

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

O.A.No.19 of 2013,  
O.A.No.248 of 2016 and  
O.A.No.224 of 2016

Meenavargal Mempattu Sangam

...Applicant

Vs-

The Chief Secretary,  
Government of Tamil Nadu,  
Chennai and others

...Respondents

**Written Submissions filed by 6<sup>th</sup> respondent**

This Respondent respectfully submits as follows:-

This Respondent submits that the effluent from TPL does not contain any hazardous substances and toxic metals. All the units are having effluent treatment plant since inception and are discharging only treated effluent to the sea.

- TPL has three facilities (LAB, HCD & ECH) located at Manali.
  - All the units are having Effluent Treatment Plant since inception.
  - ECH plant was not in operation from April 2013 to Dec 2018.
  - HCD and LAB plant treated effluents were disposed to sea from 2013 to 2018 since ECH plant was not in operation.
  - In HCD Plant, all the raw material and products are basically inorganic in nature and no bio degradable organics is generated from manufacturing process. Effluent generation is mainly from water treatment plant regeneration and contains sodium chlorides. Hence COD present in the effluent will not be more than 100 mg/L at any point of time. The same is clear as per **Annexure No. 2 (Page 12)**.
  - Treated effluents from LAB & HCD plants are recycled and reused in ECH Plant process from the year 2019. The quality of Treated effluent is meeting the prescribed standards.
  - Presently HCD and LAB plants are Zero Liquid Discharge Plants.
  - TPL modified the ECH plant to produce Propylene Oxide in the existing facility.
- Production started from 29.01.2019 with necessary statutory approval.
- Effluent Treatment plant was upgraded and refurbished. ETP is adequate to treat the effluent generated from ECH PO Plant. The quality of Treated effluent is meeting the prescribed standards.

- Continuous online effluent monitoring system is provided for the parameter pH,  
BOD, COD, TSS and flow and monitoring data has been connected to TNPCB / CPCB to monitor the quality of effluent continuously.
- The real time treated effluent quality is displayed in Electronic Display board provided at the entrance of the factory.
- NGT Joint committee observations pertaining to TPL are being complied.
- Applicant has not established any damage to the environment or the ecosystem, much less due to any effluent discharged by TPL.

As a responsible Corporate Citizen and a Wealth Creator for the State and the Country, TPL will continue to explore options to improve the operating conditions to bring down the environment load to the maximum extent possible.

In the light of the above no case is made out by the applicant for any further directions or for award of any compensation.

The respondent prays the Petition may be dismissed

Dated at Chennai this the                      day of February 2022

Counsel for Respondent No.6