

BEFORE THE NATIONAL GREEN TRIBUNAL (SZ), CHENNAI

Original Application No. 105 of 2021

IN THE MATTER OF

Yanati Srinivasulu Reddy and Anr

.... Applicants

Versus

Chief Secretary, Secretariat,
Govt. of Andhra Pradesh & others

.... Respondents

**TABULAR STATEMENT FILED BY THE 8TH RESPONDENT IN TERMS OF
THE ORDER DATED FEBRUARY 9, 2023 PASSED BY THIS HON'BLE
TRIBUNAL.**

M/s. KING & PARTRIDGE

C.MOHAN

M.KUMARESAN

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No. 108, Armenian Street,
Chennai – 600 001.

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COUNSEL FOR 8TH RESPONDENT

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN BENCH CHENNAI
ORIGINAL APPLICATION NO 105 OF 2021**

Yanati Srinivasalu Reddy,
S/o Ramachandra Reddy
Nelatur Village & Post
SPSR Nellore District
A.P - 524 344 & Another.

... Applicants

Vs

The Chief Secretary
Govt of Andhra Pradesh
Secretariat, Velangapudi, Amaravati,
Andhra Pradesh & Others

... Respondents

**TABULAR STATEMENT FILED BY THE 8TH RESPONDENT IN TERMS
OF THE ORDER DATED FEBRUARY 9, 2023 PASSED BY THIS
HON'BLE TRIBUNAL**

The 8th Respondent respectfully submit as follows:

1. Vide order dated 09.02.2023, the Hon'ble Tribunal directed this Respondent to file a Tabular Column of the conditions which are not complied with as per the Environmental Clearance (EC) and the compliance as per the Joint committee report dated 22.03.2022.
2. With prejudice to the above, this respondent thermal power plant in accordance to all legal requisites and mandates. The Andhra Pradesh Pollution Control Board after through verification and inspection issued its initial Consent Order for Operation on 08.05.2014 and after multiple subsequent renewals the latest Consent for Operation was accorded to this Respondent's Thermal Power Plant on 06.05.2022 which extends the validity and terms of compliance upto 31.03.2025.
3. It is further important to note that the Joint Committee had observed in their report that this Respondent had complied with 27 out of 41 conditions as on 22.03.2022. However, this respondent now has complied with all the conditions imposed in the CTO & authorization under HW Rules issued by the APPCB. If given a fair chance and if the project site is directly inspected by this Hon'ble Tribunal, a true picture of the case at hand and the collusion of the applicants to gain unfair compensation will be made out. Each and every allegation contained in the report is denied except for those that are matters of record and specifically admitted hereunder.


DIRECTOR (THERMAL)
APGENCO, VIDYUTH SOUDHA
VIJAYAWADA - 04

TABULAR STATEMENT OF ENVIRONMENTAL IMPACT COMPLIANCE

S.No	Condition	Joint Committee Observation	Current Status of Compliance																											
1.	<p>WATER POLLUTION</p> <p>The industry shall treat the effluents so as to conform to the standards stipulated under Environment (Protection) Rules, 1986 for discharge into sea notified by MoEF, GOI in vide G.S.R.422(E), dated 19.05.1993 and its amendments Thereof.</p> <table border="1" data-bbox="783 943 1361 1798"> <thead> <tr> <th data-bbox="783 1619 879 1798">OUTLET</th> <th data-bbox="783 1323 879 1619">PARAMETER</th> <th data-bbox="783 943 879 1323">CONCENTRATION IN MG/L</th> </tr> </thead> <tbody> <tr> <td data-bbox="879 1619 943 1798">1 and 2</td> <td data-bbox="879 1323 975 1619">Colour and odour*</td> <td data-bbox="879 943 943 1323">As mentioned below</td> </tr> <tr> <td></td> <td data-bbox="975 1323 1038 1619">Suspended solid</td> <td data-bbox="975 943 1038 1323">100</td> </tr> <tr> <td></td> <td data-bbox="1038 1323 1134 1619">Particulate size of suspended solid</td> <td data-bbox="1038 943 1134 1323">Floatable solids. max.3mm</td> </tr> <tr> <td></td> <td></td> <td data-bbox="1134 943 1198 1323">Settable solids, max850micron</td> </tr> <tr> <td></td> <td></td> <td data-bbox="1198 943 1262 1323">S</td> </tr> <tr> <td></td> <td data-bbox="1262 1323 1326 1619">pH</td> <td data-bbox="1262 943 1326 1323">6.5 to 8.5</td> </tr> <tr> <td></td> <td data-bbox="1326 1323 1390 1619">Oil and Grease</td> <td data-bbox="1326 943 1390 1323">10</td> </tr> <tr> <td></td> <td data-bbox="1390 1323 1453 1619">Total residual chlorine</td> <td data-bbox="1390 943 1453 1323">1.0</td> </tr> </tbody> </table>	OUTLET	PARAMETER	CONCENTRATION IN MG/L	1 and 2	Colour and odour*	As mentioned below		Suspended solid	100		Particulate size of suspended solid	Floatable solids. max.3mm			Settable solids, max850micron			S		pH	6.5 to 8.5		Oil and Grease	10		Total residual chlorine	1.0	<p>Partially complied</p> <p>The Unit is not meeting the BOD standards of 100 mg/l at the outset of the ETP. As per the analysis, BOD at the outlet of the ETP is 112 mg/l.</p> <p>Analysis Report enclosed</p>	<p>COMPLIED</p>
OUTLET	PARAMETER	CONCENTRATION IN MG/L																												
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Gangul

