

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

O.A. NO. 4 OF 2022 (SZ)

Jaganathasamy,
S/o. Palanigoundar,
No. 959, Narsingapuram,
Krishnapuram Post,
Madathukulam Taluk, Tiruppur District,
Mobile :9940231391
Email: kritika.prabakaran@gmail.com

...Petitioner

-Vs-

The Member Secretary,
The TamilNadu Pollution Control Board,
No. 76, Mount Toad, Chennai – 600 032
Phone: 044-22353145 Email: tnpcb-chn@gov.in & 6 Ors

...Respondents

ADDITIONAL AFFIDAVIT FILED BY THE PETITIONER

I, Jaganathasamy S/o. Palanigoundar, aged about 61 years, residing at No. 959, Narsingapuram, Krishnapuram Post, Madathukulam Taluk, Tiruppur District, having temporarily come down to Chennai, do hereby solemnly affirm and sincerely state as follows:

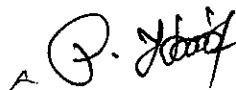
1. I am the Petitioner in the O.A. 4 of 2022 filed before this Hon'ble Forum and as such I am well acquainted with the facts and circumstances of the above case.
2. I submit that I am filing this additional affidavit in order to raise my respectful objections to the report of the Tamil

Page No:
Corrns:



- e. I submit that the contents of Para viii of the said report are false and there is no green belt on the southern side of S. No. 531/2A and further not a single tree is there on the southern side. I further submit that there is no space for the green belt also. I further submit that since the construction is under the High tension Line, there cannot be any green belt under the said high tension line in view of the risk of fire accident.
- f. I submit that the contents of Para x of the said report are false, the undertaking to lay tar road has not been complied till date.
- g. I submit that the contents of Para xi of the said report are false and I submit that on the date of inspection in January 2023, the winds were blowing from East and from April, the winds blow from the West and the readings submitted in the report are not reliable. I submit that a periodical average of readings taken over a period of one year alone will give the exact account of pollution levels in the said area.
- h. I submit that the contents of Para 5 of the said report are false. I submit that the Commercial Tax returns are in no way indicative of the actual output of the concern and reflect only the self-serving values self-declared by the concern. I submit that the brochure of ALMEDIA Company Crusher stating that it has the capacity to produce the output of 51.561 tons per hour is enclosed herewith.

Page No:
Corrns:



4. I submit that I have obtained expert opinion in regard to consumption of electricity in Units for 60 HP Crusher and 15 HP Conveyor totaling to 75 HP for one hour and the same is certified at 56 Units. The said certificate is enclosed herewith. I submit that the output in one hour as per the brochure is 51.561 Tons and for 40 Tons it is only 50 units per day on an average for 30 days, the units total only to 1500 units. However, the petitioner is given to believe that the electricity consumption of the 8th Respondent unit is several times higher than the said figure. I submit that I have applied under the Right to Information Act, 2005 dated 25.3.2023 seeking for the electrical consumption details of the 8th Respondent and ~~I am awaiting~~ the reply for the same *is enclosed*.

5. I humbly submit that the 8th Respondent concern has been downplaying the figures in their Commercial Tax Returns and their Permits obtained and only the report of the TamilNadu Electricity Board in regard to the consumption of electricity in Units alone will bring to light the extent to which the 8th Respondent has camouflaged their output per day in order to escape from the clutches of law and exploit the environment without any regard to the Pollution Control Laws for their personal gains.

It is therefore prayed that this Honble Court maybe pleased to allow the O.A.No. 4 of 2021 and this render justice.)

