

IN THE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH,
AT NEW DELHI

ORIGINAL APPLICATION NO. 104 OF 2018

IN THE MATTER OF:

SHIVPAL BHAGAT & ORS.

....APPLICANT(S)

VERSUS

UNION OF INDIA & ORS.

....RESPONDENT(S)

MAHAVIR ENERGY & COAL BENEFICATION
LIMITED

....AFFECTED PARTY

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MAHAVIR ENERGY & COAL BENEFICATION
LIMITED /
AFFECTED PARTY

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PLACE: NEW DELHI
DATE: 10.01.2022



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N.D.O.H. - 11.01.2022

REPLY TO STATUS REPORT DATED 07.12.2021 OF OVERSIGHT COMMITTEE
APPOINTED BY HON'BLE NGT FILED THROUGH CPCB ON 16.12.2021, ON
BEHALF OF MAHAVIR ENERGY & COAL BENEFICATION LIMITED

PROPOSITIONS:-

1. **Applicability of the Notifications issued by the MoEF&CC, Govt. of India, as amended from time to time, are restricted to Coal or Lignite Based Thermal Power Plants (TPPs) only:**

(i) The Ministry of Environment & Forests, Govt. of India on 14.09.1999 issued a Notification number S.O. 763(E) ("**the 1999 Notification**") under sub-section (1), clause (v) of sub-section (2) of section 3 and section 5 of the Environment (Protection) Act, 1986 (29 of 1986) ("**EPA 1986**") titled as '*Utilisation of Fly Ash from Coal or Lignite Based Thermal Power Plants*'.

(ii) *Inter alia*, one of the stated objectives of the 1999 Notification is as under:-

*"Whereas it is necessary to protect the environment, conserve top soil and prevent the dumping and disposal of fly ash **discharged from coal or lignite based thermal power plants** on land;"*

(iii) The various clauses of the 1999 Notification would show that the Central Government issued directions for restricting the excavation of top soil for

manufacture of bricks and promoting the utilisation of fly ash in the manufacture of building materials and in construction activity within a specified radius of one hundred kilometers ***"from coal or lignite based thermal power plants"***.

(iv) Subsequently, the Ministry of Environment & Forests, Govt. of India on 27.08.2003 issued a Notification number S.O. 973(E) (**"the 2003 Notification"**) amending the 1999 Notification and further imposing restriction on the construction activity within a radius of 50 to 100 kms ***"from a coal or lignite based thermal power plant."***

(v) The Central Government on 03.11.2009 vide Notification number S.O. 2804(E) (**"the 2009 Notification"**) further amended the 2003 Notification, prescribing the percentage of fly ash utilisation by weight in the building material or products and prescribing targets of fly ash utilisation ***'from a coal or lignite based thermal power plant'***.

(vi) It is imperative to note the definition of the term ***"fly ash"*** as stated in the 2009 Notification and extracted below for convenience:-

"AND WHEREAS, the term "fly ash" means and includes all categories or groups of coal or lignite ash generated at the thermal power plant and collected by Electrostatic Precipitator (ESP) or bag filters or other similar suitable equipments; bottom ash is the ash collected separately at the bottom of the boiler; pond ash is die mixture of ESP Fly ash and bottom ash, but, for the purpose of this notification, the term "fly ash" means and includes all ash generated such as Electrostatic Precipitator (ESP) ash, dry fly ash, bottom ash, pond ash and mound ash as the objective is to utilise all the ashes;"

(vii) On 02.01.2014, the Ministry of Environment & Forests, Govt. of India issued another Notification number G.S.R. 02(E) (**"the 2014 Notification"**) amending the Environment (Protection) Rules, 1986 (**"the EP Rules, 1986"**) under the EPA 1986 in respect of ***"coal based thermal power plants"*** for use of raw or blended or beneficiated coal by such coal based thermal power plants. It is most important to note the provisions of clause 2 of the 2014 Notification which amends Rule 8 of the EP Rules, 1986 is as under:-

"Provided that in respect of a thermal power plant using Circulating Fluidised Bed Combustion or Atmosphere Fluidised Bed Combustion or Pressurized Fluidised Bed Combustion or Integrated Gasification Combined Cycle technologies or any other clean technologies as may be notified by the Central Government in the Official Gazette, the provisions of clauses (a), (b) and (c) shall not be applicable."

