BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI

O.A. No. 230 of 2025

S.Murugesan

Applicant

-V-

The Union of India
&4 Others

Respondents

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Dated at Chennai this the4th day of June 2026.

Counsel for Respondent2 & 3

BEFORE THE HON'BLE GREEN TRIBUNAL(SZ), CHENNAI

O.A.No. 230 of 2025

S.Murugesan

.....Applicant.

-V-

The Union of India & Ors

.....Respondents.

REPLY FOR THE CORRESPONDING PHOTOS FILED IN ANNEXURES TO THE APPLICATION

The present status of the pipe lines photographed by the petitioner is as detailed below:

(1) Annexure A1, Page 12. Refer Google Drive video link if available

GPS Location: 13.258053 N, 80.323052 E Dated: 13.07.2025 Leak in the newly laid pipes as directed by the Court.

The leakage is in **Ash Slurry Disposal line No.5** due to damage in the O-ring. These O-rings are consumable items and are subjected to wear and tear due to continuous operation under high pressure and temperature conditions. This may also cause due to pressure fluctuations and mechanical vibrations during starting and stopping of pump. However the Minor leakage in sleeve coupling was attended by replacing Sleeve coupling and welding sleeve provide. Utmost care is taken to replace the O-ring at the weeping stage.

Present Status:

(2) Annexure A1, Page 12. Refer Google Drive video link if available:

GPS Location: 13.260028 N, 80.316861 E dated 13.07.2025

The leakage is in **Ash Slurry Disposal line No.5** due to damage in the O-ring. These O-rings are consumable items and are subjected to wear and tear due to continuous operation under high pressure and temperature conditions. This may also cause due to pressure fluctuations and mechanical vibrations during starting and stopping of pump. However the Minor leakage in sleeve coupling was attended by replacing Sleeve coupling and welding sleeve provide. Utmost care is taken to replace the replace the O ring at the weeping stage.

Present Status:

(3) Annexure A1, Page 13. Refer Google Drive video link if available.

GPS Location: 13.260028 N, 80.316861 E dated 13.07.2025

It is clarified that the line in which the O-ring leak occurred is not an **Ash Slurry Line, but the Recovery Water Line (R3),** which carries decanted saline water recovered from the Ash Pond for recirculation and reuse within the plant system. However the leak was attended immediately by replacing new O-ring.

Present status:

(4) Annexure A1, Page 15.

GPS Location: 13.261558°N, 80.312313° E Dated: 23.08.2025

Leak from new pipeline with rusted coupling.

The leakage is in **Ash Slurry line No.5** due to damage in the O-ring. These O rings are consumable items and are subjected to wear and tear due to continuous operation under high pressure and temperature conditions. This may also cause due to pressure fluctuations and mechanical vibrations. However the Minor leakage in sleeve coupling was attended by replacing the O ring immediately. Utmost care is taken to replace the replace the O ring at the weeping stage.

Present Status:

(5) Annexure A1, Page 15.

2) 13.258376° N, 80.322067° E Dated: 23.08.2025

Same photograph shown above

Present Status:

(6) Annexure A1, Page 1

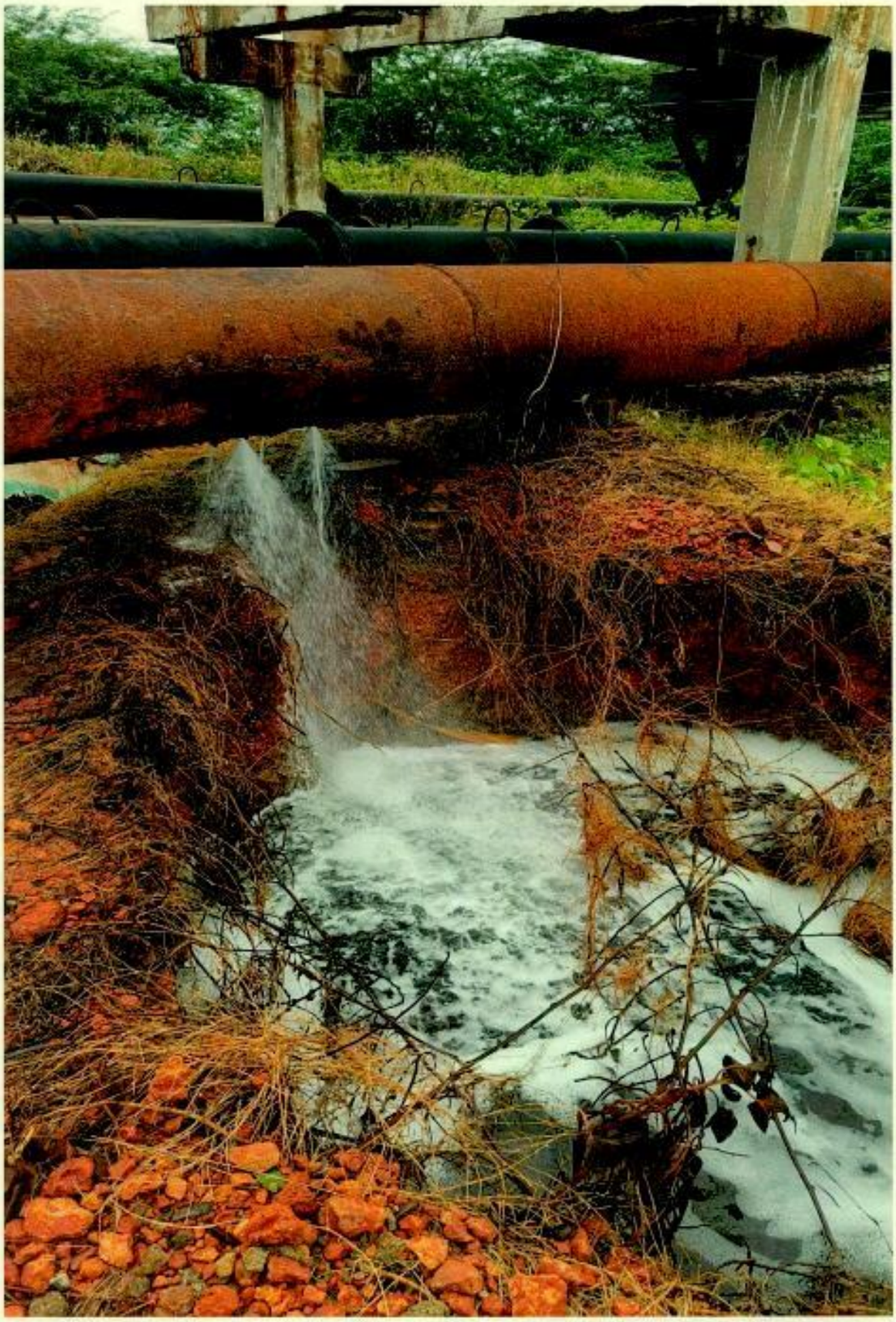
GPS: 13°15'27.2"N 80°19'27.8"E dated 04.10.2025

