

BEFORE THE NATIONAL GREEN TRIBUNAL

SOUTHERN ZONE, CHENNAI

Original Application No. 87 of 2021 (SZ)

IN THE MATTER OF

Arvind Kumar Agrawal and others

...Applicant(s)

Versus

The Chief Secretary to Government of Tamil Nadu

Pollution Control Board and Others.

...Respondent(s)

**OBJECTIONS FILED BY THE 1st Applicant
TO THE REPORT OF JOINT COMMITTEE DATED
29.09.2021**

CHENNAI

DATED: 21.10.2021

Arvind Kumar Agrawal

(Applicant and Party in person)

Mobile No. 8939001372

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Next Date: 26.10.2021

INDEX

Sl. No.	Particulars	Page No.
1	Objections filed by 1 st Applicant along with others to the report submitted by Joint Committee submitted to this Hon'ble Tribunal on dated 29.09.2021.	5 - 14
2	ANNEXURE R/1 A copy of the letter dated 14.10.2013 directing the closure of this project and EC kept in abeyance by the Ministry of Delhi	16-19
3	ANNEXURE R/2 A copy of the letter dated 24.07.2008 issued by SEIAA, Tamil Nadu, Chennai for grant of EC.	20-27
4	ANNEXURE R/3 A copy of unresolved and open issue with Respondent #5, issued by CCRWA till 18.10.2021	28-29

5	ANNEXURE R/4 Copy of snapshot measuring distance between Block B1 & B2 and STP. Copy of project site plan drawing approved by Directorate of Town and Country Planning, Mamallapuram	30
6	ANNEXURE R/5 Copy of picture showing up joint between Block B1 and STP.	31
7	ANNEXURE R/6 Copy of the email sent by Owner staying near D block STP. Copy of tripartite agreement between Vendor, Respondent #5 and CCRWA	32-40
8	ANNEXURE R/7 Copy of specific EC condition prescribed for STP during its operation phase.	41
9	ANNEXURE R/8 Copy of permissible Ambient Noise Standards issued by CPCB. Copy of permissible Noise standard published by WHO and referenced by CPCB in its website.	42-44
10	ANNEXURE R/9 Copy of CPCB guidelines on levying Environmental Compensation to Respondent #5.	45-48
11	ANNEXURE R/10 Copy of CPCB guidelines on levying Environmental Compensation on solid waste management.	49
12	ANNEXURE R/11 Copy of Consent Order No. 6096 issued to Respondent #5	50
13	ANNEXURE R/12 Copy of picture showing up Bio recycler plant set in OSR area and also solid waste is being carried away by external lorries.	51
14	ANNEXURE R/13 Copy of Letter vide F.No. 23-19/2017-IA-III dated 10.04.2018	52-54
15	ANNEXURE R/14 The copy of CA No. 5041 of 2021 – Supertech Limited vs. Emerald Court Owner Resident Welfare Association & Ors.	55-57

16	ANNEXURE R/15 The copy of excerpt from case of CIVIL APPEAL NO.8026 OF 2009.	58-59
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OBJECTIONS FILED BY THE 1st APPLICANT ALONG WITH OTHER APPLICANTS TO THE REPORT OF JOINT COMMITTEE ON DATED 29.09.2021

I, Arvind Kumar Agrawal, S/o Sri Lakhan Lal Agrawal, aged about 43 years, 1st Applicant of this application, residing at B2-302, Provident Cosmo City Apartment, Pudupakkam, 603103, do hereby solemnly affirm and declare as under:-

- I. I am the 1st petitioner in the present Application, and I am fully conversant with the facts of the present case based on the records obtained through written correspondences with various Government departments, RTI responses, visual evidences collected from this residential site, internal communications from Cosmo City Welfare Associations.
- II. This Hon'ble National Green Tribunal (NGT), Southern Zone (SZ), Chennai, in its order dated 29.09.2021, in Original Application No. 87 of 2021, has directed the following:

"The official respondents wanted to file their independent response regarding the allegations made in the application. The parties are at liberty to file their objections if any, to the report submitted by the committee as well. In the mean time the Tamil Nadu Pollution Control Board as well as the Tamil Nadu State Level Environment Impact Assessment Authority (SEIAA,

Tamil Nadu), are directed to file their independent response regarding the action taken for the alleged violations noted by them on the basis of their inspection”.

