

Brief Note in the matter of Original Application no: 54 of 2024 filed at the Honourable National Green Tribunal Western Zone (Pune) filed by Kuldipsinh Khimji Sodha Versus Union of India & 08 Others.

1. Background.

- Kuldipsinh Khimji Sodha residing at Bhuj-Kutch has filled Original application no: 54of 2024 in the Honourable National Green Tribunal, Western Bench Pune; challenges the continuous Pollution caused by the Kutch Lignite Thermal Power Plant in terms of Air and Water Pollution and thereby polluting the Kali River and Khanot Lake, nearby Residential area and water bodies. The Unit is extracting ground water using more than 35 Borewells without any permission from CGWA.
- In accordance with the petition; officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas along with representative of petitioner name Shri Ratansinh Rathod Contact: 6351665934) on date: 07/03/2024.

2. Observation by GPCB

2.1 Observations during visit dated: 07/03/2024.

- TPP has obtained EC-Amendment for change in water source from sea creek to brackish water (Bore-wells) vide letter no: J-13012/6/2000-IA.II(T) dated: 20/01/2009.
- During visit, stagnant water accumulation outside unit's premises is observed. However, as mentioned in compliance submitted by unit for notice dated: 11/10/2023; still seepage is observed outside unit's premises.
- TPP has carried out work with cost of Rs. 29,99,728.00 to lift fly ash which was earlier released by pipes leakages. During inspection no leakages are observed as plant was not in operation.
- SOx and NOx analysers are under maintenance. In coal crushing area, unit has provided wind breaking wall and water sprinkling system for control of dusting.
- Fly ash dumps near coal yard and outside unit's premises are observed.
- Natural nallah outside unit premises near Gate no: 3 is observed dry and no flow outside units premises near cooling tower area is observed as plant is not in operation.
- Based on the report GPCB has issued improvement notice dated: 06/04/2024.
- As per the order of Honourable National Green Tribunal dated: 20/03/2024:

“.....We cannot conclude from it as to whether leakages would happen if the plant is in operation. Therefore, we want a clear report in this regard from respondent No.3 – GPCB.....”
- In accordance with the order dated: 20/03/2024; following officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State

Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas on date: 09/04/2024.

2.2 Observations during visit dated: 04/04/2024

- TPP has obtained EC-Amendment for change in water source from sea creek to brackish water (Bore-wells) vide letter no: J-13012/6/2000-IA.II(T) dated: 20/01/2009.
 - During visit, stagnant water accumulation outside unit's premises is observed. However, as mentioned in compliance submitted by unit for notice dated:11/10/2023; still seepage is observed outside unit's premises.
 - TPP has carried out work with cost of Rs. 29,99,728.00 to lift fly ash which was earlier released by pipes leakages. During inspection no leakages are observed as plant was not in operation.
 - SOx and NOx analysers are under maintenance. In coal crushing area, unit has provided wind breaking wall and water sprinkling system for control of dusting.
 - Fly ash dumps near coal yard and outside unit's premises are observed.
 - Natural nallah outside unit premises near Gate no: 3 is observed dry and no flow outside units premises near cooling tower area is observed as plant is not in operation.
- In continuation with the above visit and GPCB Head Office, Gandhinagar Email dated: 04/05/2024; this office has again conducted inspection on date: 08/05/2024 along with representative of petitioner Sodha Satubha (Mob: 9978976826) to verify the compliance status of Improvement notice issued by the Board dated: 06/04/2024.

2.3 Observations during visit dated: 08/05/2024

- During visit, **no flow from ash slurry lines to River Kali was observed.** Also, little quantity of seepage water was observed only; which may be due to natural evaporation. Only dry ash was observed in Dyke-C during visit.
 - Whole route from ash slurry line to River Kali was observed dry and no live discharge observed in River Kali.
 - During visit, no leakages were observed from the ash slurry lines. Ash was observed disposed through ash slurry pipelines into Dyke-D.
 - During visit, accumulation of Seepage water is not observed outside unit premises.
 - Unit has now lifted up the ash and has disposed into Dyke-D.
 - Unit has now applied for CGWA permission vide application no: 21-4/11810/GJ/IND/2024 for extracting ground water from 38 nos. of bore-wells with capacity of 27240 m3/day.
3. With respect to the observations dated: 08/05/2024; all the points mentioned in the original applications were observed complied.

4. Petitioner has filed interlocutory application IA no: 220/2024 under this Original Application dated: 04/07/2024 and **seeks directions to the CGWA and District Administration to seal the Bore-wells** and restrain the industry from extracting ground water.
5. Unit has applied for CGWA permission vide application no: 21-4/11810/GJ/IND/ 2024 for extracting ground water from 38 nos. of bore-wells with capacity of 27240 m³/day.
6. In view of above, Show Cause Notice as per the Clause 10(b), 13 & 15 of the above mentioned notification was issued by the District Collector dated: 25/07/2024.
7. Unit has submitted reply of SCN vide letter dated: 03/08/2024.