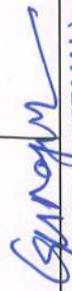
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	compounds Radio active materials Alpha emitter micro Beta emitter micro Bio assay test Manganese Iron Vanadium Nitrate Nitrogen	10-%curie/ml 10-%curie/ml 90% survival of fish after 96 hours in 100% effluents 2.0 3.0 0.2 20		
<p>* All efforts shall be made to remove colour and unpleasant odour as far as practicable. The blow down water discharge into sea shall be maintained at ambient temperature from cold water side.</p>				

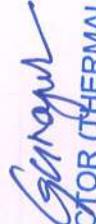
Ganapur
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2.	Treated trade and domestic effluents utilized from green belt development shall conform to the following standards of onland for irrigation standards and as stipulated under MoEF, GOINotificationG.S.R.422 (E), dated19.05.1993 and its amendments thereof.	Complied Analysis Report enclosed.	COMPLIED
OUTLET	PARAMETER	CONCENTRATION IN MG/L	
3 to 4	Colour and odour*	As mentioned below	
	Suspended solids	100	
	pH	5.5 to 9.0	
	Oil and grease	10	
	Biochemical Oxygen Demand (3 daysat27°C)	100	
	Arsenic	0.2	
	Iron (Total)	1.0	
	Copper(Total)	1.0	
	Cyanide	0.2	
	Radioactive materials	10-%curie/ml	
	a. Alpha emitter micro	10-%curie/ml	
	b. Beta emitter micro	90%survivalof fishafter96hours in100%effluents	
	Bio assay test		