The Joint Committee has submitted the report as per the direction by this Hon'ble Tribunal on dated 29.09.2021. Parties have made few observations to the said report, which are contrary to the evidences furnished in this petition. Committee has also not included certain observations with respect to DGSet stack discharge point, improper solid waste management which were not included in this report by the Joint Committee. The 1st Applicant along with other applicants is hereby filing its objections to the said report for kind consideration of this Hon'ble Tribunal. It is respectfully submitted following:

1. At the outset, it is respectfully submitted that, Joint Committee had suppressed certain important facts in this report which are significant in nature in this case and must help in leveling the charges appropriately against Respondents for misuse of power and authority, noncompliance of duty etc. It appears that facts are presented in a distort manner and are misleading to the said report.
2. That, in page #2 of this report, Joint committee has submitted that *“the Consent to operate was issued to the said unit vide Board’s proceedings vide Proc. No. T5/TNPCB/F, 1369MMR/RL/MMN/W&A/2017, dated 15.03.2017.”*

However, as per the RTI response obtained from MoEF&CC, Regional office, Chennai, EC itself was kept in abeyance for this entire project vide Letter No. F.No.SEIAA/TN/EC/8(a)/006/F-20/2008, dated 14.10.2013, due to noncompliance of EC conditions. It is certainly to be viewed as violation as EC was void at the time when TNPCB issued a Consent to Operate which is one of the pre-requisites. Hence observation made to this report may kindly be ignored and can't relied upon. Copy is annexed herewith as ANNEXURE R/1.

3. That, in the report, *it is mentioned in page #2, “Joint Chief Environmental Engineer, TNPC Board, Chennai inspected the unit on 07.08.2020 and noticed that the unit has constructed and commissioned Phase-II with about 990 dwelling units in addition to Phase-I 1184 dwelling units.”*

However it is humbly submitted that there is no term like Phase I or Phase II as mentioned in the letter vide Letter No. F.No.SEIAA/TN/EC/8(a)/006/F-20/2008, dated 24.07.2008, when granted Environmental Clearance to Respondent #5. It is perceived as one residential site at S.F. No. 53/3, 53/4, 53/10B, 55, 56/1, 57/2, 57/4 with total plot area of 127570.85 SQ. m. and with built up area of 144596 SQ. M. for 1184 dwelling units. Splitting the site plotting area between Phase I and Phase II would be contrary to the fact where EC

was granted considering this entire plot area as a one plot for residential site development for only 1184 dwelling units. Hence this observation cannot be relied upon. Copy of this letter is annexed herewith as ANNEXURE R/2.

4. That, in page #2 of this report, it is mentioned as *“The unit in its reply to show cause notice vide its letter dated 21.09.2020 has stated that the complex has been under the complete management of the Association namely Provident Cosmo City Resident’s Welfare Association (CCRWA)” and stated that the further communication may be addressed to the owner of the property M/s Cosmo City Resident’s Welfare Association and not to proceed action against them.”*

It is further respectfully submitted that, it is contrary to the fact that Association has taken over the property maintenance from Respondent #5 on date 01.11.2017 and at that time, the property including both of the STP 1 and STP2 were in very shabby state. Residents of this unit had to contribute Rs.5000/- towards the break fix cost apart from regular monthly expenses. There were many major open issues at that time which are still being carried over for past 3 years and are still unresolved. Respondent #5 is still carrying construction activity for few of its unfinished apartments and is operating its sales office activities within this premise. The list of such major issues is displayed at the entrance of this premise. A copy is annexed here with as ANNEXURE R/3.

5. That, in page #2 of this report, it is mentioned that *“Consent to operate was issued to the said unit vide Board’s proceeding on dated 15.03.2017 for only 1184 dwelling units alone as per the initial conceptual plan. It is also mentioned that The Joint Chief Environmental Engineer, TNPC Board, Chennai noted the construction and commissioned of additional 990 units upon its inspection on dated 07.08.2020.”*

It is however, contrary to the fact that, there is a statutory procedure to inspect the site by officers of TNPCB before considering the issuing Consent to operate. It is important to note that how was it left unnoticed of such large expansion of 990 dwelling units and commissioning with another STP near block B1 & B2 at that time i.e. during the inspection in year 2017. And if it is not unnoticed, then why no actions initiated against the Respondent #5 under Section 25 of the Water Act and Section 21 of the Air Act. And during that period, Respondent #5 was managing this unit.

