

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN  
ZONE, CHENNAI

Original Application No. 256 of 2020 (SZ)

IN THE MATTER OF

Tribunal on its own motion-SUO MOTU  
Based on The News item in News Desk

Magazine Dated 11.11.2020, Air Pollution  
and Industries, "These Six Industries in North  
Chennai are polluting the air for more than  
half the year, the North Chennai Thermal  
Power station alone Ennore Port"

1. Union of India,  
Ministry of Environment, Forest and Climate Change,  
Rep. by its Secretary,  
Indira Paryavaran Bhavan, Jorbagh Road, New Delhi - 100 003.
2. The Chief Secretary to Govt. of Tamil Nadu,  
Govt. Secretariat, Fort St. George,  
Chennai, Tamil Nadu- 600009.
3. The Secretary to Govt. of Tamil Nadu, Department of Environment,  
Govt. Secretariat, Fort St. George,  
Chennai, Tamil Nadu- 600009.
4. The Principal Secretary to Govt. of Tamil Nadu,  
Industries Department,  
Govt. Secretariat, Fort St. George,  
Chennai, Tamil Nadu - 600009.
5. Additional Chief Secretary to Govt. of Tamil Nadu,  
Municipal Administration and Water Supply Department,  
Govt. Secretariat, Fort St. George,  
Chennai, Tamil Nadu - 600009.

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For Manali Petrochemicals Limited



M. Karthikeyan  
Whole-time Director (Operations)

For Manali Petrochemicals Limited

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Whole-time Director (Operations)

**BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI**

**Original Application No. 256 of 2020 (SZ)**

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Union of India  
Ministry of Environment, Forest and  
Climate Change & 15 Others

....Respondents

**PAPER BOOK II**

**REPLY STATEMENT FILED ON BEHALF OF  
MANALI PETROCHEMICALS LIMITED  
15<sup>TH</sup> RESPONDENT**

**M/s AL. GANTHIMATHI  
ADVOCATE FOR 15<sup>TH</sup> RESPONDENT**

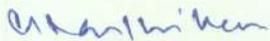
For Manali Petrochemicals Limited



**M. Karthikeyan  
Whole-time Director (Operations)**

6. Principal Secretary to Government, Health and Family Welfare Department, Secretariat, Chennai 600 009.
7. The Chairman, Central Pollution Control Board (CPCB), Parivesh Bhawan, East Arjun Nagar, Shahdara, Delhi 110 032.
8. The Chairman, Tamil Nadu Pollution Control Board (TNPCB), No. 76, Anna Salai, Guindy, Chennai, Tamil Nadu-600032.
9. The Greater Chennai Corporation, Rep. by its Commissioner, Ripon Building, Chennai - 600 003.
10. The District Collector, Chennai District, District Collectorate Office, No. 62, Rajaji Salai, 4<sup>th</sup> Floor, Chennai 600 001.
11. North Chennai Thermal Power Station Rep by its Chairman cum Managing Director (TANGEDCO) Atpattu Main Road, Thiruvallur District, Athipattu, Tamil Nadu 600 120.
12. NTPC Tamil Nadu Energy Company Limited (NTECL) Rep. by its General Manager (TS), Vallur Thermal Power Project, P.O: Vellivoyal Chavadi, Ponneri Taluk, Tiruvallur District, Chennai 600 103.
13. Chennai Petroleum Corporation Limited (CPCL) Rep. by its Managing Director, New No. 536, Anna Salai, Teynampet, Chennai 600018.

For Manali Petrochemicals Limited



M. Karthikeyan  
Whole-time Director (Operations)

14. Tamil Nadu Petro products Limited (TPL) ,  
Rep. by its Chairperson,  
Manali Express Highway, Manali, Chennai 600 068.
15. Manali Petrochemicals Limited (MPL),  
Rep. by its Chairman,  
SPIC House, VI Floor, No. 88 Mount Road,  
Guindy, Chennai 600 032.
16. Madras Fertilizers Limited (MFL)  
Rep by its Chairman & Managing Director,  
SH 104, Harikrishna Puram,  
Manali, Chennai, Tamil Nadu – 600 068.

... Respondents

For Manali Petrochemicals Limited



M. Karthikeyan  
Whole-time Director (Operations)

**Reply statement filed on behalf of Manali Petrochemicals Limited- 15<sup>th</sup> Respondent, for the Hon'ble NGT direction issued vide order dated 23-08-2022**

The Hon'ble NGT(SZ) vide its order dated 23-08-2022 has directed as follows

*" 5. In the meantime the industries who have been impleaded in the case are also directed to file the nature of pollution control mechanism provided, the age of such mechanism provided and whether any steps have been taken by them for calibrating the same or upgrading the same with the advance technology, so as to strengthen the pollution control mechanism to control pollution that is likely to be caused on account of their operation."*

In this regard, the 15<sup>th</sup> Respondent respectfully submits the following for consideration of the Hon'ble NGT(SZ) as below.

