

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SOUTHERN ZONE)  
SOUTHERN BENCH, CHENNAI**

**O.A No. 221/2015**

Isanaka Vedavathi

...Applicant

Versus

Union of India & 10 Ors.

...Respondents

**INDEX TO ADDITIONAL TYPED SET OF DOCUMENTS FILED ON BEHALF OF  
THE 11<sup>TH</sup> RESPONDENT**

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (SOUTHERN ZONE)**

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**ORIGINAL APPLICATION No. 221/2015**

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**THE 11<sup>TH</sup> RESPONDENT**

<b>Sl.</b>	<b>Date</b>	<b>Description</b>	<b>Page No.</b>
1.	26.01.2022	Summary of Reports issued by R4 and Objections filed by 11 <sup>th</sup> Respondent to each report.	1 – 20

**Date: 27.01.2022**



**Counsel for the 11<sup>th</sup> Respondent**

**From:** rajesh itta <rajesh.itta@adaniwilmar.in>  
**Sent:** 26 January 2022 19:47  
**To:** APPCB RO Nellore  
**Subject:** FW: APPCB – RO, Nellore – O.A.NO.221 of 2015 filed before Hon'ble NGT (SZ), Chennai against Edible oil units operating at Krishnapatnam area, Muthukur(M), SPSR Nellore District- Inspection Notice – Issued - Reg.  
**Attachments:** AWL Unit-II- Consolidated Summary of objections and reply\_26012022.pdf

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Respected Sir,

**Subject:** Submission of detailed summary report as mentioned in our letter dated 7<sup>th</sup> January 2022.

**Ref:** Our Letter dated 7<sup>th</sup> January 2022 wherein we committed to submit detailed summary of objections against each report.

As mentioned in our letter dated 7<sup>th</sup> January 2022 kindly find attached detailed summary of objections against each report for easy comparison and records.

Regards  
Itta Rajesh  
Adani Wilmar Limited, Unit-2

**From:** Prabhakara Korrapati  
**Sent:** Friday, January 7, 2022 9:09 PM  
**To:** APPCB RO Nellore <ronlr-ee1@appcb.gov.in>  
**Cc:** Srinivasa Rao .B <pa-ms@appcb.gov.in>  
**Subject:** FW: APPCB – RO, Nellore – O.A.NO.221 of 2015 filed before Hon'ble NGT (SZ), Chennai against Edible oil units operating at Krishnapatnam area, Muthukur(M), SPSR Nellore District- Inspection Notice – Issued - Reg.  
**Importance:** High

Dear Sir,

Please see attached our response in reply to inspection notice. As desired we are submitting remarks on all earlier reports as desired. It is requested to please look into the same.

Please see google link of the folder below for all annexures with our previous response updating compliances status on regular basis. Please acknowledge receipt of same.

<https://drive.google.com/file/d/1nwPSMK57kxfDaPr9YWubVH7pf9jv3uBi/view?usp=sharing>

Regards



**K Prabhakara Rao**

Human Resources | Adani Wilmar Ltd

+91 7228939496 Extn 76802 | [prabhakara.korrapati@adaniwilmar.in](mailto:prabhakara.korrapati@adaniwilmar.in)

Sy No.292 & 317 Epuru 1b, Pantapalem, Muthukuru Mandal, SPSR Nellore Dist, Andhara Pradesh.

**From:** Ch. Rajasekhar <ronlr-ee1@appcb.gov.in>  
**Sent:** Tuesday, January 4, 2022 5:00:27 PM  
**To:** 3F Industries <phalgun@fff.co.in>; 3F Industries <psrao@fff.co.in>; South India Krishna Oils <vincent.paul@sioils.com>; South India Krishna Oils <b.muthukrishnan@sioils.com>; Vishal kumar. Jain <Vishal.Jain1@Adaniwilmar.in>; Prabhakara Korrapati <Prabhakara.Korrapati@adaniwilmar.in>; Emami Agrotech <narayana.murthy@emamiagrotech.com>; Gemini Edible Oil <prathap@gefindia.net>; Gemini Edible Oil <manna@gefindia.net>  
**Cc:** Srinivasa Rao .B <pa-ms@appcb.gov.in>  
**Subject:** APPCB – RO, Nellore – O.A.NO.221 of 2015 filed before Hon'ble NGT (SZ), Chennai against Edible oil units operating at Krishnapatnam area, Muthukur(M), SPSR Nellore District- Inspection Notice – Issued - Reg.

**CAUTION:** This mail originated from outside AWL. Do not click links or open attachments unless you recognize the sender and know the content is safe. Please check the mail ids of the senders and recipients in the mail by double clicking them.

