

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 5th respondent

This Respondent respectfully submits as follows:-

This Respondent submits that the effluent of MPL and the effluent by TPL does not contain any hazardous substances and toxic metals. Both the units are having effluent treatment plant since inception and are discharging only treated effluent to the sea. This respondent Unit – I and II are having Effluent Treatment Plant since inception and discharging only treated effluent to the sea.

- The Plants of MPL were established 3 decades ago and effluent treatment was being done as per the then available technology meeting the then standards.
- Subsequently the norms were being revised by the Regulators and to meet the new standards MPL took various steps to develop new technology.
- Several consultants were engaged, and the COD/BOD reduction was reached in a phased manner. A few years ago, a break-through was achieved and a new bio treatment process was identified, through which MPL has succeeded in bringing down the COD/BOD levels significantly, well below the present norms which is being continuously met by the Company.
- To achieve this the Company also incurred capital expenditure of close to Rs.17 crore for both the Plants and is continuously allocating funds to ensure the ETP is working impeccably, and the effluent meets the norms.
- Online connectivity of effluent parameters viz., COD, BOD, pH, Temperature and TSS to TNPCB and CPCB servers are in place and as such there is continuous monitoring of the parameters by the regulators.
- The effluent contains high calcium chlorides. Due to this the COD analysis

deviation were there and also analysis could not be carried out sometimes. The deviation in COD/BOD analysis due to Chloride interference was studied by NEERI for MPL effluents and devised a modified method, which proved to be successful and gave consistency in the COD results which has been filed as **Annexure No. 3 (Page 73)**.

- CPCB approved the modified method of COD determination, and the method was validated by various institutions and NABL accredited laboratories has been filed as **Annexure No.4 and 5 (Pages 120 and 122)**.
- The effluent samples are collected by TNPCB every month and the values are within the prescribed limits.
- Even as per the averments of the applicant, there are 21 fishery hamlets located in and around the industries and the inhabitants are entirely depending on the sea for their social and economic needs. However the applicant alone is making only sweeping statements and unsubstantiated allegations against MPL and no proof has been submitted by the Applicant to establish that the effluent of MPL has in any manner deteriorated the quality of sea water or the eco system. The Respondents submit that Propylene Glycol which contributes to the COD/BOD in the effluent is not a bio accumulated raw material having low shelf life and is nonharmful to fish as per OECD report/PGMSDS. The OECD report and MSDS are filed as **Annexure 6A and 6B** respectively. (Page No.145 & 152)
- The PCB officials visit the plant periodically and monitor the operations.
- On ZLD, MPL has carried out various feasibility studies based on the recommendation of first Expert Committee appointed by the Hon'ble Bench while admitting the original petition. It may be noted that it was purely recommendatory only, as perhaps the Committee itself had reservations over such a prospect.
- The discussions and consultations have revealed that the effluent contains 4.5 % of calcium chloride, and so technology for ZLD would not be suitable for treatment to achieve ZLD. Moreover, the TDS contents of RO reject will be very high.
- Many renowned institutes have carried out the study and concluded that ZLD is not viable for MPL effluent. Further the technology is not proven and has not

been operated anywhere. The company will explore the possibility of ZLD if it is a technically viable option.

- Reports of various institutes have been submitted already as Annexure No.14 (Page No 759)
- It is important to note that MPL's effluent does not contain any hazardous substances and toxic metals.
- Last but not the least, no untoward incidence or mishap has been reported arising from the effluent discharged by MPL. Even the Petitioner has not given details of any damage to the environment or the eco system, muchless as attributable to MPL effluent.
- The MIA Reports also have not pointed out any violation by MPL or any issues in the marine arising from MPL's treated effluents.
- As a responsible Corporate Citizen and a Wealth Creator for the State and the Country MPL 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 has been made out by the applicant for any further directions or for award of any compensation against this respondent.

Hence it is prayed the Petition may be dismissed .

Dated at Chennai this the day of February 2022



Counsel for Respondent No.5