

**BEFORE THE NATIONAL GREEN TRIBUNAL**  
**SOUTHERN ZONE, CHENNAI**  
**Original Application No. 08 of 2021 (SZ)**

**IN THE MATTER OF:**

Meenava Thanthai K.R. Selvaraj  
Kumar, Meenavar Nala Sangam,  
Rep., by its President,  
M.R. Thiyagarajan

...Applicant(s)

**Verses**

State of Tamil Nadu and others.

....Respondent(s)

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**(Dr. S. Sankar)**  
Professor & Head  
Department of Environmental Health Engineering,  
Sri Ramchandra Institute of Higher Education and Research  
Chennai (**Joint Committee- Nodal Agency TNSEIAA**)

**REPORT OF THE JOINT COMMITTEE IN THE MATTER OF ORIGINAL APPLICATION NO. 08 OF 2021 (SZ) TITLED AS MEENAVA THANTHAI K.R. SELVARAJ KUMAR, MEENAVAR NALA SANGAM VS STATE OF TAMIL NADU AND OTHERS IN COMPLIANCE OF THE HON'BLE ORDER DATED 11-1-2021**

**1. Background**

**Hon'ble NGT Order dated 11-01-2021:**

The Hon'ble NGT, Southern Bench in the matter of OA No. 08 of 2021 (SZ) vide order dated 11-01-2021 has constituted a Joint Committee to inspect the institution in question and submit a factual as well as action taken report, if there are any violations found. The directions of NGT are reproduced below:

10. In order to ascertain the genuineness of the allegations made and also the violations alleged, we feel it appropriate to appoint a joint committee comprising of (1) The District Collector, Madurai District or a Senior Officer not below the rank of Sub Divisional Magistrate or Assistant Collector as deputed by the District Collector (2) a Senior Officer from Ministry of Environment, Forests and Climate Change (MoEF & CC) Integrated Regional Office, Chennai (3) a Senior Officer from Tamil Nadu State Environment Impact Assessment Authority (TNSEIAA) and (4) a Senior Officer from Tamil Nadu State Pollution Control Board (TNPCB) as designated by its Chairman to inspect the institution in question and submit a factual as well as action taken report, if there are any violations found.

11. The committee is directed to ascertain as to whether the Bio-Medical waste generated are properly collected, segregated and disposed of in a scientific manner, whether the Bio-Medical liquid that has been generated is being properly treated or whether it is being discharged into the drains without treatment, whether the treatments discharged meet the norms before it is being let in, whether there is any violation of environmental conditions imposed in the environmental clearance granted and whether any fresh construction is being done without obtaining necessary environmental clearance as required under the EIA Notification, 2006 and if there is any damage caused on account of the any of the illegalities and violations committed by them then, the committee is directed to assess the environmental compensation apart from taking any legal action as provided under the respective environmental laws.

12. The committee is also directed to conduct the soil as well as water quality test in the drain and whether on account of the illegal activities, contamination has been caused to the water in the nearby areas and if so, what are all the remedial measures required for restoring the same to its original position.

13. The Tamil Nadu State Environment Impact Assessment Authority (TNSEIAA) will be the nodal agency for co-ordination and for providing necessary logistics for this purpose.

The NGT vide its order dated 10-06-2021 has granted some more time to the Committee and directed to submit the report by 22-07-2021.

## 2. Joint Committee

The SEIAA, Tamil Nadu, as the nodal agency, requested all concerned authorities for the nomination of the officials for the Joint Committee and site inspection. As per the nominations received, the Joint Committee consists of the following members.

1	Dr. S. Sankar Professor & Head Department of Environmental Health Engineering, Faculty of Public Health, Sri Ramchandra Institute of Higher Education and Research (Deemed to be University), Porur, Chennai - (Representing TN SEIAA)	Member & Nodal Agency - Joint Committee
2	Dr. R. Sridhar, Scientist 'D', Integrated Regional Office (IRO), MoEF&CC, Chennai	Member
3	Dr.K. Firthouse Fathima, M.D Revenue Divisional Officer (RDO), Melur, Madurai Dist.	Member
4	Shri S.Pandiarajan District Environmental Engineer (DEE), TNPCB, Madurai District	Member

## 3. Joint Committee Inspection and Observations

The Joint Committee inspected the 4th Respondent Healthcare Facility (HCF) of M/s Velammal Medical College and Hospital (VMCH) S.F. No. 61/1, 61/2 etc. of Anuppanadi Village, Madurai South Taluk, Madurai District on 17.06.2021. All the members participated in the inspection. The observations made by the Joint Committee, based on the site inspection and relevant information /documents furnished by the HCF are given below. The photos taken during the site inspection are shown in **Annexure -I**.

## 4. Bio-Medical Waste Management by the 4th Respondent HCF

The Joint Committee reviewed the duties of the HCF in accordance with the Bio-Medical Waste Management Rules, 2016 (BMWM Rules, 2016). As per the Rules, the overall responsibility of the HCF is to take all necessary steps to ensure that bio-medical waste is handled without any adverse effect to human health and the environment. The HCF is to ensure that the BMW generated from the HCF is properly segregated, handled, stored, packaged, transported and disposed of, as per norms prescribed in these Rules.

**5. Compliance of the provisions of BMWM Rules, 2016 by the 4th Respondent HCF**

- 1) During the inspection, it was observed that the HCF was in operation
- 2) The HCF is adopting colour coding system in bags / containers / bins for the collection of biomedical waste as per BMWM Rules in all wards. They have established an earmarked separate biomedical waste collection room with lock and key facility system.
- 3) The HCF has made an agreement with the Common Bio-Medical Waste Treatment and Disposal Facility (CBMWTDF) M/s Ramky Energy and Environment Limited, Virudhunagar, for the safe disposal of biomedical waste generated from the unit and the agreement is valid up to 14-02-2022 (**Annexure-II**).
- 4) The HCF has established the bar coding system for the bags containing biomedical waste sent to the CBMWTDF. The HCF is maintaining a logbook for the disposal of biomedical waste to the CBMWTDF, on daily basis.
- 5) The recyclable solid waste such as plastic, carton boxes, paper etc., are collected and segregated in a separate place. All recyclable wastes are sent to recycling units through vendors.
- 6) Food waste and other organic wastes are collected in dumper bin and disposed through Madurai Corporation.
- 7) The HCF has provided one Sewage Treatment Plant (STP) – I of 400 KLD capacity to treat the sewage and trade effluent generated from the HCF and another STP – II of 100 KLD capacity to treat the sewage generated from the staff quarters. They are maintaining the log books for the operation of STP – I & II. They have provided Electro Magnetic Flow Meter at inlet and outlet of STP – I & II to assess the quantity of sewage treated and disposed. During the inspection, it was observed that the both the STP I & II were found in operation. From the records, it was observed that the unit is treating 300 KLD and 60 KLD of sewage respectively.
- 8) Treated sewage is utilized for gardening purpose after disinfection within the campus of the HCF. The Report of Analysis of treated sewage reveals that the parameters pH, TSS & BOD are within the standards prescribed by the Tamil Nadu Pollution Control Board.
- 9) The HCF has provided stack with acoustic enclosure as APC measures for the DG Sets 1010 KVA – 2 numbers. The HCF has made an agreement with the authorised recycler for disposal of used oil generated from the D.G. Sets and it is valid upto 14.02.2022.

- 10) The HCF has established a separate emergency room at the entrance of the health care facility.
- 11) The HCF has obtained permission from Madurai Corporation for the supply of 6.5 lakhs litres per day of water vide letter dated 13.03.2013.
- 12) Green belt development has been made inside the premises.

**6. Non-compliance of the provisions of BMWM Rules, 2016 by the 4th Respondent HCF**

- 1) **Authorization under BMWM Rules, 2016:** As per BMWM Rules, 2016, every hospital, nursing home, clinic, dispensary, veterinary institution, animal house, pathological laboratory, blood bank, health care facility and clinical establishment, irrespective of their system of medicine and by whatever name they are called are required to obtain authorization from the prescribed authority i.e. State Pollution Control Board / Pollution Control Committee, as the case may be.

In the present case, the HCF has not obtained an Authorization from the SPCB for the generation, collection, reception, storage, transportation, treatment, processing, disposal or any other form of handling of bio-medical waste in accordance with these rules and guidelines issued by the Central Government or Central Pollution Control Board as the case may be. The HCF is operating its hospital without any authorization after the environmental clearance which was obtained in the year 2013. The overall responsibility of having valid authorizations and consents under various acts lies with the In-charge of the health care facility. The HCF has also not displayed the details of authorisation, treatment, etc on their website. It was also observed that the HCF is not having Consent to Operate (CTO) and the validity of authorization in case of bedded health care facilities is synchronized with the validity of the Consents.

- 2) **Annual Reporting to State Pollution Control Board (SPCB) or Pollution Control Committee (PCC):** As per the BMWM Rules, 2016, the HCF is required to submit the Annual Report to the SPCB/PCC on or before 30th June every year, for the period from January to December of the preceding calendar year. The annual report should be filled in the prescribed format as per the Form IV prescribed under BMWM Rules, 2016. The Annual Report should contain details of following:

- 1) Particulars of Occupier/ HCF
- 2) Quantity of waste generated in kg/annum
- 3) Details of storage, treatment, transportation, processing and disposal facility
- 4) Details of training conducted on Bio Medical Waste Management
- 5) Details of accident Occurred
- 6) Details Emission and Effluent testing

As per these Rules, the Annual Report submitted to the SPCB/PCC must also be enclosed with following details and each healthcare facility must also ensure that the annual report submitted to the concerned SPCB/PCC is also published in its own website.

- a) Training imparted to the Health Care Workers involved in handling of bio-medical waste
- b) Minutes of Meeting of BMW Management Committee
- c) Details of Accident Occurred during one year, along with the remedial steps taken
- d) Records of testing of Emission of DG Sets / boilers
- e) Records of Effluent generated and its characteristics from health care facility
- f) Records of pre-treatment of specified waste categories
- g) Record of recyclable waste handed over to the authorized recycler in kg/annum (where captive treatment facility is allowed by the SPCB/PCC)

In the present case, the Joint Committee observed that the 4th Respondent HCF has not submitted any such Annual Report to the SPCB with the above-mentioned information from the inception of hospital. Also, the HCF has not made available any of the such information and the Annual Report on their website. The HCF has violated the BMW Rules by not following the above provision of the Rules and failed in his responsibility of furnishing BMW information to SPCB.

3) **Treatment and disposal of Microbiology, Biotechnology and other Clinical Laboratory Waste:** The HCF has not provided On-site pre-treatment of microbiology, biotechnology and other clinical laboratory waste as per scheduled-I of BMW Rules, 2016. These wastes are required to be pre-treated onsite before sending for final treatment or disposal through a CBMWTF Operator.

4) **Chemical Liquid Waste :** As per the Schedule-I of BMW Rules, 2016, the chemical liquid waste of the hospital must be collected through a separate collection system for pre-treatment. Hospitals with large standalone labs are required to install separate drainage system leading to pre-treatment unit prior to mixing the same with rest of the wastewater from hospital for further treatment. The HCF has not provided separate collection system with Effluent Treatment Plant to treat the liquid waste generated from laboratory, floor washing, cleaning, house-keeping, disinfecting activities, etc

## 7. **Violations under the Environment (Protection) Act, 1986**

1) **Environmental Clearance (EC):** The HCF earlier obtained an Environmental Clearance from SEIAA-TN for the built-up area of 143163.012 m<sup>2</sup> (The area of the plot is 51,605.36 m<sup>2</sup>) under the EIA Notification, 2006. This includes institute buildings and hospital building (G+3). (A copy of the EC dated 17-04-2013 is enclosed in **Annexure-III.**) The project/activity is covered under Category "B" of Item 8 (a) "Building and Construction projects" of the Schedule to the EIA Notification, 2006.

2) **EC Violation:** The HCF has increased the height of floor in the hospital main block (i.e., from B+G+ 3 floors to B+G+5 floors) without increasing the number of beds (HCF has the permission for 900 nos. of beds). They have obtained an approval from the DTCP for the additional built-up area. Though the unit has permitted for built up area of 1,43,163.015 sq. m as per the EC issued, the unit has constructed built up area covers 1,71,184.67 sq. m. In addition to that, the unit has also constructed a Nursing College and Hostel adjacent to the hospital premises and its built up area has not been furnished so far. Further, the corresponding S.F. numbers has not been furnished by the unit.