(viii) On 25.01.2016, the Ministry of Environment, Forests & Climate Change, Govt. of India issued another Notification number S.O. 254(E) ("the 2016 Notification") further amending the EP Rules, 1986 under the EPA 1986 in respect of "coal or lignite based thermal power plants", extending the area within which fly ash can be utilised from 100 km to 300 km. As per clause 5 of the 2016 Notification, the time period for compliance granted to the "coal or lignite based thermal power plants" for 100% utilisation of fly ash was again extended to 31 st December, 2017.

(ix) Vide Office Memorandum F. No. 22-13/2019-IA.III dated 28.08.2019 ("the 2019 Notification"), the Ministry of Environment, Forests & Climate Change, Govt. of India notified the changes in the conditions to existing Environmental Clearance for thermal power plants and coal mines in line with the 2003, 2009 and 2016 Notifications issued by the Central Government. The 'Guidelines for disposal/utilisation of flyash for reclamation of Low Lying Areas and in stowing of Abandoned mines/Quarries' annexed with the 2019 Notification clearly discuss the scope of the ash (fly ash, bottom ash and pond ash) under consideration. Para 1.0 of the said Guidelines provides as under:-

"1.0 Introduction:

Management of huge quantity of ash (fly ash, bottom ash and pond ash) generated from coal fired Thermal Power Plants (TPPs) is a serious environmental challenge. Ash generation from coal or lignite based thermal power plants, has increased from 40 Million tonne per year in 1993-94, to more than 200 Million tonne per year in 2017-18 and is projected to increase to 275 Million Tons / year by 2032.

The ash generation in coal and lignite based thermal power plants in various forms such as dry ash, bottom ash, pond ash and mound ash that are required to be managed in such a manner that it does not affect the environment. Utilisation of ash for reclamation of low lying areas and abandoned quarries is recognised as an alternate option and therefore, MoEF&CC has issued a notification to address utilisation of ash for various purposes including these two options

.....”

(x) The Central Government on 21.05.2020 vide Notification number S.O. 1561(E) (“**the 2020 Notification**”) amended the provisions of the 2014 Notification which mandated coal based thermal power plants to use raw or blended or beneficiated coal with ash content not exceeding thirty-four percent (34%), on quarterly basis in respect of “*coal based thermal power plants*”.

(xi) Recently on 03.01.2022, the Ministry of Environment, Forests & Climate Change, Govt. of India issued Notification number G.S.R. 285(E) (“**the 2022 Notification**”) on 100% fly ash utilisation by “*coal or lignite based thermal power plant (including captive and / or co-generating stations)*”. The preamble and substantive provisions of the 2021 Notification makes it clear that the ‘fly ash’ referred to under the said 2021 Notification is in respect of coal or lignite based thermal power plants. The relevant portion is extracted below for convenience:-

*“Whereas by Notification of the Government of India in the erstwhile Ministry of Environment and Forests vide S.O.763 (E), dated the 14th September, 1999, as amended from time to time, the Central Government, issued directions for restricting the excavation of top soil for manufacturing of bricks and promoting the utilisation of fly ash in the manufacturing of building materials and in construction activity within a specified radius of three hundred kilometres **from the coal or lignite based thermal power plants**;*

And whereas, to implement these Notifications more effectively based on the polluter pays principle (PPP) thereby ensuring 100 % utilisation of fly ash by the coal or lignite based thermal power plants and for the sustainability of the fly ash management system, the Central Government reviewed the existing Notifications; and whereas penalties/fines need to be introduced based on the polluter pays principle;

.....

.....

*And whereas, it is necessary to protect the environment and **prevent the dumping and disposal of fly ash discharged from coal or lignite based thermal power plants** on land;*

*And whereas, in the Notification the phrase ‘ash’, has been used, it includes both fly ash as well as bottom ash **generated from Coal or Lignite based Thermal Power Plants**;*

.....

.....

A. Responsibilities of thermal power plants to dispose fly ash and bottom ash.—

(1) Every coal or lignite based thermal power plant (including captive or co-generating stations or both) shall be primarily responsible to ensure 100 per cent utilisation of ash (fly ash, and bottom ash) generated by it in an eco-friendly manner as given in sub-paragraph (2);

(2) The ash generated from coal or lignite based thermal power plants shall be utilised only for the following eco-friendly purposes, namely:-

.....
.....

(4) Every coal or lignite based thermal power plant shall be responsible to utilise 100 per cent ash

.....
.....

