

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

**Original Application No. 35 of 2025**

E. Ashok Raj Kumar,  
S/o. Easwara Gowder,  
\Door No. 5/ 92, Thekkampatti Post,  
Seeliyur (Via), Mettupalayam Taluk,  
Coimbatore District 641113.

....Applicant.

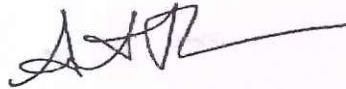
-Vs-

The Ministry of Environment, Forest and Climate Change,  
Government of India, Rep. by its Secretary (EF&CC),  
Indira Paryavaran Bhavan, Jorbagh Road,  
New Delhi-110003 and 8 others.

....Respondents.

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

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
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S/o. Easwara Gowder,  
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New Delhi-110003 and 8 others.

....Respondents.

**REPORT FILED ON BEHALF OF THE THIRD, FOURTH AND FIFTH  
RESPONDENTS - TAMIL NADU POLLUTION CONTROL BOARD.**

I, Mrs. S. Vasuki, Daughter of Thiru. P.K. Somasundaram, aged about 56 years having office at No.76, Mount Salai, Guindy, Chennai 600 032, do hereby solemnly affirm and sincerely state 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, Fourth and Fifth Respondents (TNPCB) and as such I am well acquainted with the facts of the case from the office records.
2. It is respectfully submitted that the applicant filed this OA with the following prayers:
  - i. *to direct the Respondent Nos. 1 to 7 to pass an orders to take necessary action against the 9th Respondent for violating The Environment (Protection) Act, 1986, The Water (Prevention and Control of Pollution) Act, 1974, and The Air (Prevention and Control of Pollution) Act, 1981 and thus render justice.*

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TAMILNADU POLLUTION CONTROL BOARD,  
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- ii. *To direct the Respondent Nos. 8 and 9 to pay the Environmental Compensation Amount a sum of Rs.1,00,00,000/-to the Applicant and thus render justice.*
- iii. *To direct the Respondent Nos. 8 and 9 to restore the Applicant's land to its original state and thus render justice.*
3. It is respectfully submitted that as per the directions passed by the Hon'ble NGT, SZ, Chennai on 24.02.2025, the Third to Sixth Respondents (TNPCB) submits the report herein.
4. It is submitted that the unit of M/s. ITC Limited, PSPD, Unit - Kovai, located at S.F.No: 241/1, 423/2, etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District has obtained CTO - Direct vide Proceedings dated: 18.07.2022 with validity up to 31.03.2025 and subsequently the consent was renewed for the product of Duplex Board, Art Board, Cromo Board – 1,20,000 T/Annum vide proceedings dated 28.03.2025 with validity up to 31.03.2030 subject to the conditions imposed by the Board
5. It is respectfully submitted that the unit of M/s. ITC LIMITED PSPD UNIT KOVAI - POWER PLANT located at S.F. No. 423/2,423/5, 423/4, 426/1A, 426/1B, 426/1C,426/1D, 426/2, 426/3A, 426/3B, 426/3C Thekkampatty village, THEKKAMPATTY village, Mettupalayam Taluk and Coimbatore District has obtained CTO - direct vide Proc. dated: 29.08.2022 for the product of Power Plant 8.0 MWHR with validity up to 31.03.2027
6. It is respectfully submitted that earlier O.A. No. 26 of 2019 was filed by Thiru. E. Rajendran and Thiru. E Ashok Raj Kumar before the Hon'ble National Green Tribunal, Southern Zone, Chennai against the unit M/s. ITC Limited, S.F.No.241/1, 423/2, etc., The allegations in the application are that the industry is situated at a distance of 4.8 kms from Bhavani River, and they are discharging untreated effluents in the agricultural lands, including lands of the applicants which causes soil as well as water contamination, and also mentioned that the solid waste generated were dumped in the open ground and other waste materials were also dumped in the property belonging to them in an unscientific manner which causes air pollution. It was also contended that the emission of smoke from the

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industries also causes air pollution. Further, it is mentioned that the unit is not functioning as per the terms and conditions of the Environment Clearance as well as the consent granted by the Tamil Nadu Pollution Control Board.

7. It is respectfully submitted that the Hon'ble National Green Tribunal, Southern Zone, Chennai has constituted a Joint Committee in O.A. No.26 of 2019 on 13.12.2019 with the officials consisting of a Senior Scientist from Central Pollution Control Board, and Tamil Nadu Pollution Control Board to inspect the unit in question and to consider whether the "landfill" has been properly maintained and they are complying all the norms and assess soil, water and air quality in that area and if there is any violation, they are directed to take appropriate action in accordance with law and submit a factual and action taken report.
8. It is respectfully submitted that on 6<sup>th</sup> and 7<sup>th</sup> January, 2020, the Joint Committee inspected the unit. A Show Cause notice was issued to the unit vide Proc No. dated.10.01.2020 under the Water Act and the Air Act to impose Environmental Compensation for the following major violations,
  - a) Non installation of OCEMS in 44 TPH boiler.
  - b) Dumping of plastic wastes inside the unit premises.
  - c) Exceedance of source emission parameters.
  - d) Traces of heavy metals present in soil due to past discharge of partially/untreated effluent.
9. It is respectfully submitted that the recommendations made by the Joint committee on 12.03.2020 were as follows:
  - a. The Results of Analysis of the samples collected by the committee shows no significant impact in the soil and ground water/surface water.
  - b. The traces of heavy metals present in the soil sample are less as compared with compost manure quality. However, this indicates the past discharge of partially/untreated effluent. The industries should ensure no discharge of partially/untreated effluent.

