

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

APPEAL No.33 of 2024

S.P. MUTHURAMAN
S/o. S. Ponnusamy,
Door No. 204, Railway Feeder Road,
Sankar Nagar Post,
Tirunelveli - 627 357.

...Appellant

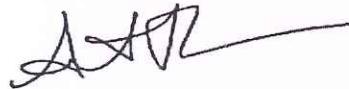
AND

The Secretary
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhawan,
Vayu Wing, 3rd Floor, Aliganj,
Jorbagh Road, New Delhi-110 003 & 4 others.

...Respondents

INDEX

S.No	Description	Page No.
1.	REPLY AFFIDAVIT FILED ON BEHALF OF THE THIRD AND FOURTH RESPONDENTS - TAMIL NADU POLLUTION CONTROL BOARD	1 - 12



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

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

APPEAL No.33 of 2024

S.P. MUTHURAMAN
S/o. S. Ponnusamy,
Door No. 204, Railway Feeder Road,
Sankar Nagar Post,
Tirunelveli - 627 357.

...Appellant

AND

1. The Secretary
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhawan,
Vayu Wing, 3rd Floor, Aliganj,
Jorbagh Road, New Delhi-110 003.
2. The Member Secretary,
Industry III, EAC,
Ministry of Environment, Forest & Climate Change,
Indira Paryavaran Bhawan,
Vayu Wing, 3rd Floor, Aliganj,
Jorbagh Road, New Delhi-110 003.
3. The Member Secretary,
Tamil Nadu Pollution Control Board,
No. 76, Mount Road,
Guindy, Chennai - 600 032.
4. The District Environment Engineer,
Krishnagiri District,
O/o. The Tamil Nadu Pollution Board,
Plot No. 149/A, First Floor,
SIPCOT Industrial Estate Phase - 1,
Dharga, Hosur-635 126
Krishnagiri District.
5. M/s. ChemplastSanmar Limited,
Rep. by its President,
No. 44, Theertham Road,
Berigai, Suligunta Village,
Shoolagiri Taluk,
Krishnagiri District - 635 105.

...Respondents


JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.78, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

REPLY AFFIDAVIT FILED ON BEHALF OF THE THIRD AND FOURTH RESPONDENTS -TAMIL NADU POLLUTION CONTROL BOARD

I, R.Sarasavani D/o. Thiru. Raghavan aged about 59 years having office at No.76, Mount Salai, Guindy, Chennai - 600032 do hereby solemnly affirms and sincerely states as follows.

1. I submit that I am working as the Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board, Chennai-600032 and I am authorized to file this report on behalf of the third and fourth respondents - Tamil Nadu Pollution Control Board and as such I am well acquainted with the facts of the case as per office records.
2. It is respectfully submitted that the present Appeal is filed with a prayer to
 - a) *To quash the Environmental Clearance issued by the 1st Respondent to the 5th Respondent's 2nd expansion activities as invalid and illegal as the same was issued without taking into consideration of the intentionally suppressed facts of the 1st expansion's completion status.*
 - b) *To Stay all and any further process of the project work which was commenced in contravention of EIA Notification, 2006.*
 - c) *To direct the 1st Respondent to initiate appropriate legal proceedings against the Expert Appraisal Committee who had recommended for the grant of Environmental Clearance.*
 - d) *To direct the 1st Respondent to initiate legal action against the 5th Respondent for the offence of intentional suppression of the facts regarding the status of the 1st expansion, the terms and conditions issued and the non-compliance of the same.*
3. It is respectfully submitted that the unit M/s. ChemplastSanmarLimited., located in SF.No.5, 7/12...etc of Suligunta Village, Shoolagiri Taluk, Krishnagiri District has obtained Consent to Operate vide TNPCB's Proc. Dated: 19.08.2020 under the Water(P&CP) Act, 1974 and Air (P&CP) Act, 1981 and subsequent renewal valid upto 31.03.2027 for the following products: -

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 TAMIL NADU POLLUTION CONTROL BOARD
 No.76, MOUNT SALAI, GUINDY,
 CHENNAI-600 032.

