

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE, CHENNAI

O.A. No. 26 of 2025

Selvaraj Duraiswamy, S/o.Duraiswamy,

No.8/29, Kattupakkam Main Road, Kattukuppam,

Kattivakkam, Ennore,

Thiruvallur, Tamil Nadu - 600 057

:

Applicant

Versus

1. The Union of India,

Rep by its Secretary of Government,

Ministry of Environment, Forest & Climate Change (MoEF &CC)

New Delhi

2. Tamil Nadu Generation and Distribution

Corporation (TANGEDCO),

Represented by its Chariman cum Managing Director,

4th floor, NPKRR Maaligai, 144, Anna Salai

:

Respondents

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Dated at Chennai this the 28th day of July 2025.


Counsel for the Respondents No.2

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ADDITIONAL AFFIDAVIT FILED BY THE 2ND RESPONDENT

I, R.Balakrishnan, son of T.V.Ramasamy, aged about 59 years, Chief Engineer, TNPGL, having office at 5th Floor, Western Wing, 144 Anna Salai, Chennai 600002, Chennai, do hereby solemnly affirm and sincerely state as follows:-

1. I am the Chief Engineer and the Respondent No.2 in the application, and I am well acquainted with the facts of the case based on records.
2. I crave leave of this Hon'ble Tribunal may be pleased treat this additional affidavit as part and parcel of counter affidavit filed by the 2nd respondent.
3. I submit that subject matter of project 72% of project work was completed as on 31.12.2024 (ie before expiry of EC & CRZ clearance) in respect of Ennore SEZ TPP.


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(i)The component wise project works completed are as detailed below.

Sl No	Description	% of work
1	Boiler & Auxiliaries Unit I & II	85
2	Power House & Auxiliaries Unit I & II	64
3	NDCT I & II	69
4	Water System (RODM,PT,CWS)	68
5	SWIO System	74
6	Coal Handling system	65
7	Ash handling system	61
8	400 KV GIS & Switchyard	86
9	Chimney	89
10	Fire Detection & Protection System	59
	Total completion of works	72

(ii). Balance works will be completed after obtaining extension of EC & CRZ clearance from MoEF & CC which is under consideration by MoEF&CC.

(iii).It is further submitted that the following essential works are carried out for the protection of equipments / plants and safety of workers beyond 31.12.2024.

(iv). Details of essential works executed from Jan 2025 to till date in Ennore SEZ STPP

Sl. No	Location	Work Executed	Reason for execution of works
1	Transformer Yard	Generator Transformers 1A, 1B, 1C and Spare Oil filling work	For preservation of already erected transformers as per M/s. BHEL transformer preservation manual.
2	NDCT I & II and Chimney	Fixing earthing electrodes for Lighting protection of structuring	For safety and to meet the Statutory requirements.
3	Various Location in Main Plant and BOP	Power supply infrastructures Maintenance such as Replacement of damaged cable, insulators, Fuse renewal etc.,)	For maintaining power supply for all essential systems for Up keep and preservation of already erected equipments.
4	400 KV GIS	Maintenance of battery such as electrolyte top up, cleaning and recording essential parameters.	The erected batteries required to be monitored continuously and rectification of any abnormality is essential for maintaining healthiness of batteries.
5	Various Location in Main Plant and BOP	Provision of lighting for safety.	For safety and Security purpose.
6	Various Location in Main Plant and BOP	Maintenance of lighting system, Aviation lamp, Lift, etc.,	For safety, security and to meet the Statutory requirements.