3) **Application of the HCF for an amendment in the EC:** The HCF has applied for an amendment in the existing EC to TN SEIAA for the additional built-up area on 13-06-2017. The unit has informed that the existing EC built-up area is 1,43,163.015 sq.m. and now applied built-area is 1,01,124.64 sq.m and the total plot area is 50,296.00 sq.m. They have informed that excluding the institutions building built-up area, the actual built-up area is 1,01,124.64 sq.m which is less than the permitted built-up area mentioned in the EC.

The HCF applied for Terms of Reference (ToR) under violation for the construction of Medical Hospital building at S.F.No.61/1, 61/2, 61/3, 61/4, 61/5, 61/6, 61/7, 61/8, 61/9, 61/10, 62/4, 62/5A, 62/6, 62/7, 63/1, 63/3, 63/6, 63/9A, 63/9B, 63/9C, 63/10, 63/11, 64/1, 64/2, 64/3, 64/4, 64/6, 64/7A, 64/7B, 64/8B, 65/2, 65/8A, 65/11, 65/12A, 65/12, 65/12B, 65/13, 65/14A, 66/1, 66/4, 66/5, 70/1A, 70/1B, 70/2A, 70/2B, 70/4A, 70/6(P), 71/1, 71/2A, 71/2B, 71/3, 71/4A, 71/4B, 71/5, 71/6B1A, 71/6B2, 71/6B1B, 72/1, 72/2, 72/3A, 72/3B, 72/4A, 72/4B, 72/4C, 72/4D, 72/5, 72/6, 72/7, 72/8, 72/9A, 72/9B2, 72/10, 72/11A, 72/11B, 72/12, 72/13, 73/3(P), 73/4A(P), 73/4B, 73/10(P), 73/11(P), 73/12(P), 73/13, 73/14(P), 80/3A, 80/5, 80/7(P), 80/8, 80/9, 80/10, 80/11, 80/19 & 80/20A of 29, Anuppanadi Village, Madurai South Taluk, Madurai District, Tamil Nadu.

The proposal of the HCF under EC violation category is currently being examined under the Tamil Nadu State Environment Impact Assessment Authority (TN SEIAA). The SEAC in its 178th Meeting held on 1st October 2020, recommended the Terms of Reference (ToR) for the project including the preparation of 1) Assessment of Ecological Damage, 2) Remediation Plan and 3) Natural & Community Resource Augmentation Plan as an independent chapter in EIA report.

During the visit, the Committee was informed that the Report on 1) Assessment of Ecological Damage, 2) Remediation Plan and 3) Natural & Community Resource Augmentation Plan was submitted by the HCF to TN SEIAA.

The final decision of the SEIAA on the EC Amendment application submitted by the 4th Respondent HCF is not yet received/made available to the Joint Committee.

8. **Action taken under the Water and Air Acts**

During the visit, the Joint Committee observed that the HCF is not having valid CTO. The HCF submitted its application requesting CTO on 02-01-2014 with Environmental Clearance obtained from TNSEIAA vide Lr.No. SEIAA/TN/F.518/EC/8 (a) /143/2012 dated 17-04-2013 following the Show Cause Notice issued by the TNPCB on 3-7-2013 (**Annexure-IV-Contd**). Again, the HCF was inspected by the TNPCB on 13-02-2014 and Show Cause Notice was issued to the hospital vide proceedings dated 13-02-2014 for commencing its activity without obtaining Environmental Clearance. (A copy of the show cause notice dated 13-2-2014 issued by the TNPCB is enclosed in **Annexure-IV**) The hospital replied for the Show Cause Notice, expressing apologies and furnished a letter of commitment stating such violations will not be repeated in future. (A copy of the reply letter dated 20-2-2014 from HCF to TNPCB is enclosed in **Annexure-V**)

Further, another Show Cause Notice was issued by the TNPCB under the Air and Water Acts to the hospital vide proceeding dated 19-3-2020 for operation of the unit without obtaining Consent of TNPCB (**Annexure-VIII**). As per the status informed by TNPCB, the HCF has not resubmitted the application for Consent with Environmental Clearance Amendment / Revision for the additional construction in the EC already obtained.

9. **Assessment of Environmental Compensation**

The Hon'ble Tribunal directed the Joint Committee to assess environmental compensation if there is any damage caused on account of any of illegalities and violations committed. Accordingly, based on the guidelines issued by the CPCB "Guidelines for Imposition of Environmental Compensation Charges against Healthcare Facilities and Common Biomedical Waste Treatment Facilities (As per the directions of the NGT order dated 12-03-2019 in the matter of OA No. 710 of 2017)" the environmental compensation for the violations committed by the HCF is calculated. While calculating the environmental compensation, the Joint Committee considered the following the non-compliance of the provisions of BMW Rules 2016 by the HCF:

- (i) No Authorization under BMW Rules, 2016
- (ii) No facility for pre-treatment of yellow category waste (microbiology, biotechnology and other clinical laboratory waste)
- (iii) The HCF has not provided separate collection system with Effluent Treatment Plant to treat the liquid waste generated from laboratory, floor washing, cleaning, house-keeping, disinfecting activities, etc
- (iv) The HCF has not submitted the Annual Report to the SPCB and no Annual Report update in their website.
- (v) The HCF has not obtained Consent to Operate from the TNPCB.

In view of the above, the environmental compensation for the violations/non-compliance committed by the 4th Respondent HCF is calculated as below:

Environmental Compensation for HCFs =	HR x T x S x R x N
HR – Health Risk factor (Score 50 ) T- Type of Healthcare Facility (1.0) S – Size of Health Care Facility (1.5) R – Environmental Compensation factor (Rs.250) N – Number of days of Violation (462 days) [i.e., from date of inspection on 13-03-2020 (Show Cause Notice dated 19-3-2020) to date of Committee visit to the HCF on 17-6-2021]	
Environmental compensation	50 x 1.0 x 1.5 x 250 x 462
Environmental Compensation for the 4th Respondent HCF	86,62,500 /-

Thus, the Joint Committee based on the above criteria and non-compliance of various Rule provisions, calculated an amount of **Rs. 86,62,500/- (Eighty Six Lakhs Sixty Two Thousand and Five Hundred)** as an environmental compensation for the 4th Respondent HCF.

Further, the Joint Committee observed that, as per the "Standard Operating Procedure (SoP) for identification and handling of violation cases under the EIA Notification, 2006 in compliance to order of Hon'ble NGT in OA No.34/2020 WZ" issued by the MoEF&CC vide OM No. 22-21/2020-IA.III dated 7-7-2021 (**Annexure-VI**), the above compensation shall be in addition to the liability for carrying out various remedial measures which is worked based on the damage assessment for quantifying the environmental damage caused due to unauthorised project activity by the HCF. During the visit, the Committee was informed that a report on 1) Assessment of Ecological Damage, 2) Remediation Plan and 3) Natural & Community Resource Augmentation Plan including cost implications and payment of bank guarantee by the HCF, was submitted by the HCF to TN SEIAA and it is under examination of SEIAA for approval.

10. **Impact of dumping of bio-medical waste in soil and water around the 4th Respondent HCF.**

The Hon'ble NGT directed the Joint Committee to conduct the soil as well as water quality test in the drain and to examine any contamination that has been caused to the water in the nearby areas on account of the illegal activities and also directed the Committee to draw the remedial measures required for restoring the same to its original position if so. Accordingly, the sewage, bore well and soil samples were collected on 17-06-2021 in the following places:

Sample Code No	Point of Collection	Sewage / Water / Soil
MDU/926	STP 400 KLD Capacity	Untreated
MDU/927	STP 400 KLD Capacity	Treated
MDU/928	STP 100 KLD Capacity	Untreated
MDU/929	STP 100 KLD Capacity	Treated
MDU/930	Bore well located outside the premises southeast direction @ 150 Metres.	Bore well water
MDU/931	Outside the premises behind maintenance office @ 150m	Soil
MDU/932	Inside the premises near STP I (400 KLD Capacity)	Soil
MDU/933	Inside the premises near STP II (100 KLD Capacity)	Soil

The above samples were analysed in the advanced environmental laboratory, TNPCB, Madurai. The results are enclosed in **Annexure-VII**. Report of Analysis of the treated sewage collected from the outlet of sewage treatment plants reveals that the parameters pH, TSS & BOD are within the standards prescribed by the TNPCB. The analytical data of bore well water samples revealed that all the quality parameters are within the permissible limit as per IS 10500:2012. Further all the heavy metals which have been analysed in the bore well water are detected at below detectable level except Total Dissolved Solids and Total Hardness. This may be due to presence of Bi-Carbonates of Calcium, Magnesium and Chloride in the presence of soil nature. Hence, based on the above analysis, it is observed that there is no contamination detected in soil and water quality around the HCF.

#### 11. **Other suggestion by the Joint Committee**

In accordance with the BMWM Rules, 2016 (12. Monitoring of implementation of the rules in health care facilities), "(4) Every State Government or Union territory Administration shall constitute District Level Monitoring Committee in the districts under the chairmanship of District Collector or District Magistrate or Deputy Commissioner or Additional District Magistrate to monitor the compliance of the provisions of these rules in the health care facilities generating bio-medical waste and in the common bio-medical waste treatment and disposal facilities, where the bio-medical waste is treated and disposed of".

"(5) The District Level Monitoring Committee constituted under sub-rule (4) shall submit its report once in six months to the State Advisory Committee and a copy thereof shall also be forwarded to State Pollution Control Board or Pollution Control Committee concerned for taking further necessary action".

"(6) The District Level Monitoring Committee shall comprise of District Medical Officer or District Health Officer, representatives from State Pollution Control Board or Pollution Control Committee, Public Health Engineering Department, local bodies or municipal

corporation, Indian Medical Association, common bio-medical waste treatment facility and registered nongovernmental organisations working in the field of bio-medical waste management and the Committee may co-opt other members and experts, if necessary and the District Medical Officer shall be the Member Secretary of this Committee".

The Joint Committee has observed that the above Rule provisions need be complied with by taking appropriate actions at State and District Level authorities for the purpose of effective implementation of BMWM Rules, 2016.

**By considering the above facts and observation of the Joint Committee, the Hon'ble Tribunal may pass appropriate Order (s)/Direction (s) as deemed fit.**



Professor & Head  
Department of Environmental Health  
Engineering, Sri Ramchandra Institute of  
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Scientist 'D',  
Regional Office,  
MoEF&CC, Chennai



Revenue Divisional Officer (RDO),  
Melur, Madurai



District Environmental Engineer,  
TNPCB,  
Madurai District

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## Annexure-I

**M/s. Velammal Medical College Hospital and Research Institute, Anuppanadi**  
**Village, Madurai South Taluk, Madurai District.**

### **JOINT COMMITTEE INSPECTION PHOTOS**



**EARMARKED STORAGE ROOM FOR BIOMEDICAL WASTE**



**EARMARKED STORAGE ROOM FOR BIOMEDICAL WASTE**



**SEWAGE TREATMENT PLANT – 400 KLD CAPACITY**



**SEWAGE TREATMENT PLANT – 400 KLD CAPACITY**



**SEWAGE TREATMENT PLANT – 400 KLD FLOW METER**



**SEGREGATION OF PLASTIC WASTE**

**Collection and Segregation of general solid waste generated at the Velammal Hospital**





**UNTREATED SEWAGE SAMPLE COLLECTION - 400 KLD CAPACITY**  
**SEWAGE TREATMENT PLANT**



**TREATED SEWAGE SAMPLE COLLECTION - 400 KLD CAPACITY**  
**SEWAGE TREATMENT PLANT**



**SEWAGE / WATER SAMPLE CANE SEALED**



**SEWAGE TREATMENT PLANT – 100 KLD CAPACITY**



**UNTREATED SEWAGE SAMPLE COLLECTION - 100 KLD CAPACITY**  
**SEWAGE TREATMENT PLANT**



**TREATED SEWAGE SAMPLE COLLECTION - 100 KLD CAPACITY**  
**SEWAGE TREATMENT PLANT**



**SEWAGE TREATMENT PLANT - 100 KLD**



**UNTREATED SEWAGE SAMPLE COLLECTION – 100 KLD STP**

**Biomedical waste segregation at non-Covid Ward at M/s Velammal Hospital**



**Joint Committee visit to non-Covid Ward at M/s Velammal Hospital**



**BIO MEDICAL WASTE COLLECTION IN LAB**

**Committee's visit around the hospital premise to examine the allegation of illegal dumping of waste**





தமிழ்நாடு தமிழ்நாடு TAMIL NADU

88AB 272820

15-02-2021

சுந்தர்  
சுந்தர்

T. சங்கரலக்ஷ்மி  
Jt. SRO IV Vendor  
ROC No. 6845 B1/85  
10-A, B.B. ரோடு  
கந்திராமபாளையம், மதுரை-625 011



**AGREEMENT OF SERVICE**

This agreement is entered into on the 15 (day) of 02 (Month) of 2021 Valid Up to: 14/02/2022

Between

M/s. Ramky Energy and Environment Ltd., functioning at D.No.2B/1, Vaigai Main Street, Velmurugan Nagar, Bye Pass Road, Madurai-625 016 and having its registered office at Ramky Grandiose, 12<sup>th</sup> & 13<sup>th</sup> Floor, Ramky Towers complex, Gachibowli, Hyderabad- 500032 (herein after called as REAEL) represented by its Authorized Signatory.