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	<p>*All efforts shall be made to remove colour and unpleasant odour as far as practicable. The blow down water discharge into sea shall be maintained at ambient temperature from cold water side.</p>																				
<p>3.</p>	<p>The industry shall take steps to reduce water consumption to the extent possible and consumption shall NOT exceed the quantities mentioned below:</p>	<p>Complied.</p>	<p>COMPLIED</p>																		
	<table border="1"> <thead> <tr> <th data-bbox="654 1624 694 1792">S.NO</th> <th data-bbox="654 1288 694 1624">PURPOSE</th> <th data-bbox="654 952 694 1288">QUANTITY IN KLD</th> </tr> </thead> <tbody> <tr> <td data-bbox="694 1624 734 1792">1.</td> <td data-bbox="694 1288 901 1624"> For cooling tower make up (saline water) </td> <td data-bbox="694 952 901 1288">3,13,560</td> </tr> <tr> <td></td> <td data-bbox="901 1288 981 1624"> For Desalination plant feed </td> <td data-bbox="901 952 981 1288">15,874</td> </tr> <tr> <td></td> <td data-bbox="981 1288 1021 1624"> a) DM Plant </td> <td data-bbox="981 952 1021 1288">1380</td> </tr> <tr> <td></td> <td data-bbox="1021 1288 1276 1624"> b) For dust suppression (coal dust suppression +dry fog systems) </td> <td data-bbox="1021 952 1276 1288">1632</td> </tr> <tr> <td></td> <td data-bbox="1276 1288 1372 1624"> c) HVAC makeup & auxiliary </td> <td data-bbox="1276 952 1372 1288">2454</td> </tr> </tbody> </table>	S.NO	PURPOSE	QUANTITY IN KLD	1.	For cooling tower make up (saline water)	3,13,560		For Desalination plant feed	15,874		a) DM Plant	1380		b) For dust suppression (coal dust suppression +dry fog systems)	1632		c) HVAC makeup & auxiliary	2454		<p style="text-align: right;">  DIRECTOR (THERMAL) APGENCO, VIDYUTH SOUDHA VIJAYAWADA - 04 </p>
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TOTAL												
4.	<p>Separate meters with necessary pipeline shall be maintained for assessing the quantity of water used for each of the purposes mentioned above for Cess assessment purpose.</p> <p>The industry shall also comply with water consumption limits and time lines notified by the MoEF and CC, GOI in the G.S.R.3305 (E) dated 7.12.2015 as applicable.</p> <table border="1"> <thead> <tr> <th data-bbox="874 1592 914 1776">INDUSTRY</th> <th data-bbox="874 1317 914 1592">PARAMETER</th> <th data-bbox="874 920 914 1317">STNADARD</th> </tr> </thead> <tbody> <tr> <td data-bbox="914 1592 1106 1776">Thermal Power (Water consumption limit)</td> <td data-bbox="914 1317 1106 1592">Water Consumption</td> <td data-bbox="914 920 1106 1317">All plants with Once Through Cooling(OTC) shall install Cooling TOWER(CT) and achieve specific water consumption upto maximum of 3.5 m³/MWh within a period of two years from the date of</td> </tr> </tbody> </table>	INDUSTRY	PARAMETER	STNADARD	Thermal Power (Water consumption limit)	Water Consumption	All plants with Once Through Cooling(OTC) shall install Cooling TOWER(CT) and achieve specific water consumption upto maximum of 3.5 m ³ /MWh within a period of two years from the date of	Not applicable As the MoEF and CC, GOI vide notification dated 28.06.2018 issued.	NOT APPLICABLE			
INDUSTRY	PARAMETER	STNADARD										
Thermal Power (Water consumption limit)	Water Consumption	All plants with Once Through Cooling(OTC) shall install Cooling TOWER(CT) and achieve specific water consumption upto maximum of 3.5 m ³ /MWh within a period of two years from the date of										


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			publication of notification. This								
			All existing CT-based plants reduce specific water consumption upto maximum of 3.5m ³ /M Wh with in a period of two years from the date of publication of this notification.								
5.	AIR POLLUTION		The emissions shall not contain constituents in excess of the prescribed limits mentioned below:	Complied	COMPLIED						
			<table border="1"> <thead> <tr> <th>Chimney No.</th> <th>Parameter</th> <th>Emission Standards</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Particulate Matter</td> <td>100mg/Nm</td> </tr> </tbody> </table>	Chimney No.	Parameter	Emission Standards	1	Particulate Matter	100mg/Nm		
Chimney No.	Parameter	Emission Standards									
1	Particulate Matter	100mg/Nm									
6.			The Industry shall also comply with standards notified by the OEF&CC, GOI in the G.S.R.3305(E), Dated 07.12.2015 and	Complied for	COMPLIED						

G. M. Soudha
DIRECTOR (THERMAL)

APGENCO, VIDYUTH SOUDHA
VIJAYANAGAR, B. 04

G.S.R. 682(E), dated 07.03.2016 as applicable.

Chimney No. 1	Parameter	Standards
	TPPs (units) installed after "January, 2004, upto 31 st December,2016*	50mg/Nm
	Sulphur Dioxide	600mg/Nm (units (SO2) smaller than 500MW capacity units)
	Oxides of Nitrogen(NO.)	200mg/Nm (for units having capacity of 500M Wand above)
	Mercury	300mg/Nm
		0.03mg/Nm

*TPPs (units) shall meet the limits within two years from the date of publication of the notification G.S.R. 3305 (E), dated 07.12.2015.

Particulate Matter.