Enclosures:

1. Inspection report dated: 07/03/2024
2. Inspection report dated: 04/04/2024
3. SCN issued by GPCB dated: 06/04/2024
4. Inspection report dated: 08/05/2024
5. SCN issued by District Collector dated: 25/07/2024
6. Units reply dated: 03/08/2024

Annexure 1

**Inspection report dated:
07/03/2024**

**Inspection report in the matter of Original Application no: 53 of
2024 filed at the Honourable National Green Tribunal
Western Zone (Pune)**

Kuldipsinh Khimji Sodha

Versus

Union of India & 08 Others.

1. Background.

- Kuldipsinh Khimji Sodha residing at Bhuj-Kutch has filled Original application no: 53 of 2023 in the Honourable National Green Tribunal, Western Bench Pune; challenges the continuous Pollution caused by the Kutch Lignite Thermal Power Plant in terms of Air and Water Pollution and thereby polluting the Kali River and Khanot Lake, nearby Residential area and water bodies. The Unit is extracting ground water using more than 35 Borewells without any permission from CGWA.
- In accordance with the petition; Following officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas along with representative of petitioner name Shri Ratansinh Rathod Contact: 6351665934) on date: 07/03/2024.
 - Zeel K. Adhikari, Assistant Environment Engineer.
 - Yogesh V. Champaneri, Senior Scientific Assistant.

2. Company's profile & History of the case.

- M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) is located at Village: Panandhro, Taluka: Lakhpat, Dist: Kutch. It is engaged in Electricity Generation: 290 MW and has Consolidated Consent & Authorisation (CC&A) no: AWH-128069 Valid up to 23/05/2028.
- TPP has obtained Environmental Clearance for Unit-4 of 75 MW capacity vide letter no: J-13012/6/2002.IA-II (T) dated: 31/05/2005. It has also obtained EC-Amendment for change in water source from sea creek to brackish water (Borewells) vide letter no: J-13012/6/2000-IA. II(T) dated: 20/01/2009.
- It has 04 power generating unit out of which Unit-1 & 2 (70 MW each) are already decommissioned and Unit-3 (75 MW) & Unit-4 (75 MW) are operated by unit.
- This office has earlier received complaints of effluent discharge from KLTPS Thermal Power Plant to nearby River Kali and has inspected the same on date: 16/11/2021, 26/04/2022 and 06/09/2023 and observed that ash slurry pipelines are ruptured and spillages from dykes which is ultimately meets the River Kali.
- Accordingly, pertaining to the non-compliances observed during these visits dated: 16/11/2021, 27/04/2022 & 11/09/2023; Notice of Directions under the Section 31-A of the Air Act, 1981 dated: 15/12/2021, Notice of Directions under the Section 33-A of the Water Act, 1974 dated: 25/05/2022 and Notice of Directions under the Section 33-A of the Water Act, 1974 dated: 11/10/2023 were issued to the unit respectively.
- With respect to the Notice issued dated: 15/12/2021; below mentioned compliance submitted by unit:
 - *KLTPS is planning for retaining wall near dyke A& E to stop/ minimize the seepage, after construction of retaining wall and by making Pond*

inside retaining wall the collected water will be transferred/pumped into dyke A & E. Further, the collected water in dyke A & E will be transferred to ash Dyke-D by pumping. Estimate for transfer collected water from dyke A& E to Ash Dyke-D is under approval stage and same work will be completed up to March-22: Estimate for retaining wall is under preparation and same work will be completed up to June'22. Ash slurry is very erosive and corrosive as well as sticky in nature due to, this ash slurry, no leakage occurs and which is attended by replacing of new ash slurry pipe. All ash slurry pipes are 12-meter-long and it is replaced with help of machineries i.e. Hydra. At present damaged pipe replacement work started and all damaged ash slurry pipes will be replaced within a month i.e. Dec,21 end.

- With respect to the Notice issued dated: 25/05/2022; below mentioned compliances were submitted by unit:
 - *Proposal for (1) lifting and shifting of ash from River Kali to ash Dyke-D (2) Ash lifting from bund area at ash Dyke-D to avoiding overflow of ash slurry (3) Running work order for ash slurry line maintenance (4) Proposal for O&M of unit-3 ash slurry line maintenance work (4) Proposal for replacement of damage ash slurry pipe (5) Proposal for replacement /erection of new ash slurry line were given.*
 - *Bund barrier was built by providing sand embarkment to avoid further passage of ash slurry water to the River Kali.*
 - *Channel also built near bund barrier to Dyke-D to move any accidental leakages water to Dyke-D.*

- With respect to the Notice issued dated: 11/10/2023; below mentioned compliances were submitted by unit:
 - *However, collection system (pump and collection facility) was there to collect that water and disposed of again in dyke. Order of the same is given vide letter dated: 17/08/2021.*
 - *Work order no: 4575 dated: 04/10/2023 cost Rs. 20.0 Lacs for 345-meter new pipeline erection of ash slurry disposal.*
 - *Tender no: ME-106 @ cost Rs. 1.20 Crore for new pipeline having length 3.2 KM will be on web tender*
 - *New proposal for Rs.4.18 Crore of pipeline having length of 10.8 KM will be under approval*
 - *Chain-link fencing tender for area of dykes at GMDC mines will be under tenderization and having cost of Rs. 2.20 Lacs.*