6. That, in page #3 of report, committee has observed during inspection that *“The STP meant for treating the sewage generated from the 990 dwelling units is place near Block B i.e. Block B1 & Block B2 with distance of 6 m in between”.*

It is respectfully submitted, that it is contrary to the fact that, the distance is barely 3.5 m between STP and Block B1 and Block B2. As per the project site planning drawing obtained from the Directorate of Town and Country Planning, Chengalpattu, confirms the distance of 3.5 M between Block B(1&2) and this STP in question. Copy is also annexed herewith as a reference ANNEXURE R/4. Hence observation made to this report may kindly be ignored and must not be relied upon.

7. That, in page #4, committee has observed during inspection that *“The blower arrangement provided to suck & release the odorous gas if any generated from collection cum equalization tank was under operation at the time of inspection.”*

It is respectfully submitted, that committee has not mentioned the fact, that there is an arrangement for vent emitting out gases which is the extension to B1 block from this STP in question. It can be seen in picture submitted in the report. Copy is annexed herewith as ANNEXURE R/5.

8. That, in page #4, committee has observed during the inspection, that *“Another Sewage Treatment Plant (STP-I) for the treatment of sewage generated from other blocks such as Block C & Block D of the said residential complex is also functioning in the same premises in other location near Block D which is also operated by Provident Cosmo City Resident’s Welfare Association (CCRWA) for which there is no complaint has been received from the nearby residents.”*

It is respectfully submitted that, D block residents are also facing the challenges similar to residents staying nearby STP-II i.e. residents from Block B1 & Block B2. While, parties are in verge of confirming the same from the current Association and Office Bearers of CCRWA, one of the residents from D30-001 confirmed that he is also facing issues like bad odor and noise pollution because of proximity to STP-I. Copy of confirmation that made via email is annexed herewith ANNEXURE R/6. Another fact which is distorted to mislead that there was a tripartite agreement executed among vendor, Respondent #5 and CCRWA Association for revamp and restoration of both of the STPs (1 & 2). It is important to note, that if there were no issues submitted to said report for STP near D block, why it was (STP located near D block) considered for revamp. This observation needs to be ignored and cannot be relied upon.

9. That, page#4 of report, committee has observed that *“The arrangement has been provided for the utilization of the treated sewage for gardening and for toilet flushing by providing dual plumbing line within the Flat premises. But there is no disinfection facility to disinfect the treated sewage before utilizing for toilet flushing.”*

It is respectfully submitted further, that despite violation of specific condition prescribed in EC, treated water is being pumped to all the A & B blocks residential units for toilet flushing and is also used for gardening. The copy of this specific EC condition is herewith annexed as ANNEXURE R/7.

10. That, in page #4 of report, committee submitted that *“Report of analysis of the Ambient Noise Level survey conducted by the TNPC Board Laboratory on 02.08.2021 reveals that the noise level measured at the petitioner’s resident Flat No. B2-302 is 57.3 db(A) Leq (in the Hall), 59.6 dB(A) Leq (in the Bed room) as against the standard of 55 db(A). Further in the residence of Thiru Radhakrishnan Flat No. B1-003 is 61.3 dB(A) Leq, as against the standard of 55 dB(A). The noise level is 65.9 dB(A) as measured in common corridor near STP.”*

It is respectfully submitted in this regard that, standard of 55 dB(A) is permissible during day time while 45 dB(A) is also there during night time which considered between 10 PM to 6 A.M. Such standards are published under Ambient Noise Standards Schedule – rule 3(1) & 4(1). Though it is permissible standard for Residential Area category, we must also consider the situation where family has old aged members, patients, kids etc where exposure to such noise level leads to discomfort to their routine lifestyle and health. CPCB has also considered the WHO noise quality guidelines. Noise guideline values are for the onset of health effects from noise exposures. In this guidelines, Specific Environment like outside bedroom, standard limit is 45 LAeq[dB]. Copy is herewith annexed as ANNEXURE R/8.