Sir,

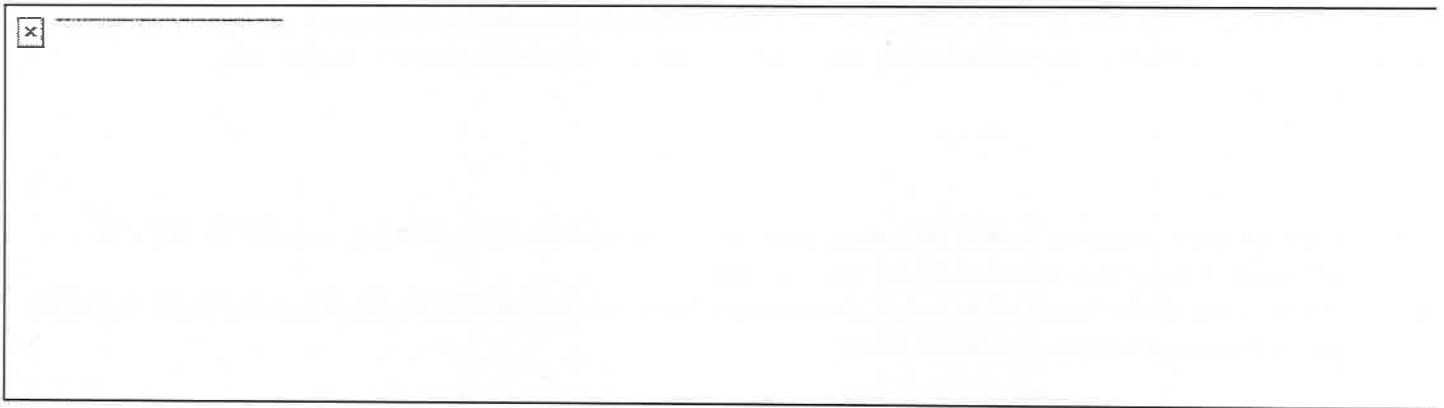
2

Adverting to the above, it is to inform that the Hon'ble NGT vide its order dated. 22.12.2021 directed that the Joint Committee shall consider all the objections filed by respondents, namely, 9, 10 and 11and objection of any other industries and also compliance of the directions, if any, issued by the Pollution Control Board on the basis of the subsequent inspections made and if there is any further violations, then consider those aspects as well and come with a comprehensive report to the Tribunal, so that this Tribunal can finally consider all those aspects and pass appropriate orders and dispose of the matter itself as the matter is pending since 2015.

In this regard, the Joint committee decided to conduct meeting with the representative of the industries and to carryout inspection on 10.01.2022 & 11.01.2022. IN the meanwhile, you are directed to submit the remarks/ objections if any on the earlier reports by 07.01.2022.

In view of the above, you are hereby directed that the decision making authority pertaining to your unit shall be available for the mentioned period and ensure that all the relevant records as required by the Joint committee shall be made available.

**With regards**  
**Environmental Engineer,**  
**APPCB, RO, Nellore.**



**SUMMARY OF REPORTS & REPLIES RELEVANT TO 11<sup>th</sup> RESPONDENT IN OA 221 OF 2015**

Period for which EC is sought to be levied	17.01.2020-14.10.2020
Environmental Compensation proposed against R11	INR 81,30,000/-
Amount already collected from R.11 (BG Forfeited)	INR 7,50,000/-
Balance sought to be recovered from R11	INR 73,80,000/-

**M/s Adani Wilmar Limited-(Unit-II)** is the 11<sup>th</sup> Respondent in the Original Application No. 221 of 2015 filed by Isanaka Vedavathi (“**Applicant**”) and pending before the Hon’ble National Green Tribunal, Southern Bench, Chennai.

**Background to Reports & Replies filed before Hon’ble NGT**

2. In the course of hearing arguments in the OA 221 of 2015, the Hon’ble NGT constituted a Joint Committee (“**JC**”) under Order dated 16.03.2020 with the following mandate:
  - a. to ascertain the present status of the functioning of the edible oil refinery units
  - b. to find out whether edible oil units are complying with the conditions of “consent” issued and whether the pollution control mechanism provided by them are proper and sufficient and whether they are complying with the norms and whether the “Zero Liquid Discharge” system said to have been established by them are properly functioning
  - c. action taken by Andhra Pradesh Pollution Control Board
  - d. to find out whether there is any violation in the use of surface water and whether necessary permission has been obtained by the units for drawal of surface water for their purpose
  - e. to find out whether pollution control mechanism provided to suppress the air pollution or water pollution are sufficient to meet the requirements has been provided under the Environment (Protection) Act, 1984
  - f. to determine whether these units are properly disposing the fly ash generated during their manufacturing process
  - g. imposition of environment compensation against the erring units
  
3. The JC filed a Report dated 01.12.2020 (“**JC Report-I**”) assessing Environmental Compensation of INR 81,00,000/- against the 11<sup>th</sup> Respondent. Of this amount, INR 7,50,000/- was collected by the 4<sup>th</sup> Respondent by invoking the 11<sup>th</sup> Respondent’s Bank Guarantee.

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4. In compliance with directions issued under various daily orders over the course of hearings in OA 221 of 2015, the JC filed Reports against the 11<sup>th</sup> Respondent. Wherever directed by the Hon'ble Tribunal, the 4<sup>th</sup> Respondent (APPCB) filed their Action Taken Report ("A.T.R.") in the matter. At each hearing, the Hon'ble NGT permitted and directed the Respondent units to file their objections to the JC Reports and also to the A.T.R.s so that the OA 221 of 2015 could be disposed of expeditiously.
5. Even while the OA was pending before the Hon'ble NGT, the 4<sup>th</sup> Respondent (APPCB) issued Order No.149/APPCB/UH-II/TF/NLR/2018 dated 23.09.2021 ("Order dated 23.09.2021") directing the 11<sup>th</sup> Respondent to immediately pay EC of INR 73,80,000/-. The 11<sup>th</sup> Respondent filed Interlocutory Application No. 155 of 2021 praying that the Order dated 23.09.2021 be stayed pending disposal of the OA 221 of 2015. The IA 155 of 2021 was disposed of under Daily Order dated 24.11.2021.
6. The 11<sup>th</sup> Respondent also filed Appeals 77-78 of 2021 against the Order dated 23.09.2021. The 4<sup>th</sup> Respondent (APPCB) filed Reports dated 20.12.2021 in the Appeals 77-78 of 2021 ("Reports dated 20.12.2021"). The Appeals 77-78 of 2021 were disposed of by the Hon'ble NGT vide Order dated 22.12.2021 wherein the Hon'ble NGT observed that the Reports dated 20.12.2021 would be considered in the OA 221 of 2015. The Reports dated 20.12.2021 are identical to the 4<sup>th</sup> Respondent's A.T.R. dated 13.12.2021 ("A.T.R. dated 13.12.2021") and all objections to the A.T.R. dated 13.12.2021 are adopted herein, to the extent applicable.
7. Under Order dated 22.12.2021, the Hon'ble NGT directed the 4<sup>th</sup> Respondent and the JC to meet objections raised by the Respondent-Units and pass specific findings thereon. Liberty was granted to revisit the EC sought to be imposed on the Respondent-units.
8. Subsequently, the 11<sup>th</sup> Respondent was served with Inspection Notice bearing No. OA 221 of 2015/APPCB/RO/NLR/2022-957 dated 04.01.2022 ("Inspection Notice") directing the 11<sup>th</sup> Respondent to file their objections to the A.T.R. dated 13.12.2021 by 07.01.2022. The 11<sup>th</sup> Respondent filed a Reply dated 07.01.2022 to the Inspection Notice requesting that prior objections be considered. The 11<sup>th</sup> Respondent filed a Reply dated 18.01.2022 to the A.T.R. dated 13.12.2021 ("Reply to A.T.R. dated 13.12.2021").
9. That subsequently inspection was conducted on 11<sup>th</sup> Jan, 2022 and report was sought in format given by 4<sup>th</sup> Respondent. 11<sup>th</sup> Respondent had submitted compliance update vide its email dated 19<sup>th</sup> Jan, 2022 (Compliance update submitted vide email dated 19<sup>th</sup> Jan, 2022, post 11<sup>th</sup> Jan, 2022 inspection).