A) Product:-

S.No	Description	Quantity
1	PHYTO CHEMICALS (1.Colchicine,2.Thiocolchicoside)	1.4 Tons/ Year
2.	ORGANIC CHEMICALS (1.Mahagonate, 2.Vetikone, 3.Anisyl Acetone, 4.Para Methyl Acetophenone, 5.Para Methoxy Phenyl Acetone, 6.Para Methoxy Benzyl Cyanide, 7.Para Methoxy Phenyl Ethylamine, 8.Tyramine/Thyramine HCL, 9. CHEA, 10. BHBA, 11. ATSC, 12. Sandur-3, 13. T4C, 14. 4-Hydroxy Indanone, 15. Substituted Aryl Alkyl Amine, 16. Nitroaniline, 17. Aminobenzenetricarboxylic acid, 18. TR1600 / TR1400, 19. Aminophthalic acid, 20.PSH, 21. Cyanodiester, 22. Cabsans, 23. Aloin, 24. CD675, 25. 2-Fluro acetophenone, 26. Methoxytetralone, 27.Methyl-2 phenoxyisobutyrate, 28. 4- Chloro-Butyl veratrate, 29. 2-Thionyl methyl malonic mono ester, 30. AE Phenol, 31. Long chain alchohol Ester, 32. 3,4 Dichoro Benzamideamine, 33. 2-Choro-N,N-Dimethyl propylamine, 34. Benzhydrol, 35. PAPT, 36, Phenoxyethylamine, 37. Substituted Benzophenone, 38. 2-S- Aminobutramide HCL)	1080 Tons/ Year

4. It is respectfully submitted that the unit had submitted application for expansion of product from 1080 Tons/year to 1601.4 Tons/year under "No increase in pollution load" as per the notification S. No. 980 E, dated: 02/03/2021, Ministry of Environment, Forest and Climate Change, Government of India, New Delhi and subject was placed in the Pollution Load Assessment Committee meeting held on 27.01.2022 in the Board. The committee decided to certify that there is no increase in pollution load due to expansion in production of the unit. Hence the committee has recommended that the unit shall be granted consent without Environmental Clearance letter vide dated 17.03.2022.

5. It is respectfully submitted that the unit has applied for Consent to Establish for Expansion-I based on the no increase in pollution load certificate and obtained CTE- Expansion vide TNPCB's Proc.

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 No.76, MOUNT SALAI, GUINDY,
 CHENNAI-600 032.

Dated:03/06/2022 under the Water (P&CP) Act, 1974 and Air (P&CP) Act, 1981 valid upto 31/03/2027 for the following products:-

B) Product:-

Sl.No.	Description	Quantity
1.	PHYTO CHEMICALS (1.Colchicine,2.Thiocolchicoside)	1.4 Tons/ Year
22.	ORGANIC CHEMICALS (1.CHEA, 2.T4C, 3.AE PHENOL, 4.4-CHOLO-BUTYL VERATRATE, 5.TR1600/TR1400, 6.SUBSTITUTED ARYL ALKYL AMINE, 7.METHYL-2 PHENOXY ISOBUTYRATE, 8.(4R)- 2- OXOOXAZOLIDINE -4- CARBOXYLIC ACID (COX), 9.4-t BUTYLPHENYLACETONITRILE, 10.1- BROMO-3,5-DICHLOROBENZENE (DCBB), 11.4-CHLORO-2-NITRO BENZOIC ACID, 12.2- (4-BROMO PHENYL) PROPANOL (BPP), 13.2- CHLORO-5-CHLOROMETHYL- 1,3-THIAZOLE (CCMT), 14.TETRACHLORO BUTYRIC ACID (TCBA), 15.IONOPHOR, 16.4-BROMO-2- FLUORO HYDROXY BIPHENYL (BFB), 17.PARA METHYL PHENCYL CHLORIDE (PMPC), 18.SODIUM 4-(2,4-DICHLOR MTOLUOYL)-1,3-DI METHYL -5- PYRAZOLATE (MY710Na), 19.2- TRIFLUOROMETHYL BENZENE SULFONAMIDE (TBSA), 20.METHYL CARBAZATE, 21.TETRALONE IMINE, 22.DIAMIDE, 23.SULFONAMIDE, 24.5- CHLORO-8-HYDROXY-QUINOLINE (CHQ), 25.PHENYLGUANIDINE	1600 Tons/ Year

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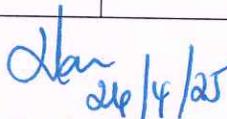
	CARBONATE (PGC), 26.FE (III) ACETYL ACETANOATE, 27.ANODE, 28.Cathode)	
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6. It is respectfully submitted that the unit has applied for Consent to Operate for Expansion-I and obtained the same for the increase in production capacity from 1081.4 Tons/ Year to 1601.4 Tons/ Year vide Board Proc.dated 18/08/2023 under the Water (P&CP) Act, 1974 and Air (P&CP) Act, 1981 valid upto 31.03.2028.