The deposited ash has been removed completely.

Present Status:

(7) Annexure A1, Page 19.

GPS: 13°15'31.8"N 80°19'13.7"E dated 04.10.2025



The line in which the leak occurred **is not an Ash Slurry Line, but the Recovery Water Line (R2),** which carries decanted saline water recovered from the Ash Pond for recirculation and reuse within the plant system. However the leak was attended immediately by patch welding.

(8). Annexure A1, Page 20.

GPS: 13°15'33.0"N 80°19'09.4"E dated 04.10.2025 (Picture No.1)

The line in which the leak occurred due to O-ring **is not an Ash Slurry Line, but the Recovery Water Line (R3)** which carries decanted saline water recovered from the Ash Pond for recirculation and reuse within the plant system. However the leak was attended immediately by replacing the O-ring.

(9) Annexure A1, Page 20. (Picture No.2)

GPS: 13°15'37.4"N 80°18'56.6"E dated 04.10.2025

There is **no leak in the pipe however the plastic cover has been removed.**

Present Status:

(10) Annexure A1, Page 21 (Picture No.1)

GPS: 13°15'33.0"N 80°19'09.4"E dated 04.10.2025

The leakage was noticed in the ASDL line No. 3 welding joint. The Pipe has been renewed with new pipe.

Present Status:

(11) Annexure A1, Page 21 (Picture No.2)

GPS: 13°15'33.0"N 80°19'09.4"E dated 04.10.2025

Same photo of ASDL line No. 3 welding joint

<u>Present Status:</u>

(12) Annexure 1, Page No. 22 (Picture No.1)

GPS : 13°15'52.0"N, 80°18'24.1"E dated 04.10.2025

These lines **(ASD line 2 and 3)** are laid near to dyke and when water nearby got stagnated the debris and red sand got deposited over the pipes making a rusty look and Since the inner layer is coated with Cast basalt liners there is no potential risk of leak but however the **Pipes will be painted periodically.**

Present Status:

(13) Annexure A1, Page 22 (Picture No.2)

GPS : 13°15'52.0"N, 80°18'24.1"E dated 04.10.2025

These lines (**ASD line 2 and 3)** are laid near to dyke and when water near by got stagnated the debris and red sand got deposited over the pipes making a rusty look and Since the inner layer is coated with Cast basalt liners there is no potential risk of leak but however the **Pipes will be painted periodically.**

Present Status:

(14) Annexure -1, Page No. 23 (Picture No.1)

GPS: 13°16'01.7"N 80°18'24.5"E dated 04.10.2025

The line shown is the **ASDL No. 3** laid during the year 2021 and the outer layer got corroded and **painting proposal under progress.**

Present Status:

(15) Annexure 1 page No.23 (Picture No.2)

GPS: 13 16'09.4"N 80 18'24.5"E **dated 04.10.2025**

The line shown is the **ASDL No.3** line laid during the year 2021 and the outer layer got corroded and **painting proposal under progress.**

Present Status:

(16) Annexure 1, Page No. 24 (Pictures 1)

GPS: 13°16'18.7"N 80°18'23.6"E dated 04.10.2025

It is submitted that, the observation made by the petitioner appears to be misinterpreted. The cloth seen in the photograph over the slurry line is not an intentional attempt to conceal a leak. The Ash Slurry Disposal System of NCTPS-I conveys ash slurry at a **minimum pressure of 5 kg/cm² (ksc). Under such pressure conditions, a piece of cloth or any fabric material cannot physically arrest or hide a leak.** Any leakage under these conditions would be forceful and immediately visible. It might be leftover by the maintenance personnel or an act of outsiders since the pipe lies along the open corridor. **The O-ring of the ASDL No.2 coupling has been replaced as weeping noticed.**

Present Status:

(17) Annexure 1, Page No.24 (Picture 2)

GPS: 13°16'18.7"N 80°18'23.6"E dated 04.10.2025

Same O-ring of ASDL No.2 coupling as in (16) Annexure 1, Page No. 24 (Pictures 1) taken from a different angle.

