

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

Appeal No.77 of 2022 (SZ)

M/s Varalakshmi Starch Industries (P) Ltd.
Rep. by its Director, Salem.

...Appellant

Vs

Tamil Nadu Pollution Control Board
Rep. by its Chairperson,
76, Anna Salai, Guindy,
Chennai – 32 and ors.

...Respondent

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**Filed by
Thiru. S. Sai Sathya Jith,
Advocate, Chennai.**

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ADDL. REPORT FILED ON BEHALF OF THE 1st to 3rd RESPONDENTS
TAMIL NADU POLLUTION CONTROL BOARD

I, R.Rajamanickam, S/o. P.M.Ramasamy, Hindu, aged about 58 years, having my office at 76, Mount Salai, Guindy, Chennai-600032, do hereby solemnly affirm and sincerely state as follows:-

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

2) It is respectfully submitted that the respondent has read the rejoinder affidavit filed by the appellant to the reply affidavit filed by this respondent, affidavit stating the directions issued by this respondent and stage of compliance/time frame for compliance and denies each and every one of the averments and allegations contained therein, except those that are specifically admitted herein.

3) With regard to the standards generally prescribed for discharge of treated effluent on land/water body, it is respectfully submitted that this Respondent generally prescribes stringent inland surface water standard for the discharge of treated effluent on land for gardening/Irrigation. In-land surface water standard may possibly have meant for the standards prescribed for discharging the treated effluent in to any of the running water course so as to


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have better dilution on mixing and to avoid any contamination of the receiving water body.

4) It is respectfully submitted that earlier, consent to the industries were issued to discharge their treated effluent with the inland surface water standards only. Later, to protect the water body from pollution, this respondent decided not to allow any industries to discharge their effluent into any water body and maintains with the inland surface water standards, though it uses for gardening/irrigation.

5) It is respectfully submitted that, furthermore, in Tamilnadu there is no perennial water course running for dilution of effluent if discharged in to the water body.

6) With regard to the calculation to determine whether the land is sufficient to discharge treated effluent of unit, it is respectfully submitted that the land requirement of a unit to discharge treated effluent is calculated at the rate of 35 KL/Hectare / day considering the soil condition including its porosity so as to avoid any ponding or stagnation, while using for irrigation.

7) With regard to the sufficiency of the land for discharge and the basis of the calculation, it is respectfully submitted that the total extent of land as per the application submitted by the unit for the consent of the Board is 32.86 Hectares.

- Ground coverage area, which includes building and other amenities of the industry-17.45 Hectares.
- Green Belt/Irrigation area of the industry-15.41 Hectares.
- Consented quantity of Trade effluent generation & disposal is 500.1 KLD.

Hence, the area required for discharge of trade effluent as per the hydraulic loading rate of 35 KL/Hec/day is

$$\begin{aligned} &=500.1/35 \\ &=14.2886 \text{ Hectares.} \end{aligned}$$

Hence the available land for developing green belt/irrigation as declared by the unit is sufficient to utilize the treated effluent for gardening /irrigation.


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8) With regard to the distance from the unit to the nearest water channel and with specific distance to the discharge point, it is respectfully submitted that the the Peeniyaru channel is running very adjacent to the boundary of the unit.

The area in which the unit discharges the treated trade effluent for green belt development is also located very adjacent and there is no buffer between the unit boundary and the peeniyaru channel. Topo View of the Google image showing the location of ETPs, storage yard, drying yard, rain water harvesting pond is enclosed herewith as **Annexure I**.

9) With regard to normal buffer from water bodies when units are applied inland water standards instead of land Irrigation standards, it is respectfully submitted that there is no preference for the industries to opt for the discharge standards for utilization of treated effluent.

10) It is respectfully submitted that there is no such buffer area prescribed from water bodies, while issuing consent order. However, the unit shall ensure that there shall not be any discharge of effluent either directly or indirectly in to the water course to avoid any pollution.

11) It is respectfully submitted that to restrict the industries to setup near water courses and to avoid any discharge in to water courses, the Govt. of Tamil Nadu in its order in G.O No.213 dated 30.3.1989 and G.O No.127 dated 08.05.1998 prohibits the establishment of the 14 types of Industrial activities (including Sago industries) within 1 Km and 5 Km from the notified Rivers/Water bodies respectively.

12) It is respectfully submitted that in general, inland surface water standards only prescribed for all the effluent generating industries irrespective of mode of disposal such as Recycling to process/On land for gardening/Solar evaporation Pan.

13) It is respectfully submitted that most of the sago industries in Dharmapuri District are been issued with consent order to discharge the treated effluent prescribing the inland surface water standards only.


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Under the above circumstances, it is humbly prayed that this Hon'ble National Green Tribunal 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.


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TAMIL NADU POLLUTION CONTROL BOARD
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BEFORE ME

VERIFICATION

I, R.Rajamanickam, S/o. P.M.Ramasamy, working as Additional Chief Environmental Engineer, having office at No. 76, Anna Salai, Guindy, Chennai – 32, do hereby submit that the above contents are true to the best of my knowledge and belief through records.


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Annexure



tippi storage yard

ETP

ETP

Varalakshmi Starch Industries (p)

Tippi drying yard-1

Royal Fashions

Rainwater harvesting pond

Pari's Stock Mill

Kaviya Garden

328

Tippi drying yard 2

Image © 2023 Airbus

Imagery Date: 3/7/2023 11°53'44.69" N 78°22'31.03

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BOARD.**

**Advocate for Respondent: TNPCB
Thiru. S. Sai Sathya Jith,
Advocate, Chennai.**

Date:17.05.2023.

Date of hearing on:19.05.2023.