11. That, page #5 & #6 of report, the committee has submitted the Environmental compensation levied to the said unit. It is respectfully submitted that committee had considered instances like below as per CBCB guidelines for levying Environmental Compensation
 - a. Discharge in violation of consent conditions, mainly prescribed standards/ consent limits.
 - b. Not complying with the direction issued, such as direction for closure etc.

It is further respectfully stated that above consideration for levying Environmental compensation is contrary to the fact where CPCB has given detailed guidelines for consideration of instances like “Intentional discharge to the environment”, “improper municipal solid waste” and “Illegal Extraction of ground water”. As per CPCB guidelines, Formulas are proposed based on the such specific cases however committee has not considered such cases while arriving at environmental compensation.

It is also respectfully submitted, that CPCB has also proposed the guidelines on repeated violation where under Chapter I, section 1.3.1 of g stated as *“In order to include*

deterrent effect for repeated violations, EC may be increased on exponential basis, i.e. by 2 times on 1st repetition, 4 times on 2nd repetition and 8 times on further repetitions.” As per the RTI response vide letter F.NO. A. 14030/RTI-49/ROSEZ/CHN/2020-21/726, dated 09.09./2020, it reveals that due to noncompliance of EC conditions, multiple Showcause notices including direction for closure were served on dated 07.12.2012, 08.02.2013, 14.10.2013 by the MoEF&CC to the Respondent #5. In such Showcause notices, a copied was marked to TNPC Board as well.

It is also respectfully submitted, that committee in its report arrived at the Number of days – 414 from the date of violation observed i.e. 10.08.2020. However it is contrary to the fact, that the observation to this violation was first identified on 06.02.2009 by the monitoring of the project by Regional Office of Ministry and is mentioned this fact in its letter vide No. F.No. 23-19/2017-IA-III, dated 10.04.2018, Government of India, Indira Paryavaran Bhavan, Jor Bagh Road, New Delhi -3 (annexed as ANNEXURE R/13). It is also mentioned in this letter that, multiple Showcause notices were served to Respondent #5 and copied were marked to TNPC Board. As per this letter, even TNPCB has issued the show cause notice on 10.09.2014. Hence the Date of violation observed must be viewed as 06.02.2009 while arriving at the number of Days. Hence the calculation for levying Environmental Compensation is likely to be as follows:

- The date of violation observed: 06.02.2009
- Pollution Index for Red category industries as per CPCB guideline – 80
- Number of days = 4616 (days between 06.02.2009 and 27.09.2021)
- R as per CPCB Guidelines -250
- S as per CPCB Guidelines – 1.5
- LF as per CPCB Guidelines – 1.0
- Environmental Compensation (EC) = PI * N * R * S * LF

$$EC = 80 * 4616 * 250 * 1.5 * 1.0 = \text{Rs.}138480000/-$$

As per Chapter-I Environmental Compensation to be levied on Industrial unit, Section 1.3 – Methodology for Accessing Environmental Compensation, and g of 1.3.1, it is stated that *“In order to include deterrent effect of repeated violations, EC may be increased on exponential basis.”* Since, Respondent #5 had repeated events of violations, it could be factor as 8 times and in this case. Amount of EC arrived as = 8 * 138480000 = Rs. 1107840000/-

Furthermore, it is respectfully submitted that, as per CPCB guidelines under Chapter- I Environmental Compensation to be levied on Industrial unit, Section 1.3 – Methodology for Accessing Environmental Compensation, committee must consider the clause 1.3.2 where it states as below:

- *“In other instances, i.e. d, e and f, the environmental compensation may contain two parts – one requires providing immediate relief and other long-term measures such as remediation. In all these cases, detailed investigations are required from expert institution/organizations based on which environmental compensation will be decided.”*

Copy of Environmental Compensation guidelines from CPCB with regard to instances and formulas is annexed here with as ANNEXURE R/9. Recommendation on levying the Environmental compensation submitted by Joint Committee appears to be more lenient to Respondent #5. Hence observation made to this report, on levying Environmental Compensation calculation may kindly be reconsidered.