10. The following Reports and Replies have been filed in the OA 221 of 2015, as on date:

**Table 1 - Reports and Replies filed in OA 221 of 2015**

Sl.	Report	Objections filed by 11 <sup>th</sup> Respondent	STATUS
(i)	Joint Committee Report-I dated 01.12.2020	Reply dated 18.02.2021	Order dated 13.07.2021 of Hon'ble NGT directed R4 (APPCB) & JC to consider objections raised by Respondent-units and to file a further report.
(ii)	Joint Committee Report-II dated 10.08.2021	Reply dated 24.09.2021	Order dated 16.09.2021 of the Hon'ble NGT directed R4 (APPCB) to file action taken report and directed JC to file a further report. R11 filed Reply dated 24.09.2021 to the JC Report-II
(iii)	Action Taken Report dated 17.11.2021 filed by R4 (APPCB)	Reply dated 06.12.2021	Order dated 22.12.2021 of the Hon'ble NGT directed R4 and JC to meet all objections raised by R11 and give their specific findings on those aspects.
(iv)	Joint Committee Report-III dated 20.11.2021	Reply dated 06.12.2021	
(v)	Action Taken Report dated 13.12.2021 filed by R4 (APPCB)	Reply dated 18.01.2022	--

11. At the outset, it is submitted that the JC Reports and the Action Taken Reports are vague, non-speaking, and do not address any of the submissions made by the 11<sup>th</sup> Respondent.

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Summary of Contentions and Objections spread across the 5 Reports filed by JC/4<sup>th</sup> Respondent (APPCB)

12. In order to comprehensively map each contention and reply, the 11<sup>th</sup> Respondent is summarizing the contentions raised by the JC/4<sup>th</sup> Respondent (APPCB) in the above 5

Reports, and the 11<sup>th</sup> Respondent's Objections filed against said contentions. In the summary tabulated below,

- a. All references drawn to page numbers relate to internal page numbers in the concerned document;
- b. The Joint Committee Reports are individually referred to as 'JC Report-I dated 01.12.2020/JC Report-II dated 10.08.2021/JC Report-III dated 20.11.2021' and as 'JC Reports I, II & III' in the collective;
- c. The Action Taken Reports are referred to as 'A.T.R. dated 17.11.2021/A.T.R. dated 13.12.2021'.

**Table 2-** Summary of Contentions and Objections (Page number references to internal page number)

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
<b>A. Contentions &amp; Objections on Fly Ash Spillage in R11 Unit.</b>										
VI.d.(h) – page 22 Fly ash spillage. The unit is generating 940 TPM of flyash and unit has installed silo of 40 tonnes (roughly	<b>Ground A, Page 3</b> Pictures in JC report do not belong to R11. Installation of new silos is a new condition, and the installation was in progress.	<b>II.c., Page 10</b> No spillage observed New Silos yet to be installed <b>Para VIII-6, Pg 20</b> JC recommended that APPCB may review the direction	<b>Ground B, Page 6</b> JC Report-II is non-speaking New Silos with increased storage capacity (120 MT) will be operational by 30.09.2021	<b>No reference.</b> Mere stated that R11 is delaying the matter to avoid payment of EC.	<b>Paras 13-22, pages 4-5</b> A.T.R. is non-speaking, A.T.R. is incorrectly of R11 of dilatory tactics.	<b>Sl. 12, Page 7</b> No specific reference. R11 was non-compliant during JC's visit for which EC is liable. Present compliance cannot be	<b>Ground F, Page 5</b> Objections pressed by R11 are not met. Findings are incomplete.	No specific reference to fly ash spillage, whereas common point for all industries at Sl. 9, Page 5 refers to common compliance condition to be complied by all industry by taking common steps by all units to prevent ambient dust from fly ash dumped adjacent	<b>Sl. 9, Page 6</b> R11 reiterated common steps to prevent ambient dust in association with other industries. R11 in association with other industries has complied with this requirement, as	<b>No EC is leviable as there are no contraventions on the part of the Unit.</b> No EC is leviable on this ground as direction for new silo was imposed only on 17.1.2020. The