Solemnly affirmed at Chennai
On this the 15th day of April, 2023

And signed his name in my presence Advocate : : Chennai

(Signature)
Before me
(Signature)
15/2/2023

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INDEX TO TYPED SET OF PAPERS

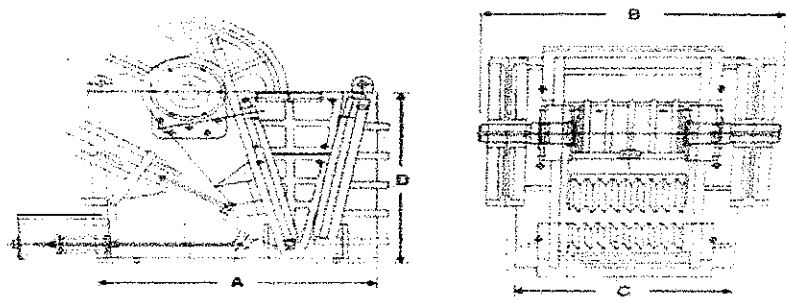
S.No.	Date	Description	Page
1.	-	Brochure for Almeida Brothers Crusher	1
2.	-	Calculation of units consumed for 75 HP for one hour	2
3.	25.03.2023	Application under RTI for EB Bill of the 8 th Respondent with reply	3-4
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It is, hereby certified that the above documents are true copies of their respective originals.

Dated at Chennai on this the 15th day of April 2023


COUNSEL FOR APPLICANT

CRUSHERS AT GLANCE



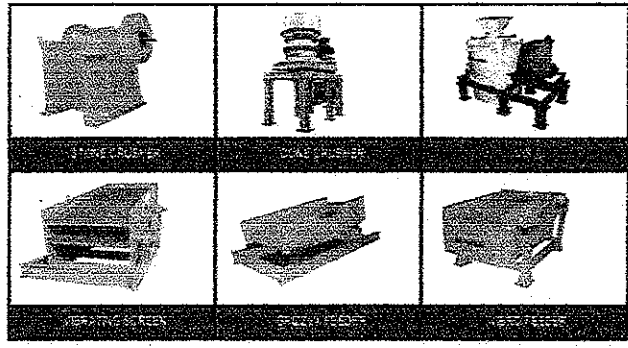
Size	450 x250	400 x250	350 x250	300 x300	250 x300	200 x300	150 x300	100 x300	75 x300	50 x300	30 x300	25 x300	20 x300	15 x300	10 x300	7.5 x300	5 x300
Capacity	1310	1310	1400	1610	1375	1425	1625	1041	1660	1820	1755	1910	1930	2050	2180	2180	2180
Capacity	1390	1390	1480	1650	1365	1750	2000	1675	2360	1720	1700	2065	1778	2410	2605	2605	2605
Capacity	825	825	980	1020	980	1170	1370	1460	1675	1020	1020	1230	1282	1240	1220	1220	1220
Capacity	1260	1260	1660	1735	1860	910	870	863	1015	1735	1710	1720	1447	1905	2135	2135	2135
Capacity	25	25	30	50	30	40	50	40	75	50	60	60	75	100	125	125	125
Capacity	300	300	300	300	330	330	330	330	330	300	275	275	275	280	275	265	265
Capacity	-225	-225	-225	-275	-125	125	-175	-40	-200	-350	-350	-400	-525	-650	-750	-900	-900
Capacity	2.90	2.90	3.90	7.10	4.10	5.70	7.50	4.10	11.50	7.20	8.80	10.50	11.00	17.50	23.00	31.00	31.00

Crushing Capacity in Cubic Mtrs/Hr :

SETTING in mm	5.2	5.2	9.9	-	12.0	14.0	16.0	-	-	-	-	-	-	-	-	-	-
5.8	5.8	5.8	10.5	14.2	13.2	15.5	17.5	-	-	-	-	-	-	-	-	-	-
6.4	6.4	6.4	11.8	15.4	14.5	17.0	19.0	-	-	19.0	-	-	-	-	-	-	-
8.5	8.5	8.5	15.0	19.0	-	-	-	-	-	26.0	32.0	-	-	-	-	-	-
-	-	-	17.0	22.0	-	-	-	-	-	29.0	37.0	45.0	45.0	-	-	-	-
-	-	-	26.0	-	-	-	-	-	-	35.0	144.0	54.0	54.0	80.0	-	-	-
-	-	-	-	-	-	-	-	-	-	41.0	52.0	63.0	63.0	100.0	120.0	150.0	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	135.0	170.0	195.0	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	185.0	230.0	265.0	-

All Dimensions are in mm (approx.)