(7) Every coal or lignite based thermal power plant shall ensure.....

(8) Every coal or lignite based thermal power plant shall install dedicated silos.....

(9) Every coal or lignite based thermal power plant (including captive or co-generating stations or both) shall provide real time data on.....

.....
.....

C. Environmental compensation for non-compliance.—

(1) In the first two years of a three years cycle, if the coal or lignite based thermal power plant (including captive or co-generating stations or both) has not achieved at least 80 per cent ash (fly ash and bottom ash) utilisation, then such non-compliant thermal power plants shall be imposed with an environmental compensation of Rs. 1000 per ton on unutilised ash during the end of financial year based on the annual reports submitted and if it is unable to utilise 100 per cent of ash in the third year of the three years cycle, it shall be liable to pay an environmental compensation of Rs. 1000 per ton on the unutilised quantity on which environmental compensation has not been imposed earlier:

.....
....."

(xii) A complete reading of the provisions of the 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications issued by the Central Government from time to time makes it unequivocally clear that the "fly ash" as referred to in the various Notifications of the Central Government, means and includes all categories or groups of coal or lignite ash generated at the thermal power plants (including captive and / or co-generating stations). The several measures adopted by the Central Government under the various Notifications such as prevention of dumping and disposal of fly ash discharged from coal or lignite based thermal power plants on land, utilisation of 100% fly ash, use of raw or blended or beneficiated coal, changes

in the conditions to existing Environmental Clearance etc., are squarely in the context of **coal or lignite based thermal power plants** and the fly ash discharged by such thermal power plants, which are also the stated objectives.

(xiii) The proviso to clause 2 of the 2014 Notification which amends Rule 8 of the EP Rules, 1986 admittedly provides that the thermal power plants using Circulating Fluidised Bed Combustion or Atmosphere Fluidised Bed Combustion or Pressurized Fluidised Bed Combustion or Integrated Gasification Combined Cycle technologies or any other clean technologies, shall not be governed by the notification. The 2021 Notification also makes it crystal clear that it is the coal or lignite based thermal power plants (including captive or co-generating stations or both) that are responsible for 100% ash utilisation and its disposal. The '*Environmental Compensation for Non-Compliance*' under the 2021 Notification also provides for compensation payable by "*coal or lignite based thermal power plant (including captive or co-generating stations or both)*" if such coal or lignite based thermal power plant (including captive or co-generating stations or both) has not achieved at least 80 per cent ash (fly ash and bottom ash) utilisation.

2. **Mahavir Energy & Coal Benefication Limited is not a coal or lignite based thermal power plant and the Notifications issued by the MoEF&CC, Govt. of India, as amended from time to time, are inapplicable in its case:**

(i) It is respectfully submitted that Mahavir Energy & Coal Benefication Limited ("**MECBL / Affected Party**") has installed a 12 MW Biomass Power Plant based on agro-residue in Village – Bhengari, P.O. Navapara Tenda, Tehsil – Gharghora, District Raigarh, Chhattisgarh. The Biomass Power Plant of MECBL was commissioned in 2009 as a "**Renewable Energy Power Plant**" which means the power plants other than the conventional power plants generating grid quality electricity from renewable energy sources. The Central Electricity Regulatory Commission ("**CERC**") which is the Central Regulator established under the Electricity Act, 2003 has defined

the term "**Renewable Energy Sources**" under its various delegated legislation as, "sources such as small hydro, wind, solar including its integration with combined cycle, biomass, bio fuel cogeneration, urban or municipal waste and other such sources as approved by the MNRE". Further, MECBL is neither a captive power plant nor a co-generation power plant.

(ii) As per Regulation 41 of the Central Electricity Regulatory Commission Terms and Conditions for Tariff determination from Renewable Energy Sources) Regulations, 2009, the use of Fossil Fuels (such as coal and lignite) has been limited in the case of Renewable Energy Power Plants to 15% of total fuel consumption on annual basis. This means, the Renewable Energy Power Plants (including MECBL) is mandated to necessarily use non-fossil fuels to the extent of 85% of total fuel consumption on annual basis. There is also in place a '*Monitoring Mechanism for the use of fossil fuel*' which reports to the competent authorities if in case the Fuel Mix norms are violated by any Renewable Energy Power Plant. Non-compliance of the Fuel Mix norms under the regulations would also invite consequences such as withdrawal of Renewable Energy Power Plant status and applicable benefits in tariff to such defaulting Renewable Energy Power Plant.