7. It is respectfully submitted that the unit M/s. Chemplast Sanmar Limited has carried out study on "Pollution Loads" after commencing the operation of product mix change based on the NIPL certificate issued to the unit and the same was submitted to the TNPCB vide unit's letter dated 07.03.2024. The Pollution Load Assessment Report concluded that the pollution load is within the quantity stipulated as in the NIPL proposal report submitted earlier and No increase in pollution load (NIPL) Certificate issued by Pollution Load Assessment Committee (PLAC).

8. It is respectfully submitted that the unit has obtained Environmental Clearance for expansion vide Lr. No. F-J-11011/ 104/ 2009- 1A-II (I), dated: 17.10.2023, from MoEF&CC, GOI after conducting the public hearing under the EIA Notification 2006 as amended for the following:

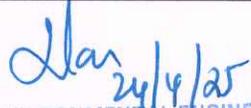
SL.No.	Name of the product	Quantity
a.	Main Products manufactured:	
1.	PHYTO CHEMICALS(1.Colchicine,2.Thiocolchicoside) - API	1.4 Tons/Year
2.	ORGANIC CHEMICALS 1. 2-1- CYLCOHEXENYL ETHYL AMINE(CHEA) 2. 3- [1,3,3-TRIS-(2-CARBOXY-ETHYL)-2-OXO- CYCLOHEXYL]-PROPIONIC ACID (T4C) 3.SUBSTITUTED ARYL ALKYL AMINE4.2-	20000 Tons/Year


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AMINO-2-PHENYLBUTYRICACID	SODIUM
SALT /METHYL 2-(N,N-DIMETHYLAMINO)-2-	
PHENYLBUTYRATE (TR1600/TR1400)	5. 4-
CHOLO-BUTYL VERATRATE	6. 4-(2-
AMINOETHYL)-2-	
METHOXYPHENOL(AEPHENOL)7.METHYL-	
2PHENOXY ISOBUTYRATE	8. (4R)- 2-
OXOOXAZOLIDINE -4- CARBOXYLICACID	
(COX) 9. 4-tBUTYLPHENYLACETONITRILE	10.
1-BROMO-3,5-DICHLOROBENZENE(DCBB)	11.
4-CHLORO-2-NITROBENZOICACID	12.4-
BROMOPHENYL PROPANOL (BPP)	13. 2-
CHLORO-5-CHLOROMETHYL-1,3 -THIAZOLE	
(CCMT) 14.TETRACHLORO BUTYRIC	
ACID(TCBA) 15. IONOPHOR	16. 4-BROMO-2-
FLUORO HYDROXY BIPHENYL(BFB)	17. PARA
METHYL PHENYLCHLORIDE (PMPC)	18.
SODIUM 4-(2,4-DICHLOROMETHOXY)-1,3-	
DIMETHYL-5-PYRAZOLATE(MY710Na)	19. 2-
TRIFLUOROMETHYL	
BENZENESULFONAMIDE (TBSA)	20.
METHYLCARBAZATE	21. TETRALONE
IMINE	22. 4-[2(4-CHLORO-2,6-
DIMETHYLPHENYL)ACETYL]METHYLAMIN	
O]-1-METHOXY-NPHENYL PIPERIDIN-4-	
CARBOXAMIDE (DIAMIDE)	23.3(2,2,2-
TRIFLUOROETOXY)2-PYRIDINE	
SULFONAMIDE	SODIUMSALT
(SULFONAMIDE) 24. 5-CHLORO-8-HYDROXY	
QUINOLINE(CHQ)	25.
PHENYLGUANIDINECARBONATE (PGC)	26. FE
(III)ACETYL ACETANOATE	27.MANGANESE