And

M/s Velammal Medical College Hospital and Research Institute, Anupanadi, Madurai-625009 (herein after called as VMCHRI)

1. Whereas REAEL is establishing a common facility in accordance with the Bio-Medical Waste (Management and Handling) Rules, 2016, for collection, treatment and disposal of the bio-medial wastes generated by the "Health Care Establishments" (Hospitals, Nursing Homes, Diagnostic Centers, Labs, Dental Clinics, Blood Bank...).
2. VMCHRI is a Hospital Having NINE HUNDRED (900) BED'S is generating Bio-Medical Wastes which need to be managed in accordance with the Bio-Medical Wastes (Management and Handling) Rules, 2016 of Govt. of India.

Velammal Medical College Hospital  
& Research Institute  
Chairman



3. VMCHRI who uses the service of REAEL shall pay a one time Membership fee of Rs.2000/- towards membership.
4. Whereas REAEL offers to provide the services required for the members of VMCHRI to be complied with the above said rules, on a "user-pay-principle" at Rs 5,00,000/- monthly basis.
5. VMCHRI shall not pay advance to the REAEL.
6. REAEL will make periodic followed of the VMCHRI regarding the generation of the waste, Collection and Segregation of Bio-Medical Waste etc.,
7. The Health Care Establishments shall segregate the wastes in accordance with the Bio – Medical Waste (Management and Handling) Rules, 2016 of Govt. of India.
8. REAEL shall provide the initial training, free of cost, about segregation of wastes, collection of wastes in color coded bags as well as occupational safety in management and handling of Bio-Medical Wastes.
9. REAEL shall distribute color coded bags (cost is Rs.5/Bag + GST Tax)
10. The VMCHRI shall ensure that all the syringes disposed shall not have any part of the needle.
11. REAEL shall collect the VMCHRI at times and frequency mutually agreed by both the parties.
12. REAEL shall be liable for violation under the Bio-Medical Wastes (Management and Handling) Rules, 2016 from the time the waste is handed over to REAEL.
13. REAEL shall meet all the rules and regulations stipulated by the Tamil Nadu Pollution control Board.
14. REAEL promises to keep high standards of pollution control and shall update equipment as and when required.
15. All complaints (if any) shall be attended to in the shortest possible time, (48 hours).
16. VMCHRI shall maintain discharge of the waste approved by the Tamil Nadu Pollution control Board.

Velammal Medical College Hospital  
& Research Institute

Chairman



17. REAEL shall send bill for the preceding month by the 3<sup>rd</sup> of the next month and the same shall be paid by DD / Account payee Cheque only drawn in favor of "Ramky Energy and Environment Ltd"., payable at Madurai.
18. The DD or Cheque should reach Madurai Office on or before 15<sup>th</sup> of the same month.
19. Payments made after 15<sup>th</sup>, shall attract a penalty of Rs.30/- per day.
20. REAEL shall stop services if payments are not made within 20 days from the date of billing.
21. Any change of Rules or Disputes will be sorted out by a joint committee of REAEL & VMCHRI.
22. REAEL & VMCHRI hereby undertake to adhere to this "Agreement of Service" for a minimum period of one year.
23. VMCHRI shall generate waste and all bio medical waste will be cleared by REAEL on a daily basis.
24. VMCHRI shall maintain discharge of the waste approved by SPCB.
25. Agreement can be terminated by giving one month notice by both the parties.

FOR VMCHRI

3/3  
Velamuri Medical College Hospital  
& Research Institute  
Authorized Signatory

Chairman

FOR REAEL

Authorized Signatory



DR. H.MALLESHAPPA,I.F.S.,  
MEMBER SECRETARY



STATE LEVEL ENVIRONMENT  
IMPACT ASSESSMENT  
AUTHORITY, Annexure-III  
TAMILNADU,  
3rd Floor, PanagalMaaligai,  
No.1 Jeenis Road, Saidapet,  
Chennai-15.

BY RPA

Letter No. SEIAA/TN/F.518/EC/ 8(a)/143/2012 dt: 17.04.2013.

To

The Chairman,  
M/s. Velammal Education Trust,  
Velammal Village, Madurai – Tuticorin Ring Road,  
Anuppanadi,  
Madurai - 9.

Sir,

**Sub:** SEIAA, TN - Environmental Clearance - Proposed construction of Medical College – “VELAMMAL MEDICAL COLLEGE & HOSPITAL”, S.F No 61/1,61/2, 61/3, 61/4, 61/5, 61/6, 61/7, 61/8, 61/9, 61/10, 62/4, 62/5A, 62/6, 62/7, 63/1, 63/3, 63/6, 63/9A, 63/9B, 63/9C, 63/10, 63/11, 64/1, 64/2, 64/3, 64/4, 64/6, 64/7A, 64/7B, 64/8B, 65/2, 65/8A, 65/11, 65/12A, 65/12B, 65/13, 65/14A, 66/1, 66/4, 66/5, 70/1A, 70/1B, 70/2A, 70/2B, 70/4A, 70/6[P], 71/1, 71/2A, 71/2B, 71/3, 71/4A, 71/4B, 71/5, 71/6B1A, 71/6B2, 71/6B1B, 72/1, 72/2, 72/3A, 72/3B, 72/4A, 72/4B, 72/4C, 72/4D, 72/5, 72/6, 72/7, 72/8, 72/9A, 72/9B2, 72/10, 72/11A, 72/11B, 72/12, 72/13, 73/3[P], 73/4A[P], 73/4B, 73/10[P], 73/11[P], 73/12[P], 73/13, 73/14[P], 80/3A, 80/5, 80/7[P], 80/8, 80/9, 80/10, 80/11, 80/19 and 80/20A of 29 Anuppanadi village, Madurai South Taluk, Madurai District – Issued – Regarding

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This has reference to your application dated 26.11.2012 submitted to the State Level Environment Impact Assessment Authority, Tamil Nadu seeking Environmental Clearance under the Environment Impact Assessment Notification, 2006, as amended.

It is noted, interalia that the project proposal involves to construct Hospital Main Block- B+G+3 floors - 1 no, No of beds in hospital – 900, Institute Block - G+4 floors- 1 no, Animal House Building - G floor - 1 no, Mortuary Building - G floor- 1 no, Work shop- G floor - 1 no, Dining & Kitchen Building - G + 3 floors – 2 nos, Staff Quarters 3 BHK - Stilt + 7 floors - 1 no, Staff Quarters 2

BHK - Stilt + 5 floors - 3 nos, Staff Quarters 2 BHK - Stilt + 6 floors - 2 nos, Boys Hostel - G + 3 floors - 1 no, Boys Hostel - G + 6 floors - 1 no, Girls Hostel - G + 4 floors- 1 no, Girls Hostel - G + 4 floors - 1 no, Library Building - G + 3 floors – 1 no, Individual House-G + 1 floors – 3 no, Maintenance Office - G + 1 floors – 1 no. The area of the plot is 151,605.36 m<sup>2</sup> and the built up area is 1, 43,163.015 m<sup>2</sup>. The parking area as per report is 39194.13 m<sup>2</sup> and green belt area is 28504.79 m<sup>2</sup> (site green belt area).

Daily fresh water requirement for the project will be 622.13 KLD, which will be met from the Madurai Corporation source. Out of which 499.42 KLD will be used for the Hospital, Institution, Workshop and mortuary & maintenance staff purposes and 122.71 KLD for staff quarters & hostels. The sewage generated after treatment will be 472 KLD out of which 100 KLD will be utilized for gardening & 372 KLD will be utilized for HVAC.

Solid Waste generation has been projected as 1789 Kgs/day out of which 674 kgs/day of Biodegradable waste, 60 Kg/day of Organic sludge generation from STP will be treated through Organic waste convertor, 825 kgs/day of Non-Biodegradable / recyclable waste will be handed over to authorized vendors and 230 Kg/day of Biomedical waste will be sent to Ramky Energy & Environment Ltd. as reported.

The power required will be of 8870 KVA with backup power of 1250 KVA DG set: 2 nos. with 9.5 m stack height from ground level (each), 625 KVA DG set: 4 nos. with 7.5 m stack height from ground level (each), 180 KVA DG set: 1 no. with 6 m stack height from ground level & 100 KVA DG set: 1 no. with 5 m stack height from ground level.

The total cost of the project is about Rs. 139.4 Crores.

The project activity is covered in 8(a) of the Schedule and is of 'B2' category. It does not require Public Consultation as per Para 7(i) III Stage (3) (d) 'Public Consultation' of EIA Notification, 2006. Based on the application made in Form-1, Form-IA, Conceptual plan, Annexures, and the additional clarifications furnished by the proponent, the SEAC vide Item No. 38.08 in its 38<sup>th</sup> meeting conducted on 22<sup>nd</sup> March, 2013 and recommended to the SEIAA, Tamil Nadu to grant Environmental Clearance to this project. The proposal was considered by the SEIAA, Tamil Nadu vide Item No.69-4 in its meeting held on 17.04.2013 and the proposal was discussed in detail and decided to issue EC. Accordingly, the SEIAA hereby accords Environmental Clearance to the above project under the

provisions of EIA Notification dated 14<sup>th</sup> September, 2006 as amended, with validity for five years from the date of issue of EC, subject to the condition that and strict compliance of the terms and conditions stipulated below:

(3)

### SPECIFIC CONDITIONS

#### Construction Phase

- i) "Consent for Establishment" shall be obtained from the Tamil Nadu Pollution Control Board and a copy shall be submitted to the SEIAA, Tamil Nadu before taking up of any construction activity at the site.
- ii) The entire water requirement during construction phase shall be met from Madurai Corporation as committed.
- iii) All required sanitary and hygienic measures should be in place before starting construction activities and they have to be maintained throughout the construction phase.
- iv) A First Aid Room shall be provided in the project site during the entire construction phase of the project.
- v) Adequate drinking water and sanitary facilities should be provided for construction workers at the site. The safe disposal of waste water and solid wastes generated during the construction phase should be ensured.
- vi) All the labourers to be engaged for construction should be screened for health and adequately treated before and during their employment in the work at the site.
- vii) The solid waste in the form of excavated earth excluding the top soil generated from the project activity shall be scientifically utilized for construction of approach roads and peripheral roads, as reported.
- viii) All the top soil excavated during construction activities should be stored for use in horticulture/ landscape development within the project site.
- ix) Disposal of other construction debris during construction phase should not create any adverse effect on the neighboring communities and be disposed off only in approved sites, with the approval of Competent Authority with necessary precautions for general safety and health aspects of the people.