(iii) It is respectfully submitted that the MECBL has strictly complied with the Fuel Mix norms as prescribed under the extant regulations and has retained the status of Renewable Energy Power Plant since its commissioning till date without any default thereof. MECBL has been using 85% as primary biomass fuel while remaining 15% fossil fuel is used as per permitted norms.

(iv) Hence, it is abundantly clear that MECBL is not a coal or lignite based thermal power plant but a Renewable Energy Power Plant. The Notifications issued by the Central Government amended from time to time are applicable only to fly ash in the context of "*coal or lignite based thermal power plant (including captive and / or co-generating stations)*". The thermal power plants using Circulating Fluidised Bed

Combustion or Atmosphere Fluidised Bed Combustion or Pressurized Fluidised Bed Combustion or Integrated Gasification Combined Cycle technologies or any other clean technologies have been specifically excluded. MECBL uses 85% as primary biomass fuel which is clean technology and to that extent, MECBL is not covered under the provisions of the 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications issued by the Central Government from time to time. Therefore, there cannot be any question of violation on the part of MECBL of the said 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications.

(v) The fundamental principle of interpretation of statutes is that the words used in the statute have to be given their plain dictionary meaning as observed by Privy Council in '*Pakala Narayanasami v. Emperor*' AIR 1939 PC 47, that when the meaning of the words is plain, it is not the duty of Courts to busy themselves with supposed intentions. that the rule of literal interpretation has been explained by the Hon'ble Supreme Court in '*Nelson Motis Vs. Union of India*', AIR 1992 SC 1981, observing that it is well established that if the words of a statute are clear and free from any vagueness and are, therefore, reasonably susceptible to only one meaning, it must be construed by giving effect to that meaning, irrespective of consequences. In '*Ombalika Das Vs. Hulisa Shaw*' (2002) 4 SCC 539, the Hon'ble Supreme Court unequivocally declared that resort can be had to the legislative intent for the purpose of interpreting a provision of law, when the language employed by the legislature is doubtful or susceptible of meanings more than one. However, when the language is plain and explicit and does not admit of any doubtful interpretation, the Supreme Court cannot, by reference to an assumed legislative intent, expand the meaning of an expression employed by the legislature. The same view was held in '*Keshavji Ravji & Co. v. CIT*' (1990) 2 SCC 231 and also in '*Nagar Palika Nigam v. Krishi Upaj Mandi Samiti & Ors.*' (2003 (4) SCALE 197) where it was held that:-

"15. It is well settled principle in law that the Court cannot read anything into a statutory provision which is plain and unambiguous. A statute is an edict of the Legislature. The language employed in a statute is the determinative factor of legislative intent."

3. Fly ash from coal & lignite fuels vis-à-vis fly ash from biomass fuel:

(i) It is reiterated that the term "fly ash" referred to in the various Notifications issued by the Central Govt. from time to time means and includes all categories or groups of 'coal or lignite ash' generated at the thermal power plants (including captive and / or co-generating stations). It is also neither the intent of the legislature nor the object to treat fly ash from biomass fuel (which is renewable source) similarly as fly ash from coal/lignite (which is non-renewable).

(ii) In the case of MECBL, the fly ash generated as a result of power generation, to the extent of 85% is fly ash from biomass fuel while only 15% is fly ash from coal & lignite fuels. *In arguendo*, if at all this Hon'ble Tribunal is seeking to apply the various Notifications issued by the Central Govt. from time to time to the fly ash from non-coal/non-lignite based power plants (though the Notifications provide otherwise), the same could apply only to the extent of 15% fly ash from coal & lignite fuels in MECBL's case. There is no embargo under the said Notifications on MECBL regarding disposal or utilisation of fly ash from biomass fuel as on date. Therefore, to the said extent, if at all, MECBL cannot be forced to pay any compensation on the 85% fly ash from biomass fuel.