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
<p>JC REPORT I dated 01.12.2020</p> <p>around Two days storage).</p> <ul style="list-style-type: none"> <li>The Unit is disposing Fly Ash on alternative days.</li> <li>R11 presently has silos with storage for 15 days: to be increased to 30 days.</li> </ul>	<p>R11 Reply dated 18.02.2021</p> <ul style="list-style-type: none"> <li>Without prejudice, direction was implementable w/i 3 months. Period between 17.01.2020-17.03.2020 to be excluded.</li> <li>Para IX.7 – page 40</li> <li>JC Report I concluded that direction may be reviewed.</li> </ul>	<p>JC REPORT II dated 10.08.2021</p> <p>as fly was disposed on alternate days which Respondent was stated to be complied in first JC Report-I.</p>	<p>R11 Reply dated 24.09.2021</p>	<p>A.T.R. dated 17.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to A.T.R.)</p>	<p>JC Report III dated 20.11.2021</p> <p>considered for past violations.</p> <ul style="list-style-type: none"> <li>Objections need not be considered.</li> </ul>	<p>R11 Reply dated 06.12.2021 (to JC Report-III)</p>	<p>A.T.R. dated 13.12.2021</p> <p>to R9, and that the units are to jointly compact the fly ash.</p>	<p>R11 Reply dated 18.01.2022</p> <p>is evident from Krishnapatnam Edible Oil Refiners Association's letter dated 18.01.2022 which reflects 80% completion of the common requirement and remaining work to be completed by 18.02.2022.</p>	<p>Summary of R11's submissions</p> <p>contentions of fly ash spillage are unfounded as photographs in JC Report-I are not of R11 unit.</p> <ul style="list-style-type: none"> <li>Direction to install new silos with increased storage was imposed on 17.01.2020 (which was not part of original consent conditions), which was on one hand complied by the Unit on 30.09.2021 in view of the fact there entire country was facing covid-19 from March, 2020 onwards,</li> </ul>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
<p>JC REPORT I dated 01.12.2020</p>	<p>R11 Reply dated 18.02.2021</p>	<p>JC REPORT II dated 10.08.2021</p>	<p>R11 Reply dated 24.09.2021</p>	<p>A.T.R. dated 17.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to A.T.R.)</p>	<p>JC Report III dated 20.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to JC Report-III)</p>	<p>A.T.R. dated 13.12.2021</p>	<p>R11 Reply dated 18.01.2022</p>	<p>and on the other hand the condition is also subjected to review by JC since R-11 was disposing fly ash on every alternate days. Therefore, the Unit has remained compliant all through, and even with the new additional requirements. Therefore, the need to impose EC does not arise at all.</p>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
<b>B. Contentions &amp; Objections on Source of Water and quantity of water used per day</b>										
<p><b>VI.d(i), Page 21-22</b></p> <p>Though Unit has obtained permission to withdraw 380 KL of ground water, 75% of water requirement is met from tankers.</p> <p><b>Para IX.2, Page 39</b></p> <p>Units were advised to set up common desalination plant as recommended by JC, subject to necessary approvals.</p>	<p><b>Ground B, Page 5-7</b></p> <p>R11 acknowledged intent to set up common desalination plant recommended by JC, subject to necessary approvals.</p>	<p>No statement over illegal sources of water.</p> <p>Para VIII-1, Page 19 prays that Hon'ble NGT must direct APIIC &amp; Department of Industries to provide water supply to Industries.</p> <p>Para IX-2, Page 21 repeats the above prayer.</p>	<p><b>Para 19.1, Page 17</b></p> <p>Respondent-Units commonly obtained permission from Nellore Municipal Corporation for drawing water through Pipeline.</p>	<p><b>No reference.</b></p> <p>Bald statement that R11 is delaying the matter to evade payment of EC</p>	<p><b>Paras 13-22, pages 4-5</b></p> <p>A.T.R. is non-speaking. A.T.R. is incorrectly contending R11 of dilatory tactics.</p>	<p><b>Sl. 12, Page 7</b></p> <p>No specific reference.</p> <p>R11 was non-compliant during JC's visit for which EC is liable.</p> <p>Present compliance cannot absolve R11 from past violations.</p> <p>Objections need not be considered.</p>	<p><b>Grounds A-E, I - Pages 4-5,8</b></p> <p>Submissions of R11 are not met</p>	<p><b>Sl. 2, Page 4</b></p> <p>Industry is still procuring water in illegal manner. R4 (APPCB) requested Collector &amp; District Magistrate, SPSR Nellore to direct concerned Departments to stop illegal drawl from borewells which supply water to units.</p> <p>Consent issued to Nellore Corporation to prepare DPR for laying of pipeline for supply of water.</p>	<p><b>Sl. 2, Page 3</b></p> <p>Contentions are vague. The water scarcity is well known and even R4 has acknowledged it. R11 cooperate in ensuring that alternative sources are used and has already taken steps by exploring possibilities for taking water through Nellore Municipal</p>	<p>No EC is leviable as there is no contravention by the Unit as JC-1 confirmed that R-11 has all necessary permissions for withdrawal of ground water.</p> <p>Contentions that R11 used water from 'illegal sources' is harsh as JC Reports I &amp; II acknowledged the difficulties faced by the Respondent Units.</p> <p>JC recommendation was for State Government to provide for</p>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
<p>JC REPORT I dated 01.12.2020</p>	<p>R11 Reply dated 18.02.2021</p>	<p>JC REPORT II dated 10.08.2021</p>	<p>R11 Reply dated 24.09.2021</p>	<p>A.T.R. dated 17.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to A.T.R.)</p>	<p>JC Report III dated 20.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to JC Report-III)</p>	<p>A.T.R. dated 13.12.2021</p>	<p>R11 Reply dated 18.01.2022</p>	<p>Summary of R11's submissions</p>
<p>alternative water sources.</p> <ul style="list-style-type: none"> <li>▪ R11 was ready to set up common desalination plant with other Respondent units to avoid use of surface water but in Second JC report this condition was removed.</li> <li>▪ The industry association have given letter for exploring possibilities for taking water through Nellore Municipal Corporation &amp; Sarvepalli reservoir by laying pipeline.</li> </ul>										