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- c. The unit has installed flow meter at outlet of ETP only. Flow meter shall be provided at inlet of ETP in order to quantify total effluent generation and treated. These flow metres shall be connected to the online servers of CPCB and TNPCB.
- d. OCEMS installed in 60 TPH boiler for the parameters PM, SO<sub>2</sub> and NO<sub>2</sub>. SO<sub>2</sub> and NO<sub>2</sub> analyser shall be provided with calibration facility and same be connected to CPCB and TNPCB server. OCEMS shall be placed in appropriate location as per emission regulations part - III.
- e. OCEMS Shall be installed in 44 TPH boiler for the parameters PM, SO<sub>2</sub> and NO<sub>2</sub> with gaseous calibration facility and connected to CPCB and TNPCB server.
- f. Proper processing and storage facilities shall be provided for vermicomposting of biological sludge.
- g. Adequate storage facilities shall be provided for the boiler fuel (lignite and biomass) and avoid open storage. This facility shall be provided proper drainage system.
- h. Adequate control measures shall be provided and maintain regularly to avoid fugitive emission from storage yard of boiler fuel and bottom Ash.
- i. Open dumping of plastic waste and process waste sludge (Binding chemicals) found during committee visit shall be removed and disposed properly. The industry shall ensure no open dumping of waste.
- j. The complainant informed that the seepage water from the industry was found during rainy season, which is due to the industry geographical location. So, the industrial shall provide garland drain system around the premises and connect to concrete rainwater harvesting pond to avoid seepage or can adopt any appropriate methods to avoid seepage water flowing to agriculture land.
- k. The interim environmental compensation calculated till 11.03.2020 is Rs. 331.80 lakhs and thereon each day Rs.30,000

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shall be levied until compliance of the directions issued vide Proc. Dated 17.03.2020 based on the above recommendations made by the Joint Committee.

10. It is submitted that based on the Joint Committee report, the Hon'ble Tribunal on 19.3.2020 directed the TNPCB to file an action taken report in pursuance to the proceedings initiated. To comply the Order the TNPC Board had called for personal hearing meeting with the unit of M/s. ITC Limited, Paper Boards and Specialty Boards Division, Unit: Kovai on 10.06.2020 at 11.00 AM at Corporate Office, TNPCB, Guindy, Chennai. The unit had not attended the personal hearing meeting due to COVID-19 pandemic and requested to arrange personal hearing meeting after 10.07.2020 vide unit's letter dated:08.06.2020, and again after 23.07.2020 vide unit's letter dated: 15.07.2020. Hence, the TNPC Board had conducted personal hearing meeting with the unit of M/s. ITC Limited, Paper Boards and Specialty Boards Division, Unit - Kovai on 07.08.2020 at 10.00 AM at Corporate Office, TNPCB, Guindy, Chennai. During the personal hearing, the unit has requested to waive the Environmental compensation and agreed to segregate the consents of M/s. ITC LIMITED, PSPD UNIT KOVAI and M/s. ITC LIMITED PSPD UNIT KOVAI - POWER PLANT.
11. It is respectfully submitted that meantime, a Writ Petition No.10495 of 2020 was filed before the Hon'ble High Court of Madras by the unit ITC Limited against Board's Proc. No..T1 / TNPCB / F.0038 / CBN/RL / W&A / 2020 dated 17.03.2020 stating to quash the Environmental compensation levied and sought interim stay against the Board's Proceedings. On 21.8.2020, the Hon'ble High Court of Madras has granted an interim stay to the TNPC Board Proceedings dated 17.3.2020.
- 12.It is respectfully submitted that the OA No.26 of 2019 was "disposed of" on 28.5.2021 by the Hon'ble Tribunal with certain directions to the respondents and the operative portion of the Order is as follows:
- i. *The 12th respondent is directed to comply with the recommendations issued by the Joint Committee in the report dated 12.03.2020 in its letter and spirit.*

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- ii. *The Tamil Nadu Pollution Control Board is directed to monitor the compliance of the recommendation made by the Committee and also directions issued by them to the 12th respondent in the impugned notice, which was challenged before the Hon'ble High Court of Madras to the extent of imposing compensation. If there are any violations or noncompliance found, then Pollution Control Board is directed to take action against the 12th respondent in accordance with law.*
- iii. *As regards the compensation is concerned since the matter is sub-judice and pending before the Hon'ble High Court of Madras in W.P No. 10495 of 2020 we are not passing any order regarding the same and that will be subject to final order passed by the Hon'ble High Court in the above writ petition and also on that basis Tamil Nadu Pollution Control Board is directed to take action against the 12th respondent in respect of the same subject to the result of the writ petition mentioned above.*
- iv. *The 12th respondent is directed to comply with all the pollution norms and conditions imposed in the clearance as well as in the consent and operate the unit in an environmental friendly manner without causing pollution to the environment or causing any disturbance to the neighboring property owners.*
- v. *Liberty of the applicants to approach this Tribunal later, if there is noncompliance by 12th respondent is left open.*

13. It is respectfully submitted that the Writ Petition No.10495 of 2020 was allowed on 12.04.2023, by the Hon'ble High Court of Madras and the Operative portion of the Judgment is as follows:

1. *The order dated 17.3.2020 was set aside. The matter is remanded to the second respondent. The second respondent shall issue notice to the petitioner and fix the date of hearing on which day the petitioner appear and gives its explanation.*
2. *If the petitioner does not avail this opportunity the respondents can proceed and pass orders.*
3. *The second respondent shall pass detailed speaking order taking into*

