

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

**ORIGINAL APPLICATION NO. 144 of 2023 (SZ)**

K. Ramachandran Pillai and ors. : Applicant

Vs.

The Principal Secretary to Government of Kerala,  
Department of Environment, Thiruvananthapuram  
and Ors : Respondents

**REPORT FILED BY THE ENVIRONMENTAL ENGINEER,  
KERALA STATE POLLUTION CONTROL BOARD, FOR AND ON  
BEHALF OF THE RESPONDENT**



Adv. Rema Smrithi.V.K

ADDITIONAL STANDING COUNSEL FOR THE THIRD RESPONDENT

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

**ORIGINAL APPLICATION NO. 144 of 2023 (SZ)**

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Department of Environment, Thiruvananthapuram  
and Ors : Respondents

**VOLUME 1**

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Dated this the 8<sup>th</sup> day of November 2024

Remasmrithi. V.K, Advocate

ADDITIONAL STANDING COUNSEL FOR THE THIRD RESPONDENT:

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI  
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**VOLUME 2**

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Dated this the 8<sup>th</sup> day of November 2024

Remasmrithi. V.K, Advocate

ADDITIONAL STANDING COUNSEL FOR THE THIRD RESPONDENT:

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

**ORIGINAL APPLICATION NO. 144 of 2023 (SZ)**

Applicant : K. Ramachandran Pillai and ors.

Vs

Respondents : The Principal Secretary to  
Government of Kerala, Department  
of Environment, Thiruvananthapuram  
and others

**REPORT FILED BY ENVIRONMENTAL ENGINEER, DISTRICT OFFICE,  
KOLLAM FOR AND ON BEHALF OF THE KERALA STATE POLLUTION  
CONTROL BOARD**

1. I, Rachel Thomas, aged 41 years, D/o Sri. A. Thomas, now working as Environmental Engineer, Kerala State Pollution Control Board, District Office, Kollam. I am authorized to represent the Board (3<sup>rd</sup> respondent) in the above O.A. I know the facts and circumstances of the case. The factual submissions are true and correct to the best of my knowledge, information and belief.
2. The Hon'ble National Green Tribunal (NGT) Southern Zone, Chennai vide order dated 13.08.2024 had directed to the Board to submit an action taken report in compliance with the Joint Committee report. Accordingly Report is filed on behalf of the Kerala State Pollution Control Board.
3. The Joint Committee inspected on 07.02.2023 and noticed issues such as the clogging of canals, river bank erosion, siltation, and brick kilns without valid licenses over the course of the river. The committee observed that the river is continuously flourishing during the summer and that there are no issues pertaining to pollution, such as garbage dumping along the stretches also shows that the river meets the standards for organized bathing ghat. Copy of the analysis result of the year 2023 from sampling stations Ithikkara and Uppukadavu is attached herewith and marked as **Annexure I**. Ithikkara is the thickly populated area where the NH 66 crosses the river and Uppukadavu is the estuary



*Rachel Thomas*

RACHEL THOMAS  
Environmental Engineer

area where the river meets the sea. As per the analysis report, BOD of Ithikkara sampling station is within the permissible limit and during the months of May and June, the BOD at Uppukadavu exceeds the permissible limit due to sea water intrusion. The parameters such as chloride, conductivity and hardness exceed the limit in some months due to the proximity of sea.

4. Based on the decisions by the Joint Committee, a letter dated 04.03.2023 was issued to the Secretary, Chathannoor Grama Panchayat, regarding the details of activities of the unauthorized brick kilns. As reply was not received from the Secretary, a reminder was issued on 31.08.2024. Copy of the letter dated 31.08.2024 is produced herewith and marked as **Annexure II**. In reply dated 26.09.2024 received from the Secretary, Chathannoor Grama Panchayat, claims that weeds and wastes from the Chathannoor Canal has been removing throughout the year under the Mahatma Gandhi National Rural Employment Guarantee Scheme (MGNREGS) project and had prevented the dumping of wastes into the canal. Copy of the same is produced herewith and marked as **Annexure III**.

