

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI**

APPEAL NO. 21 OF 2025 (SZ)

The Chennai Petroleum Corporation Limited,
Rep by its Managing Director,
New No. 536, Anna Salai,
Teynampet, Chennai – 600 018.
Tel: 044-24349833 & Email ID: vsriram@cpcl.co.in

....Appellant

-Vs-

1. Tamil Nadu Pollution Control Board,
Rep. by its Chairperson,
No. 76, Mount Salai,
Guindy, Chennai – 600 032.
Tel: 044-26880219 & Email ID tnpcbmn@gmail.com
2. The Joint Chief Environmental Engineer (M),
Tamil Nadu Pollution Control Board,
2nd Floor, 77-A, South Avenue Road,
Ambattur Industrial Estate,
Ambattur Taluk, Chennai - 600 058.
Tel: 044-26880219 & Email ID tnpcbmn@gmail.com
3. District Environmental Engineer,
Tamil Nadu Pollution Control Board,
1st Floor, 6/1, Sri Jothi Complex,
Murugesan Street, Balavinayagar Nagar,
Arumbakkam, Chennai - 600 106.
Phone 044 23632603 & Email ID: tnpcbchennai@yahoo.in.

.... Respondents

MEMO FILED BY THE APPELLANT

The Appellant begs to submit as follows :

1. That the subject appeal has been filed challenging the order dated 24.02.2025 passed under Section 5 of the Environment Protection Act, by the Respondent Board herein in imposing Environmental Compensation to the Appellant's unit for alleged pollution.

2. That the Respondent board herein has filed its Reply Statement to each of the Appeals preferred by the Appellant as against the orders passed for each individual industrial unit of the Appellant.
3. However, it is submitted the Reply Statement suffers from a clerical error which renders its contents not relating to the Appeal under which it has been filed.
4. That the subject Appeal No 21 of 2025 pertains to Proc. No.: T6 / TNPCB /F.017544/018927 / 2023 - 4 dated 24.02.2025, which is for DHDS Plant. However, in Para 3 of the Reply Statement of the Board, reference number is mentioned as Proc. No.: T6 / TNPCB /F.017544/018927 / 2023 - 1 dated 24.02.2025, which is not correct as it pertains to Refinery I, II & CPP Plant, a different unit.
5. Hence, the above facts may be taken into consideration and the Respondent Board may be directed to rectify and file a fresh counter affidavit pertaining to the correct unit under which the Appeal is filed.

DATED AT CHENNAI ON THIS THE 4th DAY OF NOVEMBER, 2025



COUNSEL FOR APPELLANT

**M/s. AAV PARTNERS
S SARAVANAN
E KARTHIKEYAN
74, II Floor, Marshalls Road,
Egmore, Chennai.
Email -
saleemperson@gmail.com
Ph - 9500069660**