

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI.**

Original Application No. 232 of 2017 (SZ)

Mr.S.P. Muthuraman,
S/o S.Ponnusamy,
No.204, Railway Feeder Road,
Sankar Nagar Post – 627 357,
Tirunelveli District.

...Applicant

Vs

The Secretary,
Environment and Forest Department,
Government of Tamil Nadu,
St. George Fort,
Chennai – 600 009 & 4 others.

...Respondents

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Filed by
Thiru. C. Kasirajan,
Advocate,
Chennai.

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...Applicant

-Vs-

1. The Secretary,
Environment and Forest Department,
Government of Tamilnadu,
St. George Fort, Chennai – 600 009.
2. The Member Secretary,
Tamil Nadu Pollution Control Board
No. 76, Anna Salai, Guindy,
Chennai-600032.
3. The Joint-Chief Environmental Engineer,
Tamil Nadu Pollution Control Board,
30/2,"SIDCO" Industrial Estate,
Pettai, Tirunelveli – 627 010.
4. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
30/2,"SIDCO" Industrial Estate,
Pettai, Tirunelveli – 627 010.
5. M/s. Madura Coats Private Limited,
Rep. by its Managing Director,
Papanasam Mill Post
Ambasamudram Taluk
Tirunelveli District - 627 422.

...Respondents

REPORT FILED ON BEHALF OF THE 2ND, 3RD & 4TH RESPONDENTS

TAMILNADU POLLUTION CONTROL BOARD

I, S.Ragupathi, Son of Thiru.R.Sanganan, Hindu, aged about 56 years, having my office at No. 76, Mount Salai, Guindy, Chennai – 600 032 do hereby solemnly affirm and sincerely state as follows:-

S. Ragupathi

1. I am the Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board (TNPCB), Chennai -600 032, and filing this Report on behalf of the 2nd, 3rd & 4th Respondents Board and as such I am well acquainted with the facts of the case from the records.

2. It is respectfully submitted that the present Application has been filed by the Applicant seeking for an order to the Respondents 1 to 4 for taking appropriate legal action against the 5th Respondent for the violation committed by him in running the manufacturing unit without obtaining Consent to Establish and Consent to Operate for the expansion activities and for not renewing the Consent to Operate from 01.01.2006 onwards and other consequential relief. During the pendency of the litigation, the 5th Respondent unit submitted an Application for renewal of the present period 2019-2020 and the 2nd Respondent has been directed by this Hon'ble Tribunal vide its Order dated 24.01.2020 to take appropriate decision in the Application in accordance with law within a period of one month and come with the status and action report taken. Subsequently, vide order dated 28.02.2020, 04.06.2020, 15.07.2020 and 03.09.2020 this Hon'ble Tribunal passed certain directions to the 2nd Respondent towards the pending Application for renewal. In due compliance of the same, the Application has been in accordance with law Consent to Operate has been issued vide Board Proc.No.T5/TNPCB/ F.0787TNV/RL/TNV/ W&A/2020 dated: 17/12/2020, valid upto 31/03/2021 with certain conditions for compliance as stated thereon.

3. It is respectfully submitted that the present Report is filed detailing the steps taken by the answering Respondents towards granting of Consent to Operate which is captured below.

4. It is respectfully submitted that the 5th Respondent unit of M/s.Madura Coats Private Limited, Aladiyur 2 Village, Ambasamudram Taluk, Tirunelveli District vide its letter dated 12.11.2020 has furnished revised Bank Guarantee for Rs.25,00,000/- for the compliance of IIT-Madras Recommendations, valid for a period of one year, as per the Consent Clearance Committee Resolution vide Item No.CCC/CA/11/2020, dated:- 23.05.2020.

5. It is respectfully submitted that with respect to ZLD adequacy report and STP proposal submitted by the 5th Respondent unit and the compliance of IIT-Madras, Chennai Recommendations as reported by the JCEE(M), Tirunelveli letter dated 16.12.2020 are as follows:-

S.No	Recommendations of IIT-Madras, Chennai to the unit	Compliance by the unit
1.	The unit shall restrict the effluent generation to 2500 KLD till it carry out the performance evaluation study of the ZLD system by reputed institutes like IIT, NEERI, etc.	The unit has furnished adequacy of Effluent Treatment Plant & Zero Liquid Discharge System - November 2020 from CES, Anna University in which it was concluded that the ETP with ZLD plant is adequate to treat mercerizing, bleaching & dyeing effluents at the rate of 3750 m³/day .
2.	The unit shall complete the installation of the third ATFD at the earliest and put in operation. However, they may limit the production capacity within the treatability capacity of the MEE & ATFD I&II. Once the third unit has installed TNPCB may review and give appropriate direction.	JCEE(M), Tirunelveli & DEE, Tirunelveli vide letter dated 16.12.2020 has reported that the existing 2 ATFDs of 0.35 m ³ /hr and 0.3 m ³ /hr are in operation. The unit has installed the third ATFD of capacity 1.2 m ³ /hr and put into operation from July' 2020.