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
<b>C. Contentions &amp; Objections on maintenance of Effluent Treatment Plant ('ETP')</b>										
<p><b>VI.d.(j), Page 22</b></p> <ul style="list-style-type: none"> <li>ETP was not properly maintained.</li> <li>ETP sludge is stored in the open</li> <li>Effluent carrying drains were clogged</li> </ul> <p><b>IX.11, Page 41</b></p> <ul style="list-style-type: none"> <li>Units shall upgrade ETP, periodically remove accumulated sludge &amp; oil from the</li> </ul>	<p><b>Ground C, Pages 7-8</b></p> <ul style="list-style-type: none"> <li>R11 was in the process of upgrading the Multi-Effect Evaporator.</li> <li>Effluents were within normal parameters.</li> <li>R11 stores the ETP sludge in separate shed.</li> <li>Drains were clogged because of rainfall on 14.10.2020, the day prior to inspection. The JC Report's</li> </ul>	<p><b>II.c, Page 10</b></p> <ul style="list-style-type: none"> <li>agreed that ETP was fully revamped.</li> <li>ETP sludge stored in separate shed.</li> </ul> <p><b>Para IX.1, Page 21</b></p> <ul style="list-style-type: none"> <li>ETPs are fully operational.</li> </ul> <p><b>Para IX.4, Page 22</b></p> <ul style="list-style-type: none"> <li>No discharge of effluents in drains</li> </ul>	<p><b>Ground C, Page 8</b></p> <ul style="list-style-type: none"> <li>Non-speaking order on all counts</li> <li>No findings in respect of objection that photographs do not belong to R11.</li> </ul>	<p><b>No reference.</b></p> <p>Bald statement that R11 is delaying the matter to evade payment of EC</p>	<p><b>Paras 13-22, pages 4-5</b></p> <ul style="list-style-type: none"> <li>A.T.R. is non-speaking.</li> <li>A.T.R. is incorrectly stated R11 involving in dilatory tactics.</li> </ul>	<p><b>Sl. 12, Page 7</b></p> <ul style="list-style-type: none"> <li>No specific reference.</li> <li>R11 was non-compliant during the JC's visit for which EC is liable.</li> <li>Present compliance will not absolve R11 from past violations.</li> <li>Objections need not be considered.</li> </ul>	<p><b>Ground G, Page 6</b></p> <ul style="list-style-type: none"> <li>Objections pressed by R11 are not met.</li> <li>Non-speaking as no findings recorded on incorrect photographs basis which EC was sought to be levied.</li> </ul>	<p><b>Sl. 4, Page 5</b></p> <ul style="list-style-type: none"> <li>Unit is not discharging effluent.</li> </ul> <p><b>Sl. 13, Page 6</b></p> <ul style="list-style-type: none"> <li>On the requirement of Entire effluent, including floor washings, spillages etc. shall be sent to the ETP through pipes, the unit is fully compliant.</li> <li>Partial compliance is recorded insofar as the requirement of the first flush of storm water for first 15 minutes shall be collected and routed to the ETP. This point was raised for</li> </ul>	<p><b>Sl. 4, Page 4</b></p> <ul style="list-style-type: none"> <li>R11 is compliant and undertook to remain compliant.</li> </ul> <p><b>Sl. 13, Page 6</b></p> <ul style="list-style-type: none"> <li>R11's storm water drains are clear even as per page 10 of JC Report-II</li> <li>Though A.T.R. records 'partially compliant', comments indicate full compliance. With respect to point.13(ii),</li> </ul>	<ul style="list-style-type: none"> <li>R11 is fully compliant.</li> <li>No EC merits to be levied as there is no contravention.</li> <li>JC Report II has acknowledged that R11 is compliant.</li> </ul>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
<p><b>JC REPORT I</b> dated 01.12.2020</p> <p>tanks and to send TSDF. Units shall operate ETP and ensure compliance with effluent discharge standards stipulated by R4.</p>	<p><b>R11 Reply</b> dated 18.02.2021</p> <p>photos are not of R11 unit.</p>	<p><b>JC REPORT II</b> dated 10.08.2021</p>	<p><b>R11 Reply</b> dated 24.09.2021</p>	<p><b>A.T.R. dated</b> 17.11.2021</p>	<p><b>R11 Reply</b> dated 06.12.2021 (to A.T.R.)</p>	<p><b>JC Report III</b> dated 20.11.2021</p>	<p><b>R11 Reply</b> dated 06.12.2021 (to JC Report-III)</p>	<p><b>A.T.R. dated</b> 13.12.2021</p> <p>first time 23<sup>rd</sup> September, 2021 direction.</p> <ul style="list-style-type: none"> <li>Unit maintains dry condition in storm water drains on non-rainy days.</li> </ul>	<p><b>R11 Reply</b> dated 18.01.2022</p> <p>Respondent No.11 had already confirmed compliance of same view its letter dated 2<sup>nd</sup> November, 2021.</p>	<p><b>Summary of R11's</b> submissions</p>
<b>D. Contentions &amp; Objections on non-functioning of RO Plant</b>										
<p><b>VI.d.(k), Page 22-23</b></p> <ul style="list-style-type: none"> <li>RO was not in operation on day of R4 inspection.</li> <li>Treated effluent was directly discharged without treating in RO</li> <li>Outlet of ETP did not meet</li> </ul>	<p><b>Ground D, Pages 8-9</b></p> <ul style="list-style-type: none"> <li>ETP-RO plant was fully functional, as evident from the Logbook and Report</li> <li>R11 treats all effluents – this is a bald statement contrary to records.</li> </ul>	<p><b>II.c, Page 11</b></p> <p>recorded that R11 is compliant.</p>	<p><b>Para 19.10, Page 19</b></p> <p>R11 reiterated compliance and undertook to remain so.</p>	<p><b>No reference.</b></p> <p>Bald statement that R11 is delaying the matter to evade payment of EC</p>	<p><b>Paras 13-22, pages 4-5</b></p> <ul style="list-style-type: none"> <li>A.T.R. is non-speaking.</li> <li>A.T.R. is incorrectly alleging R11 of dilatory tactics.</li> </ul>	<p><b>Sl. 12, Page 7</b></p> <ul style="list-style-type: none"> <li>No specific reference.</li> <li>R11 was non-compliant during the JC's visit for which EC is liable.</li> <li>Present compliance will not absolve R11</li> </ul>	<p><b>Grounds A-E, I – Pages 4-5,8</b></p> <p>Submissions of R11 are not met</p>	<p><b>No reference to contentment of RO plant not being in operation.</b></p> <p><b>Sl. 4, Page 5</b></p> <ul style="list-style-type: none"> <li>Unit is not discharging effluent.</li> </ul>	<p><b>Sl. 4, Page 4</b></p> <p>R11 is compliant and would remain compliant.</p>	<ul style="list-style-type: none"> <li>No EC is leviable as there is no contravention.</li> <li>No untreated effluent was ever discharged outside the factory premises.</li> <li>Statements are mere averments.</li> <li>Reports do not</li> </ul>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
APPCB standards.	<ul style="list-style-type: none"> <li>Reports analyzing samples for 2020 proved that outlet of treated water met APPCB standards.</li> <li>Water samples drawn violate procedures</li> </ul>					from past violations. <ul style="list-style-type: none"> <li>Objections need not be considered.</li> </ul>				<ul style="list-style-type: none"> <li>consider evidences pressed by R11</li> <li>It is settled law that non-speaking orders are infirm and must be set aside.</li> <li>Water Samples drawn on 18.06.2020 are not in accordance with Section 21 of the Water (Prevention and Control) Act, 1974.</li> </ul>
<b>E. Contentions &amp; Objections on online Stack monitoring Equipment</b>										
VI.d.(m), Page 23	Ground E, Page 10	Paragraph II.c, Page 11	Paragraph 8, Page 20	No reference.	Paras 13-22, pages 4-5	Sl. 12, Page 7	Grounds A-E, I - Pages 4-5,8	Sl. 7, Page 5	Sl. 7, Page 5	R11 has been compliant all along
R11 complying with stack	R11 reiterated compliance	recorded that R11 is compliant.	R11 reiterated compliance and	Bald contention that R11 is delaying the		No specific reference. R11 was non-		R11 has not provided Online AAQ monitoring station to	New contention cast	JC Reports I, II and III have