For remaining Parameters the MoEF and CC, GOI vide notification dated 31.3.2021 extended the compliance date upto 31.12.2025

For remaining Parameters other than particulate matter the MoEF and CC, GOI vide notification dated 31.3.2021 extended the compliance date upto 31.12.2025


 DIRECTOR (THERMAL)
 APGENCO, VIDYUTH SOUDHA
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7.	<p>The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 100m) - 100 g/ m³; PM2.5 (Particulate Matter size less than 2.5 m) - 60 g/m³; SO₂ - 80 g/ m³; NO_x - 80 g/m³, outside the factory premises at the periphery of the industry.</p> <p>Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-1, dated 18.11.2009.</p> <p>Noise Levels: Day time(6 AM to 10 PM - 75 dB (A) Nighttime(10PMto6AM)-70dB(A)</p>	<p>Not complied</p> <p>During inspection Ambient Air quality monitoring was conducted at MPP primary school, Pinampuram (v) Muthukur (M) and PM-10 value recorded as 168.5 ug/m against the standard of 100 ug/m</p>	<p>COMPLIED</p> <p>The industry has continuously operating CAAQM stations and data is being regularly uploaded in the CPCB and APPCB website.</p> <p>There are total 4 Nos. CAAQMS Stations at the following locations:</p> <ol style="list-style-type: none"> i. Switchyard area ii. Coal Gate area iii. At Ash Pond area iv. At Project Hostel <p>Now all CAAQMS are in working condition. A New Analyzer for Unit-2 station is also installed.</p> <p>SPM measurement is working for both</p>
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[Signature]
DIRECTOR(THERMAL)

			Units. Calibrations of AAQMS & CEMS are being done as per schedule and on time. The calibration reports also submitted to APPCB.
8.	The industry shall comply with emission limits for DG sets of capacity upto 800 KW as per the Notification G.S.R.520(E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules. 2004. In case of DG sets of capacity more than 800KW shall comply with emission limits as per the Notification G.S.R.489 (E), dated.09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	Complied	COMPLIED
9.	The industry shall maintain flow meters preferably Electro Magnetic flow meters with totalisers for water and effluent quantity measurements for different streams of effluents and different categories of water usage stipulated in this order.	Complied	COMPLIED


DIRECTOR (THERMAL)

APGENCO, VIDYUTH SOUDHA
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10.	<p>The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board:</p> <ul style="list-style-type: none"> a. Daily production details (ER-ICentral Excise Returns). b. Quantity of Effluents generated, treated, recycled/reused and disposed to sea. C. Log Books for pollution control systems. d. Characteristics of ambient air, effluents and emissions. e. Hazardous/non-hazardous solid waste generated and disposed. f. Inspection book. g. Manifest copies of hazardous waste. 	Complied	COMPLIED																
11.	<p>he industry shall dispose solid waste (NONHAZARDOUS) as follows:</p> <table border="1" data-bbox="837 940 1361 1792"> <thead> <tr> <th>S.NO</th> <th>NAME OF SOLID WASTE</th> <th>QUANTITY</th> <th>DISPOSAL</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Fly Ash</td> <td>3886.0TPD</td> <td>Disposed to cement/brick units, excess o Ash pond.</td> </tr> <tr> <td>2.</td> <td>Bottom Ash</td> <td>972.0TPD</td> <td>Disposed to Ash Pond</td> </tr> <tr> <td>3.</td> <td>Copper Scrap</td> <td>1.0MT</td> <td>Disposed to authorized</td> </tr> </tbody> </table>	S.NO	NAME OF SOLID WASTE	QUANTITY	DISPOSAL	1.	Fly Ash	3886.0TPD	Disposed to cement/brick units, excess o Ash pond.	2.	Bottom Ash	972.0TPD	Disposed to Ash Pond	3.	Copper Scrap	1.0MT	Disposed to authorized	Complied	COMPLIED
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Ganapati
DIRECTOR (THERMAL)

			recyclers	
4.	Copper Cables scrap	0.20MT	Disposed to authorized recyclers	
12.	The industry shall operate the STP and report the compliance to RO: Nellore regular y.			
13.	A detailed action plan for disposal of bottom ash shall be submitted within one month indicating quantities and disposal areas.			
14.	The industry shall comply with Fly Ash Notification dated 03.11.2009 and its amendments thereof, issued by MoEF, GOI and submit monthly reports to the RO: Nellore.			
		Complied		COMPLIED
		Not Complied The unit is accumulating the bottom ash in the ash pond.		COMPLIED
		Not complied		COMPLIED Action is taken to utilize 100% fly ash by exploring all possibilities for utilization of fly ash and have also entered MOU with Cement Industries.