5. The Board Officials conducted an inspection on 12.09.2024 at the brick kiln under the name and style of M/s. S.R. Bricks, Meenad. The unit had been working with the consent of the Board till 30.06.2009. After that the consent has not been renewed. During the inspection it was noticed that the unit was functioning without adequate pollution control measures. As per the notification G.S.R.143(E) dated 22.02.2022 of the Ministry of Environment, Forest and Climate Change (MoEF & CC) has amended the Environment (Protection) Rules, 1986, Schedule I with respect to brick kilns, all brick kilns shall be allowed only with zig-zag technology or vertical shaft or use of piped natural gas as fuel in brick making. The Board vide letter dated 13.09.2024 directed the unit to provide pollution control measures as per the notification of MoEF & CC and to apply for the Consent of the Board. Copy of the letter dated 13.09.2024 is produced herewith and marked as **Annexure IV**. As it seems that the unit has not submitted compliance letter/application for renewal within the permitted time period, Show Cause Notice dated 19.10.2024 was issued to the unit. Copy of the Show Cause Notice dated 19.10.2024 is produced herewith and marked as **Annexure V**. Further action will be initiated if found necessary.

Other major industries causing air and water pollution were not seen on the banks of the Ithikkara river.



*Rachel Thomas*

RACHEL THOMAS  
Environmental Engineer

All that stated above are true to the best of my knowledge, information and belief.

Dated this the 8<sup>th</sup> day of November 2024.

**ENVIRONMENTAL ENGINEER**

**For the 3<sup>rd</sup> Respondent**

**RACHEL THOMAS**  
Environmental Engineer



		ANALYSIS REPORT OF ITHIKKARA RIVER-2023													
NAME OF	STATION: ITHIKKARA														
SL NO.	Parameters	Unit	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
1	Temperature	OC	26.1	28.1	26.8	25.8	26.1	25.1	27	27.9	26.8	26.8	25.7	26.7	
2	Dissolved Oxygen	mg/l	5.6	6.1	5.9	5.9	5.6	5.8	6.8	5.8	6.9	6.8	6.93	6.5	
3	pH		7.3	7.1	7.4	7.1	7.3	7.4	7.2	7.6	7.2	7.2	7.4	7.4	
4	Conductivity	µmhos/cm	16523	16987	16523	13652	12110	10652	7785	8540	12540	106	159.8	160.2	
5	BOD	mg/l	1.9	2.1	1.9	1.8	1.8	1.7	1.8	2.5	0.5	2.1	2.9	2.8	
6	Nitrate-N	mg/l	NA	NA	NA	NA	NA	NA	2.4	2.2	3.5	3.5	3.5	3.5	
7	Turbidity	NTU	5.3	4.6	5.3	2.9	3.2	2.9	7.45	0.9	3.6	3.5	4.8	1.3	
8	Total Alkalinity	mg/l	26	31	26	29	30	28	20	15	22	10.2	9	9	
9	Chloride	mg/l	6210	6314	6210	4910	4300	4100	3083	3050	3450	9	20	20	
10	Ammoniacal-N	mg/l	NA	BDL	BDL	BDL	BDL	NA	NA	BDL	NA	NA	NA	NA	
11	Hardness as CaCO <sub>3</sub>	mg/l	2324	2418	2324	3240	3110	4625	1720	2000	2000	28	37	37	
12	Calcium as CaCO <sub>3</sub>	mg/l	1425	1562	1425	1640	2100	2530	1070	1250	1250	12	25	25	
13	Magnesium as CaCO <sub>3</sub>	mg/l	896	856	896	1600	1010	1014	650	750	750	16	12	12	
14	Sulphate	mg/l	125.3	117.1	125.3	50.8	162.3	BDL	100.2	110	118	17.6	30.82	29.5	
15	Sodium	mg/l	3250	3418	3250	785	2310	2028	1680	1700	1780	6.5	11.02	12.45	
16	Total Dissolved Solids	mg/l	10530	10742	8375	9856	9632	8523	6224	6900	6900	69	102.5	102.5	
17	Phosphate	mg/l	0.425	0.425	0.425	0.712	0.61	0.529	BDL	BDL	BDL	BDL	0.116	0.125	
18	Boron	mg/l	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
19	Potassium	mg/l	82.3	82.3	82.3	68.4	64.5	49.36	20.6	39.9	84	2.1	2.93	3.06	
20	Total Coliform	MPN/100 ml	1080	1170	1080	510	1100	940	930	950	800	750	760	770	
21	Fecal Coliform	MPN/100 ml	470	480	470	80	420	340	320	350	250	220	220	230	
22	Sodium Absorption Ratio		29.3	25.9	24.84	4.7	15.6	48.2	17.6	16.5	16.3	0.5	0.8	0.9	