3. Observation during visit.

- During visit, TPP is observed not in operation. As informed Unit-3 is not operated from 11/01/2024 due to annual overhauling and Unit-4 is not operated from 06/07/2023.
- Along with complainer; we had first visited the ash slurry pipelines. During inspection, it is observed that these are the fly ash slurry lines which come from

TPP to Dyke-D. There are total 03 nos. of 6” inch diameter MS Pipelines from TPP to Dyke-D. During visit, no live discharge observed in River Kali. Unit has also built bund barrier to stop the further passage of effluent to River kali. It has provided arrangement that leakage water from ash slurry line can be directed to Dyke-D. Photographs attached.

- Complainers also claims that, the seepage outside the unit’s premises; through natural flow meets to River Kali. During visit, stagnant water accumulation outside unit’s premises is observed. **However, as mentioned in compliance submitted by unit for notice dated:11/10/2023; still seepage is observed outside unit’s premises.**
- In compliance of fly ash reached to River Kali through ruptured pipelines; TPP has submitted that; **they have completed work for lifting and shifting of ash from river kali to Dyke-D with work amount of Rs. 29,99,728.00**

3.1 Air Pollution Control & Management.

- TPP has installed Boiler-3 of 330 TPH capacity and CFBC Boiler-4 of 315 TPH capacity with Electrostatic precipitator as an APCM and 190-meter stack height with each boiler. Lignite is utilised as fuel in boiler. TPP has provided lime dosing system with Boiler no: 4.
- It has provided online monitoring system analysers for PM, SO_x and NO_x with stack attached to Unit-3 & Unit-4. As informed, SO_x and NO_x analysers are under maintenance.
- In coal crushing area, unit has provided wind breaking wall and water sprinkling system for control of dusting.

3.1.1 Fly ash Management & Disposal.

- For fly ash disposal, unit has provided Dyke A and Dyke-E within premises. Unit has also developed GMDC mines area as Dyke-C & Dyke-D where slurry of waste water with fly ash is disposed.
- At present, Dyke-E is proposed for setting up 35 MW solar plant with battery backup system. No seepage from Dyke-A is observed.
- There are total 03 nos. of 6” inch diameter MS Pipelines from TPP for disposal of ash slurry into Dyke-D. At present, unit is utilising only Dyke-d for ash slurry disposal.
- During the financial year 2023-24; 135465.43 MT of fly ash is generated which is disposed at abandoned mines i.e. Dyke-D through converting ash into slurry and disposed.
- Fly ash dumps near coal yard and outside unit’s premises are observed.

3.2 Water and Waste Water Management.

- Source of water is through Bore-wells (38 nos. as informed). Unit is extracting ground water without CGWA Permission; earlier unit has applied for permission but was rejected by the CGWA. As informed, unit has initiated work for modelling study and impact assessment of ground water and will re-apply after the study.
- During the financial year 2023-24; average daily water consumption is 4207.5 m³ and Water is required for Boiler, Cooling tower and domestic purpose. During the financial year 2023-24; average daily waste water generation from DM plant reject, RO reject, Boiler blow down is 1104.8 m³ which is treated in provided primary ETP. Online monitoring system is provided in ETP which is not in operation as TPP is under annual overhauling. Treated water is used in dust suppression within premises. Cooling tower bleed-off is directly utilized for fly ash slurry preparation.
- Natural nallah outside unit premises near Gate no: 3 is also verified which is observed dry at the time of visit. Also, no flow outside unit's premises near cooling tower area is observed as TPP is not in operation. Photographs attached.

4. Conclusions.

- TPP has obtained EC-Amendment for change in water source from sea creek to brackish water (Bore-wells) vide letter no: J-13012/6/2000-IA.II(T) dated: 20/01/2009.
- During visit, stagnant water accumulation outside unit's premises is observed. **However, as mentioned in compliance submitted by unit for notice dated:11/10/2023; still seepage is observed outside unit's premises.**
- TPP has carried out work with cost of Rs. 29,99,728.00 to lift fly ash which was earlier released by pipes leakages. During inspection no leakages are observed as plant was not in operation.
- SO_x and NO_x analysers are under maintenance. In coal crushing area, unit has provided wind breaking wall and water sprinkling system for control of dusting.
- Fly ash dumps near coal yard and outside unit's premises are observed.
- Natural nallah outside unit premises near Gate no: 3 is observed dry and no flow outside units premises near cooling tower area is observed as plant is not in operation.

5. Recommendations.

- TPP shall ensure and carry out preventive measures to avoid spillages/leakages from ash slurry lines.
- TPP shall obtain CGWA Permission for extraction of ground water.

- TPP shall lift the ash outside the premises and will dispose as per the fly ash notification.
6. Photographs taken during visit are attached as Annexure-A.