Present Status:

(18) Annexure A1, Page 25 (5 Nos. of Pictures)

GPS: 13°16'19.1"N 80°18'23.5"E dated 04.10.2025

The Pipes and coupling were procured from different agencies and the pipe was painted with black paint and the Sleeve coupling was supplied with red oxide paint. Hence it seems to be varying. However it is hereby stated that the coupling is not old and there is no structural damage in the pipes /couplings. **The painting proposal for the ASDL No.2 and 3 is under progress and periodical painting will be carried out in future.**

Present Status:

(20) Annexure A1 page No.26 (Picture No.1)

The Pipes and coupling were procured from different agencies and the pipe was painted with black paint and the Sleeve coupling was supplied with red oxide paint. Hence it seems to be varying. However it is hereby stated that the coupling is not old and there is no structural damage in the pipes /couplings. **The painting proposal for the ASDL No.2 and 3 is under progress and periodical painting will be carried out in future.**

Present Status:

(21) Annexure A1 Page No.26 (Picture No.2)

GPS: 13°16'20.5"N 80°18'23.4"E dated 04.10.2025

Reply

(22) Annexure A1, Page No.27 (Picture No.1)
14. GPS: 13°16'38.5"N 80°18'21.6"E dated 04.10.2025

The ASDL lines depicted in the photograph are not partially replaced of pipes. The **pipes were renewed in a phased manner from 2021 to 2025** in the order of ASDL 3(2021-22), ASDL 2 (2022-23), ASDL4 (2023-24), ASDL 5(2024-25, ASDL1(2024-25). Hence there is no partial replacement. Also new pipes were replaced in the existing pipes ASDL 3 and 2 whenever emergency rises. Also written submission were filed before the Hob'ble NGT after replacement of ASDL pipes as directed by the Hon'ble NGT.

Present Status:

(23) Annexure A1, page No.27 (Picture No.2)

GPS: 13°16'19.1"N 80°18'23.5"E dated 04.10.2025

The ASDL lines depicted in the photograph are not partially replaced of pipes. The **pipes were renewed in a phased manner from 2021 to 2025** in the order of ASDL 3(2021-22), ASDL 2 (2022-23), ASDL4 (2023-24), ASDL5(2024-25, ASDL1(2024-25). Hence there is no partial replacement. Also new pipes were replaced in the existing ASDL 3 and 2 whenever emergency rises.

Present Status:

(24) Annexure A1, page No. 28 (Picture No.1 and 2)

GPS coordinates: 13°16'44.4"N 80°18'21.2"E

During rainy season the pipes got submerged and the Red soil and tiny stone particles got stuck to the pipe lines showing a rusty look and **beyond the soil area it could be seen clear.**

Present Status:

(25) Annexure A5, Page No.49

These Photgraphs depict the erection work of new line in ASDL.

(26) Annexure A7, Page No.57,
Date : October 4, 2025 / 9:00 A.M. to 1:00 P.M.

The lines laid under the steel structure pertain to NCTPS-I, **out of which 5 Nos. are Ash Slurry disposal lines and 3 Nos. are Recovery water lines**. The lines laid over the structure pertains to NCTPS-II.

(27) Annexure A7, Page No.60 (Picture No.2)

The HDPE pipe does not pertain to NCTPS-I and also it is clarified it is **not a slurry or recovery water line it is an abandoned drinking water line of Ennore SEZ TPP.**

Present Status:

(28) Annexure A7, Page No.60 (Picture No.3)

The B8 mentioned is **recovery water line and is not in service at present**. It was kept as a standby line for the recovery water system. At present Tender to be called for the procurement of pipe lines (Entire length of 2,910 M) for the Recovery

water line No.1 (B8) and Administrative approval for Recovery water line No. 2 (B9) (Entire length of 2,910 M) is awaited from Board Level Tender Committee and tender is in process for the partial replacement of the Recovery water line No. 3 (B2) (816M) for replacement in phased manner as mentioned previously.

(29) Annexure A7, Page No. 63 (Picture No. 1)

The B2 line is the **Recovery water line and not slurry line. B8 is not in service** and at present Tender to be called for the procurement of pipe lines for the Recovery water line No.1 (B8). **B2 line is also recovery water line (R3)** and tendering for the partial replacement of the damaged pipe line (**816 M)** is in pregress and the work will be completed on or **before July'2026.** For B4 line which is the Ash Slurry Disposal Line and the **proposal for painting the same is under progress**.