ANALYSIS REPORT OF ITHIKKARA RIVER-2023														
NAME OF STATION : UPPUKADAVU														
SL NO.	Parameters	Unit	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
1	Temperature	OC	27	28.2	27.2	28	26.5	26.5	25.8	28.6	27.6	27	25.7	26.4
2	Dissolved Oxygen	mg/l	4.7	4.3	5.2	6.1	6.1	6.1	7.6	6.9	6.6	7.6	4.73	6.5
3	pH		7.8	7.9	6.8	7.1	6.8	6.8	6.2	6	6.2	6.6	7.2	6.9
4	Conductivity	µmhos/cm	42900	23145	24589	26563	20240	18220	7360	5551	1951	90.78	763.3	1067
5	BOD	mg/l	0.5	1.2	1.2	2	3.6	3.1	0.6	1	1.5	1.8	1.4	0.7
6	Nitrate-N	mg/l	NA	NA	NA	NA	NA	NA	3.2	3.6	3.5	3.5	4.1	3.5
7	Turbidity	NTU	5.5	4.2	4.8	3.7	5.9	4.9	4.3	1.3	4.5	7.2	BDL	3.8
8	Total Alkalinity	mg/l	22	28	48	42	32	48	5	4	25	20	11	20
9	Chloride	mg/l	8150	8420	7250	8620	10500	14120	4350	4450	3650	65	179	182
10	Ammoniacal-N	mg/l	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
11	Hardness as CaCO3	mg/l	15000	14500	16200	18420	15700	16380	10800	10850	9650	98.5	70	15
12	Calcium as CaCO3	mg/l	9200	10200	10400	11420	8950	11000	7250	8700	7830	72.5	21	10
13	Magnesium as CaCO3	mg/l	5800	4300	5800	7000	6750	5380	3550	2150	1820	26	49	5
14	Sulphate	mg/l	106.6	100.2	107.4	88.4	74.2	77.8	31.3	33.5	33.5	33.5	8.85	6.78
15	Sodium	mg/l	1366.5	1278	1285	1396	1428	1634	6618	444.6	182.6	10.91	60.28	99.6
16	Total Dissolved Solids	mg/l	20360	15694	16521	16521	14300	9850	6127	4156	980.6	56.8	421	551
17	Phosphate	mg/l	0.145	0.145	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.053	0.06
18	Boron	mg/l	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
19	Potassium	mg/l	1264	980	816	918	920	840	3.76	78.7	17.6	3.93	5.06	7.4
20	Total Coliform	MPN/100 ml	1000	1200	1100	1000	1100	990	750	700	730	710	720	900
21	Fecal Coliform	MPN/100 ml	400	450	360	380	290	200	300	350	210	200	210	260
22	Sodium Absorption Ratio		15.8	4.04	3.76	3.79	4.13	18.1	27.7	1.9	0.8	0.5	3.1	11.2

Office Phone: 0474- 2762117  
Office E-mail: [kspcbklm@gmail.com](mailto:kspcbklm@gmail.com)  
Web site : [www.kspcb.kerala.gov.in](http://www.kspcb.kerala.gov.in)  
Help Desk : 0474- 2950617  
Help Desk email : [kspcbkollam.hd@gmail.com](mailto:kspcbkollam.hd@gmail.com)



# KERALA STATE POLLUTION CONTROL BOARD

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

DISTRICT OFFICE

ജില്ലാ ഓഫീസ്

USHUS BUILDING, BIG BAZAR, KOLLAM - 691 001

ഉഷസ്സ് ബിൽഡിംഗ്, ബിഗ് ബസാർ, കൊല്ലം - 691 001



Date: 31.08.2024

No. PCB/KO/GEN/01/2023

From The Environmental Engineer  
To The Secretary  
Chathanoor Grama Panchayath

FAIR COPY  
DESPATCHED  
ON... 31/8/24...

Sub:- O.A 144/2023(SZ) - before the Hon'ble NGT - Ithikkara River  
Pollution/Illegal Mining (Earlier in O.A 730/2022(PB)) - reg.

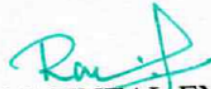
Ref:- 1. Hon'ble NGT Order dated 02.01.2023 in O.A 730/2022  
2. This office letter no. PCB/KO/G/35/2006 dated 04.03.2023  
3. Hon'ble NGT Order dated 13.08.2024 in O.A 144/2023 (SZ)

Sir,

With reference to above (1), the joint committee constituted by the Hon'ble NGT in above referred O.A visited the river and its premises on 07.02.2023 and a factual report was submitted for the Hon'ble NGT. Vide ref. (3) the Board was directed to report further action taken in this regard. In order to comply with the direction, you are requested to report the compliance of the direction issued vide ref. (2). As no reply has been received from your end regarding this matter, it is requested to furnish details urgently so that to file the action taken report before the Hon'ble NGT.