Yogesh V. Champaneri
Senior Scientific Assistant
Regional Office, Kutch West
Gujarat Pollution Control Board

Date: 07/03/2024



Zeel K. Adhikari
Assistant Environment Engineer
Regional Office, Kutch West
Gujarat Pollution Control Board

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Annexure-A
Photographs taken during visit



Coal yard with water sprinkling system



Fly ash slurry lines from TPP to Dyke-D



Area after and before of bund barrier. It is constructed to obstruct the flow of ash slurry in to river.

TPP has made arrangement that slurry leakage can be directed in to dyke-D.



Stagnant accumulation of water outside units premises is observed.



Natural nallah outside units premises near Gate no: 3 which is dry.



No flow from cooling tower outside unit's premises is observed.



Fly ash dumps near coal yard and outside unit's premises is observed.

Annexure 2

**Inspection report dated:
04/04/2024**

**Inspection report in the matter of Original Application no: 54 of
2024 filled at the Honourable National Green Tribunal
Western Zone (Pune)**

Kuldipsinh Khimji Sodha

Versus

Union of India & 08 Others.

1. Background.

- Kuldipsinh Khimji Sodha residing at Bhuj-Kutch has filled Original application no: 54 of 2024 in the Honourable National Green Tribunal, Western Bench Pune; challenges the continuous Pollution caused by the Kutch Lignite Thermal Power Plant in terms of Air and Water Pollution and thereby polluting the Kali River and Khanot Lake, nearby Residential area and water bodies. The Unit is extracting ground water using more than 35 Borewells without any permission from CGWA.
- In accordance with the petition; officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas along with representative of petitioner name Shri Ratansinh Rathod Contact: 6351665934) on date: 07/03/2024.
- **Observations during visit dated: 07/03/2024.**
 - TPP is observed not in operation. As informed Unit-3 is not operated from 11/01/2024 due to annual overhauling and Unit-4 is not operated from 06/07/2023.
 - Unit is extracting ground water without CGWA Permission; earlier unit has applied for permission but was rejected by the CGWA. As informed, unit has initiated work for modelling study and impact assessment of ground water and will re-apply after the study.
 - During visit, no live discharge observed in River Kali. Still seepage is observed outside unit's premises. No seepage from Dyke-A is observed.
 - SOx and NOx analysers are under maintenance.
 - Fly ash dumps near coal yard and outside unit's premises are observed.
 - Natural nallah outside unit premises near Gate no: 3 is observed dry and no flow outside units premises near cooling tower area is observed as plant is not in operation.
- Based on the report GPCB has issued improvement notice dated: 06/04/2024.
- As per the order of Honourable National Green Tribunal dated: 20/03/2024:

“.....We cannot conclude from it as to whether leakages would happen if the plant is in operation. Therefore, we want a clear report in this regard from respondent No.3 – GPCB.....”
- In accordance with the order dated: 20/03/2024; following officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas on date: 09/04/2024:

- Yogesh V. Champaneri, Scientific Officer
- Zeel K. Adhikari, Assistant Environment Engineer.

2. Observation during visit.

- During visit, only Unit-3 of TPP is observed in operation and Unit-4 was under shutdown. As informed, unit is in operation from 26/03/2024.
- At first; we had visited the ash slurry pipelines. During inspection, maintenance work of pipelines was observed **and no leakages were observed from pipelines.** TPP has given order for work of cleaning of ash slurry pipelines, chock up, removal, leakage, attending and maintenance/ replacement of ash slurry pipe in Boiler Unit no: 3 on as & when required basis at AHP, KLTPS to M/s. Aquatech Engineering Services, Lakhpat, Kutch.
- Unit has also built bund barrier to stop the further passage of effluent to River kali. It has provided arrangement that leakage water from ash slurry line can be directed to Dyke-D. Then, we follow the route from the ash slurry pipeline to River Kali. **Whole route was observed dry and no live discharge observed in River Kali.** Photographs attached.
- Seepage observed outside units premises as mentioned in earlier report dated: 07/03/2024; during visit, little quantity of seepage water is observed only which may be due to natural evaporation. Photographs attached.
- **During visit, accumulation of Seepage water is observed outside unit premises from Dyke-A.**

3.1 Air Pollution Control & Management.

- During visit, Boiler-3 of 330 TPH capacity was observed in operation. Boiler operating load was 273 TPH and power generating load was 67 MW. Electrostatic precipitator is provided as an APCM with 190-meter stack height with stack monitoring facility. 8 out of 10 ESP field were in operation. Lignite feeding rate is 92 MTPH during visit. One no. of air emission sample was taken for analysis. Analysis report shows PM: 72 mg/NM³, SO₂: 630 mg/NM³ and NO_x: 24.6 mg/NM³ which are higher than the consented limits.
- It has provided online monitoring system analysers for PM, SO_x and NO_x with stack attached to Unit-3 & Unit-4. Online monitoring system shows results for PM: 60 mg/Nm³. As informed, SO_x and NO_x analysers are under maintenance.
- In coal crushing area, unit has provided wind breaking wall and water sprinkling system for control of dusting. Unit has fully covered conveyor belt from coal crushing to plant. It has provided 01 no. of mobile dust suppression system within plant premises to control fugitive emission.