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*consideration all aspects including the joint inspection report but the order shall not be predicted only on the basis of the joint inspection report done presently.*

4. *This exercise shall be completed within a period of 3 months from the date of receipt of a copy of this order.*
14. It is respectfully submitted that to comply the above Order passed by the Hon'ble High Court of Madras, personal hearing was also conducted on 09.06.2023 at Corporate Office, TNPCB, Guindy, Chennai.
15. It is respectfully submitted that the unit has submitted that all the works were completed in the directions issued by the Board dated 17.03.2020 except the removal of plastic and also stated that they have engaged Zigma Global Environ solutions Pvt limited for the same. The unit has requested to give 12-15 months to complete the work.
16. It is respectfully submitted that the board vide Proc. dated 29.12.2023 has issued the following directions.
- a. The unit shall carry out assessment study on the plastic dump site through reputed agencies to arrive at the following,
    - i. Total area of plastic dumped in hectares within the premises with breakup of area of Accumulated quantity of plastic waste & Excavated quantity of plastics dumped.
    - ii. Total area in hectares; area already excavated in hectares, Remaining area to be excavated in hectares
    - iii. Time/period needed for the remaining excavation works
  - b. The unit shall furnish the action plan and time completion chart for the remaining excavation works
  - c. From the inward, aggregates stock and disposal as on 30.11.2023 furnished by the unit, it is observed that 18870 MT of plastic waste segregated; whereas only 15344 MT is disposed to Dalmia, JSW Cements. The unit shall balance the detail of plastic waste excavated & disposed and furnish revised statement in this regard.
  - d. The unit shall furnish monthly progress report on the works being carried out to the JCEE(M), CBE and the Board regularly.
  - e. The unit shall carry out study on status of environmental impact with

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details on damage, remediation, etc. in and around 500 m radius through reputed institutions with respect to water, air, soil, heavy metals and shall furnish within a month.

- f. The unit shall remit the Environmental Compensation if levied by the TNPCB based on the study report, actual status and field status report furnished by TNPCB.
  - g. The unit shall carry out water audit so as to minimise water consumption and recycle maximum extent of treated effluent in its process itself, so as to avoid land and ground water pollution.
  - h. The unit shall furnish periodical ROA of water samples from 10 Nos. of piezometric wells provided at the land areas earmarked for utilizing treated trade effluent.
  - i. The unit shall furnish action plan for providing leachate collection system for the vermi composting area so as to enable the collected leachate to be treated in the ETP to achieve Board's Standards.
  - j. The unit shall furnish possible measures (like process / equipment modification, improved internal recycling practices, good housekeeping) to conserve the fresh water requirement and work towards the Bench Mark target as per CPCB guidelines, 2006 set by National Productivity Council.
  - k. The unit shall furnish details of generation & disposal of ETP sludge at present as per CPCB SOP along with details of HWA obtained, details as quantity of plastic waste co processed, converted to fuel, chips etc.
  - l. The unit shall furnish details of online connectivity status of the flow meters provided at the inlet and out let of ETP to the online servers of CPCB and the online continuous monitor for effluent parameters flow, pH, BOD, COD and, TSS with Water Quality Watch of TNPCB.
  - m. The unit shall furnish present status of plastic waste collected during sorting of waste paper before pulping and method of disposal with supporting documents.
17. It is respectfully submitted that the unit has furnished reply to board on 25.01.2024 for the directions issued dated 29.12.2023 and later the unit has

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also furnished the work completion letter on 12.06.2024 for the removal of plastic. **(Enclosed as Annexure - I)**

18. It is respectfully submitted that based on the complaint received from E. Ashok Raj Kumar dated 30.09.2024 alleging that the unit operation is causing damage to the quality of water and soil to the applicant's agricultural land, the unit was inspected on 09.01.2025 by the TNPCB officials. The said land is adjacent to the industries compound wall. In this regard, the JCEE (M), TNPC Board has requested the Tamil Nadu Agricultural University (TNAU), Coimbatore to include the said land in scope of their study which is been regularly conducted (Since from 2004, TNAU is engaged by the unit as per the consent order conditions to ensure no pending or stagnation effluent and to provide adequate densities of crops / plantation) and also to collect water and soil samples from the alleged field. **(Enclosed as Annexure - II)**

a) A scientist from Department of Environmental sciences, TNAU, Coimbatore has visited the Complainant land on 12.02.2025 and collected soil and water samples.

b) The ROA of the samples were furnished by TNAU on 18.03.2025 **(Enclosed as Annexure - III)**

c) The ROA of the soil reveals key characteristics influencing its fertility and environmental impacts. The soil sample had a pH of 7.8 the soil is slightly alkaline with the low electrical conductivity (0.01 ds/ m) indicating low salinity beneficial for most crops. However, the organic carbon content is relatively low at 0.16% suggesting that incorporation of organic amendments is necessary to enhance soil health and productivity. The available nitrogen is high at 360 kg/ha, beneficial for growth. Phosphorus is low at 8 kg/ha, which may limit plant growth unless supplemented, while potassium is moderate at 224 kg/ha, providing a good balance. Exchangeable sodium is very low, posing no sodicity risk, while calcium and magnesium levels are substantial, contributing to fertility and structure. Available iron is low, and copper is high, which could be beneficial. All heavy metals are below detection

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limits; indicating no significant environmental or health risks. Overall, the soil has nutrient imbalances but no heavy metal hazards, suggesting management strategies like organic matter addition, and nutrient balancing to optimize fertility and plant growth.