- x) Construction spoils, including bituminous materials and other hazardous materials, must not be allowed to contaminate watercourses. The dump sites for such materials must be secured so that they should not leach into the adjacent land/ lake/ stream etc.
- xi) Low Sulphur Diesel shall be used for the operating diesel generator sets to be used during construction phase. The air and noise emission shall conform to the standards prescribed in the Rules under the Environment (Protection) Act, 1986, and the Rules framed thereon.
- xii) Vehicles hired for bringing construction materials to the site should be in good condition and should conform to air and noise emission standards, prescribed by TNPCB/CPCB. The vehicles should be operated only during non-peak hours.
- xiii) Ambient air and noise levels should conform to residential standards prescribed by the TNPCB, both during day and night. Incremental pollution loads on the ambient air and noise quality should be closely monitored during the construction phase.
- xiv) Fly- Ash bricks should be used as building material in the construction as per the provision of Fly ash Notification of September, 1999 as amended.
- xv) Ready mix concrete of high quality should be used in building construction and necessary cub-tests should be conducted to ascertain their quality.
- xvi) Storm water control and its re-use shall be as per CGWB and BIS standards for various applications.
- xvii) Water demand during construction should be reduced by use of pre-mixed concrete, curing agents and other best practices prevalent.
- xviii) Fixtures for showers, toilet flushing and drinking water should be of low flow type by adopting the use of aerators / pressure reducing devices / sensor based control.
- xix) Use of glass shall be reduced up to 40% to reduce the electricity consumption and load on air conditioning. If necessary, high quality double glass with special reflecting coating shall be used in windows.

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- xx) Roof should meet prescriptive requirement as per Energy Conservation Building Code by using appropriate thermal insulation material, to fulfill the requirement.
- xxi) Adequate measures to reduce air and noise pollution during construction shall be adopted, conforming to norms prescribed by the TNPCB on noise limits.
- xxii) Opaque wall should meet prescriptive requirement as per Energy Conservation Building Code which is mandatory for all air conditioned spaces by use of appropriate thermal insulation material to fulfill the requirement.
- xxiii) The Project proponent is requested to indicate the probable date of commissioning of the project supported with necessary bar charts.
- xxiv) Adequate fire protection equipments and rescue arrangements should be made as per the prescribed standards.
- xxv) Proper approach road for fire-fighting vehicles and for rescue operations in the event of emergency shall be made.
- xxvi) Design of buildings should be in conformity with the Seismic Zone Classifications.
- xxvii) All ECBC norms have to be adopted.
- xxviii) The proponent should also ensure to keep necessary road width as per O.M. dated 7.2.12 of MOEF, GOI, New Delhi with respect to high rise buildings.
- xxix) Personnel working in dusty areas should wear protective respiratory devices and they should also be provided with adequate training and information on safety and health aspects. Occupational health surveillance program of the workers should be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.
- xxx) Periodical medical examination of the workers engaged in the project shall be carried out and records maintained. For the purpose, schedule of health examination of the workers should be drawn and followed accordingly. The workers shall be provided with personnel protective measures such as masks, gloves, boots etc.

Operation Phase

- i) The entire water requirement during operation phase shall be met from Madurai Corporation after getting permission as committed scientifically throughout the period of operation.
- ii) The Proponent as committed shall utilize 100 KLD of treated sewage water green belt development usage and 372 KLD for HVAC purposes throughout the period of operation.
- iii) The proponent shall ensure that storm water drain provided at the project site shall be maintained without choking or causing stagnation and should also ensure that the storm water shall be properly disposed off in the natural drainage / channels without disrupting the adjacent public. Adequate harvesting of the storm water should also be ensured.
- iv) The proponent should also ensure that necessary trenches for openings shall be provided at periodic intervals along the compound wall, so as to let out the storm water during rainy season, without stagnation / ponding.
- v) The proponent shall ensure that rain water collected from the covered roof of the buildings, etc shall be scientifically harvested so as to ensure the maximum beneficitation of rain water harvesting.
- vi) Rain water harvesting for roof run-off and surface run-off, as per plan submitted should be implemented. Before recharging the surface run off, pre-treatment with screens, settlers etc. must be done to remove suspended matter, oil and grease, etc.
- vii) The Biodegradable solid waste and STP sludge generated from the project activity shall be disposed through Organic waste convertor, Non - Biodegradable solid waste from the project activity shall be disposed through authorized vendors and biomedical waste shall be sent to Ramky Energy & Environment Ltd. as committed, and as per the prescribed method of collection and segregation at source etc.
- viii) The biodegradable municipal solid waste and STP sludge generated shall be treated through organic waste convertor and the manure shall be used as compost for green belt development/ avenue plantation as committed.

- x) A First Aid Room shall be provided during operation of the project, with necessary equipments and life- saving medicines.
- x) The Plastic wastes shall be segregated and disposed as per the provisions of Plastic Waste (Management & Handling) Rules 2011.
- xi) The acoustic enclosures shall be installed at all noise generating equipments such as DG sets, air conditioning systems, etc. and the noise level shall be maintained as per MoEF/CPCB/TNPCB guidelines/norms both during day and night time.
- xii) The green belt design along the periphery of the plot shall achieve attenuation factor conforming to the day and night noise standards prescribed for residential land use. The open spaces inside the plot shall be suitably landscaped and covered with vegetation of suitable variety.
- xiii) Incremental pollution loads on the ambient air quality, noise and water quality shall be periodically monitored after commissioning of the project.
- xiv) Application of solar energy should be incorporated for illumination of common areas, lighting for gardens and street lighting in addition to provision for solar water heating. A hybrids system or fully solar system for a portion of the apartments shall be provided.
- xv) Traffic congestion near the entry and exit points from the roads adjoining the proposed projects site shall be avoided. Parking shall be fully internalized and no public space should be utilized.
- xvi) A report on the energy conservation measures conforming to energy conservation norms prescribed by the Bureau of Energy Efficiency shall be prepared incorporating details about building materials & technology; R & U factors etc and submitted to the SEIAA in three month's time.
- xvii) The Proponent shall install two STP units of bar screen chamber, collection tank, Aeration tank, clarifier, Pressure sand filter, Activated carbon filter, UV & UF systems, treated water tank, sludge drying beds and filter water tank as committed (Capacity of 400 KLD & 100 KLD) with laundry waste treatment set up units of collection tank, Neutralization tank and Flocculator and Biomedical waste treatment set up of collection tank, Disinfection tank and Flocculator and

operated continuously to achieve the standards prescribed by the Tamil Nadu Pollution Control Board.

- xviii) It is the sole responsibility of the proponent to utilize 372 KLD of treated sewage for HVAC purposes and biomedical waste shall be sent to Ramky Energy & Environment Ltd throughout the period of operation as committed.
- xix) It is the sole responsibility of the proponent that the treated sewage water disposed for green belt development/ avenue plantation should not pollute the soil/ ground water/ adjacent canals/ lakes/ ponds, etc.
- xx) No construction activity of any kind shall be taken up in the OSR area. Consent of the local body concerned should be obtained for using the secondary treated sewage in the OSR area.
- xxi) Spent oil from D.G sets should be stored in HDPE drums in an isolated covered facility and disposed as per the Hazardous Wastes (Management, Handling, Transboundary Movement) Rules 2008. Spent oil from D.G sets should be disposed off through registered recyclers.
- xxii) The e waste generated should be collected and disposed to a nearby authorized e-waste centre as per e waste (Management & Handling), Rules 2011.
- xxiii) To facilitate easy disposal and making the solid waste disposal less laborious, chute shall be provided in each floor with a collection bin (wheeled bins with top lid arrangement) in the bottom of the chute to be kept in the ground floor level which the bins shall be transferred to the solid waste disposal area identified within the facility.
- xxiv) A terrace garden (40% of roof top area) over a possible larger space shall be developed and maintained continuously by the proponent.

#### GENERAL CONDITIONS

- i) It is mandatory for the Project proponent to furnish to the SEIAA, Half yearly compliance report in Hard and Soft copies on 1<sup>st</sup> June and 1<sup>st</sup> December of each calendar year in respect of the conditions stipulated in the prior Environmental Clearance.
- ii) In the case of any change(s) in the scope of the project, a fresh appraisal by the SEAC/SEIAA shall be obtained.
- iii) A copy of the clearance letter shall be sent by the proponent to

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Commissioner of Corporation/ municipalities/ executive officers of town panchayat / Block development officers of panchayat union whichever is applicable and the Local NGO, if any, from whom suggestions /representations, if any, have been received while processing the proposal. The clearance letter shall also be put on the website of the Proponent.

- iv) The SEIAA reserves the right to add additional safeguard measures subsequently, if non compliance of EC conditions are found and to take action, including revoking of this Environmental Clearance as the case may be.
- v) All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire and Rescue Services Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wild Life (Protection) Act, 1972, State / Central Ground Water Authority, Coastal Regulatory Zone Authority, other statutory and other authorities as applicable to the project shall be obtained by project proponent from the concerned competent authorities.
- vi) The project authorities should advertise with basic details at least in two local newspaper widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at website of SEIAA, TN and a copy of the same should be forwarded to the Regional Office of the Ministry of Environment and Forests located at Bangalore.
- vii) Under the provisions of Environment (Protection) Act, 1986, legal action shall be initiated against the project proponent if it is found that Construction of the project has been started without obtaining Environmental Clearance, and for any other action resulting in violation of any condition stipulated in the Environmental Clearance
- viii) The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, Bengaluru, the respective Zonal Office of CPCB, Bengaluru and the TNPCB. The criteria pollutant levels namely; SPM, RSPM, SO<sub>2</sub>, NO<sub>x</sub> (ambient levels as well as stack emissions) or

critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of company in the public domain.

- ix) A separate environmental management cell with suitable qualified personnel should be set-up under the control of a Senior Executive, who will report directly to the Head of the Organization.
- x) The funds earmarked for environmental protection measures should be kept in separate account and should not be diverted for other purpose. Year wise expenditure should be reported to the Ministry of Environment and Forests and its Regional Office located at Bangalore.
- xi) The Regional Office of the Ministry located at Bangalore shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information / monitoring reports.
- xii) The project proponent shall submit six - monthly reports on the status of compliance of the stipulated environmental clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the Ministry of Environment and Forests, its Regional Office Bangalore, the respective Zonal Office of Central Pollution Control Board, SEIAA, TN and the State Pollution Control Board.
- xiii) The environmental statement for each financial year ending 31<sup>st</sup> March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the Regional Office of the Ministry of Environment and Forests, Bangalore by e-mail.
- xvi) The Environmental Clearance does not absolve the applicant/proponent of his obligation/requirement to obtain other statutory and administrative clearances from other statutory and administrative authorities.
- xv) This Environmental Clearance does not imply that the other statutory / administrative clearances shall be granted to the project by the concerned authorities. Such authorities would be considering the project on merits and be taking decisions independently of the Environmental

**Clearance**

- vi) The SEIAA, TN may alter/modify the above conditions or stipulate any further condition in the interest of environment protection, even during the subsequent period.
- xvii) The SEIAA, TN may cancel the environmental clearance granted to this project under the provisions of EIA Notification, 2006, if, at any stage of the validity of this environmental clearance, if it is found or if it comes to the knowledge of this SEIAA, TN that the project proponent has deliberately concealed and/or submitted false or misleading information or inadequate data for obtaining the environmental clearance.
- xviii) Failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.
- xix) The above conditions will be enforced inter-alia, under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, the Public Liability Insurance Act, 1991, along with their amendments, draft Minor Mineral Conservation & Development Rules, 2010 framed under MMDR Act 1957, National Commission for protection of Child Right Rules, 2006 and rules made there under and also any other orders passed by the Hon'ble Supreme Court of India, Hon'ble High Court of Madras and any other Courts of Law, including the Hon'ble Natural Green Tribunal relating to the subject matter.
- xx) Any appeal against this environmental clearance shall lie with the Hon'ble National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

**Copy to:-**

1. The Principal Secretary to Government, Environment & Forests Dept, Govt. of Tamil Nadu, Fort St. George, Chennai - 9.
2. The Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD Cum-Office Complex, East Arjun Nagar, New Delhi 110032.
3. The Member Secretary, Tamil Nadu Pollution Control Board.