3.1.1 Fly ash Management and disposal.

- From 26/03/2024 to 09/04/2024 @ 7139 MT of fly ash is generated which is disposed to Dyke- D through converting ash into slurry.
- As per earlier observations dated: 07/03/2024; no seepage from Dyke-A was observed as TPP was observed not in operation. **However, as TPP is operational accumulation of seepage water outside units premises from Dyke-A is observed.**
- As per earlier observations dated: 07/03/2024; Fly ash dumps near coal yard and outside unit's premises are observed. **However, portion of the ash dumps were still observed near coal yard. As per unit's submission; part of the ash was disposed to the dyke and remaining will be completed by 30/04/2024.**

3.2 Water and Waste Water Management.

- Source of water is Bore-well. As informed, **modelling study has been completed and they will re-apply for CGWA permission.**
- From 26/03/2024 to 09/04/2024 water consumption for Boiler, Cooling tower and domestic purpose was 102446 m³ and 40379 m³ waste water was generated which is treated in provided primary ETP.
- Online monitoring system is provided in ETP which shows reading pH:7.02 and TSS:121 mg/l. Treated water is reused in dust suppression within premises. Cooling tower bleed-off is directly utilized for fly ash slurry preparation. One no. of sample from final outlet of ETP was taken for analysis.
- Natural nallah outside unit premises near Gate no: 3 is also verified which is observed dry at the time of visit. Also, no flow outside unit's premises near cooling tower area is observed. Photographs attached.

3. Conclusions.

- During inspection, maintenance work of pipelines was observed and no leakages were observed from pipelines. TPP has given order for work of cleaning of ash slurry pipelines, chock up, removal, leakage, attending and maintenance/ replacement of ash slurry pipe in Boiler Unit no: 3 on as & when required basis.
- Whole route from ash slurry line to River Kali was observed dry and no live discharge observed in River Kali.
- Accumulation of Seepage water is observed outside unit premises from Dyke-A. and little quantity of seepage water is observed only near Dyke-C which may be due to natural evaporation.
- One no. of air emission sample was taken for analysis and results are higher than the consented limits. SO_x and NO_x analysers are under maintenance.

- Natural nallah outside unit premises near Gate no: 3 is also verified which is observed dry at the time of visit. Also, no flow outside unit's premises near cooling tower area is observed.

4. Recommendations.

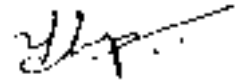
- TPP shall ensure and carry out preventive measures to avoid spillages/leakages from Dyke-A.

5. Photographs taken during visit are attached as Annexure-A.



Zeel K. Adhikari

**Assistant Environment Engineer
Regional Office, Kutch West
Gujarat Pollution Control Board**



Yogesh V. Champaneri

**Senior Scientific Assistant
Regional Office, Kutch West
Gujarat Pollution Control Board**

Date: 09/04/2024

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Annexure-A
Photographs taken during visit



Gate no: 3 nallah observed dry



No flow outside units premises near cooling tower

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Annexure-A
Photographs taken during visit



Area near cooling tower is observed dry.



Little water accumulations is observed outside Dyke-C.

146
Annexure-A
Photographs taken during visit



Seepage outside units premises due to Dyke-A.

147
Annexure-A
Photographs taken during visit



A



B



C



D

Route from slurry pipelines (A) to River Kali (D)

Annexure 3

**SCN Issued by GPCB dated:
06/04/2024**



150 GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN, SECTOR 10-A,
GANDHINAGAR - 382010,
(T) 079-23232152

By R.F.A.D.

IMPROVEMENT NOTICE


You are having industrial plant **G.S.E.C.L. (KLTPS) Panandhro**, located at Plot no. 236p, 255p, Kutch Lignite Thermal Power Station, Panandhro, Tal: Lakhpat, Dist. Kutch.

AND WHEREAS, the Board officials had visited your unit on dated 07/03/2024, and during the inspection non compliances were observed. In view of the same, you are directed to take following corrective measure:

1. To lift & remove the fly ash bunds observed near the coal yard outside the premises and properly disposed off in the ash dyke by 30/04/2024.
2. To lift stagnant water / seepage water outside the premises and transfer it to "C" dyke collection system by 30/04/2024.
3. To obtain CGWA permission for ground water abstraction at the earliest.

You are also directed to submit the action taken report/progress status immediately after 30/04/2024, failing to which further necessary actions can be initiated under the provision of Water Act-1974 & Air Act-1981.

For and on behalf of
Gujarat Pollution Control Board


(T. C. Patel)
Unit Head

Date: - /04/2024

NO: PC/CCA- KUTCH-79(11)/GPCB ID: 17838/

ISSUED TO:

M/s. G.S.E.C.L. (KLTPS) Panandhro,
Survey no. 236p, 255p,
Vill: Moti Chirai, Ta. Lakhpat,
Dist. Kutch - 370 601

Outward No: 798180, 05/04/2024

Clean Gujarat Green Gujarat

Website : <https://gpcb.gujarat.gov.in>

Annexure 4

**Inspection report dated:
08/05/2024**

**Inspection report in the matter of Original Application no: 54 of
2024 filled at the Honorable National Green Tribunal
Western Zone (Pune)**

Kuldipsinh Khimji Sodha

Versus

Union of India & 08 Others.