(30) Annexure A7, Page No. 63 (Picture No. 2)

B2 line is also Recovery water line (R3) and proposal has been sent for obtaining administrative approval **for the replacement of the entire length of 2,910 M** to the Board Level Tender Committee and after obtaining the Administrative Approval tendering process will be initiated. For the **B4 line is an Ash Slurry Disposal Line for which the painting proposal is under progress.**

(31) Annexure A7, Page No.64 (Picture No.2)

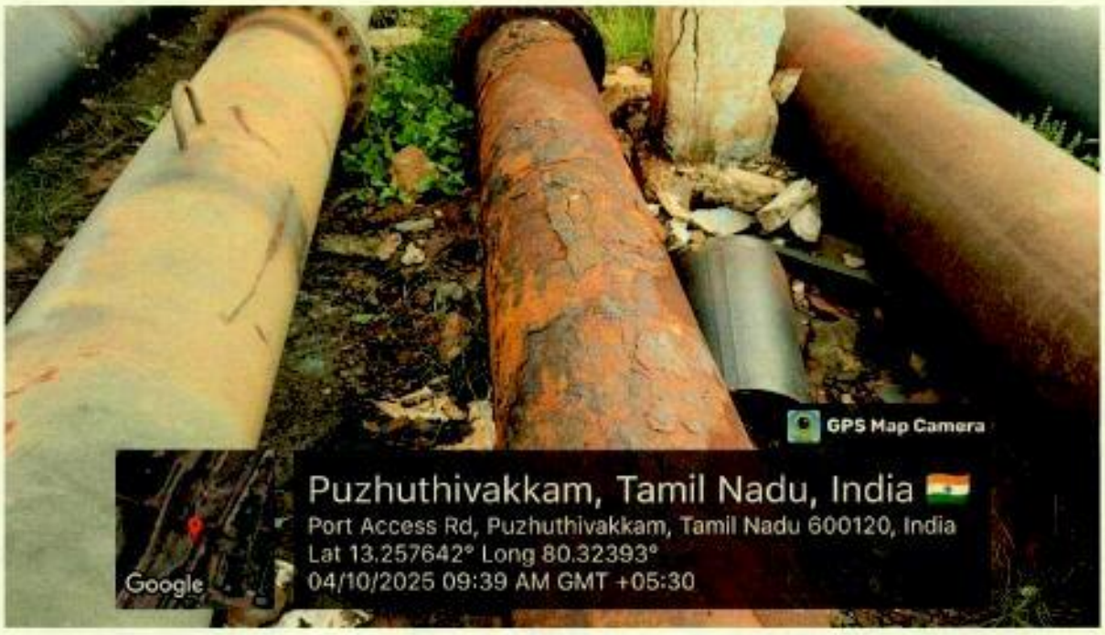
Present status:

(32) Annexure A7, Page No.64 (Picture No.1)

The rusted line shown is the **Recovery water line R3 carrying recovered water from Ash Dyke for recirculation**. Tendering is in progress for replacement of the damaged pipes **(816 m)** in R3 line (B2).

Present Status:

(33) Annexure A7, Page No.65 (Picture No.1) GPS: 13°15'27.5"N



The **Ash Slurry Disposal Line No. 3 was commissioned during the year 2021.** The corrosion is due to prolonged exposure to saline and humid coastal atmosphere, accelerating oxidation. The lines are lined with cast basalt lining of 20 mm Thickness. However **proposal is under progress for protective coating by painting with epoxy paint and the work will be completed before May'2026.**

Present Status:

(34) Annexure A7, Page No.66 (Picture No.1)

Present Status:

(35) Annexure A7, Page No. 66 (Picture No.2) GPS 13°15'28.3"N

The same photograph from Annexure A1, page No. 16. The deposited ash has been removed completely.

Present Status:

(36) Annexure A7, Page No.67 (Picture No.1)