SPECIMEN for CASE-1

Proc.No:- F.1821/RL/MDU SOUTH/DEE/MDU/2014 Dated:- 13.02.2014

Sub:- TNPCB- M/s.VELAMMAL EDUCATION TRUST, Velammal Medical College & Hospital, Anuppanadi, Madurai South Taluk, Madurai District – violation of the provisions of the EIA Notification, 2006 for an offence under section 15(1) read with Section 16(1) and punishable under Section 15(1) of the Environment (Protection) Act, 1986 – Prosecution under Section 19(a) of the Environment (Protection) Act, 1986 – Show Cause Notice – Issued.

- Ref:- 1. The Environment (Protection) Act, 1986, as amended.  
2. The Environmental Impact Assessment Notification, 2006, Dated: 14.09.2006  
3. Office Memorandum No. J-11013/41/2006-1A II (I), Dated 14<sup>th</sup> September 2010, from the Ministry of Environment and Forest, New Delhi.  
4. Office Memorandum No. J-11013/41/2006-1A II (I), Dated 12<sup>th</sup> December 2012, from the Ministry of Environment and Forest, New Delhi.  
5. Resolution dated 07.02.2013 of the Board of M/s. Velammal Educational Trust and furnished to the SEIAA.  
6. Inspection of the unit on 13.02.2014 By the DEE/ TNPCB/Madurai

Whereas, your company of M/s. VELAMMAL EDUCATION TRUST, has undertaken Project in the name and style of Velammal Medical College & Hospital, Madurai at S.Nos.81/1 to 10 etc Anuppanadi Village, Madurai South Taluk, Madurai District, with a total built-up area of 14.3163 square meters.

Whereas, the above project involves construction of building/construction project/area development and Township of more than 20,000 square meters area, the same requires Environmental Clearance, as stipulated in the Environmental Impact Assessment Notification, 2006, dated 14.09.2006, notified under the provisions of the Environment (Protection) Act, 1986.

Whereas, Paragraph 1 of the Environmental Impact Assessment Notification, 2006, dated 14.09.2006, stipulates that the construction of new projects or activities or the expansion or modernization of existing projects or activities listed in the schedule of the notification, shall be undertaken in any part of India, only after the prior Environmental Clearance. Any violation of the provisions of the Environmental Impact Assessment Notification, 2006 by any company or person, is an offence punishable under section 15(1) read with section 16(1) of the Environment (Protection) Act, 1986.

37 17/2/14  
[Signature]

Whereas, section 15(1) of the Environment (Protection) Act, 1986, provides that "Whoever fails to comply with or contravenes any of the provisions of this Act, or the rules made or orders or directions issued thereunder, shall, in respect of each such failure or contravention, be punishable with imprisonment for a term which may extend to five years with fine which may extend to one lakh rupees, or with both" and section 16(1) of the said Act provides that "Where any offence under this Act has been committed by a company, every person who, at the time the offence was committed, was directly in charge of, and was responsible to, the company for the conduct of the business of the company, as well as the company, shall be deemed to be guilty of the offence and shall be liable to be proceeded against and punished accordingly".

Whereas, in the context of commencing the construction of your project, without obtaining the prior Environmental Clearance, as required under the Environmental Impact Assessment Notification, 2006, your company vide Resolution No \_\_\_\_\_ dated 07.02.2013 has made a written commitment that the violation would not be repeated.

Whereas, the action of your company and you as the person directly in charge of, and was responsible to, the company for the conduct of the business of the company, having commenced the construction without obtaining the prior Environmental Clearance, as required under the Environmental Impact Assessment Notification, 2006 is an offence under section 15(1) read with section 16(1) of the Environment (Protection) Act, 1986, and punishable under section 15(1) of the Environment (Protection) Act, 1986.

Whereas TNPCB official has inspected your unit on 13.02.2014 and found that the Construction Works are completed and hospital is under functioning

Whereas, the office memorandums of the Ministry of Environment and Forest in the reference third and fourth cited, stipulated that credible action should be initiated on the violation of the provisions of the Environmental Impact Assessment Notification, 2006, by invoking the powers conferred under section 19(1) of the Environment (Protection) Act, 1986. Accordingly, the state Environmental Impact Assessment Authority for the State of Tamil Nadu, has advised to launch prosecution, for the violation of the provisions of the Environmental Impact Assessment Notification, 2006.

In view of the above, in exercise of the powers conferred under Section 19(a) of the Environment (Protection) Act, 1986, it is proposed to initiate action to file complaint against your company and against you and to launch prosecution against the company and against you as the person directly in charge of, and was responsible to the company for the conduct of the business of the company, when the offence was committed.

Therefore, you are hereby directed to show cause, within 15(Fifteen) days as to why prosecution should not be launched by filing a complaint, as per the powers conferred under section 19(a) of the Environment (Protection) Act, 1986, against your company and against you for the offence committed in violation of the provisions of the Environmental Impact Assessment Notification, 2006, which is an offence under section 15(1) read with section 16(1) of the Environment (Protection) Act, 1986, and punishable under section 15(1) of the said Act.

It is informed if no reply is received within the time limit fixed above it would be construed that your company and you do not have any satisfactory explanation to offer in this matter, and appropriate action would be initiated in accordance with law.

6-20-10/14 14/2/14  
District Environmental Engineer,  
Tamil Nadu Pollution Control Board  
Madurai

To

1. M/s. Velammal Educational Trust.  
Velammal Medical College Hospital & Research Institute  
Represented by its Chairman Cum Managing Trustees, Thiru M.V.Muthuramalingam  
Having Office at Velammal Village, Madurai, Tutucorin Ring Road,  
Anuppandi, Madurai 625 009.
2. Thiru, M.V., Muthuramalingam  
Chairman Cum Managing Trustees  
M/s. Velammal Medical College & Hospital & Research Institute  
Velammal Village, Madurai, Tutucorin Ring Road,  
Anuppandi, Madurai 625 009.

## Annexure-IV-Contd/-



ஒப்புதலுடன் கூடிய பதிவுத் தபாலில்



மாவட்ட சுற்றுச்சூழல் பொறியாளர் அலுவலகம்  
தமிழ்நாடு மாசு கட்டுப்பாடு வாரியம், மதுரை.

நடப்பு குறிப்பாணை எண்.: கோபுதிது/மாசு/மதுரை/2013 நாள் 3.07.2013

பொருள்: 1974 - ஆம் ஆண்டு நீர் (மாசு தடுப்பு மற்றும் கட்டுப்பாடு) சட்டத்தின் வரைமுறைகள் மீறுகைக்காக விளக்கம் கோரல் - தி/ள். வேலம்மாள் மருத்துவக் கல்லூரி மருத்துவமனை மற்றும் ஆராய்ச்சி நிலையம், மதுரை-தூத்துக்குடி சுற்று சாலை, மதுரை - முகாந்திரம் கோரல் - தொடர்பாக.

பார்வை: 1. இவ்வலுவலக Lr.No.F.MDU/NA/DEE/MDU/2011 dt. 12.10.2011  
2. இவ்வலுவலக Lr.No.DEE/TNPCB/MDU/NA/2013 dt. 11.03.2013  
3. மருத்துவக் கல்லூரி மருத்துவமனை ஆய்வு 2.07.2013

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1988 ஆம் ஆண்டு திருத்தப்பட்ட 1974 ஆம் ஆண்டு நீர் (மாசு தடுப்பு மற்றும் கட்டுப்பாடு) சட்டத்தின்படி தமிழ்நாடு மாசு கட்டுப்பாடு வாரியத்தால் இந்த விளக்கம் கேட்கப்படுகிறது. (சட்டம் என இதற்குப்பின் இதில் குறிப்பிடப்படும்). தங்களது மருத்துவக் கல்லூரி மருத்துவமனை தமிழ்நாடு மாசு கட்டுப்பாடு வாரியத்தின் இசைவாணையை பெற வேண்டி இவ்வலுவலக கடிதம் பார்வை 1 மற்றும் 2ல் கேட்டுக்கொள்ளப்பட்டது. தங்களது மருத்துவமனை 2.07.2013 அன்று ஆய்வு செய்த பொழுது தமிழ்நாடு மாசு கட்டுப்பாடு வாரியத்தின் இசைவாணையைப் பெறாமல் கட்டுமானப்பணி நடைபெற்று வருவதும், மருத்துவக் கல்லூரி மருத்துவமனை செயல்பட்டு வருவதும் கண்டறியப்பட்டது. மேலும், மருத்துவமனையிலிருந்து வெளியேற்றப்படும் மருத்துவக் கழிவுகளை அப்படிப்படுத்துவது சம்மந்தமாகவும் சுற்றுச்சூழல் ஒப்புதல் (Environmental Clearance) பெறப்பட்டது சம்மந்தமாகவும் இவ்வலுவலகத்திற்கு இதுநாள் வரை தெரிவிக்கப்படவில்லை.

ஆகவே தாங்கள் மேற்படி சட்டத்தின் 25 ஆம் பிரிவின் வரைமுறைகளை மீறியுள்ளீர்கள். எனவே, மேற்படி குற்றத்தினை உங்களது நிறுவனமும் தாங்களும் புரிந்துள்ளீர்கள்.

எனவே, உங்கள் நிறுவனத்தை மேற்கொள்ள சட்டத்தின் 33 (அ) பிரிவின்படி மூடுவதற்கும், மின்சாரம் வழங்குதல் மற்றும் நீர் வழங்குதலை நிறுத்தவும் ஏன் ஆணை பிறப்பிக்கக் கூடாது என்பதற்கும் இந்த அறிவிப்பு கிடைத்த 7 நாட்களுக்குள் காரணம் காட்ட வேண்டும் என்று உத்தரவிடப்படுகிறது.

மேற்குறிப்பிட்டுள்ள கால அளவுக்குள் பதில் எதுவும் பெறப்படாவிட்டால் தங்கள் தரப்பில் திருப்தி அளிக்கும் விளக்கம் எதுவுமில்லை எனக்கருதி நடவடிக்கை மேற்கொள்ளப்படும் என தெரிவிக்கப்படுகிறது.

இந்த நடவடிக்கை முகாந்திரம் கிடைக்கப் பெற்றமைக்கான ஒப்புதலை அளிக்குமாறு கேட்டுக் கொள்ளப்படுகிறார்கள்.

30.07.2013

மாவட்ட சுற்றுச்சூழல் பொறியாளர்  
தமிழ் நாடு மாசு கட்டுப்பாடு வாரியம்,  
மதுரை

பெறுநர்:

நிர்வாக இயக்குனர்  
தி/ள். வேலம்மாள் மருத்துவக் கல்லூரி  
மருத்துவமனை மற்றும் ஆராய்ச்சி நிலையம்,  
மதுரை-தூத்துக்குடி சுற்று சாலை,  
அனுப்பாண்டி  
மதுரை - 9

அனுப்பப்பட்டது  
30/7/13

Annexure - VI

ANNEXURE - VI

020  
24/2/14



  
**VELAMMAL**  
Medical College Hospital  
& Research Institute  
The Healing Touch  
Date: 20/02/2014

Ref: VET-VMCH&RI/TNPCB/2014/2002/1

To,

District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
Madurai.

Annexure-V

Sir,

Sub: TNPCB -M/s. VELAMMAL EDUCATIONAL TRUST, Velammal Medical College Hospital & Research Institute, Anuppanadi, Madurai South Taluk, -Madurai District - violation of the provisions of the EIA Notification, 2006 for an offence under section 15(1) read with Section 16(1) and punishable under Section 15(1) of the Environment (Protection) Act, 1986 - Prosecution under Section 19(a) of the Environment (protection) Act, 1986 - Show cause Notice -Issued.