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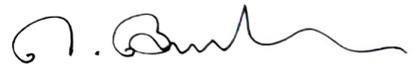
7	CW Pipe line, & ACW Pipe line	Pipes placement and fit-up	Pipes shifted and stacked near the deeper foundations are placed in position to prevent sliding of already excavated earth.
8	Power cycle piping	Heavy power cycle pipes welding works	These pipes lifted and temporarily hanged were to be fit-up and welded for safety reasons
9	Boiler ducts	Boiler ducts welding	Prefabricated flue gas ducts which were lifted and hanging with the help of chains have to welded and supported for safety reasons.
10	CRUSHER HOUSE, Transfer tower 1 to 12, YBC 1A, 1B, Drive house, Sampling tower	Structural bracing erection and welding work, erection of Cladding sheet and Roofing sheet	To Safeguard the structure from wind action
11	BCN 2A2B, Cable rack, Wind barrier	Pile cap Works	To avoid sliding of earth in the already excavated portion at deepest level.
12	ERH, RC-1	Wall works upto from -11.85 to -7.85m including slab at -7.85m completed in Hopper portion; Wall works upto -3.00 m completed in Maintenance bay	To ensure safety against sliding of sub soil as the portion is at deepest level.
13	Coal Shed	Erection of roof truss of coal cover shed	To connect the members in roof truss erected on stability aspect
14	VACUUM PUMP HOUSE II, Fly ash slurry pump house, Pipe rack works	Foundation and Super Structure work upto Bottom of Roof beam	To avoid sliding of earth in already excavated portion.
15	Fly Ash SILOS	Silo shell works	To protect the already left reinforcement dowels
16	At Various Needy Locations	Drain	To safeguard stacked equipment and construction materials due to potential rain inundation and flooding.
17	South side near Ash bund	Compound wall	Security measure to protect valuable equipment, construction materials and assets from unauthorized access.
18	Powerhouse & CCR	Various floor slab and wall cladding in Powerhouse and CCR area.	To protect the already erected Turbo Generator, rotor, Heater and electronic control panels from alternate weather conditions such as rain and weather exposure.
19	Transformer Yard	Foundations	To protect the sliding of earth in already excavated pit.
20	Structural Works (Powerhouse and Mill)	Bracings and Floor beams.	To safeguard the already erected structural columns from wind action otherwise column may get twisted and collapsed.


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21	Structural Works (Chimney)	Flue can welding	Flue cans erected are in hanging conditions to safeguard these cans, welding and seating works were carried out.
22	NDCT-I	Outlet Channel RCC	To protect the already placed reinforcement from corrosion, Since NDCT is a unique structure of height 145 m..
23	NDCT-II	Shell RCC from 81st lift 108th lift, Outlet channel	
24	Electro Chlorination Building, PTP Sludge sump	Plinth beam; RCC footing, column. Sludge sump raft & wall	Since excavation is already completed and also situated over the abandoned ash bund, work carried out to prevent sliding of already excavated earth and to protect the already placed reinforcement from corrosion due to alternate weather conditions.
25	Cooling Water Pump House, Feedpool & CW Channel	PCC, RCC Raft & walls	As the foundation level is deeper, and also situated over the ash bund, concreting done to prevent sliding of already excavated earth and to protect the already placed reinforcement from corrosion due to alternate weather conditions.
26	CW Pipe line, GRP Line & ACW Pipe line	RCC Raft & Encasing	As the foundation level is deeper, and also situated over the ash bund, concreting done to prevent sliding of already excavated earth and to protect the already placed reinforcement from corrosion due to alternate weather conditions.

(v). In this connection, 2nd respondent needs time till 31.12.2025 to complete the project to satisfy the demand of TN people.

In the interest of justice, it is therefore prayed that, this Hon'ble Tribunal may be pleased to dismiss this OA No. 26 of 2025 and pass any order or orders as this Hon'ble Court may deem fit considering the facts and thus render justice.



**Chief Engineer/Projects
TNPGL
144, Anna Salai, Chennai-600 002.**

Solemnly affirmed at Chennai

This the 28th day of July 2025

And signed his name in my presence

BEFORE ME

E. Kilaraj
M.S No. 7469/22

No. 70 Lingudhthy Street
Advocate : Chennai