3.	The unit shall examine the reason why the sewage quality is like treated water quality (since the BOD of untreated sewage is as low as 5mg/l) and whether any diversion of sewage or dilution of sewage occur within the premises.	JCEE(M), Tirunelveli & DEE, Tirunelveli vide letter dated 16.12.2020 has reported that the ROA of the combined raw sewage collected from the raw sewage collection sump reveals that BOD – 126 mg/l and TSS -68 mg/l. Also, the ROA of the inlet of STP reveals that BOD – 242 mg/l and TSS -32 mg/l. Hence, it is noted that the BOD value of inlet sewage has been increased to 242 mg/l against the value of 5 mg/l earlier noted.
4.	The unit shall provide a new STP and a UF system to recycle or reuse the treated water in the process.	JCEE(M), Tirunelveli & DEE, Tirunelveli vide letter dated 16.12.2020 has reported that the unit is presently operating a STP to treat 300 KLD of sewage. Now, the unit has furnished design adequacy report of Sewage Treatment Plant of Capacity 300 KLD - November 2020 from CES, Anna University in which it was stated that based on the process design furnished, the STP of 300 KLD capacity provided with Moving Bed Biofilm Reactor (MBBR) technology with tertiary treatment system is expected to meet the reuse standards. Also, the unit has furnished time schedule for stage wise completion of STP for 10 month time period.
5	The unit shall provide a revised water balance taking into account the ZLD plant for reuse in the process as well as reuse of treated sewage for flushing and gardening purposes.	JCEE(M), Tirunelveli & DEE, Tirunelveli vide letter dated 16.12.2020 has reported that that the unit has furnished revised water balance by making changes in the domestic water consumption. Accordingly, the domestic water consumption was reduced from 490 KLD to 340 KLD and water consumption for fire hydrant/safety reduced from 595 KLD to 565 KLD. Accordingly, the sewage generation was reduced from 450 KLD to 300 KLD. The unit is yet to comply with the water audit.
6	It is noticed that the unit is using huge quantity of water in the process, washing of machinery etc. Hence, the	The unit has provided EMFM at all of the following three pipelines. 1. The 1 st 6" pipeline is exclusively utilized for

	unit shall provide separate EMFMs to the domestic supply to the colony, domestic supply to the unit, RO permeate reuse and make up water to the process.	safety purpose i.e) water sprinkler for ware house & process house. 2. The 2nd 6" pipeline is utilised for supplying water for fire hydrant stand and domestic purpose. 3. The 12" pipeline is utilised for process colony and canteen. The unit has yet to provide a separate i. EMFM to assess the quantity of water utilised for fresh water requirement for process, ii. EMFM to assess the quantity exclusively domestic consumption and iii. EMFM to assess the quantity utilised for fire hydrant/safety.
7	The unit shall carry out detailed water audit as well as waste audit by a reputed institute like IIT, NEERI, etc., based on the use of water balance and the waste water balance, hazardous wastes generation quantities for the last one year. The study shall reveal the quantity of the water used and the sewage and effluent generation, sludge generation from effluent treatment and also the salt generation, along with the environmental management plan, within a period of three months.	The unit has informed that detailed water audit as well as waste audit will be done through CES, Anna University, Chennai. The unit is yet to comply with the same.
8	The River Thamirabarani and its channel water are being used for drinking and bathing purpose, thus the unit shall take extreme adequate measures not to discharge the effluent/sewage into the channel/the River.	JCEE(M), Tirunelveli & DEE, Tirunelveli vide letter dated 16.12.2020 has reported that the No effluent was found discharged outside the premises into S.K.Channel leading to River Thamirabarani as the discharge pipeline was completely closed both inside and outside the premises from 04/02/2019. Also, the pipeline from which treated sewage was earlier let out for irrigation outside the premises was also removed.



Based on the above, the 2nd Respondent Board has issued Consent to Operate vide Board Proceeding No.T5/TNPCB/F.0787TNV/RL/TNV/ W&A/2020 dated: 17/12/2020, valid upto 31/03/2021 with certain conditions for compliance as stated thereon.

Under the above circumstances, it is humbly prayed that this Hon'ble National Green Tribunal (Southern Zone) may be pleased to pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstance of this case and thus render justice.


JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.
BEFORE ME

VERIFICATION

I, S.Ragupathi, Son of Thiru.R.Sanganan, working as Joint Chief Environmental Engineer, TNPCB, office at No. 76, Anna Salai, Guindy, Chennai – 32, do hereby verify that the above contents are true to the best of my knowledge and belief through records.

Verified at Chennai on this day of January, 2021.


JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

