, Coal Mill, Cement Mill) for monitoring Particulate Matter (PM) Emissions and the real time data is uploaded regularly in CPCB & TSPCB Websites. Existing PM-CEMS for all the stacks were replaced with SICK make analyzers (SB-30) during Nov-19. Gaseous CEMS analyzers have been installed for monitoring of SO <sub>2</sub> & NO <sub>x</sub> from Kiln/Raw Mill stacks for Line-1 & Line-2 and the real time data is uploaded regularly in CPCB & TSPCB Websites.
VI	The industry shall use the stone chips and sludge generated from the nearby stone polishing units as raw materials as per the recommendations of the Joint Committee constituted by the Hon'ble NGT.	Usage of stone chips and sludge generated from the nearby stone polishing units is adopted & is in practice.
VII	The industry shall take up regular cleaning of internal roads to avoid fugitive dust emissions due to vehicular movement.	The Internal roads are concreted, regular maintenance carried out and roads cleaning is carried out by using BOBCAT for avoiding the emissions due to vehicle movement

VIII	The industry shall store all the raw materials in closed sheds to avoid fugitive emissions.	Raw materials such as Laterite, Coal & Gypsum are stored in closed sheds to avoid fugitive emissions. Shed for storage of Laterite constructed with an investment of Rs.100 Lakhs. Shed constructed with an investment of Rs.260 Lakhs for storage of Coal.
IX	The industry shall provide / maintain water sprinklers at various dust generating points.	The Limestone crusher hopper is fitted with belt curtains and water sprinkler system for controlling of fugitive emissions. Regular water sprinkling is practiced on internal roads within the premises by using dedicated tankers for minimizing the dust emissions during the vehicular movement.
X	The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipment's and maintain record for daily energy consumption.	Separate Energy meters are installed for Air Pollution Control Equipment's and records maintained.
XI	The industry shall take all the necessary precautions to ensure that dust does not spread to the surrounding areas during the plant operations and shall meet the stack & Ambient air quality standards stipulated by the board.	Necessary control measures undertaken for controlling the stack & fugitive emissions during plant operations are:  <ol style="list-style-type: none"> <li>1. Air Pollution Control Equipment's such as ESP's, Bag Houses &amp; Bag filters are installed for controlling &amp; maintaining the stack emissions within standards.</li> <li>2. Line-2 kiln/Raw Mill ESP is converted into Bag filter with an investment of around 4.0 crores.</li> <li>3. Line-1 Cement Mill ESP is converted into Bag filter.</li> <li>4. Revamping of Cooler ESP-1 internals, water spray system installed with an investment of around Rs. 2.15 crores has been done.</li> <li>5. Revamping of Cooler ESP-2 and water spray system installed with an investment of around Rs. 2.0 crores has been done.</li> <li>6. A Shed is constructed for storage of Laterite with an investment of Rs.100 Lakhs, and a Coal shed is constructed with an investment of around Rs.260 Lakhs, other raw materials are also stored in sheds.</li> <li>7. Internal Roads are concreted, regular maintenance done, cleaning by using road sweeping machine (bobcat) practiced for controlling of fugitive emissions.</li> </ol> <p style="text-align: right;">For THE INDIA CEMENTS LIMITED  <i>y. Achinayya Rao</i></p>

		<p>8. Fly ash is stored in silo, transported through bouzers &amp; unloaded pneumatically for controlling the fugitive emissions.</p> <p>9. Thick greenbelt is developed in and around the plant &amp; colony premises with tall growing trees for reducing fugitive emissions.</p>
XII	The industry shall provide / maintain Road Sweeping Machines for sweeping the internal roads to avoid fugitive / dust emissions.	Procured New Road Sweeping Machine (Bobcat) with an investment of 20 Lakhs and regular cleaning of Internal Roads is practiced to avoid fugitive dust emission.
XIII	The industry shall calibrate online systems on Quarterly basis and records for the calibration data shall be maintained.	Regular calibration of online systems is practiced and records maintained.

5. As a responsible corporate citizen, the this Respondent has been compliant with the norms prescribed from time to time and has also proactively adopted environmentally safe industrial practices. Pertinently, there have been no show cause notices issued to the 10<sup>th</sup> Respondent for any violations of pollution norms till date and this Respondent is fully committed to implementing environmentally sound practices and is willing to comply with the directions issued by regulatory bodies in this regard.

In light of the above facts, it is humbly prayed that this Hon'ble Tribunal may be pleased to take on record the aforementioned compliances on the part of the 10<sup>th</sup> Respondent and dismiss the present Application as against the 10<sup>th</sup> Respondent with costs, and pass any other orders it may deem fit, in the interest of justice.

For THE INDIA CEMENTS LIMITED  
*- Adinarayan*  
 Authorised Signatory

Solemnly affirmed at

On this 15<sup>th</sup> February 2021

And signed his name in my  
 presence.

**BEFORE ME**