**A. Nature of Pollution Control Mechanism**

1. Boiler Stack is the only source of emission in both the Plants of Manali Petrochemicals Limited (MPL) operating in Manali, Chennai, viz., Plant 1 at Ponneri Highway and Plant 2 at Sathangadu Village.
2. The heights of the all the stacks of the boilers are as per CPCB guidelines and are adequate for effective upward dispersion of flue gases.
3. Re-gasified Natural Gas (R-LNG) is being used as fuel in boilers at Plant - I
4. In respect of Plant 2, the Company and Indian Oil Corporation Limited, IOCL have completed the required infrastructure for receiving and using R-LNG. The supplies were slated to commence during the year 2021-22, but have been postponed due to delay in laying pipeline for about 1.5 KM to the supply point of MPL Plant 2, requiring some statutory/regulatory approvals for which actions have been taken by IOCL.
5. Pending the above, to ensure adherence to the emission norms, Low Sulphur Furnace Oil (LSFO) is being used as fuel in boilers at Plant 2.
6. Air-Fuel ratio controllers have been provided in the burners of respective boilers which enable optimizing fuel usage, thereby ensuring complete combustion of the fuel.

For Manali Petrochemicals Limited

  
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7. Online Continuous Emission Monitoring System (OCEMS) have been provided to boiler stacks and for Ambient Air Quality (AAQ) monitoring.
8. Real time data of OCEMS relating to boiler stack and AAQ monitoring are being displayed in the LED panel board at the entrance of the respective units.
9. In strict compliance with the CPCB guidelines, all the required online analyzers with latest technology have been installed for effective monitoring & control of emissions. The emissions adhere to analytical requirements prescribed by the PCBs.

**B. Age of the mechanism**

10. The OCEMS, was introduced and have been connected to PCB servers during the year 2010 and all the equipment / mechanism have been in place since the beginning and are replaced regularly on need basis.

**C. Calibration, upkeep and upgradation**

11. All monitoring systems are being maintained in good condition and Scheduled Periodical Maintenance (SPM) activities are being carried out to avoid any breakdowns.
12. All the analyzers are calibrated periodically and also tested by external accredited agencies. Copies of latest calibration certificates of analyzers pertaining to the boiler stack and AAQ monitoring are enclosed in **Annexure – 1A, 1B & 2A, 2B**
13. Online Continuous Emission Monitoring System (OCEMS) for stack and Ambient Air were replaced during the year 2017 for switching over to a new technologically advanced system.

**D. Monitoring of emission and compliance status**

14. In addition to the online monitoring, the boiler stack and AAQ monitoring are also being carried out by Tamil Nadu Pollution Control Board (TNPCB) laboratory, NABL accredited laboratory and in-house laboratory. Copies of analysis reports from TNPCB laboratory are attached vide **Annexure - 3A, 3B & 4A, 4B**.

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15. OCEMS data for the period from January 2022 to August 2022 for boiler stack and AAQ for both the units are enclosed in **Annexures – 5A, 5B & 6A, 6B** from which it could be seen that the emission values are within the prescribed CPCB and NAAQ standards respectively.
16. A counter affidavit was filed before the Hon'ble NGT (SZ) on 23-07-2021 and respectfully prayed to discharge MPL from this case by stating the facts of compliance of OCEMS as per CPCB guidelines and the effective pollution control measures adopted by the units. The reason being, MPL was not exceeding the norms and had complied to data connectivity within CEMS guidelines of 85% (min). Copy of the same is enclosed as **Annexure – 7**.

**E. Conclusion and Prayer**

It is respectfully submitted that as could be seen from the results of analysis all the emission values pertaining to the boiler stack and AAQ are within the prescribed CPCB and NAAQ standards.

Further even in the report of Climate Action Group, no violation or exceedance have been observed on the emissions by both the Plants of the Company. The non-compliance hours mentioned in the report are actually the duration of non- availability of data, which incidentally is also within the norms.

The Report of the Joint Committee appointed by the Hon'ble Bench also does not contain any adverse remarks and the emission values are within the norms.

It is assured that the Company would strictly adhere to the norms and continue the maintenance and upgradation activities to ensure proper compliance in letter and spirit.

In view of the above it is respectfully submitted that the Respondent No. 15 be discharged from the case and excluded from further proceedings in the case.

Dated at Chennai on this 10<sup>th</sup> day of September 2022

For Manali Petrochemicals Limited



M. Karthikeyan  
Whole-time Director (Operations)

**VERIFICATION**

I, M Karthikeyan, Wholetime Director (Operations) of Manali Petrochemicals Limited the 15<sup>th</sup> Respondent Company herein, do hereby declare that what is stated in the above paragraphs are true and correct to the best of my knowledge, information, and belief.

Verified at Chennai on this 10<sup>th</sup> day of September 2022

For Manali Petrochemicals Limited



M. Karthikeyan  
Whole-time Director (Operations)



**COUNSEL FOR 15<sup>TH</sup> RESPONDENT**

**DEPONENT**