12. That, the committee has not submitted its observations in its report, on the Point of Discharge stack height for DGSet. The Hon'ble Tribunal had also directed the Joint Committee to consider the violation and deficiency in DGSet installation and operation. As per the Consent Order No. 6096 dated 19.03.2013, issued by TNPCB, the point of Discharge stack height must be 15 M. However as of it's current state, stack height is less than the building height. This concern is already raised by the petitioners in their plaint. Copy of Consent Order no. 6096 is annexed herewith as ANNEXURE R/11.
13. That, committee has not submitted its observations in its report on the Solid Bio Waste Management. Nearly 5946 kg /day of solid waste is estimated for this residential unit. Bio recycling machine is provided by the Respondent #5. It is located in OSR area however never been put into operation. The solid waste is carried away through Municipal lorries. Picture showing up Bio recycler plant setup in Open space reservation (OSR) and green belt area. It is the important fact which is missing in this report. It's inclusion may help setting up levying appropriate penalty as per CBCB Environmental Compensation guidelines as mentioned under Chapter III, section 3.4 – *“Environment Compensation to be levied on Concerned Individual/ Authority for Improper Solid Waste Management”*. Copy of this guideline is annexed herewith as ANNEXURE R/10
14. That, in page 6# & #7 of this report, committee has recommended the revamp of STP- II near B1 and B2 blocks. Recommendations from committee listed under 1st to 15th point seems to alleviate the issues that petitioners raised in its plaint. However, it is respectfully submitted that such recommendations are contrary to the statutory guidelines set by Tamil

Nadu Pollution Control Board, National Building Code as well as CPC Board. Siting Criteria of such plants published by TNPCB in its Compendium, it is mentioned as *“The STP site should be located at least 500 meter away from a notified habitated area and zone of 100 meters around STP site boundary should be declared as no-development zone so that green belt can be developed in that area”*. As per NBR norms, *“distance between two building must be not less than 6 m.”* In one of recent judgement Supertech Limited Vs. Emerald Court Owner Resident Welfare Association & Ors., the Hon’ble Supreme court has directed to demolish the 42 stories building, as it is not complied with NBR 2010 Regulation 24.2.1(6). It is a plant of massive capacity, which requires continuous operation and maintenance. It is estimated to be process and treat 6,50,000 liters of Sewage water on a daily basis. Over the past 3 years, there have been multiple attempts for improvements. Despite spending many Lakhs of rupees, issues like bad odor and excessive noise still persist. Extraction of sludge removal through external lorry vendors and other maintenance work on periodic basis are inevitable which aggravates nuisance to nearby residents. Hence recommendations (1st to 15th) made by Joint Committee in this regard may kindly be ignored, as it may alleviate issues to certain extent, but cannot be fully eliminated. Copy of CA No. 5041 of 2021 is annexed herewith as ANNEXURE R/14.

15. That, page #7 of report, committee has recommended, that *“The proponent shall apply and obtain Environmental Clearance for the additionally constructed residential complex with 990 dwelling units with total built up area of 26619.02 Sq.m”*.

It is contrary to the fact and that committee has missed out. As per the RTI response obtained vide letter F.NO. A. 14030/RTI-49/ROSEZ/CHN/2020-21/726 dated 09.09./2020, it is clearly pointed out that Respondent #5 had submitted the application vide No. IA/TN/NCP/63558/2017 for seeking Environment clearance for the expansion of additional 990 units on dated 29.03.2017, to the Ministry of Environment, Forest and Climate Change, Jog Bagh, New Delhi. However, the application is rejected based on the recommendation from Expert Appraisal Committee (EAC) of Impact Assessment Division, MoEF&CC, New Delhi. The excerpt from the letter on recommendation from EAC is as below:

- a. *The project proponent shall submit the monitoring report on compliance status of the earlier EC conditions(EC dated 24.07.2008 issued by SEIAA) from the Regional Office of the Ministry to conclude the show cause notices issued by the Ministry.*
- b. *The State Government/SPCB to take action against the project proponent under the provisions of section 19 of the Environment (Protection) Act, 1986, and further no consent to operate or occupancy certificate be issued till the project is granted EC.*

It is evident from the report, that committee submitted that the construction additional 990 units is already completed. The unit is now in operating phase with more than 90% of the flats (Both A block & B blocks). Despite the fact, that this project is non complaint to earlier EC conditions, and as per letter vide F.No. SEIAA/TN/EC/8(a)/006/F-20/2008 ,dated 14.10.2013, EC was kept in abeyance, the Respondent #5 is believed to have sold nearly 2000 flats so far and is making every effort to sell rest of flats.