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
<p>JC REPORT I dated 01.12.2020</p> <p>emissions and ambient air standards.</p> <p><b>Paragraph IX.10, Page 41</b></p> <p>▪ R11 is compliant.</p>	<p>R11 Reply dated 18.02.2021</p> <p>and undertook to remain so.</p>	<p>JC REPORT II dated 10.08.2021</p> <p><b>Paragraph IV, page 21</b></p> <p>Records that surrounding villages meet National ambient air quality standards</p> <p><b>Paragraph IX. 8, Page 23</b></p> <p>recorded that R11 is compliant.</p>	<p>R11 Reply dated 24.09.2021</p> <p>undertook to remain so.</p>	<p>A.T.R. dated 17.11.2021</p> <p>matter to evade payment of EC</p>	<p>R11 Reply dated 06.12.2021 (to A.T.R.)</p> <p>▪ A.T.R. is non-speaking.</p> <p>▪ A.T.R. is incorrectly contending R11 of dilatory tactics.</p>	<p>JC Report III dated 20.11.2021</p> <p>compliant during the JC's visit for which EC is liable.</p> <p>▪ Present compliance will not absolve R11 from past violations.</p> <p>Objections need not be considered.</p>	<p>R11 Reply dated 06.12.2021 (to JC Report-III)</p> <p>Submissions of R11 are not met</p>	<p>A.T.R. dated 13.12.2021</p> <p>measure PM10 in surrounding villages. This was newly added condition first time meant for all industries as individual industry was already complying with stack emission and ambient standards.</p>	<p>R11 Reply dated 18.01.2022</p> <p>for the very first time.</p> <p>▪ Previous Reports attest to R11's compliance.</p>	<p>Summary of R11's submissions</p> <p>recorded this fact that Records surrounding villages meet National ambient air quality standards.</p> <p>▪ No EC is leviable on this count.</p> <p>▪ During recent inspection on 11<sup>th</sup> Jan, 2022, it was agreed that association will install AAQ monitoring station at Pantapalem Village.</p>

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<p>JC REPORT I dated 01.12.2020</p>	<p>R11 Reply dated 18.02.2021</p>	<p>JC REPORT II dated 10.08.2021</p>	<p>R11 Reply dated 24.09.2021</p>	<p>A.T.R. dated 17.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to A.T.R.)</p>	<p>JC Report III dated 20.11.2021</p>	<p>R11 Reply dated 06.12.2021 (to JC Report-III)</p>	<p>A.T.R. dated 13.12.2021</p>	<p>R11 Reply dated 18.01.2022</p>	<p>Summary of R11's submissions</p>
<p><b>F. Contentions &amp; Objections on Green Belt maintained by 11<sup>th</sup> Respondent</b></p>										
<p>VI.d.(n), Page 23 R11 has developed green belt to an extent 3.5-4 Acres against R4 (APPCB) requirement of 5 Acres (33%)</p>	<p>Ground F, Page 10 R11 is maintaining a total green cover of 9 acres</p> <ul style="list-style-type: none"> <li>▪ 4 acres are located within R11's premises and a compensatory 5 acres are maintained outside factory premises.</li> </ul>	<p>Para IX.10, Page 23</p> <ul style="list-style-type: none"> <li>▪ Units shall develop green belt all along the boundary of the Units and ensure that 33% is covered.</li> </ul>	<p>Paragraph 21, 10, Page 21 R11 reiterated compliance and undertook to remain so.</p>	<p>No reference.</p> <p>Bald contention that R11 is delaying the matter to evade payment of EC</p>	<p>Paras 13-22, pages 4-5</p> <ul style="list-style-type: none"> <li>▪ A.T.R. is unclear.</li> <li>▪ A.T.R. is incorrectly contending R11 of dilatory tactics.</li> </ul>	<p>Sl. 12, Page 7</p> <ul style="list-style-type: none"> <li>▪ No specific reference.</li> <li>▪ R11 was non-compliant during the JC's visit for which EC is liable.</li> <li>▪ Present compliance will not absolve R11 from past violations.</li> <li>▪ Objections need not be considered</li> </ul>	<p>Grounds A-E, I – Pages 4-5,8</p> <p>Submissions of R11 are not met</p>	<p>Sl. 11, Page 5</p> <p>Unit has complied with green belt development. Unit may take up compensatory green belt in public lands as part of CSR Activity.</p>	<p>Sl. 11, Page 6</p> <p>R11 is already compliant and will continue to comply. A Letter to that effect was also submitted.</p>	<ul style="list-style-type: none"> <li>▪ JC report-I stated that R11 was not maintaining adequate green cover.</li> <li>Subsequent reports confirmed this point as complied till ATR report of 13<sup>th</sup> Dec, 2021.</li> <li>Respondent 11 again have reiterated that it has complied this condition earlier as well.</li> <li>▪ R11's objections were not met by the subsequent Reports.</li> <li>▪ No EC is leviable.</li> </ul>