 24/4/25
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(II) HEXACYANO MANGANATE(II)SODIUM SALT (ANODE)28.	IRON
(II)MANGANESE(II)HEXACYANOFERRATE(II) SODIUMSALT	
TETRADECAHYDRATE(CATHODE) 29.	1-
CHLORO-3-NITROBENZENE 30.	2,4,6
TRICHLOROANILINE 31.	PIVALOYL
CHLORIDE32.	5-CHLORO
VALEROYLCHLORIDE 33.	4-FLUORO
PHENYLACETIC ACID 34.	4-
BROMOFLUOROBENZENE 35.	3-
FLUOROTOLUENE 36.	4-FLUOROTOLUENE 37.
ORTHO NITROANISOLE 38.	PARA NITRO
ANISOLE39.	OCHLORO PNITRO TOLUENE
40.3-AMINO- 4- METHYL BENZOIC	
ACIDMETHYL ESTER 41.	3-AMINO 4-METHYL
BENZOIC ACID ISOPROPYLESTER 42.	5-
AMINO-2-METHYLBENZENE	SULPHONIC
ACID PHENYLESTER 43.	(3-
AMINOPHENYL)BENZENESULFONATE 44.	4 -
AMINOBENZOIC ACID METHYL ESTER 45.	2-
FLUOROANISOLE 46.	4-FLUOROANISOLE 47.
2-PHENOXYETHYLAMINE	48.
SPIROPIDION(TINIVION)49.	4-
AMINOBENZAMIDE50.	P-TOLUIDINE 51.
M-ANISIDINE 52.	4-CHLORO,2 AMINO PHENOL (4-
CAP). 53.	HYDROXY ESTER (HES) 54.
PARA CHLORO PHENYL GLYCINE(PCPG) 55.	
DICHLOROFLUOROBROMO BENZENE	
(DCFBB)56.	4-ACETYL-2-METHYL
BENZOICACID (AMBA)	
Note:S.No 1 to 47 and 49 to 56 are syntheticorganic	


 24/4/25
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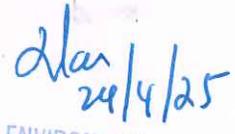
	chemicals / Agrochemical intermediates S.No 48 -SPIROPIDION (TINIVION)is aPesticide	
3.	R&D and Pilot Scale products	30 Tons/Year
b By-products manufactured:		
1.	Dil. HYDROCHLORIC ACID	13140 Tons/Year
2.	Dil. Sulphuric acid	9380 Tons/Year
3.	Dil. Acetic acid	22000 Tons/Year
4.	Potassium salt	11400 Tons/Year

9. It is respectfully submitted that the objection letter given by the applicant was forwarded to the MoEF & CC along with the Public hearing minutes.

10. It is respectfully submitted that the unit has obtained CTE Expansion – II for increase in the production capacity from 1601.4 Tons/ Year to 20,031.4 Tons/ Year from the TNPCB vide Proc. DATED: 27/03/2024 under the Water Act and Air Act valid up to 31/03/2033 for the same quantity and products mentioned in the EC.

11. It is respectfully submitted that the 5th Respondent unit was inspected by the DEE, TNPCB, Hosur, 4th respondent herein, on 02.01.2025 and the following were observed:

- a. The unit was under operation.
- b. All the components of the Effluent Treatment Plant, RO systems. Multiple Effect Evaporator and Agitated Thin Film Drier were found under operation.
- c. The Sewage Treatment Plant was in operation.
- d. Construction of new STP and installation of additional RO under expansion activity was under progress.
- e. The unit has provided the Effluent treatment plant followed by RO and RMS for the treatment of effluent generated in the


 24/4/25
 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMIL NADU POLLUTION CONTROL BOARD
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 CHENNAI-600 032.

process. The ETP, RO and RMS system were under operation. RO permeate is recycled back to process.

- f. There was no discharge of trade effluent found during inspection on land/water sources from the unit.
- g. The unit has provided computer recording facility for the Electromagnetic flow meter readings and connected the EMFM data to Water Quality Watch Centre of TNPCB.
- h. The unit has recovered the mixed salt of 20.0 Tons from ATFD and stored in the hazardous waste storage shed.
- i. All the APC measures were found in operation.
- j. The unit has provided OCEMS to the Boiler, for the parameter PM and SO₂ and the parameter 'HCN provided for Scrubbers in process section are connected with the CAC, Chennai and CPCB Web portal.

12. It is respectfully submitted that the unit M/s. Chemplast Sanmar Limited has been instructed as follows:

- i. The unit shall operate and maintain the STP efficiently and continuously so as to achieve the standards as prescribed by the Board.
- ii. The unit shall operate and maintain the ETP, RO, RMS (MEE & ATFD) efficiently and continuously so as to achieve the standards as prescribed by the Board and to achieve the ZLD at all times.
- iii. The unit shall ensure that the product manufactured and effluent generated is within the consented quantity.
- iv. The unit shall ensure the online connectivity with WQW of TNPCB, Chennai to provide proper quality data at all times.
- v. The unit shall operate and maintain the existing APC measures efficiently and continuously so as to bring the quality of emission to satisfy the NAAQ/SM/ANL standards prescribed by the Board.

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JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.78, MOUNT SALAI, GUINDY,
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vi. The unit shall maintain Online Continuous Emission Monitoring System (OCEMS) attached to boiler & Thermic Fluid Heaters & process stacks properly to ensure continuous connectivity with the CAC of TNPCB/CPCB server for transmission of emission data of PM, SO₂ and HCN without any interruption.