- d) The ROA of water sample collected from stream near farmer's field (Latitude — 11.246122, Longitude — 76.880942) which is being used for irrigation. The water samples were analyzed for its physico — chemical characteristics. The pH level of 7.67 falls within the acceptable range of 6.5-8.5, aligning with WHO and BIS standards, which indicates no significant risks related to corrosivity or alkalinity. Sample also had a total dissolved solids (TDS) of 768 mg/L with low sodium, sulfate, and chloride levels which are found to be in safe limits. All tested heavy metals (arsenic, cadmium, lead, chromium, and nickel) were also found to be below detection limits, eliminating associated health risks. Overall, all the parameters tested were found to be within the limit indicating suitability of water for irrigation.

19. It is respectfully submitted that later during the inspection of the unit on 21.03.2025 the following were observed:

- a) The unit was under operation and all the manufacturing processes were under operation.
- b) The unit is carrying out the production within the consented capacity.
- c) All the components of Combined Effluent Treatment Plan was found in operation, and treated effluent is utilized for on land irrigation.
- d) All the components of STP (50 KLD) were under operation and the treated sewage is discharged into existing ETP.
- e) The unit has provided Air pollution control measures to control the emission. During the time of inspection all the Air pollution control measures were under operable condition.

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- f) The individual energy meters for the APC measures were under operable condition.
- g) The unit has provided water sprinkler arrangements for dust suppression in fuel handling area and were in operation.
- h) The unit has installed Online Continuous Emission Monitoring System (OCEMS) for 44 TPH stand by Boiler for the parameters PM, SO<sub>2</sub> and NO<sub>2</sub> and connected to CPCB and Care Air Centre, TNPCB server.
- i) The unit has installed Online Continuous Effluent Monitoring System for the parameters pH, TSS, COD, BOD, Temperature & flow in ETP.
- j) The unit has connected the flow meters at the inlet and outlet of ETP to the online servers of CPCB & TNPCB server.
- k) In the consent order additional conditions, the TNPCB has directed the unit from 2004 to monitor the effects of using treated effluent for using agricultural purpose by engaging Agriculture Board. In this regard, Tamil Nadu Agriculture University is continuously collecting the soil and water samples in and around the premises every three months and studying the effects of treated effluent on land for irrigation on soil and crops / plants / trees and furnishing report to unit annually. The unit submits the report on receipt to the Board.

20. It is respectfully submitted that the Tamil Nadu Agriculture University has given its annual report dated on 25.10.2024 titled Study on the impacts of ITC Kovai paper board mill treated effluent along with sludge on soil health and crop productivity. In the report it is concluded that,

- a. The treated paper board effluent is suitable for irrigation since the vital quality parameters such as pH, EC, BOD, TDS and heavy metals are within the prescribed limits of CPCB norms
- b. In order to assess the long-term impact of effluent irrigation on ground water quality, 30 bench mark sites were selected in around factory premises, ground water samples were

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withdrawn at periodical intervals and analysed. The water levels of the piezometer and piezo well sampling sites are ranges between 4 to 7 meters. All the ground water quality parameters are within permissible limits and the average SAR value is found to be less than 5. It indicates the ground water quality is not deteriorated due to use of treated effluent for irrigation.

- c. Based on the analytical results of collected soil samples, it is revealed that the soil quality was not deteriorated in all the bench mark sites.
- d. Field experiment with fodder maize as test crop for crop rotation was initiated and it has been observed that the application of sludge ETP vermicompost @ 5t ha<sup>-1</sup> along with treated effluent through drip irrigation recorded significantly better growth and yield compared to other treatments.

21. It is respectfully submitted that each month TNPCB is collecting water and treated effluent samples in and around the premises of the unit. The samples were collected for the month of February and March, 2025 ROA reveals that the parameters are within the standards prescribed by the Board.  
(Enclosed as Annexure - ~~IV~~)

Therefore, it is respectfully prayed that this Hon'ble Tribunal (SZ), may be pleased to pass such order or other orders as this Hon'ble Tribunal may deem fit and necessary in the circumstances of the case and thus render justice.

S. Vasuki 6.8.25  
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### VERIFICATION

I, Mrs. S. Vasuki, Daughter of Thiru. P.K. Somasundaram, working as Joint Chief Environmental Engineer, having office at No.76, Mount Salai, Guindy, Chennai 600 032, do hereby verify that the contents of above report are true to the best of my knowledge through records.

S. Vasuki 6.8.25  
JOINT CHIEF ENVIRONMENTAL ENGINEER  
TAMILNADU POLLUTION CONTROL BOARD,  
No.76, MOUNT SALAI, CHENNAI-600 032.

12/06/2024

The District Environmental Engineer,  
Tamil Nadu Pollution Control Board,  
No-5, Ramasamy Nagar,  
Kavundampalayam,  
Coimbatore - 641 025



ITC Limited  
PAPERBOARDS & SPECIALTY PAPERS DIVISION  
Unit : Kovai  
Vivekanandapuram (PO), Thekkampatty (Village)  
Coimbatore - 641 113, Tamilnadu, India.  
Tel(O) : 91-4254- 271234 / 284304  
Fax : 91-4254-284304  
www.itcpspd.com



Dear Sir,

**Sub:** Extraction and disposal of plastics by Zigma Global Environ Solutions Private Limited from our site at Thekkampatty Village

As you are aware that we had engaged one Zigma Global Environ Solutions Private Limited ("Zigma") for extraction, segregation and disposal of plastics which were found embedded in our aforesaid unit's premises leftover by the erstwhile owner of the unit viz., BILT Industrial Packaging Company Limited. Zigma had started their works in February 2023 and we have regularly been updating your good office on the progress of such works.