This shall be treated as most urgent.

Yours faithfully,

  
ENVIRONMENTAL ENGINEER  
& Nodal Officer

o/c



ഭരണഭാഷ-മാതൃഭാഷ

ചാത്തന്നൂർ ഗ്രാമപഞ്ചായത്ത്

ചാത്തന്നൂർ - 691572 ഫോൺ : 0474 - 2593254

ഇ മെയിൽ : chathannoorgp@gmail.com

(ISO 9001:2015 CERTIFIED)

എസ് സി - 2254/2023

തീയതി: 26/09/2024

പ്രേഷിതൻ

സെക്രട്ടറി

ചാത്തന്നൂർ ഗ്രാമപഞ്ചായത്ത്

സീക്രട്ടറേറ്റ്

എൻവയോൺമെന്റൽ എൻജിനീയർ & നോഡൽ ഓഫീസർ

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

ജില്ലാ ഓഫീസ്, കൊല്ലം

സർ,

വിഷയം : ചാത്തന്നൂർ ഗ്രാമ പഞ്ചായത്ത്-O.A 730/2022 - ഇത്തിക്കരയാറിന്റെ

മലിനീകരണം/അനധികൃത മണൽ ഖനനം സംബന്ധിച്ച്

പരാമർശം- ആ ആഫീസിലെ 04.03.2023 തീയതിയിലെ PCB/KO/G/35/2006 നമ്പർ

കത്ത്

സൂചനയിലേക്ക് ശ്രദ്ധ ക്ഷണിക്കുന്നു.

ചാത്തന്നൂർ ഗ്രാമപഞ്ചായത്തിൽ കൂടി കടന്നു പോകുന്ന ചാത്തന്നൂർ തോട് എല്ലാവർഷവും മഹാത്മാഗാന്ധി ദേശീയ ഗ്രാമീണ തൊഴിലുറപ്പ് പദ്ധതിയിൽ വൃത്തിയാക്കി, കളകളും മാലിന്യങ്ങളും നീക്കം ചെയ്യുന്നുണ്ട്. ചാത്തന്നൂർ തോട്ടിൽ മാലിന്യം നിക്ഷേപിക്കുന്നത് പൂർണ്ണമായും തടഞ്ഞിട്ടുണ്ട്. കൂടാതെ, ചാത്തന്നൂർ ഗ്രാമപഞ്ചായത്ത് 18-ാം വാർഡിൽ ഇത്തിക്കരയാറിന്റെ തീരത്ത് തോട്ടത്തിൽ ഹോളോബ്രിക്ക്സ് എന്ന സ്ഥാപനം സ്ഥിതി ചെയ്യുന്നതാണെന്നും ടി സ്ഥാപനം നിലവിൽ പ്രവർത്തിക്കുന്നില്ലായെന്നുമുള്ള വിവരം തുടർനടപടിക്കായി സമർപ്പിക്കുന്നു.



വിശ്വസ്തതയോടെ,  
K. SAJEEV  
Secretary  
Chathannoor Grama Panchayat  
Chathannoor P.O., Kollam (Dist.)  
Kerala (State), India - 691572  
Ph: 0474 - 2593254, 94 4941819  
E-mail: chathannoorgp@gmail.com

## Translation of Annexure III

**S C1-2254/2023**

**Date: 26.09.2024**

From

The Secretary  
Chathannoor Grama Panchayat

To

The Environmental Engineer & Nodal Officer  
Kerala State Pollution Control Board  
District Office, Kollam

Sir,

Sub: - Chathannoor Grama Panchayat – O.A. 730/2022 – Illegal sand mining/Pollution in Ithikkara river – reg.

Ref: - Letter no. PCB/KO/G/35/2006 dated 04.03.2023 from that office

Kind attention is invited to the reference.

The Chathannoor thodu passing through Chathannoor Grama Panchayat is cleaned and weeds and garbage are removed every year under the Mahatma Gandhi National Rural Employment Scheme. Dumping of waste in Chathannoor thodu has been completely restricted. Further, a unit named 'Thottathil Hollow Bricks', which was located on the banks of Ithikkara River in ward no. 8 of Chathannoor Grama Panchayat and had not working.