1 Brass=2.83cu.m=100cft=4.56ton



- Our Products List**
- > Stone Crushers
 - > Cone Crushers
 - > Vertical Shaft Impactors
 - > Vibrating Screen
 - > Grizzly Feeder
 - > Vibro Feeder
 - > Reciprocating Feeder
 - > Spare parts & Accessories

ALMEIDA BROTHERS

Mfrs. & Exporters of Jaw Crushers (Stone Crushers) & Accessories
 Work: Opp. Hd. Vketan, Near Kolan Nagar, J.M. Road, Bandrup (W), Mumbai-400078 | Tel: 25946034 / 9222065519
 Email: almeidabrothers2011@gmail.com | Website: www.kdshet.com/almeidabrothers

60 HP Power

2.83 cu. m = 100 cft = 4.56 ton

32.00 cu. m ÷ 2.83 X 4.56 = 51.561 Tons

1 HP = 746 Watts/ 1Hr


1000 Watts = 1 units/ 1 Hr

75 HP = 55,950 WATTS/1Hr

(60+15Hp)

75 Hp = 55.9 units

EB consumption = 56 Units/

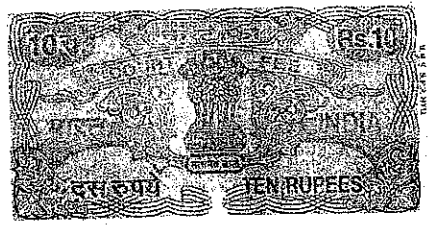

N. DHANDAPANI,
ELECTRICAL CONTRACTOR,
ESB : 1869, Dt.: 11.8.11 - 10.08.23
C.19232, Dt.: 04.10.94 - 03.10.26
1A3, Ganeshapuram,
Madathukulam - 642 113

உணர் சிபிஎம் உரிமைக்காக 2005 விநியோகம்.

3

அனுப்புகள்: P. ஜெனாத்தாஸ் தொல். 8270 335865 25.03.2023

8/26/2005
959. நரசிம்மையன்
கிஷோரியன் (P)
புத்தூர் (T.K)



உயரநாயகர்: - திரு. ஜெனாத்தாஸ் அய்யர்
தேயர் உயர்நாயகர்
சென்னை
அதிகாரம் உரிமைக்காக 2005 விநியோகம்
உயர்நாயகர்
உணர்

உயர்,

உணர் உரிமைக்காக 2005 விநியோகம்

அனுப்புகள் கிஷோரியன் இ உரிமைக்காக
03310011346 உ. விக்கிரம (அனுப்புகள்)
உணர் உரிமைக்காக 2005 விநியோகம்
உயர்நாயகர் உரிமைக்காக 2005 விநியோகம்
அனுப்புகள் உரிமைக்காக 2005 விநியோகம்
அனுப்புகள் உரிமைக்காக 2005 விநியோகம்

25/03/23

RT#172661751N IVR:8284417266175
 RL UDAMPET H.O (642126)
 Counter No:1,25/03/2023,11:29
 To:POORJ THESAVAL, TANGEDCO UNIT
 PIN:642126, Udampet H.O
 From:JEBANATHASAMY, NARASINGAPURAM
 Wt:20gms
 Amt:25.00(Cash)
 (Track on www.indiapost.gov.in)
 (Dial 18002666868) (Wear Masks. Stay Safe)



தமிழ்நாடு மின் உற்பத்தி மற்றும் பகிர்மானக் கழகம் லிமிடெட் 5

(இணையதளவழி மின் கட்டணம் முறை)

மின் கட்டணம் ரசீது

பெயர் : S.VIGNESH

மின். இ. எண்: 03310011346

கட்டண முறை : BHARAT BILL PAYMENT SYSTEM

இரசீது எண் : PGIBP183621453

நாள் : 20/02/2023 18:10:55

வ.எண்	கட்டணம் விவரம்	தொகை (ரூ.)
1	23100-CC Charges	58586.00
	மொத்தம்	58586.00

தொகை (எழுத்தால்) ரூ. Fifty Eight thousand Five hundred Eighty Six only

இதர விவரங்கள் :