We are now pleased to inform the Board that Zigma has completed the aforesaid works in May 2024, by excavating about 3.03 hectares of land and processed 2.25 Lakh MT of soil at the aforesaid Unit, extracting plastics there from and disposing about 17902 MT of plastics, in aggregate. These plastics were sent to various Cement plants. Copies of Delivery Challan towards disposal of such plastics to cement plants are enclosed herewith for your kind reference. At the locations that were excavated, we have been planting trees after refilling earth in order to maintain greenery.

This is for your information and necessary record.

Thanking you,

Yours faithfully,  
For ITC Limited - PSPD, Unit: Kovai.

S. Venkatrao  
Unit Head

- Encl: 1. Summary of soil excavation & plastic disposal details.  
2. Copies of Delivery Challan towards plastic disposal

Copy: The Joint Chief Environmental Engineer (M), Coimbatore.

Summary of the Soil Excavated & Plastic Disposal status

Summary of the soil excavated & plastic disposed details		
Month	Soil excavated for segregation (MT)	Disposed Plastic waste to Cement Plants (MT)
Feb-23	2,562	0
Mar-23	9,222	187
Apr-23	15,179	1,572
May-23	12,342	2,073
Jun-23	17,565	1,072
Jul-23	36,058	2,534
Aug-23	24,573	2,378
Sep-23	33,323	1,841
Oct-23	26,277	2,977
Nov-23	13,780	676
Dec-23	19,115	505
Jan-24	13,755	446
Feb-24	1,249	31
Mar-24	0	150
Apr-24	0	889
May-24	0	571
<b>Total</b>	<b>225,000</b>	<b>17,902</b>

Summary of plastic disposed to Cement Industries			
S/L No	Name of the Cement plant	Location	Quantity of Plastics disposed (MT)
1	Dalmia Cement (B) Ltd (Unit: Ariyalur)	Ariyalur	3410
2	Dalmia Cement (B) Ltd (Unit: Dalmiapuram)	Dalmiapuram	874
3	JSW Cement Limited	Nandyal	10621
4	M/S Jindal Urban Waste Management (Guntur) Limited	Guntur	737
5	Ultratech Cement Limited (Unit: Reddipalayam)	Reddipalayam	14
6	Zuari Cement Limited (Unit: Yerraguntla)	Yerraguntla	2224
7	Chettinad Cement Corporation Private Limited (Unit: Ariyalur)	Ariyalur	21
<b>Total</b>			<b>17,902</b>

Annexure - W

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TAMIL NADU POLLUTION CONTROL BOARD

From	To
Dr.K.Ravichandran, M.Tech,P.hD., Joint Chief Environmental Engineer (M) TamilNadu Pollution Control Board 4 <sup>th</sup> Floor, 34, Bharathi Park 8 <sup>th</sup> cross, Saibaba Colony, Coimbatore - 11.	Dr.P.Dhevagi, Ph.D., The Professor and Head Department of Environmental Sciences, Tamilnadu Agricultural University, Lawley Rd, P N Pudur, Coimbatore.

Lr. No. JCEE (M)/TNPCB/CBE/F.200/Tech/2025, Dated: 10.02.2025.

Sir,

Sub	TNPC Board – O/o JCEE(M), Coimbatore Zone – to conduct soil and ground water sample analysis in the Agri land of Thiru. E. Ashok Raj Kumar – requested – regarding.
Ref	1. The unit of M/s. ITC Limited, Paper Boards and Speciality Boards Divn, Unit Kovai, letter dated: 04.07.2024 addressed to the TNAU, Coimbatore. 2. Complaint received from Thiru.E.Ashok Raj Kumar, S/o Easwara Gowder, Thekkampatti Post, Seeliyur(via), Mettupalayam Taluk, Coimbatore District – 113, dated: 30.09.2024. 3. Inspection of the unit by the TNPCB officials on 09.01.2025

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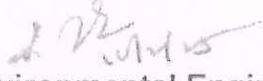
I am to invite your kind attention to the references cited and It was ascertained that the TNAU was given a project to carryout study on the impact of continuous application of treated effluent of M/s. ITC Limited, Paper Boards and Speciality Boards Divn, Unit Kovai, S.F.No. 241/1, etc., Thekkampatty Village, Mettupalayam Taluk, Coimbatore District in their own agricultural land and suggest suitable remedial measures including preparation of comprehensive Irrigation Management Plan.

In this connection, it is informed that a complaint has been received from Thiru. Ashok Raj Kumar against the unit of M/s. ITC Limited, Paper Boards and Speciality Boards Divn, Unit Kovai alleging that the unit's operation are causing damage to the

quality of water and soil of the agri land bearing S.F. No. 407/2A1, Thekkampatti Village, Mettupalayam Taluk, Coimbatore District. The said land is located adjacent to the industries compound wall.

In this regard, it is requested to include the said land in your scope of study and collect water and soil samples from that field also. Assistance for collection of sample and field visit will be provided by the O/o DEE, Coimbatore North.

The action taken on the above shall be intimated to this office early. The receipt of this letter may kindly be acknowledged.