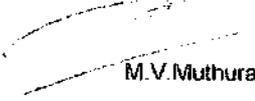
- Ref: 1. The Environment (Protection) Act, 1986, as amended.  
2. The Environmental Impact Assessment Notification, 2006, Dated 14.09.2006.  
3. Office Memorandum No.J-11013/41/2006-1A II (I) Dated 14<sup>th</sup> September 2010, from the Ministry Of Environment and Forest.  
4. Office Memorandum No. J-11013/41/2006-1A II (I), Dated 12<sup>th</sup> December 2012, from the Ministry of Environment and Forest, New Delhi.  
5. Resolution dated 07.02.2013 of the Board of M/s.Velammal Educational Trust and furnished to the SEIAA.  
6. Inspection of the unit on 13.02.2014 By the DEE / TNPCB / Madurai.  
7. Proc. No:- F.1821/RL/MDU SOUTH/DEE/MDU/2014 T 13/02/2014

Further to the subject and reference cited above, we understand the violations on the part of making substantial construction made in our project of M/s. Velammal Medical College Hospital & Research Institute at "Velammal Village", Madurai- Tuticorin Ring Road, Anuppanadi, Madurai -625009. with out obtaining prior Environmental Clearance under EIA Notification 2006. The subject is taken up for consideration of the environment related policy of action and resolved to ensure that such violations will not be repeated in future.

The Trust expresses apologies for the violations carried out for construction of the project without obtaining prior Environmental Clearance under EIA Notification 2006 and request the Tamil Nadu Pollution Control Board, Tamil Nadu to consider the issue of Environmental Clearance for the said project.

Thanking you,

Yours Sincerely

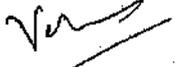
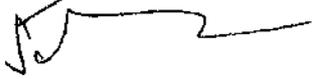
  
M.V.Muthuramalingam  
Chairman  
Velammal Educational Trust

"Velammal Village", Madurai - Tuticorin Ring Road, Anuppanadi, Madurai-625 009,  
Tamil Nadu, India. Tel: +91 452 2510000. Fax: +91 452 2510010.  
E-mail: info@velammalmedicalcollege.edu.in Web: www.velammalmedicalcollege.edu.in  
An Initiative of Velammal Educational Trust

**LETTER OF COMMITMENT AND EXPRESSION OF APOLOGISE**

We understand the violations on the part of making substantial construction / completion of construction made in our project of M/s. Velammal Medical College College Hospital & Research Institute at "Velammal Village", Madurai-Tuticorin Ring Road, Anuppanadi, Madurai - 625 009 without obtaining prior Environmental Clearance under EIA Notification 2006. The subject is taken up for consideration in the meeting of the Trust held on 7<sup>th</sup> February 2013 for consideration of the environment related policy / plan of action and resolved to ensure that such violations will not be repeated in future.

The Trust expresses apologise for the violations carried out for construction of the project without obtaining prior Environmental Clearance under EIA Notification 2006 and request the SEIAA, Tamil Nadu to consider the issue of Environmental Clearance for the said project.

1. M.V.Muthuramalingam - Chairman and Managing Trustee 
2. M.V.M. Velmurugan - Trustee 
3. M.V.M. Velmohan - Trustee 
4. M.V.M. Sasikumar - Trustee 



000566



Date: 7<sup>th</sup> February 2013

To

The Member Secretary

State Level Environment Impact Assessment Authority Tamil Nadu

3<sup>rd</sup> floor, Panagal Maligai,

No.1, Jeelis Road,

Saidapet

Chennai - 600 015

Sub: **Environmental Clearance for Construction of Velammal Medical College and Hospital at Anuppanadi, Madurai South Taluk, Madurai district, Tamil Nadu by M/s. Velammal Educational Trust -- Reg**

Ref: Letter No: F-518/2012 dated 13.12.12

Dear Sir,

Greetings from Velammal Educational Trust.

Herewith we have enclosed the "Letter of Commitment and Expression of Apologies" duly signed by the Chairman and Managing Trustee and Trustees of Velammal Educational Trust for your kind perusal. Kindly do the needful and looking forward to hear from you Sir.

Thanking you

For Velammal Educational Trust:

M.V.Muthuramalingam  
Chairman

Encl: Letter of Commitment and Expression of Apologies

## Annexure-VI

**F. No. 22-21/2020-IA.III**

Government of India

Ministry of Environment, Forest and Climate Change

Impact Assessment Division

\*\*\*\*\*

Indira ParyavaranBhawan

Jor Bagh Road, Aliganj

New Delhi - 110003

sujit.baju@gov.in

Date: 7<sup>th</sup> July, 2021

### Office Memorandum

**Subject: Standard Operating Procedure (SoP) for Identification and handling of violation cases under EIA Notification 2006 in compliance to order of Hon'ble National Green Tribunal in O.A. No.34/2020 WZ - Regarding.**

The Ministry had issued a notification number S.O.804(E), dated the 14<sup>th</sup> March, 2017 detailing the process for grant of Terms of Reference and Environmental Clearance in respect of projects or activities which have started the work on site and/or expanded the production beyond the limit of Prior EC or changed the product mix without obtaining Prior EC under the EIA Notification, 2006.

2. This Notification was applicable for six months from the date of publication i.e. 14.03.2017 to 13.09.2017 and further based on court direction from 14.03.2018 to 13.04.2018.

3. Hon'ble NGT in Original Application No. 287 of 2020 in the matter of Dastak N.G.O. Vs Synochem Organics Pvt. Ltd. &Ors. and in applications pertaining to same subject matter in Original Application No. 298 of 2020 in Vineet Nagar Vs. Central Ground Water Authority &Ors., vide order dated 03.06.2021 held that "(...) **for past violations, the concerned authorities are free to take appropriate action in accordance with polluter pays principle, following due process**".

4. Further, the Hon'ble National Green Tribunal in O.A No. 34/2020 WZ in the matter of Tanaji B. Gambhire vs. Chief Secretary, Government of Maharashtra and ors., vide order dated 24.05.2021 has directed that "**...a proper SoP be laid down for grant of EC in such cases so as to address the gaps in binding law and practice being currently followed. The MoEF may also consider circulating such SoP to all SEIAAs in the country**".

5. Therefore, in compliance to the directions of the Hon'ble NGT a Standard Operating Procedure (SoP) for dealing with violation cases is required to be drawn. The Ministry is also seized of different categories of 'violation' cases which have been

pending for want of an approved structural/procedural framework based on 'Polluter Pays Principle' and 'Principle of Proportionality'. It is undoubtedly important that action under statutory provisions is taken against the defaulters/violators and a decision on the closure of the project or activity or otherwise is taken expeditiously.

6. In the light of the above directions of the Hon'ble Tribunal and the issues involved, the matter has accordingly been examined in detail in the Ministry. A detailed SoP has accordingly been framed and is outlined herein. The SoP is also guided by the observations / decisions of the Hon'ble Courts wherein principles of proportionality and polluters pay have been outlined.

**7. Relevant Court Cases on the issue:** It is noted that while deciding issues related to violations of the Environment Protection Act, 1986 on account of running the project/activity without prior environmental clearance or in excess of capacity allowed in such clearances, **the Hon'ble courts have, *inter-alia*, deliberated on various facets involving 'violation' cases and have enunciated principles of 'Proportionality' and 'Polluter Pays' in various decisions viz. Industrial Council for Enviro-Legal Action Vs Union of India (the Bichhri village industrial pollution case) (1996 SCC [3] 212); Alembic Pharmaceuticals Ltd. Vs Rohit Prajapati & Ors. (C.A. No. 1526 of 2016, order dated 1.4.2020) and Hindustan Copper Limited Vs Union of India in (W.P. (C) No. 2364 of 2014, order dated 28.11.2014).** The salient extracts of the judgements are as under:

**Issue 1: Proposal for grant of Environmental Clearance in violation cases – to be considered on merits:**

**i. Hon'ble High Court of Jharkhand in the matter of Hindustan Copper Limited Vs Union of India in W.P. (C) No. 2364 of 2014, vide order dated 28.11.2014**

*Held: "(...) action for alleged violation would be an independent and separate proceeding and therefore, consideration of proposal for environment clearance cannot await initiation of action against the project proponent."*

*"(...) the proposal of the petitioner company for **environmental clearance must be examined on its merits, independent of any proposed action for the alleged violation of the environmental laws.**"*

**ii. Hon'ble Madras High Court in the matter of Puducherry Environment Protection Association Vs The Union of India in W.P. No. 11189 of 2017, vide order dated 13.10.2017**

*Held "27. The question is whether an establishment contributing to the economy of the country and providing livelihood to hundreds of people should be closed down only because of failure to obtain prior environmental clearance, even though the establishment may not otherwise be violating*

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pollution laws or the pollution, if any, can conveniently and effectively be checked. **The answer necessarily has to be in the negative.**"

"29. It is reiterated that protection of environment and prevention of environmental pollution and degradation are non-negotiable. At the same time, the Court cannot altogether ignore the economy of the Nation and the need to protect the livelihood of hundreds of employees employed in projects, which as stated above, otherwise comply with or can be made to comply with norms."

**Issue 2: Environmental Clearance – Prospective & not ex-post facto:**

**Hon'ble Supreme Court in the matter of Common Cause Vs Union of India in W.P. (C) No. 114 of 2014, vide order dated 2.8.2017**

*Held: "(...) an EC will come into force **not earlier than the date of its grant.**"*

**Issue 3: 'Principles of Proportionality' – to be applied:**

**Hon'ble Supreme Court in the matter of Alembic Pharmaceuticals Ltd. Vs Rohit Prajapati & Ors. in C.A. No. 1526 of 2016, vide order dated 1.4.2020**

*Held: "(...) **this Court must take a balanced approach** which holds the industries to account for having operated without environmental clearances in the past without ordering a closure of operations. The directions of the NGT for the revocation of the ECs and for closure of the units do not accord **with the principle of proportionality**"*

**Issue 4: 'Polluter pays' principle &  
&**

**Issue 5: Costs for remedial measures** implicit in Sections 3 & 5 of Environment (Protection) Act, 1986.

**Hon'ble Supreme Court in the matter of Indian Council for Enviro- Legal Action Vs Union of India (the Bichhri village industrial pollution case) in (1996 SCC [3] 212)**

**Held:**

a) The Central Government is empowered to take all measures and issue all such directions as are called for the above purpose. The said powers will **include giving directions ...** and also the power to **impose the cost of remedial measures** on the offending industry and utilize the amount so recovered for carrying out remedial measures.....

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b) **Levy of costs required for carrying out remedial measures is implicit in Sections 3 and 5** which are couched in very wide and expansive language. Sections 3 and 5 of the Environment (Protection) Act, 1986, apart from other provisions of Water and Air Acts, empower the Government to make all such directions and take all such measures as are necessary or expedient for protecting and promoting the 'environment', which expression has been defined in very wide and expansive terms in Section 2 (a) of the Environment (Protection) Act. This power includes the power to prohibit an activity, close an industry, direct to carry out remedial measures, and wherever necessary impose the cost of remedial measures upon the offending industry.

c) The question of liability of the respondents to defray the costs of remedial measures can also be looked into from accepted universally sound principle, viz., the "**Polluter Pays**" Principle. "The polluter pays principle demands that the financial costs of preventing or remedying damage caused by pollution should lie with the undertakings which cause the pollution, or produce the goods which cause the pollution".

#### **8. Legal provisions:**

i. The Environment (Protection) Act, 1986 mandates the Central Government to take all measures as it deems necessary or expedient for the purpose of protecting and improving the quality of the environment and preventing, controlling and abating environmental pollution (reference sub-section (1) of Section 3 of Environment (Protection) Act, 1986). Further, clause (xiv) of sub-section (2) of Section 3 of the Environment (Protection) Act, 1986 specifies that the measures stipulated under sub-section (1) of Section 3 of the Environment (Protection) Act 1986 includes 'such other matters as the Central Government deems necessary or expedient for the purpose of securing effective implementation of the provisions of this Act'.

ii. Further, notwithstanding anything contained in any other law but subject to the provisions of the Environment Protection Act, 1986, Section 5 of the Environment (Protection) Act, 1986, provides that the Central Government may, in the exercise of powers and performance of Central Government functions under the said Act, issue directions in writing to any person, officer or any authority and such person, officer or authority shall be bound to comply with such directions.

#### **9. Definition of Violation and Non-compliance:**

The Standard Operating Procedure (SoP) considers 'Violation' & 'Non-compliance' from the following perspective:

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i. "Violation" means cases where projects have either started the construction work or installation or excavation, whichever is earlier, on site or have expanded the production capacity and / or project area beyond the limit specified in the Environmental Clearance (Prior-EC) without obtaining Prior-EC or change of scope without prior approval from the Ministry.

ii. "Non-compliance" means non-compliance of terms and conditions prescribed by the Regulatory Authority in the Prior Environment Clearance accorded to the project.

