

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

ORIGINAL APPLICATION NO. 131 of 2023 (SZ)

Parthiban J

...Applicant

Vs

The District Collector and Ors.

...Respondents

ADDITIONAL AFFIDAVIT FILED BY THE 4th RESPONDENT



M/s. AAV PARTNERS

S SARAVANAN

E KARTHIKEYAN

COUNSEL FOR 4th RESPONDENT

74-76, II Floor, Marshall's Road, Egmore, Chennai – 600 008.

Ph – 9500069660 Email – saleemperson@gmail.com

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

Original Application No. 131 of 2023 (SZ)

BETWEEN

Parthiban J
2/18, Dharmaraja Koil Street,
Chozhavaram Post,
Karanodai, Tiruvallur,
Tamil Nadu - 600 067

... Applicant

AND

1. The District Collector,
First Floor, Collectorate,
Kancheepuram.
2. The Chairman
Tamil Nadu Pollution Control Board.
76, Mount Salai,
Guindy, Chennai - 600 032.
3. The District Environmental Engineer,
Tamil Nadu Pollution Control Board,
Plot No. CP-5B, SIPCOT Industrial Growth Centre,
Vandalur - Wallajahabad Road, Oragadam,
Kancheepuram District.



For **APOLLO TYRES LTD.**


Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance

4. Apollo Tyres Ltd.,
Rep. by its Manager Environment Health Safety (EHS)
B-25, SIPCOT Industrial Growth Centre,
Sriperumpudur - Singaperumal Koil State Highway,
Oragadam, Sriperumpudur Taluk,
Kancheepuram District - 602 105.

... Respondents

AFFIDAVIT FILED ON BEHALF OF 4TH RESPONDENT

I, G Balasubramanyam, Son of Mr. S Gopalan, aged 61 years, having address at B-25, SIPCOT Industrial Growth Centre, Oragadam, Sriperumbudur, Tamil Nadu, India - 602105, do hereby solemnly affirm and sincerely state as follows:

1. That I am the Head Commercial of M/s. Apollo Tyres Ltd., the 4th Respondent herein and as such I am well acquainted with the facts of the case from the available records.
2. That this Respondent has already filed its reply statement along with documents and also Affidavit, in the present O.A and the same may be treated as part and parcel of this present affidavit.
3. That it was submitted on behalf of the applicant that, the uncleaned carbon jumbo bags were being misused and circulated to the public which are being used without knowing its impact on them and also on the environment. However, the said statement was strongly



For APOLLO TYRES LTD.


Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance

denied by this Respondent, and that the carbon jumbo bags after its use, were and are handed over to the authorized recycler after thoroughly cleaning.

4. That during the course of hearing, this Hon'ble Tribunal vide order dated 25.01.2024, was pleased to direct this Respondent to work out the possibilities of constructing a silo to facilitate the carbon black brought in tankers, as the same is being done in Andhra Pradesh Unit.

5 That in compliance with the above direction of this Hon'ble Tribunal, a feasibility study for the provision of a carbon silo at the Chennai plant was conducted by the Respondent's team, and it was found that there is no sufficient space is available for the construction of silo in the subject plant, and an Affidavit dated 26.08.2024, was filed before this Hon'ble Tribunal.

6. That this Hon'ble Tribunal has considered the affidavit filed by this Respondent and this Hon'ble Tribunal in its order dated 27.09.2024, passed the following order:

1. *The Project Proponent (Respondent No.4) has filed an affidavit dated 26.08.2024, wherein it is stated that in compliance with our earlier order, the factory was inspected by the officials of the Project Proponent and it was observed that the plant was established in the year 2010 and the capacity was expanded twice thereafter. Therefore, there is neither any provision nor any space to put up silos for the subject plant for handling the carbon black tankers.*



For APOLLO TYRES LTD.


Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance

2. Nonetheless, the respondent agreed to cut the jumbo backs into two pieces, after emptying and cleaning the same and then handover to the recycler for processing, which would curb the unauthorized use of the carbon black jumbo bags.

3. To be noted is that in their Andhra Pradesh unit, the Project Proponent handles carbon black only with bulk tankers, without giving any room for complaints.

4. Therefore, we direct the Project Proponent (Respondent No.4) to re-examine the possibility of usage of tankers or construction of silos to avoid such problems in future.

.....

...”

7. That in compliance of the above direction of this Hon'ble Tribunal, the team of officials from this Respondent unit conducted another inspection of the unit, and observed as follows:

a. *The plant commenced operations in 2010 and has since undergone continuous capacity expansions. The plant has reached its terminal capacity and is at a saturation point, with no space left for any new construction.*

b. *The installation of silos requires an area of approximately 1000 Sqm for 2 sets of silos (6 nos. each). This space is not available near the mixer area.*



For APOLLO TYRES LTD.


Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance

c. *The maximum feasible conveying length for the material is 70 meters. Any available space is approximately 300 meters away, which far exceeds the technical limitation and would lead to significant operational issues. Running the required piping inside the existing mixer area also poses a major challenge.*

d. *Based on the above findings, it is respectfully submitted that it is not feasible to provide a carbon silo in the Chennai plant.*

e. *However, to comply with the direction of this Hon'ble Tribunal and to address the grievance raised by the Applicant, a decision was taken by this Respondent to cut the bags after emptying and cleaning them and thereafter, handover the same to the recycler for processing, in order to curb the illegal/unauthorized use of carbon black bags. Though such an exercise would increase the cost expenses to this Respondent, as a law-abiding citizen with social responsibility, this Respondent is willing to bear the same.*

8. It is further submitted that this Respondent is duly complying with all precautions and conditions imposed in the approvals by the authorities, and there is neither any Environmental Violation nor any statutory violation on the part of this Respondent and this Respondent is ready and willing to comply with any directions that this Hon'ble Tribunal be pleased to impose towards ensuring no damage to the environment or health.



For APOLLO TYRES LTD.


Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance

Under the above circumstances, it is humbly prayed that this Hon'ble Tribunal may be pleased to take on record the above affidavit and pass such orders and thus render justice.

Solemnly affirmed at Chennai *

On this the 5th day of July 2025 *

And put his signature in my presence *

[Handwritten signature]
No. 225
Law Chamber
Madurai
Ex. 305/07



For APOLLO TYRES LTD.

[Handwritten signature]
Authorised Signatory
G. BALASUBRAMANYAM
Head - Business Finance