1.TANGEDCO CIN No. : U40109TN2009SGC073746

*இது கணினியில் உருவாக்கப்பட்ட ஆவணம்

2.TANGEDCO GST No. : 33AADCT4784E1ZC

தனி ஒப்புக்க தேவையில்லை

3.HSN CODE : 27160000

*இது வங்கி ஒத்திசைவுக்கு உட்பட்டது

4.SAC CODE : 996912

5.ELECTRICAL ENERGY & DISTRIBUTION SERVICES ARE EXEMPTED UNDER GST

தமிழ்நாடு மின் உற்பத்தி மற்றும் பகிர்மானக் கழகம் லிமிடெட்

(இணையதளவழி மின் கட்டணம் முறை)

மின் கட்டணம் ரசீது

பெயர் : S.VIGNESH

மின். இ. எண்: 03310011346

கட்டண முறை : TANGEDCO PAYMENT PORTAL

இரசீது எண் : PGNSBI15614145

நாள் : 20/03/2023 16:05:21

வ.எண்	கட்டணம் விவரம்	தொகை (ரூ.)
1	23100-CC Charges	81849.00
	மொத்தம்	81849.00

தொகை (எழுத்தால்) ரூ. Eighty One thousand Eight hundred Forty Nine only

இதர விவரங்கள் :

1.TANGEDCO CIN No. : U40109TN2009SGC073746

*இது கணினியில் உருவாக்கப்பட்ட ஆவணம்

2.TANGEDCO GST No. : 33AADCT4784E1ZC

தனி ஒப்புக்க தேவையில்லை

3.HSN CODE : 27160000

*இது வங்கி ஒத்திசைவுக்கு உட்பட்டது

4.SAC CODE : 996912

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(இணையதளவழி மின் கட்டணம் முறை)

மின் கட்டணம் ரசீது

பெயர் : S.VIGNESH
மின். இ. எண் : 03310011346
இரசீது எண் : PGNSBI14911513

கட்டண முறை : TANGEDCO PAYMENT PORTAL
நாள் : 17/11/2022 20:42:11

வ.எண்	கட்டணம் விவரம்	தொகை (ரூ.)
1	23100-CC Charges	64547.00
	மொத்தம்	64547.00

தொகை (எழுத்தால்) ரூ. Sixty Four thousand Five hundred Forty Seven only

இதர விவரங்கள் :

1.TANGEDCO CIN No. : U40109TN2009SGC073746

2.TANGEDCO GST No. : 33AADCT4784E1ZC

3.HSN CODE : 27160000

4.SAC CODE : 996912

5.ELECTRICAL ENERGY & DISTRIBUTION SERVICES ARE EXEMPTED UNDER GST

*இது கணினியில் உருவாக்கப்பட்ட ஆவணம்

தனி ஒப்புக்கே தேவையில்லை

*இது வங்கி ஒத்திசைவுக்கு உட்பட்டது

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(இணையதளவழி மின் கட்டணம் முறை)

மின் கட்டணம் ரசீது

பெயர் : S.VIGNESH
மின். இ. எண் : 03310011346
இரசீது எண் : PGIBP178992429

கட்டண முறை : BHARAT BILL PAYMENT SYSTEM
நாள் : 19/12/2022 19:37:44

வ.எண்	கட்டணம் விவரம்	தொகை (ரூ.)
1	23100-CC Charges	64247.00
	மொத்தம்	64247.00

தொகை (எழுத்தால்) ரூ. Sixty Four thousand Two hundred Forty Seven only

இதர விவரங்கள் :

1.TANGEDCO CIN No. : U40109TN2009SGC073746

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தனி ஒப்புக்கே தேவையில்லை

*இது வங்கி ஒத்திசைவுக்கு உட்பட்டது

Revised Tariff rates with effect from 10.09.2022 Approved rate and payable by the Consumer
(Category of Consumers * Fully / # Partly subsidised by the Government)