#### 10. Standard Operating Procedure – Guiding Principles:

i. Without prejudice to any other consequences, **action has to be initiated under section 15 read with section 19** of The Environment (Protection) Act, 1986 **against all violations.**

ii. Projects not allowable/permissible, for grant of EC, as per extant regulations: **To be demolished.**

iii. Projects allowable/permissible, if prior EC had been taken as per extant regulations: **To be closed until EC is granted (if no prior EC has been taken) or to revert to permitted production level (in case prior EC has been granted).**

iv. **Polluter pays:** Violators to pay for violation period - proportionate to the scale of project and extent of commercial transaction.

v. Setting up a mechanism for reporting of violation to the regulatory authority(ies).

#### 11. SOP for dealing with the violation cases:

##### Step 1: Closure or Revision

Sl no.	Status of EC	Actions
1	If no prior EC has been taken	Order to <b>close</b> its operation
2.	If prior EC is available for existing/old unit	Order to <b>revert the activity/production to permissible limits.</b>
3.	If prior EC was not required for earlier production level but is now required	<b>Restrict the activity/production</b> to the extent to which prior EC was not required.

##### Step 2: Action under Environment (Projection) Act, 1986

Action under section 15 read with section 19 of the Environment (Protection) Act, 1986 shall be initiated against the violators.

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### **Step: 3: Appraisal under EIA Notification, 2006**

The permissibility of the project shall be examined from the perspective of whether such activity/project was at all eligible for the grant of prior EC.

#### **A. If not permissible:**

i. The project shall be **ordered for the demolition/closure after issuing show cause notice and providing an opportunity of hearing.**

*Ex. If a red industry is functioning in a CRZ-I area which means that the activity was, in the first place, not permitted at the time of commencement of project. Therefore, the activity is not permissible and therefore it shall be **closed & demolished.***

ii. Respective regulatory authorities shall issue directions under section 5 of the Environment (Protection) Act, 1986 for such closure & demolition of the project/activity.

#### **B. If permissible:**

i. As per extant regulations at the time of scoping, if it is viewed that the project activity is otherwise permissible, Terms of Reference (TOR) shall be issued with directions to complete the impact assessment studies & submit Environmental Impact Assessment (EIA) report & Environmental Management Plan (EMP) in a time bound manner.

ii. Such cases of violation shall be subject to appropriate

(a) Damage Assessment

(b) Remedial Plan and

(c) Community Augmentation Plan by the Central level Sectoral Expert Appraisal Committees or State/Union Territory Level Expert Appraisal Committees, as the case may be.

iii. The Competent Authority shall issue directions to the project proponent, under section 5 of the Environment (Protection) Act, 1986 on case to case basis mandating payment of such amount (as may be determined based on Polluters Pay principle) and undertaking activities relating to Remedial Plan and Community Augmentation Plan (to restore environmental damage caused including its social aspects).

iv. Upon submission of the EIA & EMP report, the project shall be appraised by the Central Sectoral Expert Appraisal Committees or the State/Union Territory Level Expert Appraisal Committees, as the case may be, as if it was a new proposal. If, on examination of the EIA/EMP report, the project is considered permissible for operation as per extant regulations, the requisite Environmental Clearance shall be issued **which shall be effective from the date of issue.**

v. However, during appraisal after examination if it is found that even though the project may **be permissible but not environmentally sustainable in its present**

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**form/configuration/features** then the project shall be directed to be **modified so that the project would be environmentally sustainable.**

vi. If, however, it is not considered appropriate to issue EC, the project shall be directed to be **demolished/ closed. If such proposal is a case of expansion, the project shall be directed to revert back to the extent of activity for which EC had been granted earlier or to revert back to the extent of activity for which EC was not required (as the case may be).**

vii. Central Sectoral Expert Appraisal Committees or the State/Union Territory Level Expert Appraisal Committees, as the case may be, may insist upon public hearing to be conducted for such categories of projects for which the EIA Notification 2006, as amended from time to time, requires the public hearing to be conducted.

viii. The project proponent will be required to **submit a bank guarantee equivalent to the amount of Remediation Plan and Natural & Community Resource Augmentation Plan with Central / the State Pollution Control Board (depending on whether it is appraised at Ministry or by SEIAA).** The quantification of such liability will be recommended by Expert Appraisal Committee and finalized by Regulatory Authority. The bank guarantee shall be deposited prior to the grant of environmental clearance and **will be released after successful implementation of the Remediation plan and Natural & Community Resource Augmentation Plan.**

**Note** - The activities, as per above clauses, shall be undertaken simultaneously wherever feasible. Environmental Clearance, if granted, to such projects or activities, after due appraisal of EIA/EMP report, **shall be effective only from the date of issuance of such clearance** and shall be subject to compliance of obligations towards Damage Assessment, Remedial Plan & Community Augmentation Plan, etc. finalized in each case.

## **12. Penalty provisions for Violation cases and applications:**

### **a. For new projects:**

- i. **Where operation has not commenced:** 1% of the total project cost incurred up to the date of filing of application along with EIA/EMP report; [Ex: Rs.1 lakh for project cost of Rs.1 Cr]
- ii. **Where operations have commenced without EC:** 1% of the total project cost incurred up to the date of filing of application along with EIA/EMP report **PLUS** 0.25% of the total turnover during the period of violation. [Ex: For Rs.100 Cr project cost and Rs.100 Cr total turnover, the penalty shall be Rs.1 Cr + Rs. 0.25 Cr = Rs.1.25 Cr]

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**b. For expansion projects:**

- i. **Where operation/production with expanded capacity has not commenced:**  
1% of the project cost, attributable to the expansion, incurred up to the date of filing of application along with EIA/EMP report.
- ii. **Where operation/ production with expanded capacity have commenced:**  
1% of the project cost (attributable to the expansion activity) incurred upto the date of filing of application along with EIA/EMP report PLUS 0.25% of the total turnover (attributable to the expanded activity/capacity) involved during the period of violation.

12.1. Without prejudice to obligation as per (a) & (b) above, where the project or activity is considered for appraisal as above & the project proponent fails to provide required information or requisite documents or complete the requisite study for the purpose of EIA/EMP reports or does not furnish such reports within such period, as specified by the appraisal committee, without reasonable cause, it shall be inferred that the project proponent is not serious enough and the project or activity shall be directed to be demolished / closed.

12.2. The percentage rates, as above, shall be halved if the project proponent *suo-moto* reports such violations without such violations coming to the knowledge of the Government either on inquiry or complaint.

12.3. The penalty, as above, shall be in addition to liability for carrying out various remedial measures which shall be worked out based on the damage assessment for quantifying the environmental damage caused due to unauthorized project activity [as per Step 3 enumerated above].

**13. Identification of Violation cases:**

With a view to protecting the environment and to expeditiously bring violators into a regulatory regime so as to prevent & control environment damage caused by such violation & to determine whether operation of such projects is permissible and to take action stipulated under Section 15 of the Environment (Protection) Act, 1986 for contravention of the provisions of the said Act, Rules, orders and directions, it is expedient to also identify the cases of violation, examine and appraise such projects so as to refrain them from causing further environmental damage and also to compensate for causing damage to the environment. Therefore, in exercise of the powers conferred under Section 5 of the Environment (Protection) Act, 1986, the Central Government hereby directs that:-

- i. State Pollution Control Boards & Union Territory Pollution Control Committees, before grant or renewal of Consents under Water(Prevention & Control of Pollution) Act, 1974 & Air (Prevention& Control of Pollution) Act, 1981, shall ensure that the project proponents applies for or possess valid Prior

Environmental Clearance in terms of extant EIA Notification and shall not grant or renew CTO (Consent to Operate) unless Environment Clearance (if applicable) has been obtained.

- ii. The Central Pollution Control Board, all State Pollution Control Boards and all Union Territory Pollution Control Committees shall identify cases of violation under their respective jurisdiction, report such cases to the Ministry or State/Union Territory Level Environmental Impact Assessment Authority, as the case may be and also revoke CTO, if granted to the unit after giving an opportunity of being heard.
  - iii. The Central Pollution Control Board, all State Pollution Control Boards and all Union Territory Pollution Control Committees shall expeditiously examine the references, received from public and other bodies, relating to violations and take necessary steps as per (ii) above.
14. This is issued with the approval of the Competent Authority.

  
(Dr. Sujit Kumar Bajpayee)  
Joint Secretary (IA)

To

1. Chairperson/Member Secretary of Central Pollution Control Board
2. Chairperson/Member Secretaries of all the SEIAAs/SEACs
3. Chairman/Members of all the Expert Appraisal Committees
4. Chairman/Members of all the State Pollution Control Boards and Union Territory Pollution Control Committees

Copy for information:

1. PS to Hon'ble Minister for Environment, Forest and Climate Change
2. PS to Hon'ble MoS for Environment, Forest and Climate Change
3. PPS to Secretary(EF&CC)
4. PPS to AS(RS) / AS (RA)/ AS (UD)/ JS(JT) / JS (MP)/ JS (NPG)
5. All the officers of IA Division
6. Website of MoEF&CC/PARIVESH/Guard file

Copy (by email) also forwarded to the Registrar, NGT, in compliance to instruction given in O.A No. 34/2020 WZ in the matter of Tanaji B. Gambhire vs. Chief Secretary, Government of Maharashtra and ors.(order dated 24.05.2021).

## Annexure-VII



**TAMILNADU POLLUTION CONTROL BOARD**  
**Advanced Environmental Laboratory, Madurai**  
 (E Mail:tnpcbaelmdu@gmail.com. Phone No:0452 2489497)

**TEST REPORT**

1. Test Report No: ULR -TC 68752000000251/252	2. Nature Of Sample : Sewage
3. Client Name & Address DEE / TNPCB / MDU	4. Sample Condition : Good
5. Samples Received Date : 18.06.2021	6. Samples Analysis Date : 17.06.2021
7. Sample Quantity : 2.5Liters	8. Analysis Completion Date : 06.07.2021
9. Point of Collection : MDU/926 - STP I Inlet, MDU/927 - STP I Outlet,	10. Date of Reporting : 07.07.2021

Sl. No	PARAMETER	TEST METHOD	Results			
			UNIT	LAB.C.No	251	252
				DEE.C.No	MDU/926	MDU/927
1.	pH @ 25° C	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 H <sup>+</sup>	--		7.24	7.75 ✓
2.	Total Suspended Solids	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2540 D	mg/L		83	26 ✓
3.	Total Dissolved Solids	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2540 C	mg/L		2362	2092
4.	Chlorides as Cl	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 Cl B	mg/L		879	774
5.	Sulphate as SO <sub>4</sub>	APHA 23 <sup>rd</sup> Edt2017, Part No. 4500 SO <sub>4</sub> E	mg/L		355	363
6.	BOD for 3 days @ 27° C	IS 3025:(Part 44) 1993	mg/L		60	15 ✓
7.	C O D	IS 3025:(Part58) 2006	mg/L		336	112

*[Signature]*  
DCSO 08/07/2021

CSO

*[Signature]*  
Assistant Director (Lab) 07/07/2021  
AEL, TNPCB, Madurai

\*\*\*END OF REPORT\*\*\*



**TAMILNADU POLLUTION CONTROL BOARD**  
Advanced Environmental Laboratory, Madurai  
(E Mail:tnpcbaelmdu@gmail.com. Phone No:0452 2489497)

**TEST REPORT**

1. Test Report No: ULR -TC 68752000000253/254	2. Nature Of Sample : Sewage
3. Client Name & Address DEE / TNPCB / MDU	4. Sample Condition : Good
5. Samples Received Date : 18.06.2021	6. Samples Analysis Date : 17.06.2021
7. Sample Quantity : 2.5Liters	8. Analysis Completion Date : 06.07.2021
9. Point of Collection : MDU/928 - STP II Inlet, MDU/929 - STP II Outlet,	10. Date of Reporting : 07.07.2021

