

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

**Original Application No. 274 of 2024**

**IN THE MATTER OF:**

Tribunal on its own motion – SUO  
MOTU based on the News item  
published in Dinamalar Chennai  
Edition dated 25.09.2024, titled  
“Dumping of 05 tons of medical waste  
in Pallavaram Eri”

Vs.

The Chief Secretary to Govt. of Tamil Nadu  
And 8 others

....Respondents

**ADDITIONAL REPLY FILED ON BEHALF OF THE 9TH RESPONDENT**

I, P.Sivakumar, Son of P.Pauldurai, aged about 47 years, working as General Manager having office at M/s. G.J. Multiclave (India) Pvt. Ltd., No.37, Old No.20, Teachers Colony, Adyar, Chennai – 600 020, do hereby solemnly affirm and sincerely submit as follows:

1. I submit that this Additional Reply is being filed to place on record and corroborate the movement of the biomedical waste collection vehicle operated by the 9th Respondent on 24.09.2024 based on GPS tracking data to further establish that the vehicle used for biomedical waste collection and transportation on the said date did not go anywhere near the illegal dumping site in Pallavaram Eri.

**For GJ Multiclave (India) Pvt. Ltd.**

*P. Osceen*  
**General Manager**

2. I submit that the 9th Respondent is operating under the strict regulatory control of the Pollution Control Board and all biomedical waste collection vehicles are fitted with GPS tracking systems to ensure full traceability of movements from the point of collection at healthcare establishments to the disposal site at the 9th Respondent's treatment facility at Thenmelpakkam, Chengalpattu.
  
3. I submit that for the date 24.09.2024 the GPS trip summary and vehicle tracking data of the vehicle bearing Registration No. TN11 AQ 9972 which was deployed for biomedical waste collection from Respondent Hospitals and other healthcare establishments is annexed and filed before this Hon'ble Tribunal along with this reply.
  
4. I submit that the GPS trip summary report clearly establishes that throughout the operational hours of the vehicle on 24.09.2024 the said vehicle strictly transited between the respective hospitals and the 9th Respondent's Common Biomedical Waste Treatment Facility at Thenmelpakkam, Chengalpattu, and at no point did the said vehicle approach or pass through the Pallavaram radial road, Pallavaram Eri area, or any location proximate to the illegal dumping site.

For GJ Multiclave (India) Pvt. Ltd.

  
General Manager

5. I respectfully submit that the GPS tracking data conclusively disproves any presumption, suspicion, or allegation that the 9th Respondent's vehicle could have been involved in any manner with the illegal dumping of waste at the said site.

6. I submit that the vehicle movements recorded and generated from the independent GPS system clearly show that the vehicle bearing No. TN11 AQ 9972 maintained direct routes from the collection points (i.e., designated hospitals) to the Thenmelpakkam facility and no deviation from the permitted operational route occurred on the date of the incident.

7. I submit that the above facts along with the 4th Respondent's inspection report and all records maintained by the 9th Respondent clearly exonerate the 9th Respondent from any involvement in the illegal dumping incident and reinforce the 9th Respondent's strict adherence to Biomedical Waste (Management & Handling) Rules, 2016.

8. I submit that in light of the above, this Hon'ble Tribunal may kindly accept the enclosed GPS tracking data as conclusive corroborative evidence of the 9th Respondent's compliance and absence of any violation or liability in respect of the incident.

For GJ Multiclave (India) Pvt. Ltd.

  
General Manager

It is therefore most respectfully prayed that this Hon'ble Tribunal may be pleased to take this Additional Reply and the GPS tracking report on record and close the above proceedings as against the 9th Respondent and thus render justice.

**Solemnly affirmed at Chennai**  
**On this the 21st day of July,**  
**2025 and signed his name**  
**In my presence.**

**Before Me**

*Shri*  
10/7/2019  
11th Law Chambers  
Nore, Ch. City.

**Advocate, Chennai**

For GJ Multiclave (India) Pvt. Ltd.