13. It is respectfully submitted that, the unit has applied for CTO Expansion II (Phase I) vide OCMMS application No. 63485931 dated 12.12.2024 for the production capacity 50031.4 Tons/ Year as follows and the application was returned to the unit on 02.04.2025 for want of additional particulars.

SL.No.	Name of the product	Quantity
a.	Main Products manufactured:	
1.	PHYTO CHEMICALS(1.Colchicine,2.Thiocolchicoside) - API	1.4 Tons/Year
2.	ORGANIC CHEMICALS 1. 2-1-CYLCOCHEXENYL ETHYL AMINE(CHEA) 2. 3-[1,3,3-TRIS-(2-CARBOXY-ETHYL)-2-OXO-CYCLOHEXYL]-PROPIONIC ACID (T4C) 3.SUBSTITUTED ARYL ALKYL AMINE 4.2-AMINO-2-PHENYLBUTYRICACID SODIUM SALT /METHYL 2-(N,N-DIMETHYLAMINO)-2-PHENYLBUTYRATE (TR1600/TR1400) 5. 4-CHOLO-BUTYL VERATRATE 6. 4-(2-AMINOETHYL)-2-METHOXYPHENOL(AEPHENOL)7.METHYL-2-PHENOXY ISOBUTYRATE 8. (4R)- 2-OXOOXAZOLIDINE -4- CARBOXYLICACID (COX) 9. 4-tBUTYLPHENYLACETONITRILE 10. 1-BROMO-3,5-DICHLO ROBENZENE(DCBB) 11. 4-CHLORO-2-NITROBENZOICACID 12.4-BROMOPHENYL PROPANOL (BPP) 13. 2-CHLORO-5-CHLOROMETHYL-1,3 -THIAZOLE (CCMT) 14.TETRACHLORO BUTYRIC ACID(TCBA) 15. IONOPHOR 16. 4-BROMO-2-	5000 Tons/Year

Alan
24/4/25
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
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FLUORO HYDROXY BIPHENYL(BFB) 17. PARA
 METHYL PHENYLCHLORIDE (PMPC) 18.
 SODIUM 4-(2,4-DICHLOR MTOLUOYL)-1,3-
 DIMETHYL-5-PYRAZOLATE(MY710Na)19. 2-
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 BENZENESULFONAMIDE (TBSA) 20.
 METHYLCARBAZATE 21. TETRALONE
 IMINE22. 4-[2(4-CHLORO-2,6-
 DIMETHYLPHENYL)ACETTYL]METHYLAMIN
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 SPIROPIDION(TINIVION)49.4-
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2/24/15
 JOINT CHIEF ENVIRONMENTAL ENGINEER
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	ANISIDINE 52.4-CHLORO,2 AMINO PHENOL (4-CAP). 53. HYDROXY ESTER (HES) 54.PARA CHLORO PHENYL GLYCINE(PCPG) 55. DICHLOROFLUOROBROMO BENZENE (DCFBB) 56.4-ACETYL-2-METHYL BENZOICACID (AMBA) Note:S.No 1 to 47 and 49 to 56 are synthetic organic chemicals / Agro chemical intermediates S.No 48 -SPIROPIDION (TINIVION)is aPesticide	
3.	R&D and Pilot Scale products	30 Tons/Year

14. It is respectfully submitted that the reply was communicated to the applicant for his complaints dated: 10.05.2023, 11.05.2023,12.05.2023,13.05.2023, 17.08.2023, 19.08.2023 and 23.08.2023 and the reply to the RTI petition filed by the petitioner has been communicated to him vide Letter dated 05.09.2022.

Therefore, it is humbly prayed that this Hon'ble National Green Tribunal may be pleased to pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the facts of this case and thus render justice.

Mar 24/4/25
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

VERIFICATION

I, R.Sarasavani D/o. Thiru. Raghavan working as Joint Chief Environmental Engineer, having office at No. 76, Anna Salai, Guindy, Chennai-32, do hereby submit that the above contents are true to the best of my knowledge and belief through records.

Mar 24/4/25
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
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**BEFORE THE HON'BLE NATIONAL
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APPEAL No.33 of 2024

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S/o. S. Ponnusamy,
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The Secretary Ministry of Environment,
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Indira Paryavaran Bhawan,
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...Respondents

**REPLY AFFIDAVIT FILED ON
BEHALF OF THE THIRD AND
FOURTH RESPONDENTS -TAMIL
NADU POLLUTION CONTROL
BOARD**

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

Date of filing :25.04.2025

Date of hearing on:25.04.2025