Sl. No	PARAMETER	TEST METHOD	Results			
			UNIT	LAB.C.No	253	254
				DEE.C.No	MDU/928	MDU/929
1.	pH @ 25° C	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 H <sup>+</sup>	--		7.02	7.86
2.	Total Suspended Solids	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2540 D	mg/L		42	14
3.	Total Dissolved Solids	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2540 C	mg/L		2044	2066
4.	Chlorides as Cl	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 Cl B	mg/L		755	729
5.	Sulphate as SO <sub>4</sub>	APHA 23 <sup>rd</sup> Edt2017, Part No. 4500 SO <sub>4</sub> E	mg/L		310	296
6.	BOD for 3 days @ 27° C	IS 3025:(Part 44) 1993	mg/L		43	13
7.	C O D	IS 3025:(Part58) 2006	mg/L		256	96

D. D. S. S. S.  
DCSO 08/07/2021

CSO

*[Signature]*  
Assistant Director (Lab),  
AEL, TNPCB, Madurai. 8/7/2021

\*\*\*END OF REPORT\*\*\*



**TAMILNADU POLLUTION CONTROL BOARD**  
**Advanced Environmental Laboratory, Madurai**  
(E Mail:tnpcbaelmdu@gmail.com. Phone No:0452 2489497)

**TEST REPORT**

1. Test Report No: ULR -TC 6875200000256/257/258	2. Nature Of Sample : Soil
3. Client Name & Address DEE / TNPCB / MDU	4. Sample Condition : Good
5. Samples Received Date : 08.01.2021	6. Samples Analysis Date : 18.01.2021
7. Sample Quantity : 1.5 Kg	8. Analysis Completion Date : 07.05.2021
9. Point of Collection : MDU/931 - Outside the premises behind maintenance office @ 150m MDU/932 - Inside the premises near STP I MDU/933- Inside the premises near STP II	10. Date of Reporting : 17.06.2021

Sl. No	PARAMETER	TEST METHOD	UNIT	Results			
				LAB.C.No	256	257	258
				DEE.C.No	MDU/931	MDU/932	MDU/933
1.	Conductivity	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2510 B	µmhos/cm		1090	2116	1136
2.	p <sup>H</sup>	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 H <sup>+</sup>	-		9.7	8.37	8.33
3.	Nitrite Nitrogen	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 NO <sub>2</sub> -B	(mg/Kg)		0.39	0.5	0.5
4.	Dissolved Phosphate (as P)	APHA 23 <sup>rd</sup> Edt 2017 Part No. 4500 P-E	(mg/Kg)		0.15	0.15	0.15
5.	Total Iron (as Fe)	APHA 23 <sup>rd</sup> Edt 2017 Part No. 3500 Fe-B	(mg/Kg)		21	22	23
6.	Zinc (as Zn)	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/Kg)		0.0015	0.0015	0.0015
7.	Potassium	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3500 - K	(mg/Kg)		161	153	160
8.	Copper	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/Kg)		0.0015	0.0015	0.0015
9.	Lead	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/Kg)		0.015	0.015	0.015
10.	Nickel	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/Kg)		0.008	0.008	0.008
11.	Cadmium	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/Kg)		0.008	0.008	0.008
12.	Manganese	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3500-Mg	(mg/Kg)		-	-	-

*S. Dh. S. S.*  
DCSO 08/07/2021

CSO

*S. V. S. S.*  
Assistant Director (Lab),  
AEL, TNPCB, Madurai.  
8/7/2021.

\*\*\*END OF REPORT\*\*\*



# TAMILNADU POLLUTION CONTROL BOARD

Advanced Environmental Laboratory, Madurai

(E Mail:tnpcbaelmdu@gmail.com. Phone No:0452 2489497)

## TEST REPORT

1. Test Report No: ULR -TC 68752000000255	2. Nature Of Sample : Water
3. Client Name & Address DEE / TNPCB / MDU	4. Sample Condition : Good
5. Samples Received Date : 18.06.2021	6. Samples Analysis Date : 17.06.2021
7. Sample Quantity : 2.5Liters	8. Analysis Completion Date : 06.07.2021
9. Point of Collection : MDU/930 - Borewell located outside the premises southeast direction @150 Meters	10. Date of Reporting : 07.07.2021

Sl. No	PARAMETER	TEST METHOD	UNIT	Results	
				LAB.C.No	255
				DEE.C.No	MDU/930
1.	P <sup>H</sup>	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 H <sup>+</sup>	-		8.14
2.	Total Dissolved Solids	APHA 23 <sup>rd</sup> Edt 2017, Part No. 2540 C	(mg/L)		2096
3.	Chlorides (as "Cl")	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 Cl B	(mg/L)		784
4.	Sulphate ( as SO <sub>4</sub> )	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 SO <sub>4</sub> E	(mg/L)		65
5.	Total Alkalinity	APHA 23 <sup>rd</sup> Edt 2017 Part No. 2320 - B	(mg/L)		187
6.	Total Hardness	APHA 23 <sup>rd</sup> Edt 2017 Part No. 2340 C	(mg/L)		760
7.	Calcium	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3500-Ca	(mg/L)		188
8.	Magnesium	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3500-Mg	(mg/L)		70
9.	Nitrate Nitrogen	IS 3025 :(Part 34) 1993	(mg/L)		0.84
10.	Fluoride (as F)	APHA 23 <sup>rd</sup> Edt 2017 Part No. 4500F B, D	(mg/L)		<0.1
11.	Total Iron (as Fe)	APHA 23 <sup>rd</sup> Edt 2017 Part No. 3500 Fe-B	(mg/L)		0.14
12.	Zinc (as Zn)	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/L)		0.0015
13.	Total Chromium	APHA 21 <sup>st</sup> Edt 2005-3500-Cr-B	(mg/L)		<0.003
14.	Copper	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/L)		0.0015
15.	Lead	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/L)		<0.01
16.	Nickel	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/L)		0.008
17.	Cadmium	APHA 23 <sup>rd</sup> Edt 2017, Part No. 3111 B	(mg/L)		<0.003
18.	Boron	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 B	(mg/L)		0.002
19.	Cyanide	APHA 23 <sup>rd</sup> Edt 2017, Part No. 4500 CN-E	(mg/L)		<0.005

DCSO 07/07/2021

CSO

Assistant Director (Lab),  
AEL, TNPCB, Madurai.



**TAMIL NADU POLLUTION CONTROL BOARD**

O/o. The District Environmental Engineer,  
TNPC Board, Kappalur, Madurai - 625008

**Proc.No.F.NA.MDU/RL/DEE/TNPCB/MDU/A/2020. Dated: 19/03/2020.**

Sir,

**Sub:** TNPC Board - Madurai - Industries - Issue of Show Cause Notice under Section 21 of the Air (Prevention and Control Of Pollution) Act, 1981 as amended in 1987 to the unit of M/s Velammal Medical College and Hospital, S.F.No. 61/1, 61/2 etc., Anuppanadi Village, Madurai South Taluk, Madurai District - regarding

**Ref:** (1) The Air (P&CP) Act, 1981 as amended in 1987.  
(2) Biomedical Waste Management Rules, 2016  
(3) Inspection of the unit by DEE, & AEE, TNPCB, Madurai on 13.03.2020.

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Tamilnadu Pollution Control Board serves this Notice to you for contravention of Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 as amended in 1987.

Whereas as per Section 21 of Air (Prevention & Control of Pollution) Act, 1981 as amended, no person shall without the prior Consent of the Board, to establish or operate any Industrial plant in the Air Pollution Control area. The entire state of Tamil Nadu is declared as Air Pollution control area with the date effect from the 1st day of October 1983.

Whereas during inspection of the unit of M/s Velammal Medical College and Hospital, S.F.No. 61/1, 61/2 etc., Anuppanadi Village, Madurai South Taluk, Madurai District, on 13.03.2020 the following were observed.

1. The unit was under operation without obtaining consent of the Board as required under Section 21 of the Air (P&CP) Act 1981 as amended.

Thereby, you have violated the provisions of the Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 which is an offence punishable under section 37 of the said Act with imprisonment for a term which shall not be less than one year and six months but which may be extended to six years and with fine.

Hence you are directed to show cause within seven days from the date of receipt of this notice as to why penal action for offences punishable under section 37 read with Section 31A of the Act should be initiated against you as violator of the provisions of the Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987.

It is informed that non receipt of any reply within the prescribed period will be considered that you have no satisfactory explanation to offer for the above said contravention and action will be taken for the disconnection of Electricity Board power supply, water connection etc., to your unit under Section 31A of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987.

The receipt of this proceeding shall be acknowledged.

  
District Environmental Engineer (i/c),  
TNPC Board, Madurai

To

The Managing Director,  
M/s Velammal Medical College and Hospital,  
Anuppanadi Village,  
Madurai South Taluk,  
Madurai District

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## TAMIL NADU POLLUTION CONTROL BOARD

O/o. The District Environmental Engineer,  
TNPC Board, Kappalur, Madurai - 625008.

**Proc.No.F.NA.MDU/RL/DEE/TNPCB/MDU/W/2020. Dated: 19/03/2020.**

Sir,

Sub: TNPC Board - Madurai - Industries - Issue of Show Cause under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 to the unit of M/s Velammal Medical College and Hospital, S.F.No. 61/1, 61/2 etc., Anuppanadi Village, Madurai South Taluk, Madurai District - regarding.

Ref: (1) The Water (P&CP) Act, 1974 as amended in 1988.  
(2) Biomedical Waste Management Rules, 2016  
(3) Inspection of the unit by DEE, & AEE, TNPCB, Madurai on 13.03.2020.

\*\*\*\*\*

Tamilnadu Pollution Control Board serves this Notice to you for contravention of Section 25 of the Water (Prevention & Control of Pollution) Act, 1974 as amended.

Whereas as per Section 25 of Water (Prevention & Control of Pollution) Act, 1974 as amended, no person shall without prior consent of the State Board to establish or take any steps to establish any industry, operation or process or any treatment and disposal system which is likely to discharge sewage or trade effluent into stream or well or sewer or land.

Whereas during inspection of the unit of M/s Velammal Medical College and Hospita, S.F.No. 61/1, 61/2 etc., Anuppanadi Village, Madurai South Taluk, Madurai District, on 13.03.2020, the following were observed.

- (1) The unit was under operation without obtaining Consent of the Board as required under Section 25 of Water (Prevention & Control of Pollution) Act, 1974.
- (2) The unit has not obtained authorization from the Board as required under Biomedical Waste Authorisation Rules 2016 for the handling and disposal of Biomedical waste.
- (3) The sewage treatment plant I & II was not under operation except the aeration tank.
- (4) Disposal of partially treated effluent was also noticed in the adjacent areas.
- (5) The Effluent Treatment Plant provided for the laundry has not been properly operated and maintained by the unit.
- (6) The other solid waste was found to be dumped in the open yard without proper segregation.
- (7) The unit has not obtained / applied for Authorisation under Hazardous and Other Waste Management and Handling Rules for the disposal of Hazardous waste.
- (8) Trade effluent from the hospital has not been collected and treated in the treatment plant.

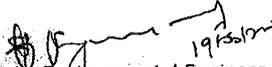
Thereby, the unit is contravening under Section 25 of Water (Prevention and Control of Pollution) Act 1974 as amended In 1988 which is an offence punishable under Section 44 read with 45A of the Act with Imprisonment for a term which shall not be less than one year and

six months, but which may extend for six years and with fine and in case the failure continues with an additional fine which may extend to five thousand rupees for every day during which such failure continues after the conviction for the first such failure.

Hence, you are requested to show cause within seven days from the date of receipt of the notice as to why penal action for the offence under Section 44 read with 45A of the Act should not be taken against you as occupier from the contraventions of conditions under Section 25 of Water (Prevention and Control of Pollution) Act 1974 as amended in 1988 and issue of direction under Section 33 A of the Act for the closure of the unit and stoppage of power supply etc. to the unit.

It is informed that non receipt of any reply within the prescribed period will be construed that you have no satisfactory explanation to offer for the above said contravention and action will be taken on merits in accordance with law.

The receipt of this proceeding shall be acknowledged.

  
District Environmental Engineer (i/c),  
TNPC Board, Madurai

To

The Managing Director,  
M/s Velammal Medical College and Hospital,  
Anuppanadi Village,  
Madurai South Taluk,  
Madurai District

*file copy*