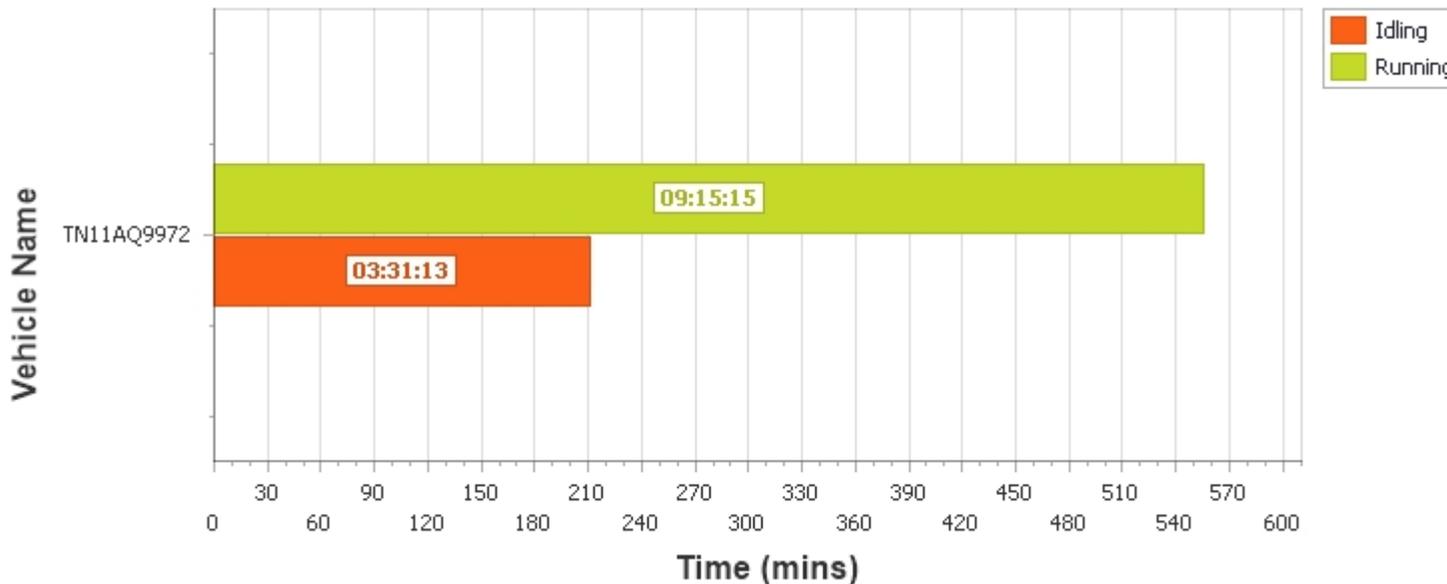
*P. Chinn*  
General Manager



<b>Fleet :</b> All	<b>Vehicle :</b> All	<b>From :</b> 24 Sep 2024 5:00:00 AM	<b>To :</b> 24 Sep 2024 8:00:00 PM
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<b>Vehicle Name :</b> TN11AQ9972	<b>VIN :</b>	<b>License Plate :</b> DC074E17F3
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Report Summary					
No of Trips	Distance (Kms)	Ignition ON Duration	Idling Duration	Total Stop Time	Odometer Start - End
12	128	09:15:15	03:31:13	04:09:21	158917 - 159045





Trip no	Departure	Arrival	Distance (Kms)	Max. Speed (KMPH)	Duration	Idling	Stop Time
1	24 Sep 2024 6:35:24 AM N/A	24 Sep 2024 6:49:25 AM 1, Apparao Colony, Tambaram Sanatorium, Chennai 600047, India	4		00:14:01	00:06:47	00:00:07
2	24 Sep 2024 6:49:32 AM 1, Apparao Colony, Tambaram Sanatorium, Chennai 600047, India	24 Sep 2024 6:49:38 AM 1, Apparao Colony, Tambaram Sanatorium, Chennai 600047, India	0		00:00:06	-	00:07:16
3	24 Sep 2024 6:56:54 AM 32, Apparao Colony, Tambaram Sanatorium, Chennai 600047, India	24 Sep 2024 9:14:24 AM Nungambakkam, Chennai 600034, India	28	42	02:17:30	01:08:23	00:10:34
4	24 Sep 2024 9:24:58 AM N/A	24 Sep 2024 9:43:23 AM Kellys, Kilpauk, Chennai 600010, India	1		00:18:25	00:13:48	00:09:03
5	24 Sep 2024 9:52:26 AM F-1 Barnaby Road, Kilpauk, Chennai 600010, India	24 Sep 2024 10:23:51 AM Aminjikarai, Chennai 600029, India	3	19	00:31:25	00:13:56	00:29:04
6	24 Sep 2024 10:52:55 AM Aminjikarai, Chennai 600029, India	24 Sep 2024 11:29:07 AM Ponnamman Nagar, Ayanambakkam, Chennai 600095, India	11	24	00:36:12	00:07:51	00:34:04



