

**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

Vs

The State of Kerala & Ors.

... Respondents

MEMO FILED BY THE APPLICANT

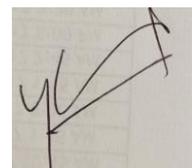
It is submitted as follows:

1. It is submitted that the KWA had filed an affidavit dated 22.11.2022 wherein at para 5 they had stated that " discharge of back wash water outside the WTP premises shall be eliminated" and that dried sludge shall be used for tile manufacturing etc.
2. Previously, on 31.10.2022, in the minutes of meeting, technology was discussed to achieve ZLD at the subject WTP.
3. Also in the typed set filed on 22.07.2022, the design of the filter backwash in drinking water treatment plants was produced, the ZLD technology details were provided (Please see top left of the page)
4. In response to an RTI request, KWA on 29.09.2022, it has been stated that the design for ZLD system is being designed by WASCON, the design wing of the KWA, the project proponent.
5. It is therefore clear based on the affidavit dated 22.11.2022 that KWA proposes NOT to discharge any liquid or solid rejects from the process and that a ZLD system is being proposed.
6. It is also submitted that the applicant had made submissions on the viability of such a system – which will be very cost intensive and the possibility of violations. These were negated by the KWA stating they are adopting the above

system and since there will be no discharge of liquids or solids from the process, the applicant's apprehension of pollution is unfounded.

7. It is submitted that it is in the interest of the environment, if KWA implements a ZLD system and operates it efficiently and does not discharge any liquid or solids (effluent, rejects etc). However, it has been noticed that undertakings given are violated thereafter in practice. It is necessary that violations if any in the future should be strictly viewed.
8. Therefore, it is requested that this Hon'ble Tribunal consider
 - a. Directing KWA to prepare a DPR for the subject WTP with full provisioning for the ZLD design and technology proposed to be used
 - b. Construct the WTP in strict compliance with the design and technology proposed to ensure zero discharge of liquid and solid rejects from the system.
 - c. Direct KWA to strictly abide by its undertaking not to discharge any solid or liquid rejects from the process.

Dated this the 1st day of December, 2022 at Chennai



Counsel for the Applicant