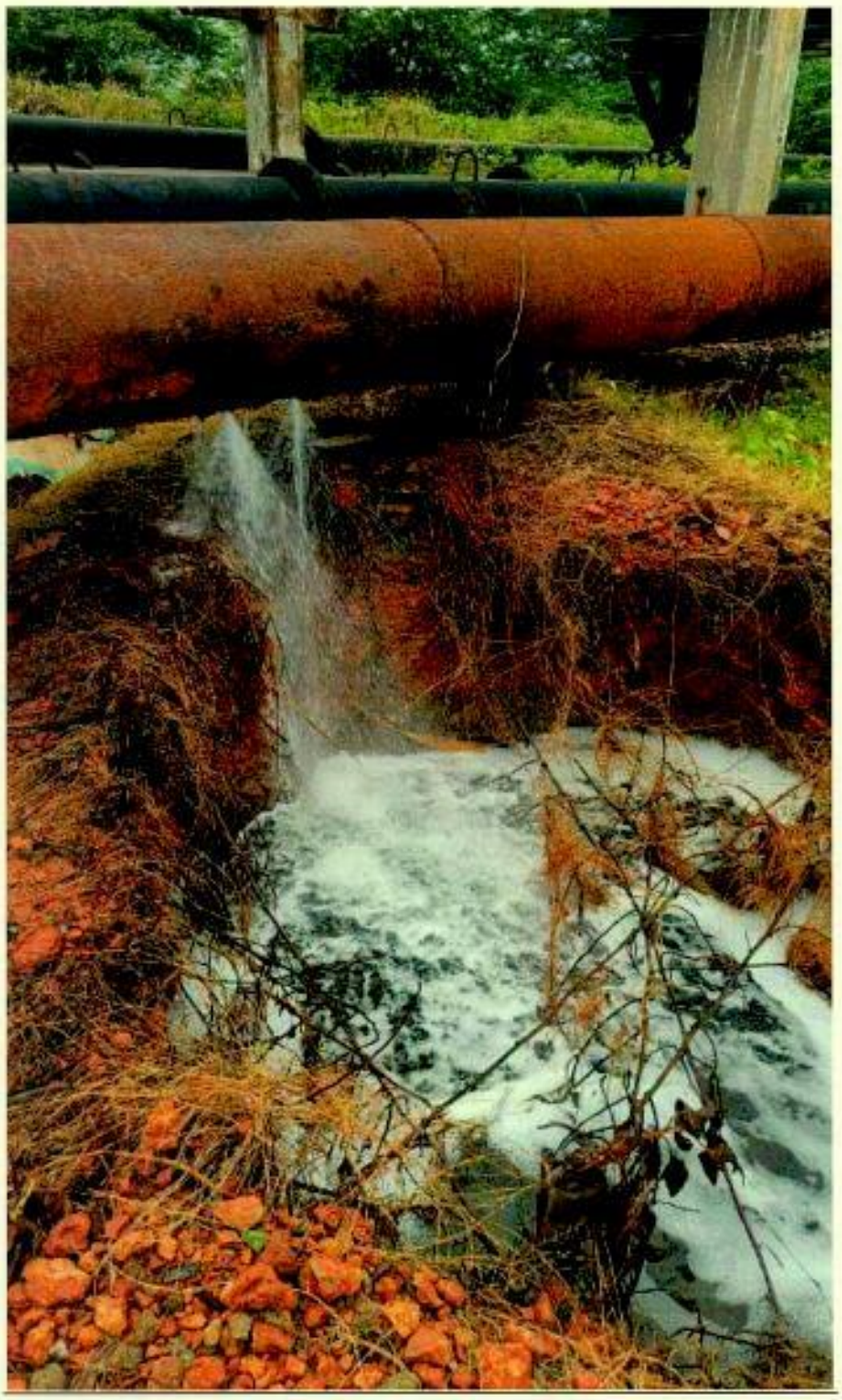
GPF: 13°15'30.3"N, 80°19'18.2"E

Proposal for **Protective coating with epoxy coating has been prepared and in process.**

Present Status:

(37) Annexure A7, Page No.68 (Picture No.1)

GPS: 13°15'31.8"N 80°19'13.7"E



It is submitted that the photograph referred to by the petitioner **does not pertain to an ash slurry disposal line, but rather to a recovery water line that conveys decanted saline water from the Recovery Water Pump House back to the NCTPS-I for reuse / recirculation in the Ash Handling System** and other auxiliary processes. The leak has been attended.

The recovery water system is a closed-loop circuit designed to minimize freshwater intake by re circulating the decanted supernatant water from the ash pond after the heavier ash particles have settled at the dyke. The recovered water thus transported contains **only trace suspended solids** within permissible limits and no fly ash or bottom ash particles in significant quantity.

The Ash Slurry Disposal Lines are of **higher diameter 406 mm** and specifically designated for ash transport. But the Recovery water line is smaller in diameter than Slurry line i.e. **350 mm dia.**

However the leak is due to mechanical failure and a pinhole puncture occurred which was attended immediately.

(38) Annexure A7, Page No.69 (Picture No.1)

The B2 line is also recovery water line (R3) and the tender for the partial replacement of the damaged lines **(816 M)** is in progress and the work will be completed on or **before July 2026.**

The B9 line is also recovery water line (R2) and the administrative approval from the Board Level Tender Committee is awaited and after obtaining the Administrative approval is obtained tendering process will be initiated for the replacement of the entire length of **2,910 M** progress and the work is expected to complete on or **before November 2026.**

(39) Annexure A7, Page No.69 (Picture No.2)

It is submitted that the line referred to as "B2" by the petitioner **is not an ash slurry disposal line, but a recovery water line** that conveys clarified saline water from the Ash Dyke back to the Thermal Power Station for reuse in the ash handling process and other plant auxiliaries.

The location shown in the photograph depicts a sleeve coupling joint used for joining two pipeline sections. The observed feature is not a broken pipe, but a standard mechanical joint assembly consisting of a sleeve, flanges, and an internal rubber O-ring to provide a watertight seal.

During a routine inspection, a minor leak was detected at this joint due to O-ring deterioration within the sleeve coupling. The pump was stopped immediately and till draining of pipe to attend the leak by replacement of O-ring. The waste cloth was used to identify the coupling in the particular area since the line stretches to about 5.5 km.

Present Status:

(40) Annexure A7, Page No.70, (Picture No.1)

GPS: 13°15'33.5"N, 80°19'08.7"E

It is submitted that, since the lines are laid along the coastal region the pipes gets corroded due to prolonged exposure to saline and humid coastal atmosphere, accelerating oxidation. Corroded sections are proposed to be replaced in a phased manner based on condition assessment. Preventive maintenance measures including providing protective epoxy coating are planned to arrest further corrosion.

The replacement of entire length of **(2,910 M) B9 (R2) recovery water line (R2) will be completed before November 2026.**

For B5 line which is the ASDL line **painting of the line will be completed by May'2026.**

Present Status:

(41) Annexure A7, Page No. 70 (Picture No.2)

GPS: 13°15'33.5"N, 80°19'08.7"E

It is submitted that, since the lines are laid along the coastal region the pipes gets corroded due to prolonged exposure to saline and humid coastal atmosphere, accelerating oxidation. Corroded sections are proposed to be replaced in a phased manner based on condition assessment. Preventive maintenance measures including providing protective epoxy coating are planned to arrest further corrosion.