I - High Tension supply

Tariff	Category of Consumers	TARIFF FIXED BY TNERC		TARIFF PAYABLE BY THE CONSUMER	
		Energy Charges (Rs/unit)	Demand Charges (Rs/kVA/month)	Energy Charges after Govt's subsidy (Rs/unit)	Demand Charges after Govt's subsidy (Rs/kVA/month)
I	Industries, Factories, Information Technology services	6.75	550	6.75	550
II A	Govt. Educational Institutions, Govt. Hospitals, Railway Traction, CMRL, Lift Irrigation Societies etc.,)	7.00	550	7.00	550
	Lift Irrigation Co-op Societies	7.00	550	0.00	0
II B	Private Educational Institutions & its hostels, Segregated Medical colleges)	7.50	550	7.50	550
III	Miscellaneous categories	8.50	550	8.50	550
IV	Construction activities and other Temporary purposes	12.00	550	12.00	550
V	Public EV charging Stations				
	05.00 to 10.00 & 14.00 to 18.00 Hours	10.00	550	10.00	550
	10.00 to 14.00 & 23.00 to 05.00 Hours	8.00		8.00	
	18.00 to 23.00 Hours	12.00		12.00	

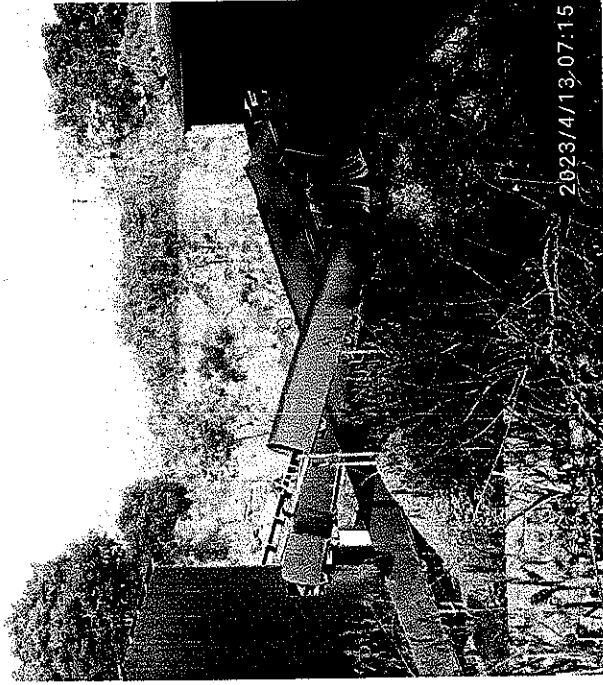
II - Low Tension Supply

Tariff	Category of Consumers & slabs	Energy Charges (Rs/unit)	Fixed Charges for two months (Rs)	Energy Charges after Govt's subsidy (Rs/unit)	Fixed Charges for two months after Govt's subsidy (Rs)
#I-A	Domestic, Multitenements, Old age homes, Handlooms				
	Consumption upto 500 units bi-monthly				
	(100 units free scheme)				
	0-100 units	4.50	0	0	0
	101-200 units	4.50	0	2.25	0
	201-400 units	4.50	0	4.50	0
	401-500 units	6.00	0	6.00	0
	Consumption above 500 units bi-monthly				
	(100 units free scheme)				
	0-100 units	4.50	0	0	0
	101-400 units	4.50	0	4.50	0
	401-500 units	6.00	0	6.00	0
501-600 units	8.00	0	8.00	0	
601-800 units	9.00	0	9.00	0	
801-1000 units	10.00	0	10.00	0	
Above 1000 units	11.00	0	11.00	0	
For Handlooms in residence, 0 to 300 units bimonthly is free. (Above 300 units bi-monthly, the corresponding slab in the domestic tariff is applicable)					
*I-B	Huts in village panchayats, TAHDCO:- Till installation of meters (Fully subsidised by the Govt.)	0	600/service	0	0
	On installation of meters (Fully subsidised by the Govt.)	9.13	0	0	0
I-C	L.T. Bulk supply with single point metering	8.00	200/service	8.00	200/service
I-D	Common facilities in Multitenements	8.00	200/kW	8.00	200/kW
