

BEFORE THE NATIONAL GREEN TRIBUNAL (SZ) CHENNAI
MEMORANDUM OF APPLICATION
(UNDER SECTION 18(1) READ WITH SECTIONS 14, 15 OF NATIONAL
GREEN
TRIBUNAL ACT, 2010)
OA NO. 24 OF 2021

O.A Ninan

... Applicant

VERSUS

The State of Kerala & Ors.

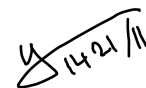
... Respondents

MEMO FILED BY THE APPLICANT

It is submitted as follows:

1. The Applicant herein had pointed out serious flaws in the Detail Project Report(DPR) for the present project, including the fact that the wastewater and sludge disposal system prescribed is designed based on a non existent water body in the vicinity. KWA submitted that they were making the WTP a ZLD unit. However, no DPR, feasibility studies, impact assessment studies etc. were provided for this revised ZLD proposal.
2. In the latest report filed by KWA, only a concept drawing of a typical recycling water treatment system was provided. The content of the report is theoretical – as found in any textbook. No Detail Project Report (DPR) for this revised proposal has been filed. This type of concept drawing is typically available in the text books. It is necessary that KWA be directed to produce the DPR for the revised project - which includes recycling plant, solid and liquid waste management systems.
3. The proposed system presented in the affidavit is analogous to STP(A detailed calculation has provided in our detail response to the affidavit) . This newly proposed recycling plant certainly require environmental impact study with environmental clearance. The proposed recycling system includes regular water treatment system with recycling system. This will require more capital fund & plant area. Techno-economic feasibility study of implementation of recycling plant is not performed or provided in the affidavit, as per NGT prior orders on this subject or CPCB guidelines on recycling plant.

Dated at Chennai this the 24th of August, 2022.

 14/21/11

Counsel for the Applicant