B4 line which is the ASDL line **painting of the line will be completed by May'2026. The B2 line is recovery water line (R3)** and partial replacement of the damaged lines **(816 M)** will be completed on or **before July 2026.**

(42) Annexure A7, Page No.71,(Picture No.2), GPS: 13°15'39.6"N, 80°18'50.1"E

The cement sack seen in the photograph over the slurry line is not an intentional attempt to conceal a leak. The Ash Slurry Disposal System of NCTPS-I conveys ash slurry at a **minimum pressure of5 kg/cm² (ksc). Under such pressure conditions, a piece of cement sack cannot physically arrest or hide a leak.** Any leakage under these conditions would be forceful and immediately visible. It might be leftover by the maintenance personnel or an act of outsiders since the pipe lies along the open corridor. It is submitted that, now the cement sack and the deposited ash have been removed.

Present Status:

(43) Annexure A7, Page No.71 (Picture No.1)

GPS: 13°15'37.4"N 80°18'56.6"E

Present Status:

(44) Annexure A7, Page No.72 (Picture No.1)

The leakage was noticed in the Slurry line No 3 welding joint and immediately attended by patch welding and later replaced the pipe line.

Present Status:

(45) Annexure A7, Page No. 72 (Picture No.2)

Same image from Annexure A1, Page 21. The leakage was noticed in the ASDL line No. 3 welding joint. The Pipe has been renewed with new pipe.

Present Status:

(46) Annexure A7, Page No.73 (Picture No.1)

Same image from Annexure A1 page 21 from different angle. The leakage was noticed in the ASDL line No. 3 welding joint. The Pipe has been renewed with new pipe.

Present Status:

(47) Annexure A7, Page No.75, (Picture No. 1)

GPS: 13°15'42.9"N, 80°18'40.6"E

The B2 line is also recovery water line (R3) and the tender for the partial replacement of the damaged lines **(816 M)** is in progress and the work will be completed on or **before July 2026.**

The B9 line is also recovery water line (R2) and the administrative approval from the Board Level Tender Committee is awaited and after obtaining the Administrative approval is obtained tendering process will be initiated for the replacement of the entire length of **2,910 M** and the work is expected to complete on or **before November 2026.**

For B4 and B5 lines which are the Ash Slurry Disposal Lines and the proposal for **painting of the lines is under progress and will be completed by May'2026.**

Present Status:

(48) Annexure A7, Page No.76 (Picture No.1)

GPS: 13°15'45.8"N, 80°18'31.0"E

Clamps are provided below the pipelines which are made up of Mild steel coated with red oxide. Since these clamps are exposed to humid coastal atmosphere, it is subjected to rusting and corrosion due to saline breeze. There is no physical damage noticed in the clamps. In case of occurrence of damage it will be replaced immediately. **However during the course of painting of pipes the same clamps also will be painted.**

Present Status:

(49) Annexure A7, Page No.77 (Picture No.1)

GPS: 13°15'50.3"N, 80°18'24.3"E

The Ash Slurry Disposal Line No. 3, commissioned during the year 2021-22, is part of the Ash Handling System that conveys fly ash and bottom ash in slurry form from NCTPS-I to the Ash Dyke, located approximately 5.5 km away along the coastal stretch. The corrosion is due to Prolonged exposure to saline and humid coastal atmosphere, accelerating oxidation. The lines are lined with cast basalt lining of 20 mm Thickness. **However proposal is under progress for protective coating by painting with epoxy paint.**

Present Status:

(50) Annexure A7, Page No.77 (Picture No.2)

GPS : 13°15'52.0"N, 80°18'24.1"E

B7 is the new line ASD line 5 which was replaced during the year 2024 and due to the red soil deposit over the lines it seems to be rusted but there is no structural damage to the pipe line since the pipe line is made up of cast basalt liner of 20 mm thick and there is no potential risk to the pipes.

Present Status:

(51) Annexure A7, page No.78(Picture No.2)

GPS: 13°15'51.9"N, 80°18'24.1"E

It is clarified that the Ash Slurry Disposal Lines convey the Wet ash slurry at a pressure above 6 Ksc and the leak could not be stopped by a piece of cloth and the leak is due to **O-ring slippage in the sleeve coupling and have been attended by replacement of the O-ring.**

Present status:

(52) Annexure A7, Page No. 79 (Picture No.1)

GPS: 13°15'59.9"N, 80°18'24.4"E

These lines S2 (B4) and S3 (B5) were erected during the year 2021 to 2022 and laid along the coastal area there. Since the inner layer is coated with Cast basalt liners there is no potential risk of leakage of Wet Ash, however proposal for Painting of the the Pipe lines is proposed **and will be painted on or before May'2026.**

Present Status:

(53) Annexure A7, Page No.79 (Picture No.2)

GPS: 13°15'59.9"N, 80°18'24.4"E

These lines S2 (B4) and S3 (B5) were erected during the year 2021 to 2022 and laid along the coastal area there. Since the inner layer is coated with Cast basalt liners there is no potential risk of leakage of Wet Ash, however proposal for Painting of the Pipe lines is proposed **and will be painted on or before May'2026.**

Present Status:

(54) Annexure A7, Page No.80 (Picture No.1)

These are the picture of the scale formation of the outer layer of the Ash Slurry Disposal Line S3. However there is no physical damage to the pipe line and the pipes will be painted on or before May'2026.