  
Joint Chief Environmental Engineer (M),  
Tamil Nadu Pollution Control Board  
Coimbatore Zone

**Copy to**

1. Thiru.E.Ashok Raj Kumar, Door No.5/92, Thekkampatti Post, Seeliyur (via), Mettupalayam Taluk, Coimbatore District – for information.
2. The Occupier, M/s. ITC Ltd., Paper Boards and Speciality Boards Divn, Unit Kovai – for further follow up
3. DEE, TNPCB, Coimbatore North – for further followup action.

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Annexure - III

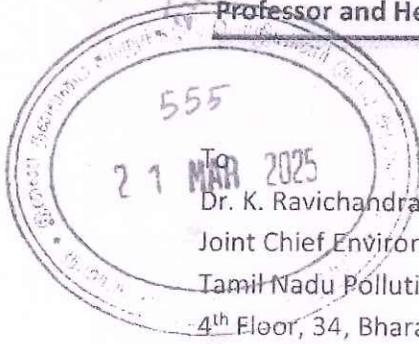


TAMIL NADU AGRICULTURAL UNIVERSITY  
DEPARTMENT OF ENVIRONMENTAL SCIENCES  
Directorate of Natural Resource Management

Dr. P. Dhevagi, Ph.D.,  
Professor and Head (Environmental Sciences)

Coimbatore - 641 003  
Tamil Nadu, India

Date: 18.03.2025



Dr. K. Ravichandran, M.Tech, Ph.D.,  
Joint Chief Environmental Engineer (M)  
Tamil Nadu Pollution Control Board  
4<sup>th</sup> Floor, 34, Bharathi Park, 8 th Cross,  
Saibaba colony, Coimbatore -11

No. P&H/ENS/Thiru Ashok Raj Kumar/Sample Collection/Soil and water analytical report/  
2025/17.3.2025

**Sub:** ENS – NLC – Thiru Ashok Raj Kumar/Sample Collection/Soil and water analytical report – Sending – Reg.

**Ref:** Lr. No. JCEE (m)/ TNPCB/CBE/F.200/Tech/2025 dt. 10.2.2025 From Office of the Joint Chief Environmental Engineer, TNPCB, Coimbatore -11

Sir,  
Greetings,

With reference to the above, I am to inform that a field visit was made by the Scientist of Environmental Sciences, TNAU, Coimbatore on 12.2.2025 to the farmers field (Th. Ashok Raj Kumar) located near by the ITC, Thekkampatty. Soil samples from the field bearing S.F. No. 241/1 and water sample from the stream near by the land which is being used for irrigation were taken and analysed for the quality parameters and the results are annexed for your reference. In addition, the above said field, water sample will be also included as one of the bench mark sites for periodical monitoring of quality parameters which is being carried out in the ongoing ITC Scheme functioning in the Department of Environmental Sciences. This is for information and further action.

  
18/3/25  
Professor and Head  
(Dept. of Env. Sciences)

Tel: +91 422 6611 252/452

Mobile: + 91 98435 30349

Email: environment@tnau.ac.in

Table 1. Physico-chemical characteristics of soil collected from the farmer Ashok Rajkumar (SF No. 241/1, Latitude – 11.248611 Longitude – 76.8802246)

S.No.	Parameters	Values
1.	pH	7.8
2.	EC(dSm <sup>-1</sup> )	0.10
3.	Organic carbon (%)	0.16
4.	Available Nitrogen (kg/ha)	360
5.	Available Phosphorus (kg/ha)	08
6.	Available Potassium (kg/ha)	224
7.	Exchangeable Sodium (Cmol kg <sup>-1</sup> )	0.02
8.	Exchangeable Calcium (Cmol kg <sup>-1</sup> )	5.8
9.	Exchangeable Magnesium (Cmol kg <sup>-1</sup> )	3.8
10.	Available Iron (mg/l)	1.72
11.	Available Copper (mg/l)	21.1
12.	Available Manganese (mg/l)	174.8
13.	Total Zinc (mg/l)	*BDL
14.	Total Nickel (mg/l)	*BDL
15.	Total Arsenic (mg/l)	*BDL
16.	Total Cadmium (mg/l)	*BDL
17.	Total Lead (mg/l)	*BDL
18.	Total Chromium (mg/l)	*BDL
19.	Total Mercury (mg/l)	*BDL

\*BDL – Below Detectable Limit

The soil analysis reveals several key characteristics influencing its fertility and environmental impacts. The soil sample had a pH of 7.8, the soil is slightly alkaline with a low electrical conductivity (0.10 dS/m) indicating low salinity, beneficial for most crops. However, the organic carbon content is relatively low at 0.16%, suggesting that incorporation of organic amendments is necessary to enhance soil health and productivity. The available nitrogen is high at 360 kg/ha, beneficial for growth. Phosphorus is low at 8 kg/ha, which may limit plant growth unless supplemented, while potassium is moderate at 224 kg/ha, providing a good balance. Exchangeable sodium is very low, posing no sodicity risk, while calcium and magnesium levels are substantial, contributing to fertility and structure. Available iron is low, and copper is high, which could be beneficial. All heavy metals are below detection limits, indicating no significant environmental or health risks. Overall, the soil has nutrient imbalances but no heavy metal hazards, suggesting management strategies like organic matter addition, and nutrient balancing to optimize fertility and plant growth.

