

**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 7 Ors.

...Respondents

**MEMO FILED ON BEHALF OF THE 5TH RESPONDENT REGARDING THE 5TH
RESPONDENT'S REPLY DATED 05.10.2024 TO THE 8TH RESPONDENT'S
NOTICE DATED 25.09.2024**

1. The 5th Respondent humbly submits that the above Original Application came up for hearing before this Hon'ble Tribunal on 18.02.2025, on which day this Hon'ble Tribunal directed the 5th and 6th Respondents to furnish before this Hon'ble Tribunal, the replies sent by the 5th and 6th Respondents to the 8th Respondent's notice dated 25.09.2024.

2. The 8th Respondent had previously on 17.10.2024, made a false submission before this Hon'ble Tribunal that the 5th Respondent has not sent a reply to the 8th Respondent's notice dated 25.09.2024 and the same allegation is also

submitted in the 8th Respondent's report dated 16.10.2024 filed before this Hon'ble Tribunal.

3. The 5th Respondent respectfully submits that the 5th Respondent's has duly replied to the 8th Respondent's notice dated 25.09.2024 and the 5th Respondent's reply dated 05.10.2024 to the 8th Respondent's notice dated 25.09.2024 has already been filed before this Hon'ble Tribunal as Annexure G in the 5th Respondent's reply dated 13.12.2024 to the 8th Respondent's report dated 16.10.2024.
4. In any case, the 5th Respondent vide this memo, once again submits the 5th Respondent's reply dated 05.10.2024 to the 8th Respondent's notice dated 25.09.2024 ("**Annexure 1**") for the benefit of this Hon'ble Tribunal.

Dated at Chennai on this the 11th day of June 2025

Shale
NS 4162/22

COUNSEL FOR THE 5th RESPONDENT



05-10-2024

To,
THE CITY HEALTH OFFICER
TAMBARAM CITY MUNICIPAL CORPORATION
TAMABARAM
CHENNAI 600 045.

ET0293992351N IVR:6904029399
SP NANDAMBAKKAM KUDIVIRUPPU
Counter No:1,65/10/2024,15:2
To:THE CITY HEALTH OFFICER,TMB
PIN:600045, Tambaram HO
From:MIOT INTERN,4/112 MP ROAD
Wt:25gms,POD=10.0
Amt:29.50,Tax:4.50,Amt.Paid:39.00(Cash)
(Track on www.indiapost.gov.in)
(Dial 18002666888) (Wear Masks, Stay Safe)

Respected Sir,

GREETINGS FROM MIOT HOSPITALS!

Sub.: Reply to the notice relating to General Waste and Bio Medical Waste Dumpage – req

Ref.: Notice No. 04 dated on 25.09.2024 and delivered in-person on 04.10.2024 at 11:00 am

We are in receipt of your notice dated 04.10.2024 received from the City Health Officer, Tambaram Corporation, regarding the dumping of Bio Medical Waste along with General Solid Waste on the Radial Road near Pallavaram Lake. We completely deny your allegation that Bio Medical Waste from our Health Care facility of M/s. MIOT HOSPITALS PRIVATE LIMITED was dumped at Public place.

We would like to inform you that we are disposing our Bio Medical Waste through TNPCB Authorised Vendor M/s G.J. Multiclave as per Bio Medical Waste Management Handling Rules 2016. The bio Medical Waste are stored, collected and segregated in respective bar coded coloured covers/containers, then the Bio Medical wastes are weighed and then entered in Bio Medical Waste register and the same is collected and disposed by the TNPCB Authorised Vendor and receipts obtained. The Receipts & Registers are well maintained as per TNPCB Bio Medical Waste Management Handling Rules 2016. We are practising the best Bio Medical Waste handling practice as per Bio Medical Waste Management Handling Rules 2016. Hence there is no possibility of mishandling Bio Medical Waste.

During our visit to the site it is observed there is no presence of Bio Medical Waste dumped which belongs to our Hospital and there is no Bio Medical Waste present.

The dumped waste are only the General waste covers in green color which includes wet & half decomposed General Waste of multiple Hospitals, Clinics, Nursing Home and Small Consulting Chambers of Doctors were there along with soil. There were only 2 plain letter heads of MIOT Hospitals, Patient scrapped OPD Doctor notes, welcome kit paper bag were only present.

As our letter heads and documents are present in the dumpage, we have been shown responsible for the entire dumpage. It is a clear and false allegation made against us without proper investigation on the contents of the Green cover and with the presence of few countable Bio Medical Waste cover of other Hospital.



The General wastes which were dumped are wet and half decomposed. Through further examination we were able to find only two green color general waste cover of our Hospital and that there were only 3 yellow Bar coded cover and blue bio medical bar code cover of another Hospital present inside the lake area with M/s.G.J Multiclave Bar code sticker and on inspection there were no Bio Medical Waste inside. We would you that we are not using blue color bar coded cover at our Hospital from 2022 onwards instead we are using blue color plastic containers with barcode distributed by M/s.G.J Multiclave.

The General Waste from our Hospital was disposed by the Vendor M/s. Ashok Paper Mart. Eventually the General Waste Vendor Mr. Ashok Kumar's Contract was terminated by our Hospital for his Unprofessional Conduct in handling waste during the period December 2023. On further enquiry the General Waste vendor Mr. Ashok Kumar, residing at No 10/8, Valluvar street, Jones Road, Saidapet Chennai-600 015, has vacated his rented dump yard without clearing the waste dumped for years together and the present owner of the premise has cleared the General Waste with unauthorized vendor which has been resulted in dumping the Waste in the Public Place.

Our Hospital follows strict Protocol with the due compliance of Law relating with the disposal of the Bio Medical Waste and General Waste.

By this representation we have made clear explanation for the allegation which was placed against our Hospital. It is purely a negligent act caused by the said Vendor M/s. Ashok Paper Mart and our Hospital is no where related to this allegation of Bio Medical Waste dumpage. As mentioned we have made the written reply to your notice within the stipulated time and through considering this representation kindly prevent us from the further proceedings.

Thank You

With Regards

Suthan JR
General Manager
Liaison & Public Relations



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TO THE 8TH RESPONDENT'S NOTICE
DATED 25.09.2024**

P.S. Suman (Ms. 924/2003)
S. Dhakshin Kumar (4201/2022)
Huda S (4162/2022)

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**COUNSEL FOR THE
5th RESPONDENT**