<b>Fleet :</b> All	<b>Vehicle :</b> All	<b>From :</b> 24 Sep 2024 5:00:00 AM	<b>To :</b> 24 Sep 2024 8:00:00 PM
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<b>Vehicle Name :</b> TN11AQ9972	<b>VIN :</b>	<b>License Plate :</b> DC074E17F3
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Trip no	Departure	Arrival	Distance (Kms)	Max. Speed (KMPH)	Duration	Idling	Stop Time
7	24 Sep 2024 12:03:11 PM Ponnamman Nagar, Ayanambakkam, Chennai 600095, India	24 Sep 2024 12:55:32 PM 4/5-C, Sri Karpagambal Nagar, Ramapuram, Chennai 600089, India	8	13	00:52:21	00:14:08	00:01:07
8	24 Sep 2024 12:56:39 PM 4/5-C, Sri Karpagambal Nagar, Ramapuram, Chennai 600089, India	24 Sep 2024 1:05:47 PM 4-8 Chellammal Nagar Road, Chellammal Nagar, Ramapuram, Chennai 600089, India	2		00:09:08	-	01:36:02
9	24 Sep 2024 2:41:49 PM 4-8 Chellammal Nagar Road, Chellammal Nagar, Ramapuram, Chennai 600089, India	24 Sep 2024 4:46:20 PM Singaperumal Koil, Chengalpattu 603204, India	36	55	02:04:31	00:44:54	00:04:55
10	24 Sep 2024 4:51:15 PM Singaperumal Koil, Chengalpattu 603204, India	24 Sep 2024 5:02:20 PM Thenmelpakkam, Chengalpattu 603004, India	4	10	00:11:05	-	00:36:36
11	24 Sep 2024 5:38:56 PM Thenmelpakkam, Chengalpattu 603004, India	24 Sep 2024 6:22:30 PM Thenmelpakkam, Chengalpattu 603004, India	0		00:43:34	00:41:26	00:02:39



<b>Fleet :</b> All	<b>Vehicle :</b> All	<b>From :</b> 24 Sep 2024 5:00:00 AM	<b>To :</b> 24 Sep 2024 8:00:00 PM
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<b>Vehicle Name :</b> TN11AQ9972	<b>VIN :</b>	<b>License Plate :</b> DC074E17F3
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Trip no	Departure	Arrival	Distance (Kms)	Max. Speed (KMPH)	Duration	Idling	Stop Time
12	24 Sep 2024 6:25:09 PM Thenmelpakkam, Chengalpattu 603004, India	24 Sep 2024 7:42:06 PM 29/34 Thirualluvar Street, Deiva Nagar, West Tambaram, Chennai 600045, India	31	58	01:16:57	-	00:17:54



Legends	
Title	Description
Trip	From Ignition ON to Ignition OFF
Idling	Time the vehicle has stopped during a Trip (without Ignition OFF).
Stop Time	Time between an Ignition OFF and next Ignition ON
Duration	Time between an Ignition ON and Ignition OFF
Distance	Total distance travelled by the vehicle in a trip
<b>*** Vehicles that have not undergone any trips within the selected duration will not be displayed here.</b>	

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**ADDITIONAL REPLY FILED ON BEHALF  
OF THE 9<sup>TH</sup> RESPONDENT**

M/s. S.L.SUDARSANAM (E.No.418/1996)  
C.P.HEMKUMAR (E.No.1462/2002)  
R.GOKUL (E.No.4636/2021)  
R.VELMURUGAN, (E.No.1663/2023)  
D.BALASUBRAMANIAM (E.No.6172/2023)

**COUNSEL FOR 9<sup>TH</sup> RESPONDENT**