Table 2. Physico-chemical characteristics of stream water

S.No.	Parameters	Values
1.	pH	7.67
2.	EC(dSm <sup>-1</sup> )	1.20
3.	TDS	768
4.	Sodium (mg/l)	120
5.	Potassium (mg/l)	5.8
6.	Calcium (mg/l)	148
7.	Magnesium (mg/l)	76
8.	Carbonate (mg/l)	Nil
9.	Bicarbonate (mg/l)	428
10.	Sulphate (mg/l)	40
11.	Chloride (mg/l)	96
12.	Total Nickel (mg/l)	*BDL
13.	Total Arsenic (mg/l)	*BDL
14.	Total Cadmium (mg/l)	*BDL
15.	Total lead (mg/l)	*BDL
16.	Total Chromium (mg/l)	*BDL

\*BDL – Below Detectable Limit

The water sample was collected from stream near farmer's field (Latitude – 11.246122, Longitude – 76.880942) which is being used for irrigation. The water samples were analyzed for its physico – chemical characteristics (Table 2). The pH level of 7.67 falls within the acceptable range of 6.5–8.5, aligning with WHO and BIS standards, which indicates no significant risks related to corrosivity or alkalinity.

Sample also had a total dissolved solids (TDS) of 768 mg/L with low sodium, sulfate, and chloride levels are which are found to be safe limits. All tested heavy metals (arsenic, cadmium, lead, chromium, and nickel) were also found to be below detection limits, eliminating associated health risks. Overall, all the parameters tested were found to be within the limit indicating suitability of water for irrigation.

Consolidated statement showing the report of analysis of samples collected from M/s. ITC LIMITED - PSPD, UNIT : KOVAI

Sl. No.	Parameters (Except pH all values are in mg/l)	Apr-24					May-24				
		ETP Outlet	Bore well (near mining area)	Open well (near canteen)	Open well (near ETP)	Bore well	ETP Outlet	Bore well (near mining area)	Open well (near canteen)	Open well (near ETP)	Bore well
1	pH @ 25°C	7.8	7.6	7.84	7.81	8.09	8.2	7.38	7.6	8.13	8.02
2	Total Suspended Solids	12	6	18	10	10	12	4	6	8	4
3	Total Dissolved solids	282	1674	462	892	1034	966	1732	1846	1162	308
4	Chloride as Cl	70	610	130	320	310	290	325	420	370	50
5	Sulphate as SO <sub>4</sub>	64	381	79	136	234	242	311	409	269	47
6	BOD for 3 days @27°C	6	4	8	6	9	8	2	2	2	2
7	COD	32	24	40	32	48	48	8	8	8	8
8	Ammonical Nitrogen	1.68	0.56	0.56	1.12	1.12	1.12	0.56	0.56	1.68	1.12
9	Total Kjeldahl Nitrogen	3.92	2.8	1.68	3.36	4.48	3.36	2.24	2.8	4.48	3.36
10	Sulphide	<1	1.2	<1	<1	<1	<1	3.6	<1	<1	<1
11	Phenolic Compounds	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
12	%Sodium	22	41	27	27	44	51	47	29	54	25

## Consolidated statement showing the report of analysis of samples collected from M/s. ITC LIMITED - PSPD, UNIT : KOVAI

Sl. No.	Parameters (Except pH all values)	Aug-24					Sep-24				
		ETP Outlet	Bore well (near mining)	Open well (near	Open well (near ETP)	Bore well	ETP Outlet	Bore well Mining	Open well (Near	Open well ETP	Bore well
1	pH @ 25°C	7.8	7.66	7.57	7.79	7.8	7.94	7.36	7.42	7.37	7.25
2	Total Suspended Solids	20	4	6	4	4	28	16	4	4	22
3	Total Dissolved solids	1318	686	1448	814	632	838	298	988	648	148
4	Chloride as Cl	560	290	580	340	270	310	95	360	230	45
5	Sulphate as SO <sub>4</sub>	175	98	149	128	89	186	43	175	86	19
6	BOD for 3 days @27°C	12	2	2	2	2	12	6	2	2	9
7	COD	64	8	8	8	8	80	40	8	8	56
8	Ammonical Nitrogen	1.12	0.56	0.56	0.56	0.56	2.24	1.12	0.56	1.12	1.68
9	Total Kjeldahl Nitrogen	3.36	2.24	2.8	2.8	2.24	5.6	3.36	2.24	3.36	3.92
10	Sulphide	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
11	Phenolic Compounds	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
12	%Sodium	46	27	26	28	28	48	32	24	25	26

## Consolidated statement showing the report of analysis of samples collected from M/s. ITC LIMITED - PSPD, UNIT : KOVAI

Sl. No.	Parameters (Except pH all values)	Oct-24					Nov-24				
		ETP Outlet	Bore well Mining area	Open well (Near	Open well ETP	Bore well	ETP Outlet	Open well ETP	Open well (Near	Bore well Mining	Bore well near raw
1	pH @ 25°C	7.87	7.58	7.61	7.78	6.39	7.67	7.36	7.37	7.25	7.21
2	Total Suspended Solids	22	4	8	4	4	22	4	6	4	4
3	Total Dissolved solids	734	756	1058	996	408	1496	1068	986	994	1072
4	Chloride as Cl	360	380	460	390	135	550	410	490	510	380
5	Sulphate as SO <sub>4</sub>	86	74	187	154	69	358	144	166	178	174
6	BOD for 3 days @27°C	12	2	2	2	2	9	2	2	2	2
7	COD	88	8	8	8	8	56	8	8	8	8
8	Ammonical Nitrogen	1.12	0.56	0.56	1.12	0.56	1.12	0.56	0.56	0.56	0.56
9	Total Kjeldahl Nitrogen	4.48	2.24	1.68	3.36	2.24	3.36	2.24	1.12	1.12	1.68
10	Sulphide	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
11	Phenolic Compounds	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
12	%Sodium	40	26	24	28	25	46	26	26	24	24

