

**BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN BENCH, CHENNAI  
(Through Video Conferencing)**

**O.A. No. 410/2013 (SZ)**

P.V.Subramanian  
S/o. P.Vellachamy,  
Arasamarathupatti,  
Neelamalaikottai Post,  
Dindigul & 5 others.

... Applicants

**Vs**

The State of Tamil Nadu  
Represented by its Director  
Environment and Forest Department,  
Fort St. George, Chennai and 7 others

... Respondents

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

**Report of the Committee submitted to the Hon'ble NGT in the order  
Dated 28.10.2020 in original application No.410 of 2013 (SZ)**

**REPORT PREPARED BY**

**Er.R.Vijayabaskaran**

**Dr.B.Jeyaraman**

**Dr.R.Chandrasekaran**

**Dr. R.BabuRajendran**

**Dr.P.Thangavel**

**Er.G.Gobi**



**DECEMBER 2020**

etc.

As per the Hon'ble NGT direction in OA No 517/2018, committee consisting of following members scrutinized and approved the report



Dr. R. Babu Rajendran,  
Professor  
Department of Environmental  
Biotechnology,  
School of Environment Science,  
Rharathidasan University, Trichy



Dr. P. Thangavel,  
Professor of Environmental Sciences  
Department of Environmental  
Sciences,  
TNAU, Coimbatore



Er. G. Gobi,  
Executive Engineer, PWD/WRD.,  
Nangangiyar Basin Division  
Palani.



Dr. R. Chandrasekaran  
DML, TNPC Board  
Dindigul



Dr. B. Jeyaraman  
Member  
Appellate Authority,  
Chennai



Er. R. Vijayabaskaran  
ACEE, TNPC Board,  
Chennai.

**The Hon'ble NGT vide order dated: 28.10.2020 in O.A.No 410 of 2013 has directed the following:**

1. To conduct the water as well as soil analysis in the neighbouring areas, after the peak monsoon is over and submit a report regarding the same. If contamination still continues then they are directed to give their recommendations for remediation of these aspects as well as to how this can be dealt with and the grievance of the applicant can be addressed.
  2. To take steps to mitigate the circumstances and disposal of remanant salt left out after manufacturing of Mor Milagai in a scientific manner and also issue necessary guidelines regarding the same.
  3. To consider these aspects and come with a concrete proposal as to how this can be scientifically disposed without causing any damage to the environment.
- I. The Committee submits its reply to the **first direction** "To conduct the water as well as soil analysis in the neighbouring areas, after the peak monsoon is over and submit a report regarding the same". If contamination still continues then they are directed to give their recommendations for remediation of these aspects as well as to how this can be dealt with and the grievance of the applicant can be addressed of Hon'ble National Green Tribunal as follows:

The Committee noted that TNPC Board has collected soil and water samples on 02.12.2020 and sent for analysis. Report is awaited. The committee advised TNPC Board to collect water as well as soil in neighboring areas after peak monsoon is over. TNPC Board has also accepted to collect water as well as soil samples during post monsoon period of April & May 2021 and submit the report of analysis for taking further recommendation if warrented.

II. The Committee submits its reply to the **second direction** “ To take steps to mitigate the circumstances and disposal of remanant salt left out after manufacturing of Mor Milagai in a scientific manner and also issue necessary guidelines regarding the same” of Hon’ble National Green Tribunal as follows:

1. The Committee observed that the MorMilagai units have provided solar evaporation pan to evaporate the waste water arising out of Mor milagai manufacturing process hence the waste water was found to be dried and the remanant salt is collected and stored.
2. The remanant salt collected is sent for disposal to common facility, where the salt is treated and converted into useful products as the salt is nonhazardous as per the report enclosed.

TNPC Board has authorized a common facility located at Vedharanyam to collect the remanant salt generated from the various type of Industries located in TamilNadu for recovery of salt through salt pans. The following guidelines are followed by Mor Milagai units.

