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BEFORE THE NATIONAL GREEN TRIBUNAL

NEW DELHI

ORIGINAL APPLICATION NO. 327 OF 2022

IN THE MATTER OF:

Amaravati Fly Ash Bricks Manufactures Association ...Applicant

VS.

Union of India & Ors.Respondent

I N D E X

Sr. No.	Description	PAGE No.
1.	Reply on behalf of Respondent No. 12 (NTPC- Kanti)	1



ARVIND GUPTA

Advocate for the Respondent No. 12
Flat No. 87, Aamarpali Apartments,
Plot No. 56, I.P. Extension, Patparganj,
Delhi-1100092, **M-9990192497**
Email Id: arvindguptaor@gmail.com
(Code-2654)

Filed on: 17.03.2025

3. That the Respondent No.12, NTPC Kanti, is a generating station in the ER-1 Region with generating and administrative functions pertaining to the power plants situated in Kanti, Muzaffarpur, Bihar. The scope of its responsibilities is confined to ensure generation of electricity in coordination with National GRID, within the region. It is submitted that the Respondent No. 12 engaged in the mainstream operation of power generation.
4. That the overarching responsibility for decision- making, operational management, and implementation of policies and practices in relation to all power plants of NTPC Limited lies with Corporate Office. The Corporate Office, the apex body, oversees and manages the core functions, operational strategy, and compliance of NTPC Limited's power plants across the country, including those in NTPC - Kanti (Muzaffarpur Thermal Power Station).
5. Therefore, it is submitted that the Respondent No. 12, in principle, adopts the stand of Respondent No. 9, NTPC Corporate Office, and aligns its submissions with those made by Respondent No. 9 in the present matter. It is submitted that the Corporate Office is the appropriate entity to address substantive issues concerning the operations, regulatory, compliance, and environmental matters of the power plants.
6. That notwithstanding the limited role of the Respondent No. 12 in the present Original Application, it is submitted that the Respondent No.12 remains compliant with all applicable norms, regulations, and guidelines pertaining to environmental standards. The Respondent No. 12 is duty-bound to support and ensure adherence to such norms to the extent of its administrative responsibilities and functions.

7. That the present short reply is being filed to place on record the limited role and scope of responsibilities of the Respondent No.12 in the subject matter of the Original Application. That the Respondent No.12 respectfully reserves its right to file detailed response, if required, with the leave of this Hon'ble Tribunal, as and when necessary.
8. That the Respondent No. 12 submit this reply with utmost respect and commitment to assist this Hon'ble Tribunal in its adjudication of the matter. It is humbly prayed that the submissions of the Respondent No. 12 may kindly be taken on record and considered in light of its limited role in the subject matter.
9. That the Original Application does not make any specific allegations or claims against NTPC-Kanti (Muzaffarpur Thermal Power Station) that warrant its inclusion as a separate respondent.
- 10.No specific violation of the Air (Prevention and Control of Pollution) Act, 1981, or the Fly Ash Utilization Notification, 1999 (as amended), has been attributed to the answering Respondent.
- 11.Any concerns regarding fly ash management should be addressed by the NTPC Corporate Office, which is already a party to the proceedings.
- 12.Given the limited role of the answering Respondent, it is respectfully submitted that this reply is being filed solely to clarify its position.

13. That the answering Respondent reserves the right to submit additional details, if required, with the leave of this Hon'ble Tribunal.

14. That accordingly, the prayer sought in the captioned Original Application is denied, and it is most respectfully prayed that the submissions of the Answering Respondent be kindly taken on record.

THROUGH



ARVIND GUPTA
Advocate for the Respondent No.12
Flat No. 87, Aamarpali Apartments,
Plot No. 56, I.P. Extension, Patparganj,
Delhi-1100092, M-9990192497
Email Id: arvindguptaor@gmail.com
annlawchambers@gmail.com

Place: New Delhi
Dated: 17.03.2025

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BEFORE THE NATIONAL GREEN TRIBUNAL
NEW DELHI
ORIGINAL APPLICATION NO. 327 OF 2022



IN THE MATTER OF:

Amaravati Fly Ash Bricks Manufactures Association

...Applicant

VS.

Book No. 02

31518...Date 17/3/25

Union of India & Ors.

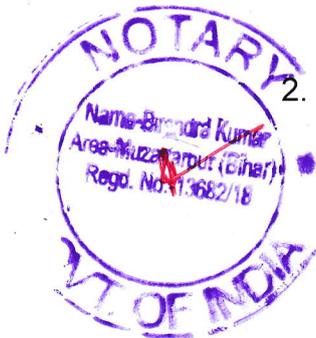
....Respondent

AFFIDAVIT

I, Chhuttan Lal Meena, working as Engineer (Ash Management Dept.), with Muzaffarpur Thermal Power Station (NPTC-Kanti), having its office at: P.O, Kanti Thermal, Distt- Muzaffarpur-843130 (Bihar), do hereby solemnly affirm and state as follows, do hereby solemnly affirm and declare as under :

1. I say that I am working as engineer (Ash Management Dept.) of the Respondent company in the above matter and am well conversant with the facts and circumstances of the present case based upon the records maintained by the Respondent company and am duly authorized to swear this affidavit.

2. I say that the contents of paras of the accompanying Reply are true and correct to the best of my knowledge and as per record are maintained by the Respondent company



चहत्तन लाल मीणा
अभिधीयता

17/3/25
Muzaffarpur (Bihar)

Chhuttan Lal Meena - 17.03.25

DEPONENT

सी.एल. मीणा
C.L. MEENA
अभिधीयता
एन्जिनियर
आश म्यानेजमेन्ट
एम्प्लोयीएस.
कान्ति थर्मल प.एस.
KANTHI

VERIFICATION:

I, the abovenamed deponent, do hereby verify that the contents of paras 1 & 2 of this affidavit are true and correct to the best of my knowledge and belief and as per advices received believed to be true and nothing false has been stated therein. Verified on 17th day of March, 2025 at Muzaffarpur, Bihar.

Engineer 17-03-25
DEPONENT

सी.एल. मीणा
G.L. MEENA
अभियंता
ENGINEER
राख प्रबंधन
ISH MANAGEMENT
एमटीपीएस,
कांटी MIPS,
KANTI