## Consolidated statement showing the report of analysis of samples collected from M/s. ITC LIMITED - PSPD, UNIT : KOVAI

Sl. No.	Parameters (Except pH all values)	Dec-24					Jan-25				
		ETP Outlet	Open well (N)	Open well (W)	Bore well (S)	Bore well (E)	ETP Outlet	Open well (N)	Open well (W)	Bore well (S)	Bore well (E)
1	pH @ 25°C	8.1	7.71	7.34	7.32	7.5	7.77	7.42	7.63	7.33	7.27
2	Total Suspended Solids	12	4	10	4	4	16	4	10	4	4
3	Total Dissolved solids	1694	986	902	904	1368	1986	1106	1294	1382	1274
4	Chloride as Cl	510	320	315	310	430	735	350	560	580	480
5	Sulphate as SO <sub>4</sub>	238	175	186	188	275	261	128	128	193	257
6	BOD for 3 days @27°C	6	2	2	2	2	12	2	2	2	2
7	COD	40	8	8	8	8	72	8	8	8	8
8	Ammonical Nitrogen	1.68	0.56	0.56	0.56	0.56	3.36	<2	<2	<2	<2
9	Total Kjeldahl Nitrogen	4.48	1.12	1.12	1.68	1.68	6.16	<5	<5	<5	<5
10	Sulphide	<1	<1	<1	<1	<1	<1	<1	<	<1	<1
11	Phenolic Compounds	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
12	%Sodium	39	29	26	27	30	47	27	25	24	26

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## Consolidated statement showing the report of analysis of samples collected from M/s. ITC LIMITED - PSPD, UNIT : KOVAI

Sl. No.	Parameters (Except pH all values)	Feb-25					Mar-25				
		ETP Inlet	near ETP	Canteen	Sigma Borewell	Raw Water Borewell	ETP Outlet	Sigma Borewell	Raw Water Borewell	Canteen	ETP Open well
1	pH @ 25°C	7.66	7.6	7.25	7.27	7.44	7.55	7.51	7.59	7.09	7.24
2	Total Suspended Solids	26	-	-	-	-	20	-	-	-	-
3	Total Dissolved solids	1784	1472	1496	1510	462	1756	1096	1006	1528	1118
4	Chloride as Cl	650	510	450	420	175	630	450	430	460	390
5	Sulphate as SO4	389	248	273	173	58	415	237	198	214	187
6	BOD for 3 days @27°C	15	-	-	-	-	12	-	-	-	-
7	COD	96	-	-	-	-	88	-	-	-	-
8	Ammonical Nitrogen	-	-	-	-	-	-	-	-	-	-
9	Total Kjeldahl Nitrogen	-	-	-	-	-	-	-	-	-	-
10	Sulphide	-	-	-	-	-	-	-	-	-	-
11	Phenolic Compounds	-	-	-	-	-	-	-	-	-	-
12	%Sodium	-	-	-	-	-	-	-	-	-	-
13	Nitrate Nitrogen	-	0.21	0.28	0.28	0.39	-	0.157	0.23	0.14	0.29
14	Fluoride	-	0.329	<0.2	<0.2	<0.2	-	0.635	0.784	0.675	0.388
15	Total Alkalinity	-	256	384	412	260	-	352	352	392	300
16	Total Hardness	-	770	840	870	280	-	480	420	850	770
17	Calcium	-	168.3	188.4	208.4	64.1	-	156.3	132.3	196.4	208.4
18	Magnesium	-	85.1	90	85.1	29.2	-	21.9	21.9	87.5	60.8
19	Hexavalent Chromium	-	<0.05	<0.05	<0.05	<0.05	-	<0.05	<0.05	<0.05	<0.05
20	Colour	-	<5	<5	<5	<5	-	50	50	<5	<5
21	Total Residual Chlorine	-	<1	<1	<1	<1	-	<1	<1	<1	<1
22	Turbidity	-	<1	<1	<1	<1	-	3.2	2.5	<1	<1
23	Iron Total	-	0.7746	0.624	0.71	0.5594	-	0.5164	0.6025	0.6889	0.6347
24	Copper	-	0.1844	0.2185	0.88	0.2216	-	0.6386	0.3448	0.3275	0.528
25	Zinc	-	0.236	0.3116	0.524	0.4046	-	0.8842	0.5216	0.388	0.7244

  
 District Environmental Engineer,  
 Tamilnadu Pollution Control Board,  
 Coimbatore (North)

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

**Original Application No. 35 of 2025**

E. Ashok Raj Kumar,  
S/o. Easwara Gowder,  
\Door No. 5/ 92, Thekkampatti Post,  
Seeliyur (Via), Mettupalayam Taluk,  
Coimbatore District 641113.

....Applicant.

-Vs-

The Ministry of Environment, Forest and  
Climate Change, Government of India,  
Rep. by its Secretary (EF&CC),  
Indira Paryavaran Bhavan, Jorbagh Road,  
New Delhi-110003 and 8 others.

....Respondents

**REPORT FILED ON BEHALF OF THE  
THIRD, FOURTH AND FIFTH  
RESPONDENTS - TAMIL NADU  
POLLUTION CONTROL BOARD**

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

**Date:07.08.2025.**

**Date of Hearing: 20.08.2025**