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- In accordance with the petition; officials of Gujarat Pollution Control Board, Regional Office, Kutch (West) had carried out inspection of M/s. Gujarat State Electricity Corporation Limited (Kutch Lignite Thermal Power Station) (GSECL, KLTPS) and surrounding areas along with representative of petitioner name Shri Ratansinh Rathod Contact: 6351665934) on date: 07/03/2024.
- Pertaining to the Honorable National Green Tribunal Order dated: 20/03/2024; this office has conducted inspection to verify the status of Thermal Power Plant in operational Condition on date: 04/04/2024.
- In continuation with the above visit and GPCB Head Office, Gandhinagar Email dated: 04/05/2024; this office has again conducted inspection on date: 08/05/2024 along with representative of petitioner Sodha Satubha (Mob: 9978976826) to verify the compliance status of Improvement notice issued by the Board dated: 06/04/2024.
- **Observations during visit dated: 04/04/2024.**
 - During inspection, maintenance work of pipelines was observed and no leakages were observed from pipelines. TPP has given order for work of cleaning of ash slurry pipelines, chock up, removal, leakage, attending and maintenance/ replacement of ash slurry pipe in Boiler Unit no: 3 on as & when required basis.
 - Whole route from ash slurry line to River Kali was observed dry and no live discharge observed in River Kali.
 - Accumulation of Seepage water is observed outside unit premises from Dyke-A. and little quantity of seepage water is observed only near Dyke-C which may be due to natural evaporation.
 - One no. of air emission sample from Stack attached to Unit-3 was taken for analysis and results of SO₂ are higher than the consented limits.
 - SO_x and NO_x analysers are under maintenance.
 - Natural nallah outside unit premises near Gate no: 3 is also verified which is observed dry at the time of visit. Also, no flow outside unit's premises near cooling tower area is observed.

2. Observation during visit.

- During visit, Unit-3 of TPP is observed in operation.
- At first; we had visited the river Kali and seepage area outside Dyke- C i.e. Outside Units premises along with representative of Complainer. During visit, **no flow from ash slurry lines to River Kali was observed.** Also, little quantity of seepage water was observed only; which may be due to natural evaporation. Only dry ash was observed in Dyke-C during visit.
- Then, we visited ash slurry lines. During visit, **no leakages were observed from the ash slurry lines.** Ash was observed disposed through ash slurry pipelines into Dyke-D.
- Unit has also built bund barrier to stop the further passage of effluent to River kali. It has provided arrangement that leakage water from ash slurry line can be directed to Dyke-D. Then, we follow the route from the ash slurry pipeline to River Kali. **Whole route was observed dry and no live discharge observed in River Kali.** Photographs attached.

3.1 Air Pollution Control & Management.

- During visit, Boiler-3 of 330 TPH capacity was observed in operation. Boiler operating load was 230 TPH and power generating load is 59.76 MW. Electrostatic precipitator is provided as an APCM with 190-meter stack height with stack monitoring facility. 10 out of 10 ESP field were in operation. Lignite feeding rate is 76MTPH during visit.
- It has provided online monitoring system analyzers for PM, SO_x and NO_x with stack attached to Unit-3 & Unit-4. Online monitoring system shows results for PM: 60 mg/Nm³. As informed, SO_x and NO_x analyzers are under maintenance.

3.1.1 Fly ash Management and disposal.

- From 04/04/2024 to 07/05/2024 is @ 16314 MT of fly ash is generated which is disposed to Dyke- D through converting ash into slurry.
- As per the earlier observation dated: 04/04/2024; Unit has submitted Action plan to control seepage from Dyke-A by utilizing the Dyke-A water for slurry preparation and providing additional pump to lift up the generated Seepage water within premises and dispose to Dyke-A. **During visit, accumulation of Seepage water is not observed outside unit premises**
- As per earlier observations dated: 07/03/2024 & 04/04/2024; Fly ash dumps near coal yard and outside unit's premises are observed. **Unit has now lifted up the ash and has disposed into Dyke-D.**

3.2 Water and Waste Water Management.

- Source of water is Bore-well. Unit has now applied for CGWA permission vide application no: 21-4/11810/GJ/IND/2024 for extracting ground water from 38 nos.

of borewells with capacity of 27240 m³/day.

- From 04/04/2024 to 07/05/2024 water consumption for Boiler, cooling tower and domestic purpose was 211082 m³ and 38680 m³ waste water was generated which is treated in provided primary ETP.
- Online monitoring system is provided in ETP which shows reading pH:6.87 and TSS:100 mg/l. Treated water is reused in dust suppression within premises. Cooling tower bleed-off is directly utilized for fly ash slurry preparation.