Gengul
DIRECTOR (THERMAL)

APGENCO, VIDYUTH SOUDHA
VILAYAWADA - 04

15.	The industry shall operate and maintain continuous online stack monitoring systems & 4 CAAQM stations and report the compliance to the Board.	Complied The unit has provided 4 nos. of CAAOM stations to monitor the live data of the ambient air. But the most of the sensors of the CAAOM stations are not functioning and the remaining also showing erratic values.	COMPLIED
16.	The industry shall not use any fuels other than those permitted in this order without prior consent from the Board. They shall maintain log registers on type of fuels & daily consumption etc., and shall furnish consolidated records to RO: Nellore for every three months.	Complied The unit is using Coal as fuel in the boilers	COMPLIED
17.	The industry shall provide & maintain interlocking facility between APC equipment (ESP) and fuel feeding system, so as that the feeding of the fuel will be stopped automatically in case of the ESP fails/trapping's are occurred.	Complied	COMPLIED


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 APGENCO, VIDYUTH SOUDHA
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18.	The industry shall operate sufficient water sprinklers at coal handling areas.	Complied	COMPLIED
19.	Provision shall be maintained for installation of flue gas Desulphurization of requisite efficiency for removal of SO ₂	Complied	COMPLIED
20.	Dry collection and disposal system shall be provided for disposal of fly ash. 100% of fly ash shall be utilized from day one.	Not Complied The Unit not yet achieved 100% disposal of fly ash	COMPLIED Fly ash utilization during 2021-22 is about 69%. Fly ash utilization during 2022-23 up to December 2022 is about 78.83%. Action will be taken to utilize 100% fly ash by exploring all possibilities for utilization of fly ash and have also entered MOU with cement Industries.
21.	The industry shall store the fly ash in silos only and dispose the same from time to time without storing it openly. The industry shall under take loading the fly ash directly into the trucks from ash silo.	Complied	COMPLIED


 DIRECTOR (THERMAL)
 APGENCO, VIDYUTH SOUDHA
 VIJAYANAGAR

22.	The industry shall ensure that regular mock drills shall be carried out for checking on-site emergency plan prepared and also to ensure changes/ improvements required in the plant	Complied	COMPLIED
23.	A three tier thick green belt on either side of the colony as stipulated in the EC order dated 03.05.2012 and 50m width green belt all along the periphery of ash pond shall be developed to prevent fugitive emissions. Green belt of 50 to 100m around the plant boundary and 100m eastern side shall be developed. A detailed action plan shall be submitted within 10 days to the RO:Neelore with specific time frames and extent/location of green belt development.	Not complied	COMPLIED A green belt in 420 Acres developed as per EC conditions.
24.	Action plan for development of green belt in an area of 270 acres shall be submitted within one month, so as to comply with condition stipulated in EC order dated 17.07.2007 (A greenbelt of 100m. width shall be developed all around the plant boundary and ash dyke covering an area of at least 420 acres).	Complied	COMPLIED
25.	The industry shall provide Rain Water Harvesting (RWH) structures within the plant site.	Complied	COMPLIED
26.	The industry shall comply with all the conditions stipulated in EC orders dated 17.07.2007 & 03.05.2012 and CRZ clearance order dated 03.09.2013.	Not Complied	COMPLIED
27.	The industry shall comply with all the conditions stipulated in the CFE orders dated 01.10.2007 and 19.12.2012	Complied	COMPLIED
28.	This order is issued subject to any other order or further orders to be passed by the Board and Hon ble High Court of A.P, Hyderabad in the writ petitions pending before the Hon' ble	Complied	COMPLIED

S. Jayaram
DIRECTOR (THERMAL)

DIRECTOR (THERMAL)
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	High court.		
29.	The conditions stipulated are without prejudice to the rights and contentions of this Board in any Hon'ble Court of Law.	Complied	COMPLIED
30.	The industry shall improve the house keeping at coal stack yard area	Not Complied	COMPLIED Adequate No of water sprinklers already provided for controlling fugitive dust in coal handling area and is in good working condition. A thick green belt also developed all round coal handling area. House -keeping in around the plant area is being improved by employing sufficient numbers of house-keeping staff.
31.	The industry shall obtain amendments of EC in respect of water consumption, waste water generation as stipulated in order dated 20.10.2014.	Complied	COMPLIED
32.	The industry shall regularly calibrate the online monitoring	Not Complied	COMPLIED

Gangul
DIRECTOR (THERMAL)