- a. All Mor Milagai units should construct elevated solar Evaporation Pan of adequate size prescribed by TNPC Board and maintain it properly.
- b. Mor Milagai unit shall dry all the waste water arising from the manufacturing process in the solar evaporation pan such that the waste water is converted into salt by evaporation.
- c. The Mor Milagai units shall collect the dried salts from solar evaporation pan as and when dried and pack it in leak proof polythene bag.
- d. The Mor Milagai units shall store the polythene bags containing salt in closed shed to avoid any leaching.
- e. The Mor Milagai units shall maintain records for the quantity of salt collected, stored and disposed through the common facility.

- f. Mor Mialgai units shall dispose the dried remanant salt to TNPC Board authorized common facility without accumulation beyond 200 kg.
- g. MorMilagai units either individually or commonly dispose the remanant salt to the common facility.
- h. TNPC Board and SriramapuramTown Panchayat shall monitor the dried remanants for proper disposal regularly by verifying records maintained by the Mor Milagai units as well as physically verifying the intact storage of salt collected.

III. The Committee submits its reply to **third direction** "To consider these aspects and come with a concrete proposal as to how this can be scientifically disposed without causing any damage to the environment" of Hon'ble NGT.

1. The Production quantity, waste water & salt generation details are furnished as follows:

<b>Product</b>		
MorMilagai	600 Kg/Month	300 Kg/15 days
<b>Raw Material</b>		
i. Green Chilli	2000 Kg/Month	1000 Kg/15 days
ii. Salt	200 Kg/Month	100 Kg/15 days
iii. Curd	600 L/Month	300 L/15 days
iv. Water	800 L/Month	400 L/15 days
<b>Trade Effluent</b>		
	80 L/Month	40 L/15 days
<b>Solid Waste</b>		
i. Waste salt from SEP	0.50 Kg/Month	0.25 Kg/15 days
ii. Salt From Drying Yard	10 Kg/Month	5kg/15 days
iii. Waste Chilli	5 Kg/Month	2.50 kg/15 days

From the above details, it is evident that maximum of 10.5 kg of salt is generated per month from each unit. For a period of one year about 126 kg of salt will be generated on an average from each unit.

2. At present the Mor Milagai units are storing the remanant salt in polythene bags. These are kept in closed shed /building. Mor Milagai units disposes the salt through TNPC Board authorized common facility.
3. The present method of disposal itself is a scientific mode of processing the waste salt. The salt is converted again to crystal salt by the common facility. It is further sent for different useful purposes.
4. The present practice of disposal of remanants through solar evaporation pan is found satisfactory.

**Conclusion:**

As per the three direction of the Hon'ble NGT in its order dated:28.10.2020 of O.A.No 410 of 2013,the committee thoroughly examined details and concluded the following:

1. Soil and well water samples are collected from all applicants premises and sent for analysis during monsoon period and shall be collected during post monsoon also.
2. Remanant salt generated are stored in premises of Mor milagai units and instructed through TNPC Board for safe disposal through common facility where it is purified and crystallized so that it can be reused in other industries. Till the remanants are disposed, it should be safely stored inside the premises.
3. The disposal of remanant salt through common facility shall be made mandatory for every industry

**Recommendation of the Committee:**

1. The DEE a member of the committee shall collect water & soil samples in post monsoon period to comply with the direction and also to assess the condition of water and soil quality.
2. The DEE a member of Committee should monitor the Mor Milagai units and ensure proper storage of remanant salts as well as by Sriramapuram Town Panchayat.
3. All the Mor Milagai units shall dispose the remanant Salts only through common facility such that no damage is caused to environment.