Yours faithfully,

**Sd/-**

**SECRETARY**

Office Phone: 0474- 2762117  
Office E-mail: [kspcbklm@gmail.com](mailto:kspcbklm@gmail.com)  
Web site : [www.kspcb.kerala.gov.in](http://www.kspcb.kerala.gov.in)  
Help Desk : 0474- 2950617  
Help Desk email : [kspcbkollam.hd@gmail.com](mailto:kspcbkollam.hd@gmail.com)



# KERALA STATE POLLUTION CONTROL BOARD

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

DISTRICT OFFICE

ജില്ലാ ഓഫീസ്

USHUS BUILDING, BIG BAZAR, KOLLAM - 691 001

ഉഷസ്സ് ബിൽഡിംഗ്, ബിഗ് ബസാർ, കൊല്ലം - 691 001



PCB/KO/GEN/01/2023

Date: 13.09.2024

From

The Environmental Engineer

To

Smt. Vimala Ramanujan  
S.R Bricks,  
Meenad,  
Nedungolam P.O,  
Kollam - 691334

FAIR COPY  
DESPATCHED  
ON 13/9/2024

Sub : Unauthorised functioning of brick kiln - M/s. S.R Bricks, Meenad – reg.

Ref : MoEF & CC Notification dated 22/02/2022

Madam,

Attention is invited to the subject matter. During the inspection conducted to your unit on 12.09.2024, it was functioning without providing adequate pollution control measures and without the consent of the Board. You are hereby directed to provide pollution control measures as per the above reference (Copy of the same is attached) and to apply for consent of the Board within 30 days, failing which further action as per the relevant rules will be initiated against the unit.

Yours faithfully,

  
Environmental Engineer

o/c

Office Phone: 0474-2762117  
Office E-mail: [kspcbklm@gmail.com](mailto:kspcbklm@gmail.com)  
Web site : [www.kspcb.kerala.gov.in](http://www.kspcb.kerala.gov.in)  
Help Desk : 0474- 2950617  
Help Desk email : [kspcbkollam.hd@gmail.com](mailto:kspcbkollam.hd@gmail.com)



# KERALA STATE POLLUTION CONTROL BOARD

കേരള സംസ്ഥാന മലിനീകരണ നിയന്ത്രണ ബോർഡ്

DISTRICT OFFICE

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ഉഷസ്സ് ബിൽഡിംഗ്, ബിഗ് ബസാർ, കൊല്ലം - 691 001



**Registered**

In reply please refer to: PCB/KO/GEN/01/2013

- Ref: - 1. Consent No. PCB/KO/CTO/F/686/08 dated 26/11/2008
- 2. MoEF & CC Notification dated 22/02/2022
- 3. This office letter of even no. dated 13/09/2024

FAIR COPY  
DESPATCHED  
ON...19/10/24....

### SHOW CAUSE NOTICE

WHEREAS M/s. S. R. Bricks, Meenadu, Nedungolam P.O., Kollam - 691334 in Survey No. 152/17, 18, 16, 31, 21, 27, 32 of Meenadu Village, Kollam Taluk, Kollam District (herein afterwards referred to as industry) comes under the purview of the Water (Prevention & Control of Pollution) Act, 1981 and the Environment (Protection) Act 1986 and is bound to comply with the standards prescribed in the Environment (Protection) Rules laid down there under;

WHEREAS Integrated Consent to Operate (herein afterwards referred to as ICO) was granted to the industry vide reference cited (1) subjected to certain conditions;

WHEREAS the validity of the granted ICO of the industry vide reference cited (1) has expired on 30.06.2009 and not renewed till the date;

o/c

WHEREAS inspection was conducted by the Board officials on 12.09.2024 and noticed some draw backs;

WHEREAS direction was issued to the industry vide ref. (3) to rectify the defects and to provide pollution control measures as per the ref. (2) above;

WHEREAS compliance letter has not been submitted yet on elapsing the time period permitted;

AND WHEREAS the operation of the industry without valid consent and adequate pollution control measures is a culpable offense as per various sections of the said Acts & Rules;

NOW THEREFORE you are hereby directed to show cause within 15 days of receipt of this notice, why action shall not initiated against you as per the relevant sections of the said Acts & Rules.

Dated this the 16<sup>th</sup> day of October, 2024.

For and on behalf of the  
KERALA STATE POLLUTION CONTROL BOARD



ENVIRONMENTAL ENGINEER

To

Smt. Vimala Ramanujan  
S.R. Bricks,  
Meenadu,  
Nedungolam P.O.,  
Kollam - 691334