ARGENCO, VIDYUTH SOUDHA
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	system.		Calibrations of AAQMS & CEMS are being done as per schedule and calibration reports will be submitted to APPCB in future.
33.	The industry shall provide water sprinkling system to control fugitive dust emissions in the ash pond area and to wet the ash in the ash pond.	Not Complied	COMPLIED
34.	The Industry shall also comply with water consumption limits and time lines notified by the MoEF&CC, GOI in the G.S.R. 3305(E), dated 07.12.2015 as applicable.	Not applicable. As the MoEF&CC, Gol vide notification dated. 28.06.2018 issued amendment.	NOT APPLICABLE
35.	The Industry shall also comply with standards notified by the MoEF&CC, GOI in the G.S.R.3305 (E), dated 07.12.2015 and G.S.R. 682 (E), dated 07.03.2016 as applicable.	Complied for Particulate Matter For remaining parameters the MoEF&CC, Gol vide Notification	COMPLIED

Gangam
 DIRECTOR (THERMAL)
 APGENCO, VIDYUTH SOUDHA
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36.	The industry shall install online monitoring systems and connect monitoring system to APPCB /CPCB websites as per CPCB directions dated 05.02.2014 & 02.03.2015 and guidelines issued regarding online monitoring systems from time to time.	<p>dated 31.03.2021 extended the compliance date upto 31.12.2025.</p> <p>Not complied</p> <p>The unit has provided 4 nos. of CAAOM stations to monitor the live data of the ambient air. But the most of the sensors of the CAAOM stations are not functioning and the remaining also showing erratic values.</p> <p>The Continuous Emission Monitoring</p>	<p>COMPLIED</p> <p>CEMS in Unit-1 is in working condition.</p> <p>CEMS IN Unit-2 is in working condition.</p> <p>New Analyzer for Unit-2 with modifications is installed.</p> <p>SPM measurement is working for both Units. All parameters of CEMS are being uploaded to websites of APPCB & CPCB.</p> <p>Calibrations of AAQMS & CEMS are being done as per</p>
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		<p>System (CEMS) provided by the industry are not functioning. The CEMS provided to the unit-1 is not functioning properly and need to be calibrated. The CEMS provided to the unit 2 is not yet all working and need to be replaced. The industry representative informed that they have placed purchase order for a new system</p>	<p>schedule and calibration reports are submitted to APPCB. All the data is being uploaded to the CPCB and APPCB website regularly.</p>
37.	The industry shall submit a copy of policy of Public Liability Insurance (PLI) duly indicating the amount contributed towards	Complied	COMPLIED

G. Soudha
DIRECTOR (THERMAL)

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	Environmental Relief Fund (ERF) to the RO once in six months.		
38.	The industry shall comply with the Task Force directions issued from time to time.	Not Complied	COMPLIED
39.	The industry shall comply with standards and directions issued by CPCB / MoEF& CC as and when notifications are issued.	Partially Complied	COMPLIED
40.	The industry shall submit action plan for use of ordinary water (non-saline) for ash handling within two months to the RO: Nellore.	Complied	COMPLIED
41.	The industry shall submit compliance report on the conditions mentioned in the consent order every six months i.e., on IS of January and July of every year to the Regional Office/ Zonal Office.	Complied	COMPLIED



DIRECTOR (THERMAL)

APGENCO, VIDYUTH SOUDHA

VIJAYAWADA - 04

4. Thus, it is evident that this Respondent has complied with all the requisites that are mandatorily in place and urges the Applicants to prove their case as it is completely illegal and bereft of merits. Given the fact that the present application has been filed as against this respondent by the applicants for land pollution and that the functioning of this Respondent affects their Crop Yield, it has been admitted by the Committee in their Report that NO MONETARY LOSS attracts crop yield.
5. This Respondent craves the leave of this Hon'ble Tribunal to file any additional submissions along with required documents if deemed necessary at any later point of time.

Dated at Vijayawada on this day the 5th of May, 2023

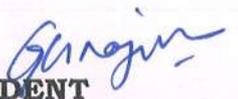
COUNSEL FOR 8TH RESPONDENT


8TH RESPONDENT
DIRECTOR (THERMAL)
APGENCO, VIDYUTH SOUDHA
VIJAYAWADA - 04

VERIFICATION

I, G.Chandrasekar, Director of APGENCO Limited, Respondent No.8, do hereby declare that what is stated in the above paragraphs 1-5 including the tabulation are true and correct to the best of my knowledge, information and belief.

Verified at Vijayawada on this the 5th day of May, 2023


8th RESPONDENT
DIRECTOR (THERMAL)
APGENCO, VIDYUTH SOUDHA
VIJAYAWADA - 04

VIJAYAWADA - 04