# G Lens Innovation Labs Pvt Ltd.

## Test Report

Report No : EN19090013-01

Report Date : 24 Sep 2019

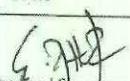
SAMPLE NOT DRAWN BY LABORATORY

Customer Name : Tamilnadu Pollution Control Board  
 Customer Address : Collector Office Campus, Dindigul-624004  
 Sample Description : Salt Residue  
 Sample No : EN19090013-01  
 Sample Identification : Solar Evaporation Pan of Mor Milagai Units  
 Sample Condition : Fit for Analysis  
 Sample Quantity : 2 Kg

Sample Received on : 20 Sep 2019  
 Test Started on : 20 Sep 2019  
 Test Completed on : 24 Sep 2019

### Test Results

Sl.No	Test Name	Test Method	Results	Units	Specification limit as per EPA Chapter Seven for TCLP
1	Arsenic as As	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	5.0
2	Barium as Ba	EPA - 1311/EPA 200.8	3.34	mg/L	100.0
3	Benzene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.5
4	Cadmium as Cd	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	1.0
5	Carbon Tetrachloride	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.5
6	Chlordane	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.01)	mg/L	0.03
7	Chlorobenzene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	100.0
8	Chloroform	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	6.0
9	Chromium as Cr	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	5.0
10	o- Cresol	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.1)	mg/L	200.0
11	m- Cresol	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.1)	mg/L	200.0
12	p- Cresol	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.1)	mg/L	200.0

  
 Authorized Signature:  
**E. Prithvirajan**  
 Manager - Lab

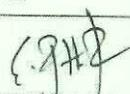
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**Test Report**
**Report No : EN19090013-01**
**Report Date : 24 Sep 2019**

Sl.No	Test Name	Test Method	Results	Units	Specification limit as per EPA Chapter Seven for TCLP
13	Cresol	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.1)	mg/L	200.0
14	2,4-D	EPA 1311/EPA 3510 C/EPA 8151 A	BLQ(LOQ:0.1)	mg/L	10.0
15	1,4-Dichlorobenzene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	7.5
17	1,1-Dichloroethylene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.7
18	2,4-Dinitrotoluene	EPA 1311/EPA 3510 C/EPA 8270 D	BLQ(LOQ:0.1)	mg/L	0.13
19	Endrin	EPA 1311/EPA 3510 C/EPA 8081 A	BLQ(LOQ:0.01)	mg/L	0.02
20	Heptachlor epoxide	EPA 1311/EPA 3510 C/EPA 8081 A	BLQ(LOQ:0.05)	mg/L	0.008
21	Hexachlorobenzene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.13
22	Hexachlorobutadiene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.5
23	Hexachloroethane	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	3.0
24	Lead as Pb	EPA - 1311/EPA 200.8	0.75	mg/L	5.0
25	Lindane	EPA 1311/EPA 3510 C/EPA 8081 A	BLQ(LOQ:0.1)	mg/L	0.4
26	Mercury as Hg	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	0.2
27	Methoxychlor	EPA 1311/EPA 3510 C/EPA 8081 A	BLQ(LOQ:0.1)	mg/L	10.0
28	Methyl ethyl ketone	EPA 1311/EPA 3510 C/EPA 8270D	BLQ(LOQ:0.1)	mg/L	200.0
29	Nitrobenzene	EPA 1311/EPA 3510 C/EPA 8260B	Absent*	mg/L	2.0
30	Pentachlorophenol	EPA 1311/EPA 3510 C/EPA 8041 A	BLQ(LOQ:0.1)	mg/L	100.0
31	Pyridine	EPA 1311/EPA 3510 C/EPA 8260B	BLQ(LOQ:0.1)	mg/L	5.0
32	Seelenium as Se	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	1.0
33	Silver as Ag	EPA - 1311/EPA 200.8	BLQ(LOQ:0.1)	mg/L	5.0
34	Tetrachloroethylene	EPA - 1311/EPA 5030 C	BLQ(LOQ:0.1)	mg/L	0.7

  
 Authorized Signature:  
**E. Prithvirajan**  
 Manager - Lab

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IN THE ORDER DATED 28.10.2020  
IN O.A.NO.410 OF 2013.**

**Advocate for Respondent No. 3 & 4  
Thiru.C. Kasirajan,  
Advocate, Chennai.**

**Date:22 .12 .2020**