II-A	Public lighting, water supply provided by Govt./Local bodies	8.00	200/kW	8.00	200/kW
II-B(1)	Govt Educational Institutions, its hostels, Govt. Hospitals, other hospitals rendering totally free services				
	0-50 KW	8.00	200/KW	8.00	200/KW
	Above 50 KW- 112KW	8.00	650/KW	8.00	650/KW
	Above 112 KW (CT Service)	8.00	550/KW/month	8.00	550/KW/month
II-B(2)	Private Educational Institutions & its hostels, Segregated Medical colleges)				
	0-50 KW	8.50	200/KW	8.50	200/KW
	Above 50 KW- 112KW	8.50	650/KW	8.50	650/KW
	Above 112 KW (CT Service)	8.50	550/KW/month	8.50	550/KW/month
#II-C	Actual Places of Public worship (Bi-monthly)				
	0-120 units	5.75	200/Kw	2.85	200/Kw
	Above 120 units	7.00	200/Kw	7.00	200/Kw
III-A(1)	Cottage and Micro Industries				
	upto 500 units	4.50	140/kW	4.50	140/kW
above 500 units	6.50	6.50			
#III-A(2)	Power Looms				
	(1000 units bimonthly is free)				
	upto 500 units	6.50	200/kW	0	0
	501-750 units	7.50		0	0
	751-1000 units	7.50		0	0
1001-1500 units	7.50	4.15		100/kW	
above 1500 units	7.50	5.30			
III-B	Industries, Information technology services				
	0-50 KW	7.50	150/KW	7.50	150/KW
	Above 50 KW- 112KW	7.50	300/KW	7.50	300/KW
	Above 112 KW (CT Service)	7.50	550/KW/month	7.50	550/KW/month
*IV	Agriculture and Allied activities - Till installation of meters (Fully subsidised by the Govt.)	0	Rs.3550/HP/Annuni	0	0
	On installation of meters (Fully subsidised by the Govt.)	4.46	0	0	0
V	Miscellaneous /General purpose (Not covered under LT-I-A, I-B, I-C, I-D, II-A, II-B(1), II-B(2), II-C, III-A(1), III-A(2), III-B, IV, VI and VII)				
	consumption upto 100 units bi-monthly	0			
	100 units	6.00	200/kW	6.00	200/kW
	consumption above 100 units bi monthly (for all units)				
	0-50 KW	9.50	200/kW	9.50	200/kW
	Above 50 KW- 112KW	9.50	600/kW	9.50	600/kW
	Above 112 KW (CT Service)	9.50	550/KW/month	9.50	550/KW/month
VI	Construction activities and other Temporary purposes	12.00	550/KW/month	12.00	550/KW/month
VII	Public EV charging Stations				
	05.00 to 10.00 & 14.00 to 18.00 Hours	10.00		10.00	
	10.00 to 14.00 & 23.00 to 05.00 Hours	8.00		8.00	
	18.00 to 23.00 Hours	12.00		12.00	
	0-50 KW		200/kW		200/kW
	Above 50 KW- 112KW		600/kW		600/kW
	Above 112 KW (CT Service)		550/KW/month		550/KW/month