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JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
<b>G. Contentions &amp; Objections on hazardous waste disposal mechanism of 11<sup>th</sup> Respondent's Unit</b>										
<p><b>VI.d.(o), Page 24</b></p> <p>Though there is separate shed hazardous waste found lying in ETP area.</p> <p><b>Para IX.11, Page 41</b></p> <p>Units to comply with effluent discharge standards stipulated by APPCB</p>	<p><b>Ground G, Page 10</b></p> <p>Pictures enclosed do not belong to R11 unit.</p> <p><b>Ground M.11, Page 16</b></p> <p>R11 is compliant and will remain so.</p>	<p><b>II.c, Page 12</b></p> <p>ATFD salts and ETP sludge are stored in separate sheds and disposed to Ramky TSDF, Nellore</p> <p>Thus, the status is recorded as "Complying"</p>	<p><b>Ground D, Pages 10-11</b></p> <p>JC Report II disregards all submissions made by R11.</p> <p>No finding passed on incorrect photographs</p>	<p><b>No reference.</b></p> <p>Bald statement that R11 is delaying the matter to evade payment of EC</p>	<p><b>Paras 13-22, pages 4-5</b></p> <p>A.T.R. is unclear.</p> <p>A.T.R. is incorrectly contending R11 of dilatory tactics.</p>	<p><b>Sl. 12, Page 7</b></p> <p>No specific reference.</p> <p>R11 was non-compliant during JC's visit for which EC is liable.</p> <p>Present compliance will not absolve R11 from past violations.</p> <p>Objections need not be considered.</p>	<p><b>Ground H, Page 7</b></p> <p>JC Report-II records R11 as compliant without corresponding deletion of EC levied under the JC Report-I.</p>	<p><b>Sl. 12, Page 6</b></p> <p>R11 stored the hazardous wastes in a closed room</p>	<p><b>Sl. 12, Page 6</b></p> <p>R11 is compliant and will continue to comply.</p>	<p>The objections were based on incorrect photographs.</p> <p>R11's submissions were not considered, and all the findings on this aspect are infirm as they are non-speaking.</p> <p>No EC is leviable as there is no violation even as per JC Report II.</p>
<b>H. Miscellaneous Contentions/common directions in Reports &amp; Replies made thereto</b>										
<b>H.1. Common directions w.r.t. Fly ash dumped in public lands</b>										
<p><b>VIII.(6), Page 38</b></p> <p>Fly ash was dumped in</p>	<p><b>Ground L, Page 14</b></p> <p>R 11 is not required to</p>	<p><b>VIII.2, Page 20</b></p> <p>JC prayed that all Respondent</p>	<p><b>Para 19.2, Page 17</b></p> <p>R11 agreed to take up JC's</p>	<p><b>No reference</b></p> <p>Bald contention that R11 is</p>	<p><b>Paras 13-22, pages 4-5</b></p>	<p><b>Sl. 12, Page 7</b></p> <p>No specific reference.</p>	<p><b>Grounds A-E, I - Pages 4-5,8</b></p>	<p><b>Sl. 9, Page 5</b></p> <p>The committee observed fly ash dumped towards</p>	<p><b>Sl. 9, Page 6</b></p> <p>Though there was no specific</p>	<p><b>There was never any objections against R.11</b></p>

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
public lands adjacent to R7 & R9, who were directed to dispose it.	reply to this, as no violation is contending against them.	Units may compact the fly ash and cover it to prevent ambient dust.	directions as part of CSR and in good conscience.	delaying the matter to evade payment of EC	<ul style="list-style-type: none"> <li>A.T.R. is unclear.</li> <li>A.T.R. is incorrectly contending R11 of dilatory tactics.</li> </ul>	<ul style="list-style-type: none"> <li>R11 was non-compliant during JC's visit for which EC is liable.</li> <li>Present compliance will not absolve R11 of liability for past violations</li> <li>Objections need not be considered</li> </ul>	Submissions of R11 are not met	North side of M/s Emami Agrotech Limited. All the 7 nos of edible oil industries directed to jointly compact the fly ash and to cover with minimum 10 cm clay/soil cover to prevent ambient dust. Further, it was also acknowledged that Krishnapatnam Edible Oil Refiners Association has issued Purchase Order to cover the area with sand/Granular Sub Base by 28.02.2022 vide P.O. dated 22.11.2021.	contention against the 11 <sup>th</sup> Respondent, the edible oil units have undertaken to fill clay or sand in the Ash for the benefit of society and as part of CSR.	<ul style="list-style-type: none"> <li>As part of CSR, R11 and other units would ensure fly ash dumped on public lands are compacted.</li> </ul>
<b>H.2. Miscellaneous common contentions regarding disposal of spent nickel catalyst</b>										
IX.3, Page 39 Units have not disposed spent nickel catalyst to	Ground M.3, Page 15 No specific contention against R11	IX.3, Page 21 Units have not disposed spent nickel catalyst	Paragraph 21.3, Page 20 No specific contention against R11	No reference Bald contention that R11 is delaying the	Paras 13-22, pages 4-5 A.T.R. is incorrectly	Sl. 12, Page 7 No specific reference.	Grounds A-E, I - Pages 4-5,8	Sl. 3, Page 5 The industry disposed spent nickel catalyst to the authorised vendor for reprocessing duly	Sl. 3, Page 4 R11 are compliant and will continue to comply.	No specific contention was ever levelled against R11 as they are