Present Status of the pipeline:

(55) AnnexureA7, Page No.80(Picture No.2)

The Sleeve coupling is provided with air release screw. Due to pressure variation and mechanical vibration the Bolt got sheared leading to leak in the pipe line. During replacement of the coupling to avoid the water passing through the bolt which hindered the replacement it was temporarily arrested by wooden plug.

Present Status:

(56) Annexure A7, Page No. 81(Picture No.1)

The clamps are generally made of Mild steel and due to continuous exposure to saline atmosphere and humid coastal atmosphere the surface protection of the clamps and pipes gets easily detoriated. During painting of the pipe lines the clamps also will be painted and **the work will be completed on or before May'2026.**

(57) Annexure A7, Page No.82 (Picture No.1)

GPS : 13°16'09.4"N, 80°18'24.5"E

These lines S2 (B4) and S3 (B5) were erected during the year 2021 to 2022 and laid along the coastal area there. Since the inner layer is coated with Cast basalt liners there is no potential risk of leakage of Wet ash slurry. However the proposal for painting these Pipes are in progress and will be painted on or before May'2026.

Present Status:

(58) Annexure A7, Page No.82 (Picture No.2)

GPS: 13°16'12.8"N, 80°18'23.9"E

These lines S2 (B4) and S3 (B5) were erected during the year 2021 to 2022 and laid along the coastal area. During the recent rain the pipes got submerged and during draining the mud and debris got settled in between the pipes and now it has been cleared. Since the inner layer is coated with Cast basalt liners there is no potential risk of leakage of Wet ash Slurry. However the proposal for painting these Pipes are in progress and will be painted on or before May'2026.

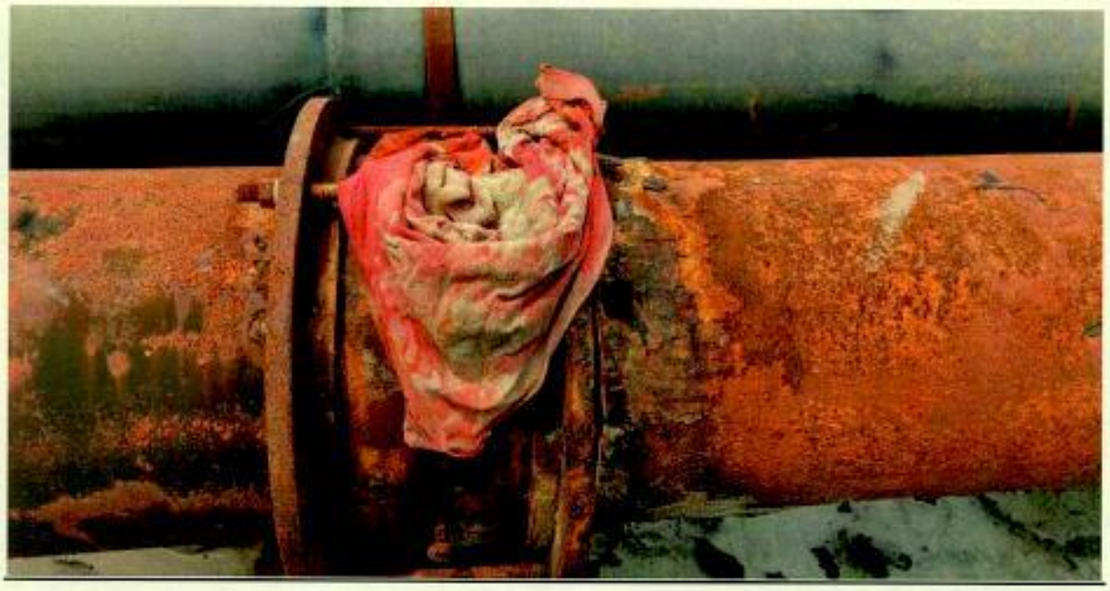
Present Status:

(59) Annexure A7, Page no.83 (Picture No.2)
GPS :13°16'18.5"N, 80°18'23.3"E

Same image as above.

Present Status:

(60) Annexure A7, Page No.84 (Picture No. 2 and 3) GPS : 13°16'18.2"N 80°18'23.5"E



Same image as in Annexure 1, page No.23.

The Ash Slurry Disposal System of NCTPS-I conveys ash slurry at a **minimum pressure of 5 kg/cm² (ksc). Under such pressure conditions, a piece of cloth or any fabric material cannot physically arrest or hide a leak.** Any leakage under these conditions would be forceful and immediately visible. It might be leftover by the maintenance personnel or an act of outsiders since the pipe lies along the open corridor. **The O-ring of the ASDL No.2 coupling has been replaced as weeping noticed.**

Present Status:

(61) Annexure A7, Page No.85 (all the 5 Nos. of Pictures)

Same image from Annexure A1, Page No.25

The Pipes and coupling were procured from different agencies and the pipe was painted with black paint and the Sleeve coupling was supplied with red oxide paint. Hence it seems to be varying. However it is hereby stated that the coupling is not old and there is no structural damage in the pipes /couplings. **The painting proposal for the ASDL No.2 and 3 is under progress and periodical painting will be carried out in future.**