NO GREEN BELT
EASTERN SIDE

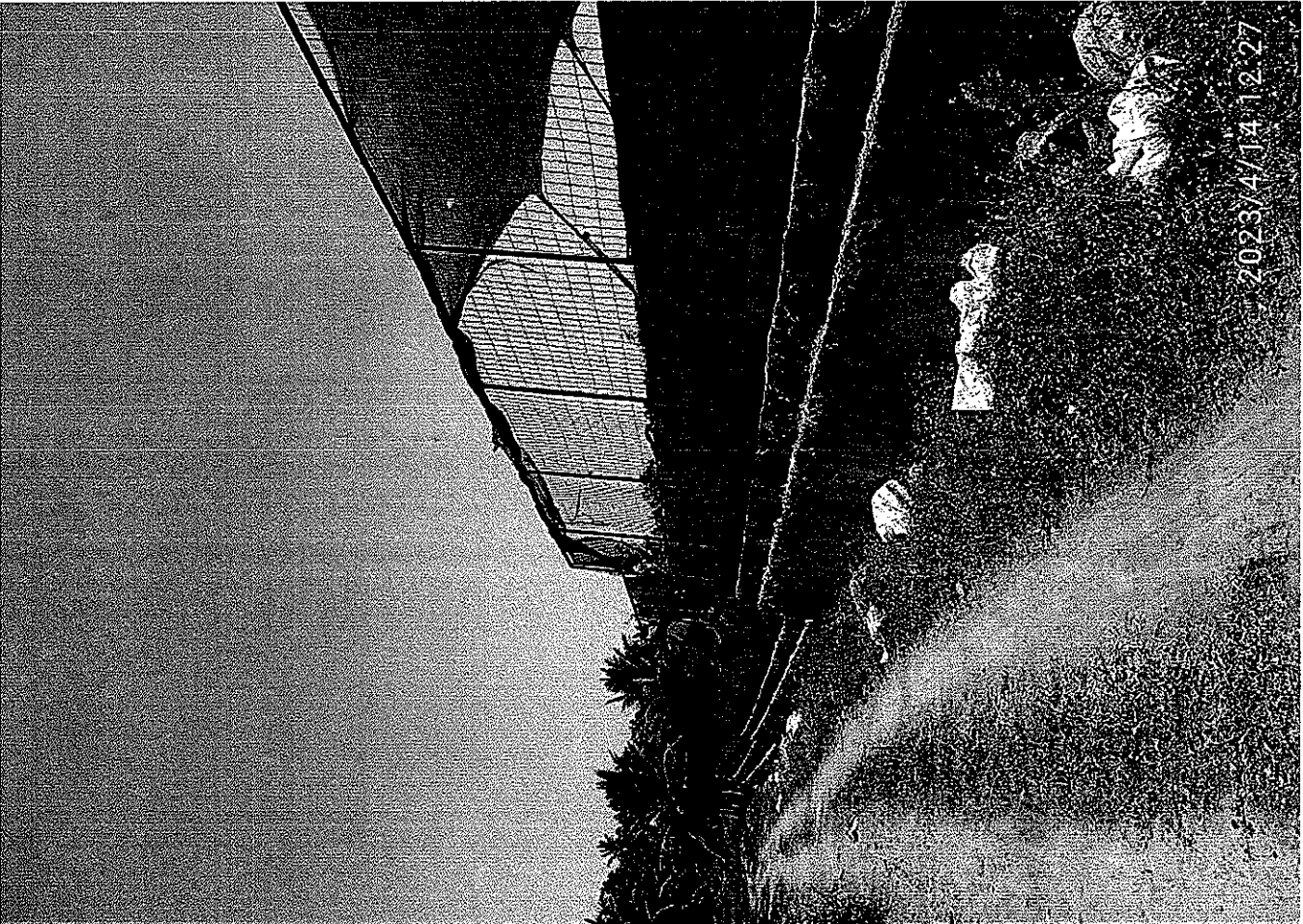
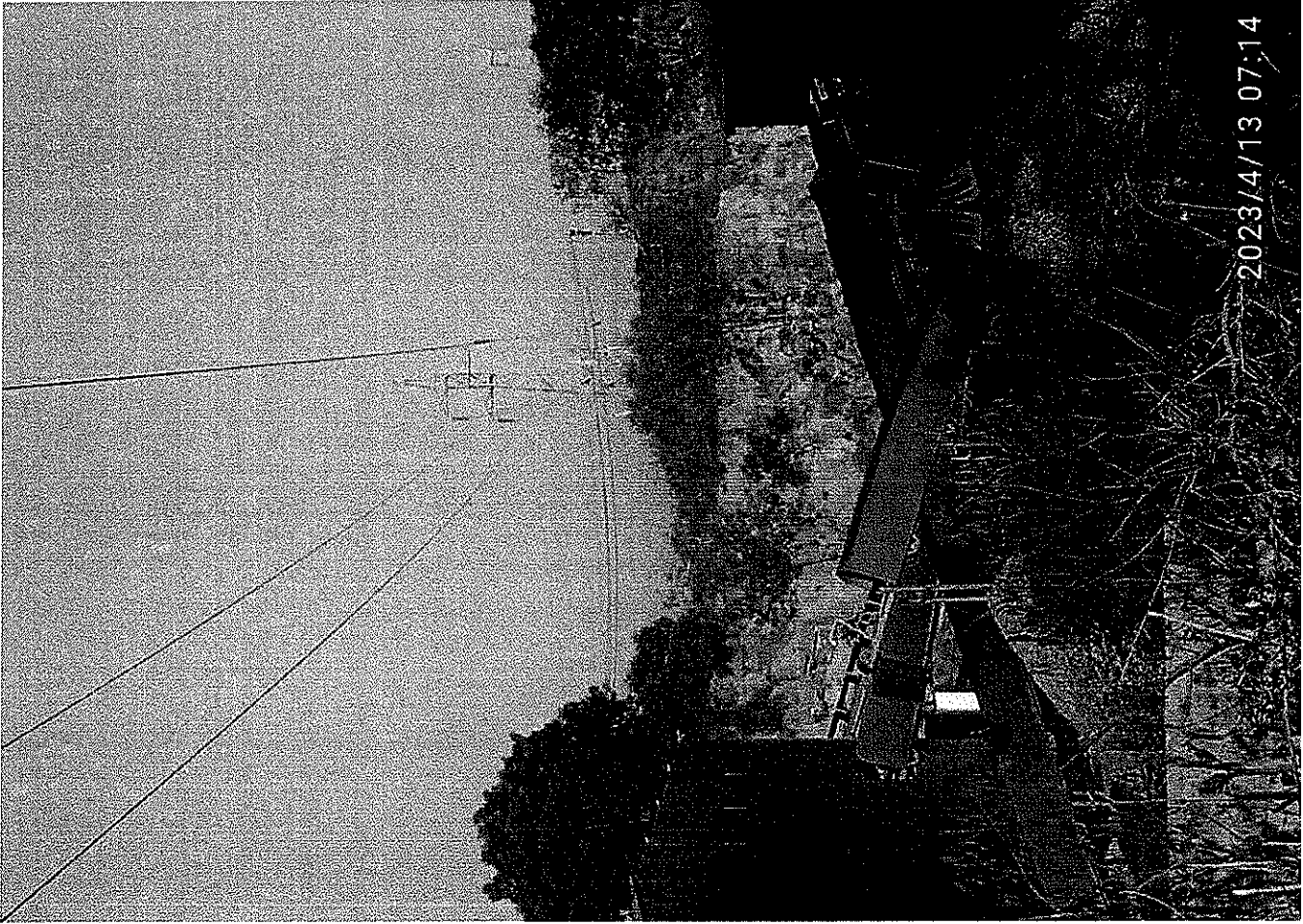


WESTERN SIDE
NO COMPOUND WALL/GREEN
BELT



TAR ROAD - NOT
COMPLETED





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

O.A. NO. 4 OF 2022 (SZ)

Jaganathasamy,
S/o. Palanigoundar,
No. 959, Narsingapuram,
Krishnapuram Post,
Madathukulam Taluk, Tiruppur
District,
Mobile :9940231391
Email: kritika.prabakaran@gmail.com

...Petitioner

-Vs-

The Member Secretary,
The TamilNadu Pollution Control
Board,
No. 76, Mount Toad, Chennai – 600
032
Phone: 044-22353145 Email: tnpcb-chn@gov.in & 6 Ors

...Respondents

TYPED SET OF PAPERS

KRITIKA KAMAL.P
9940231391
COUNSEL FOR APPLICANT