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
authorized re-processors. Units to comply with the Hazardous Wastes Rules, 2016	to authorized re-processors. Units to comply with the Hazardous Wastes Rules, 2016	to authorized re-processors. Units to comply with the Hazardous Wastes Rules, 2016	matter to evade payment of EC	contending of R11 dilatory tactics.	EC is liable for past violations.	Submissions of R11 are not met	following the manifest system. R11 is fully compliant	compliant with the extant requirements and will continue to comply.		
<b>H.3. Common directions w.r.t. public roads</b>										
IX.12, Page 42	Ground M.12, Page 16	IX.10, Page 23	Para 21.10, Page 21	No reference	Paras 13-22, pages 4-5	Sl. 12, Page 7	Grounds A-E, I - Pages 4-5,8	Sl. 10, Page 5	Sl. 10, Page 6	These are common directions which require concerted action. The directions are not on account of any violation. No EC is leviable.
Public roads surrounding units are in poor condition due to movement of heavy vehicles. All Respondent-units to collectively construct new concrete	R11 is compliant and will remain so.	Public roads surrounding units are in poor condition due to movement of heavy vehicles. All Respondent-units to collectively construct new concrete roads as part of CSR.	R11 is in the process of complying R11 and R9 have jointly undertaken these efforts	Bald contention that R11 is delaying the matter to evade payment of EC	A.T.R. is unclear. A.T.R. is incorrectly contending R11 of dilatory tactics.	No specific reference. R11 was non-compliant during JC's visit for which EC is liable. Present compliance will not absolve R11 of liability for past violations.	Submissions of R11 are not met	Access Road connecting R9 and R11 is not improved. The industry representative informed that there is a land dispute and temporary improvements are under progress.	R11 and R9 undertook the activity of making approach road, provided the necessary approvals are obtained. This direction requires concerted efforts and R11 is pursuing all avenues to	

I	II	III	IV	V	VI	VII	VIII	IX	X	XI
JC REPORT I dated 01.12.2020	R11 Reply dated 18.02.2021	JC REPORT II dated 10.08.2021	R11 Reply dated 24.09.2021	A.T.R. dated 17.11.2021	R11 Reply dated 06.12.2021 (to A.T.R.)	JC Report III dated 20.11.2021	R11 Reply dated 06.12.2021 (to JC Report-III)	A.T.R. dated 13.12.2021	R11 Reply dated 18.01.2022	Summary of R11's submissions
roads as part of CSR.						<ul style="list-style-type: none"> <li>Objections need not be considered.</li> </ul>			comply with the same.	
<b>H.4. Observations justifying levy of EC against R11</b>										
<p><b>IX.(9), Page 41</b></p> <p>JC has assessed EC for serious violations by the Units.</p>	<p><b>Ground M.9, Page 16</b></p> <ul style="list-style-type: none"> <li>R11 has not violated any terms of the consent order.</li> </ul> <p>Contentions are made on incorrect photographs and on wrong facts</p>	<p><b>VIII.8, Page 21</b></p> <p>JC has ascertained EC liability on basis the improvement and non-compliances</p>	<p><b>Paragraph 21.7, Page 19</b></p> <ul style="list-style-type: none"> <li>JC Report II has recorded that R11 is compliant on several aspects.</li> <li>JC Report II ignores R11's objections that they were already compliant and does not consider the submissions made.</li> </ul>	<p><b>Page 7-8</b></p> <p>External Advisory Committee recommended that Respondent Units shall pay EC. The units have already been given ample opportunity and Respondent-Units are only filing objections to delay the process.</p>	<p><b>Paras 13-22, pages 4-5</b></p> <ul style="list-style-type: none"> <li>A.T.R. is unclear.</li> <li>A.T.R. is incorrectly contending of R11 dilatory tactics when they have been disputing the levy of EC on facts and merits.</li> </ul>	<p><b>Sl. 12, Page 7</b></p> <ul style="list-style-type: none"> <li>R11 was non-compliant during JC's visit for which EC is liable.</li> <li>Present compliance will not absolve R11 of liability for past violations</li> </ul>	<p><b>Grounds A-E, I – Pages 4-5,8</b></p> <p>Submissions of R11 are not met</p>	<p><b>Page 18</b></p> <p>R4 Hon'ble NGT direct R11 to remit EC.</p>	<p><b>Ground F, Page 7</b></p> <p>No EC is leviable.</p>	<ul style="list-style-type: none"> <li>In view of above EC shall not be leviable as it does not meet conditions of CPCB regarding imposition of EC.</li> <li>JC &amp; R4 ought to have passed reasoned findings regarding R11's compliance</li> <li>JC &amp; R4 ought to have correspondingly deleted levy of EC wherever R11 was found compliant.</li> </ul>

13. The JC Reports and A.T.R. have also observed that the 11<sup>th</sup> Respondent was compliant in respect of matters such as conduction of mineral oil test on the crude edible oil imported from foreign countries, segregation of hazardous wastes, etc.
14. The A.T.R. Report dated 13<sup>th</sup> Dec, 2021 at point No.14 stated that R-11 shall scrupulously comply with all other recommendations made by the joint committee in its reports dt: 01.12.2020 and 10.08.2021 stating that R-11 is partially complied with the issues pertaining to the individual industry but not yet complied with the directions pertaining to the all units such as raw water, clay / soil cover over the ash dumped in the vacant area, CAAQM station in the nearby village". The points are addressed in aforesaid table for clarity.
15. The 11<sup>th</sup> Respondent submits that the JC Reports are non-speaking because they failed to meet any of the Objections raised by the 11<sup>th</sup> Respondent. The imposition of EC is also erroneous for it is merely based on surmises and conjectures, and thus deserves to be set aside. General directions/statements such as 'Units to comply with effluent discharge standards' and 'Units to maintain proper records for fullers earth (by products) generated and mode of disposal' are not specifically addressed in the above Table-2 as the 11<sup>th</sup> Respondent is already compliant and no contention was ever cast specifically on the 11<sup>th</sup> Respondent as to non-compliance or violation of any of such directions.
16. The 11<sup>th</sup> Respondent prays that they may be allowed to file additional submissions to elaborate on any of the above-referred Reports and Replies, should the need arise over the course of hearings.

**PLACE: Ahmedabad**

**DATE: 26/01/2022**



**FOR THE 11<sup>th</sup> RESPONDENT**

**BEFORE THE HON'BLE NATIONAL  
GREEN TRIBUNAL (SOUTHERN ZONE)  
SOUTHERN BENCH, CHENNAI**

**O.A No. 221/2015**

Isanaka Vedavathi

...Applicant

Versus

Union of India & 10 Others.

...Respondents

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ADDITIONAL TYPED SET OF  
DOCUMENTS  
FILED ON BEHALF OF THE  
11<sup>TH</sup> RESPONDENT**

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