3. Compliance of Improvement Notice dated: 05/04/2024

Sr. no	Points as mentioned in Notice	Compliance as on date: 08/05/2024
1	To lift and remove the fly ash bunds observed near the Coal yard outside the premises and properly dispose of in the ash dyke by 30/04/2024.	Unit has now lifted up the ash and has disposed into Dyke-D.
2	To lift stagnant water/seepage water outside the premises and transfer it to "C" dyke collection system by 30/04/2024	Little quantity of seepage water is observed only near Dyke-C which may be due to natural evaporation.
3	To obtain CGWA Permission for ground water abstraction at the earliest	Unit has now applied for CGWA permission vide application no: 21-4/11810/GJ/IND/2024 for extracting ground water from 38 nos. of borewells with capacity of 27240 m ³ /day.

4. Conclusions.

- During visit, **no flow from ash slurry lines to River Kali was observed.** Also, little quantity of seepage water was observed only; which may be due to natural evaporation. Only dry ash was observed in Dyke-C during visit.
- Whole route from ash slurry line to River Kali was observed dry and no live discharge observed in River Kali.
- During visit, **no leakages were observed from the ash slurry lines.** Ash was observed disposed through ash slurry pipelines into Dyke-D.
- During visit, accumulation of Seepage water is not observed outside unit premises.
- Unit has now lifted up the ash and has disposed into dyke-D.
- Unit has now applied for CGWA permission vide application no: 21-4/11810/GJ/IND/2024 for extracting ground water from 38 nos. of borewells with capacity of 27240 m³/day.

5. Recommendations.

- TPP shall ensure that no seepage from Dykes shall flow outside premises and

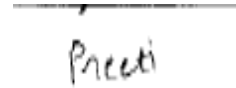
shall comply with fly ash notifications.

6. Photographs taken during visit are attached as Annexure-A.



Date:
08/05/2024

Zeel K. Adhikari
Assistant Environment Engineer
Regional Office, Kutch-West
Gujarat Pollution Control Board



Preeti H. Bhatiya
Assistant Environment Engineer
Regional Office, Kutch-West
Gujarat Pollution Control Board

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Annexure-A
Photographs taken during visit



TPP has lift up the ash near coal yard and dispose to Dyke-D.

Dyke-C is observed dry; only dry ash is stored in dyke



No seepage from Dyke-A outside unit's premises.

Photographs taken during visit



River Kali



Seepage outside units premises is observed dry due to natural evaporation

Photographs taken during visit



Route from ash slurry pipeline to river kali is observed dry.

No leakages from ash slurry pipelines.



Ash slurry disposing in Dyke-D.

Annexure 5

**SCN issued by District
Collector dated: 25/07/2024**

Amit Arora I.A.S.
Collector & District Magistrate
Kachchh, Bhuj



Collector Office, Kachchh
Jilla Seva Sadan, College Road,
Bhuj-Kachchh, (Gujarat) 370001.
Ph. 02832 - 250020
Fax 02832 - 250430
Mo. 099784 06213
E-mail : collector-kut@gujarat.gov.in
website : www.collectorkutch.gujarat.gov.in

NOTICE

You are operating Thermal Power Plant in the name of M/s. Gujarat State Electricity Power Corporation Limited (GSECL); Kutch Lignite Thermal Power Station (KLTPS) at Survey no: 236P, 255P Village Panandhro, Taluka: Lakhpat, Dist: Kutch.

Ministry of Jal Shakti vide SO no: 3289 (E) dated: 24/09/2020 has issued notifies the guidelines to regulate and control groundwater extraction in the country under the sub-section (3) of Section 3 read with Section 5 of the Environment (Protection) Act, 1986 (29 of 1986), the Department of Water Resources, River Development & Ganga Rejuvenation and amendment notification vide SO no: 1509(E) dated: 29/03/2023.

As per the notification; All new/existing industries, industries seeking expansion, infrastructure projects and mining projects abstracting ground water, unless specifically exempted are required to seek No Objection Certificate from Central Ground Water Authority.

Kuldipsinh Khimji Sodha has filled Original application no: 54 of 2023 in the Honourable National Green Tribunal, Western Bench Pune; challenges the continuous Pollution caused by your unit in terms of Air and Water Pollution and thereby polluting the Kali River and Khanot Lake, nearby Residential area and water bodies. The Unit is extracting ground water using more than 35 Bore-wells without any permission from CGWA.

Petitioner has filed interlocutory application under this Original Application dated: 04/07/2024 and seeks directions to the CGWA and District Administration to seal the Bore-wells and restrain the industry from extracting ground water.

Prima fascia, it appears that you are extracting ground water without obtaining permission from the competent authority.

As per Clause 10(b), 13 & 15 of the notification enforcement measures like sealing of unauthorized ground water abstraction structures, disconnection of electricity, launching of prosecution against those violating the No Objection Certificate conditions and taking action for imposition of Environmental Compensation can be taken.

In the view of the above, you are called upon to show cause why not to initiate procedure for sealing illegal bore-wells and recover Environment Compensation. You are required to submit corrective measures within 10 days without failure.