The Joint Committee has misled this important fact to this Hon'ble Tribunal. This is irreversible to meet the earlier EC conditions as set by SEIAA on its letter vide dated 24.07.2008. Hence, this recommendation may kindly be ignored and cannot be relied upon. Copy of Letter vide F.No. 23-19/2017-IA-III dated 10.04.2018 is herewith annexed as ANNEXURE R/13.

16. It is respectfully submitted that, expansion of 990 units has led to issue of having reduced green belt space in this unit. Furthermore, as per SEIAA letter vide no. SEIAA/TN/EC/8(a)/006/F-20/2008, dated 24.07.2008 on EC granted to Respondent #5, it is proposed, that 212 KLD water usage for land gardening and 165KLD excess water carried through CMWSSB on payment basis. However, as the total site area is reduced due to expansion of unauthorized 990 units, additional water is more than the proposed i.e. 165 KLD which is supposed to CMWSSB STP through dedicated lorries on payment fee. Moreover as capacity of sewage treatment plant has been doubled, i.e. to 330 KLD, the excess water that couldn't be consumed within this unit has to CMWSSB STP through dedicated lorries with payment of fees. For a simple math, if unit generates 330 KLD approximately per day. Further, consider the analogy of carrying over this additional water to CMWSSB premise. If tanker is hired with capacity of 16000 L with per trip of Rs 1000/-. It requires 21 trips per day with cost of Rs. 21000/- per day and amounting to Rs 6,30,000/- per month. This is over and above the maintenance charges that each one of residents contributes for this unit. It is customary, such recurring expenses is not good option for such large community and requires more feasible and permanent solution.
17. It is respectfully submitted that, petitioner has sought clarification from Cosmo City Welfare Association (CCRWA) association and Office Bearer with respect to Showcause notice served to it by TNPC Board, Chennai. The response is yet to receive from the Association.
18. It is respectfully submitted that; Respondent #5 has utilized enough time between the year 2012 to 2021 to construct and commissioning additional 990 units and gained gigantic financial benefit by selling those apartments. It is unfortunate that Respondent #1 to 4 had not initiated rightful and necessary actions on time against Respondent 5# to stop this illegal construction of 990 units thereby giving him (Respondent #5) more power and opportunities

to debilitate the past EC compliance and conceptual plans according to his favorable interest.

19. It is respectfully submitted that, construction and commissioning of additional 990 units is contrary to EC condition prescribed in letter vide dated 24.07.2008 on granting the Environmental Clearance, and hence must be viewed as unauthorized and illegal construction. According to the case of CIVIL APPEAL NO.8026 OF 2009 "*Priyanka Estates International (P) Ltd. V. State of Assam*, The Court lamented that the earlier decisions on the subject had not resulted in enhancing compliance by developers with building regulations. Further, the Court noted that if unauthorized constructions were allowed to stand or are "given a seal of approval by Court", it was bound to affect the public at large. It also noted that the jurisdiction and power of Courts to indemnify citizens who are affected by an unauthorized construction erected by a developer could be utilized to compensate ordinary citizens. Copy of *Priyanka Estates International (P) Ltd. V. State of Assam* is annexed here with as ANNEXURE R/15.
20. It is further respectfully submitted that; this case has been pending for more than 180 days since it was admitted on 24.03.2021. The adjournment to this case from time to time had also caused the delay in disposing of this case. The petitioners are being severely affected by this STP in question and looking for relief by this Hon'ble Tribunal for the sake of justice.

Hence, it is earnest prayer that this Hon'ble Tribunal is pleased to consider the objections raised here to the report submitted by Joint Committee on dated 29.09.2021 and may kindly be pass such order as deem fit and proper in the interest of justice.

VERIFICATION

I, Arvind Kumar Agrawal, S/o Shri Lakhnan Lal Agrawal, aged about 43 years do hereby verify that the concerns of paras of Objections to the said report are based on records and information are true to best of my knowledge and belief.

Hence, verified on 17th day of October 2021 at Chennai.

Sd/-- 

1st Application & Party in Person
(..Arvind Kumar Agrawal)

OA 87/2021 (SZ)
21.10.2021