(62) Annexure A7, Page No.86 (Picture No.1)

Same image in Annexure A1, Page No.26

The Pipes and coupling were procured from different agencies and the pipe was painted with black paint and the Sleeve coupling was supplied with red oxide paint. Hence it seems to be varying. However it is hereby stated that the coupling is not old and there is no structural damage in the pipes /couplings. **The painting proposal for the ASDL No.2 and 3 is under progress and periodical painting will be carried out in future.**

(63) Annexure A7, Page No.86 (Picture No.2)
GPS: 13°16'28.8"N 80°18'22.7"E

These lines S2 (B4) and S3 (B5) were erected during the year 2021 to 2022 and laid along the coastal area. During the recent rain the pipes got submerged and during draining the mud and debris got settled in between the pipes and now it has been cleared. Since the inner layer is coated with Cast basalt liners there is no potential risk of leakage of Wet ash Slurry. **However the proposal for painting these Pipes are in progress and will be painted on or before May'2026.**

(64) Annexure A7, Page No.87 (Picture No.1 & 2)

The Pipes and coupling were procured from different agencies and the pipe was painted with black paint and the Sleeve coupling was supplied with red oxide paint. Hence it seems to be varying. However it is submitted that the coupling is not old and there is no structural damage in the pipes /couplings. **The painting proposal for the ASDL No.2 and 3 (B4 and B5) is under progress and will be completed by May'2026.**

(65) Annexure A7, Page No.88 (Picture No.1)

The painting proposal for the ASDL No.2 and 3 (B4 and B5) is under progress and will be completed by May'2026. While painting the ASDL No.2 & 3, clamps in all the ASDL lines will also be painted.

(66) Annexure A7, Page No.88 (Picture No.2)
GPS 13°16'31.9"N 80°18'22.4"E:

The painting proposal for the ASDL No.2 and 3 (B4 and B5) is under progress and will be completed by May'2026. While painting the ASDL No.2 & 3, the portions of the other **ASDL line which are heavily rusted will also be painted.**

(67) Annexure A7, Page No.89 (Picture No. 1)

GPS: 13°16'38.5"N 80°18'21.6"E

The painting proposal for the ASDL No.2 and 3 (B4 and B5) is under progress and will be completed by May'2026. While painting the ASDL No.2 & 3, the portions of the other **ASDL line which are heavily rusted will also be painted.**

(68) Annexure A7, Page No.90 (Picture No. 1and 2)

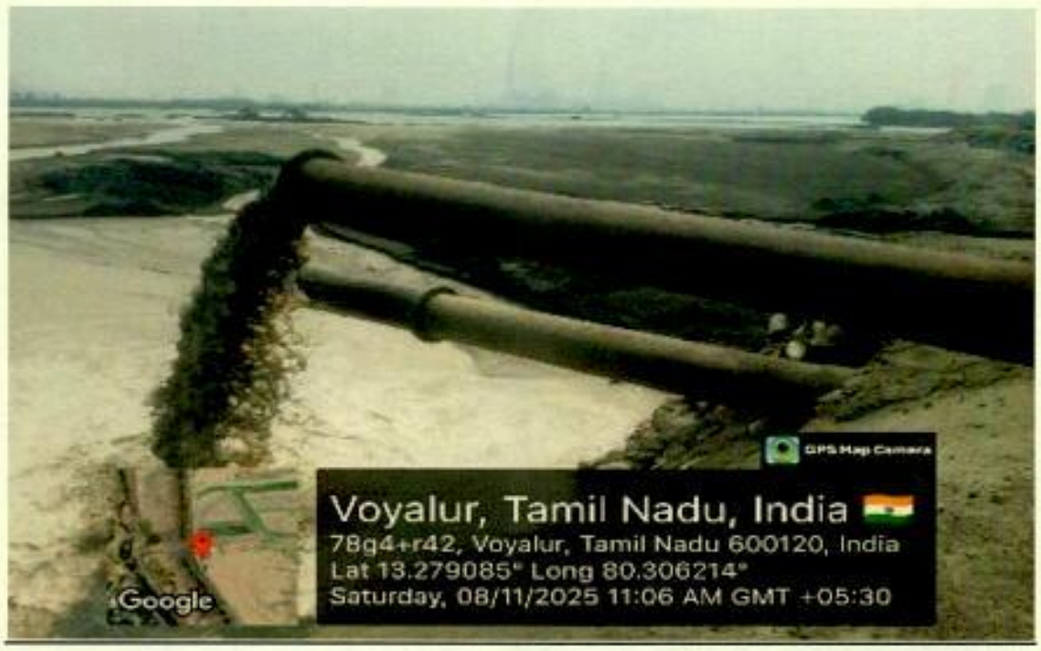
GPS: 13°16'44.8"N 80°18'21.3"E

The pipe B5 was erected during the year 2021-22.Due to continuous exposure to saline and coastal humid atmosphere the pipes Sleeve coupling/clamps gets easily corroded. Proposal for Protective coating with epoxy coating has been prepared and work will be completed on or before May'2026.

(69) Annexure A7, Page No. 91

These are the end of the B5 and B6 discharging the Wet Ash Slurry to the ash pond.

Present Status:



(70) Annexure A7, Page No. 94

Present Status:

Dated at Chennai this the 4th day of June 2026.

Counsel for 2nd Respondent.