(Amit Arora I.A.S)
District Collector & District Magistrate, Kutch

No: GPCB/RO/Kutch-West/Legal/T-5(31)/475

Date: 25/07/2024

Issue to,

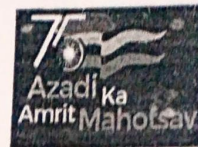
Additional Chief Engineer

M/s. Gujarat State Electricity Power Corporation Limited (GSECL);
Kutch Lignite Thermal Power Station (KLTPS), Survey no: 236P, 255P,
Village Panandhro, Taluka: Lakhpat, Dist: Kutch.

Annexure 6

Units reply dated: 01/08/2024

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GSECL

GUJARAT STATE ELECTRICITY CORPORATION LIMITED

Kutch Lignite Thermal Power Station, PO SK Varmanagar, Taluka: Lakhpat, Dist: Kutch-370601, Ph. 91-2839-262452, 264423
Fax: 91-2839-262431, 264434 e-mail: cekitps.gsecl@gmail.com Website: www.gsecl.in CIN: U40100GJ19935GC019988

SECL/KLTPS/ACE/GPCB/NGT/ 2237

Date: 01-08-2024

To,
Hon. Collector & District Magistrate
Collector office,
Jilla Seva Sadan, College Road,
Bhuj -Kachchh.
e-mail:collector-kut@gujarat.gov.in

સેલેક્ટ સુદી,
 ઇલેક્ટ્રીસિટી કોર્પોરેશન,
 કચ્છ લાયટ થર્મલ પાવર સ્ટેશન,
 ૨૨૦૨૪૦૩૩૪૮૬૭,
 ૦૨ AUG ૨૦૨૪
 ૨૨૫૧
 ૧૭/૮/૨૦૨૪
 RFMS
 સિમ્પલ

Subject: Regarding submission of corrective measures /explanations by GSECL KLTPS Panjthro.
Ref. : NOTICE no. GPCB/RO/Kutch-West/Legal/T-5(31)/475 dated 25.07.2024

Respected Sir,

With due respect, it is to state that Gujarat State Electricity Corporation LTD. Kutch Lignite Thermal Power Station (GSECL-KLTPS) is the Govt. of Gujarat owned Public sector and doing business of power generation. The power plant/units are running since 1990 after getting all approval /clearance from concern authorities, The Details of units are as under:

Sr No.	Description	Date	Remark
01	2X70 MW	1990	2X70 MW Units decommissioned since dated 1.1.2020
02	1X75 MW	1997	In service
03	1X75 MW	2009	Under Forced shut down since dated 5.7.2023

Water is the basic requirement for generation of electricity and therefore, GSECL KLTPS to fulfill their requirement of water using bore wells. It is to be noted that, Environment clearance was issued for unit-4 by MoEF vide letter no. J/13012/6/2001.IA-II (T) dated 31.05.2005 and the same was amended vide letter no. J/13012/6/2000-IA.II (T) dated 20.01.2009 for use of ground water. Hence, there is no any breach of rules/regulations by GSECL.

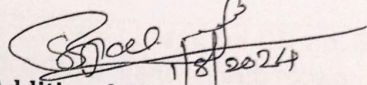
However, as per guideline and notification of CGWA and Government of India, it is required to obtain NOC for drawing of Brackish/Saline Water from existing/proposed bore wells. For implementation of CGWA public notice of 31.05.2017 & observation noted by GPCB, Bhuj during the KLTPS visit on dated 30.06.2017, GSECL KLTPS had immediately taken action and applied online on 1.07.2017 & re-applied on 5.12.2017 for obtaining NOC, which was rejected by CGWA on date 9.12.2020 with a query of submission of impact assessment report of bore well as per new CGWA guideline dated 24.09.2020. Henceforth, Re- Application for Borewell NOC was submitted on 6.04.2024 with borewell Impact assessment report (IAR) prepared by CGWA approved consultant and other required documents. Delay occurs in order placement and report preparation was mainly due to Covid pandemic and other seasonal factor for that affects hydrogeological field work required for IAR report. At present CGWA vide email dtd.22.07.2024 has instructed to submit all borewell water quality report analyzed by NABL lab. KLTPS assures to submit same before 08.08.2024. KLTPS official has also personally visited CGWA, Delhi office dtd 23.7.24 for expedite

the NOC approval work. (Chronology as per attached Annexure-1 shows effort and follow-up action since July, 2017 to till today for obtaining NOC from CGWA, New Delhi.)

Being a Government Undertaking, GSECL always committed to implement & comply all the rules & regulations of State Government and Government of India from time to time.

Looking to the above fact and as the application of GSECL is under process before CGWA, it is a humble request not to take any action as stated in the notice against GSECL KLTPS.

For & On behalf of GSECL



Additional Chief Engineer (O&M)
KLTPS Panandhro-Kuchchh.

Cfwcs to:

- (1) Hon. Managing Director, GSECL, CO, Vadodara
- (2) Hon. I/c. Executive Director (Gen.), GSECL.CO.Vadodara
- (3) Regional Officer, GPCB, Kuchchh-Bhuj.
- (4) Chief Engineer (Gen.), GSECL CO Vadodara
- (5) Legal Officer, GSECL, CO, Vadodara