(iii) Without prejudice to the above, and even otherwise, there are several fundamental differences between fly ash from coal & lignite fuels vis-à-vis fly ash from biomass fuel. When agro-residue is burnt in power plants in controlled conditions in the presence of pollution control technologies, emissions of PM, SO₂, NO_x and CO will significantly decrease-1. Further, the quantum and weight of fly ash from biomass fuel is significantly less than the quantum and weight of fly ash from

coal & lignite fuels. Few key differences between the properties of fly ash from coal & lignite fuels vis-à-vis fly ash from biomass fuel are enumerated below:-

Composition	% in Fly Ash	% in Rice Husk Ash
Trioxidosilicate (SiO ₃)	57.65	88.32
Calcium oxide (CaO)	11.64	0.67
Aluminium oxide (Al ₂ O ₃)	15.29	0.48
Ferric oxide (Fe ₂ O ₃)	6.1	0.54
Sodium Oxide (Na ₂ O)	0.94	5.4
Magnesium Oxide (MgO)	0.37	3.53
Potassium Oxide (K ₂ O)	6.19	0.94
Sulfur Trioxide (SO ₃)	1.82	0.12

(iv) It is submitted that Chhattisgarh Renewable Energy Development Agency ("CREDA"), which is the designated State Nodal Agency in Chhattisgarh to promote renewable energy sector, has categorised the fly ash generated from biomass power plants as 'manure' which is useful for agricultural purpose. However, there are not enough studies in India on hazardous effects of fly ash from biomass fuel, unlike fly ash from coal & lignite fuels which have higher pollutants and hence its disposal and use is regulated. It is therefore humbly prayed that this Hon'ble Tribunal may be pleased to direct appropriate agencies to conduct adequate studies on the properties of fly ash generated from biomass fuel prior to treating fly ash from biomass fuel on the same war footing as fly ash from coal & lignite fuels, which would be most unfair and contrary to the available data.

(v) Hon'ble Tribunal is requested to take note of the third major recommendation made by the Oversight Committee in its Report to meet out the problem of pollution due to transportation and fly ash disposal at running pg. 63 of its Report which states that:-

"3. Fly ash is a byproduct of TTP and produced as a result of Coal/lignite Burning. Fly ash is hazardous to environment. For its disposal MoEF has from time to time issued notifications and as per notification 2009 one of the mode is stowing of mines using at least 25% of fly ash on weight to weight

basis of the total stoving material used and 25% of fly ash on volume to volume basis on the total material used for external dump of over burden and same percentage in upper benches of back filling of open cast mines, this utilization is to be done under the direction of DGMS."

Hence, the Oversight Committee itself finds that fly ash is a byproduct of the thermal power plants and produced as a result of coal/lignite burning, which is regulated as per the 2009 Notification of the Central Govt. and other applicable Notifications. As a result, there is absolutely no violation on the part of MECBL in respect of disposal or utilisation of fly ash from biomass fuel as on date.

4. Wrong calculation and imposition of alleged compensation/ penalty/ fine by Oversight Committee:

(i) MECBL has not violated the provisions of the Notifications issued by the Central Govt. which apply only to coal or lignite based thermal power plants and is not liable for any alleged compensation / penalty/ fine. Without prejudice to the above, it is respectfully submitted that if at all the Hon'ble Tribunal were pleased to hold MECBL liable, the alleged Environmental Compensation amount of Rs. 1,42,90,000/- (One crore forty two lakhs ninety thousand) imposed by the Oversight Committee is grossly arbitrary, based on incorrect assumptions and calculations and highly incommensurate.

(ii) The Oversight Committee has computed the alleged amount of Environment Compensation on the basis of formula approved by Hon'ble NGT in its Order dated 12.02.2020 in OA No.117/2014 for coal/lignite based thermal power plants for non-utilization of 100% fly ash in year 2018 (2018-19) and 2019 (2019-20) as per the Notifications issued by the Central Govt. under the EPA, 1986 and the Rules. As per the said order, the Notifications issued by the Central Govt. in respect of coal or lignite based thermal power plants and utilization of 100% ash by such thermal power plants was the issue before the Hon'ble NGT. The errant coal or lignite based thermal power plants which were in violation of the Notifications issued by the

Central Govt were imposed Environment Compensation as per formula devised and approved by the CPCB.

(iii) It is respectfully submitted that the said Order dated 12.02.2020 in O.A. No. 117/2014 and the Environment Compensation formula approved therein is inapplicable in MECBL's case since MECBL is neither a coal or lignite based thermal power plant nor has it violated the Notifications issued by the Central Govt. in respect of coal or lignite based thermal power plants and utilization of 100% ash by such thermal power plants. Hence, the alleged compensation / penalty/ fine imposed on MECBL by the Oversight Committee is liable to be set-aside.

(iv) Without prejudice, it is submitted that the Oversight Committee at pg. 11 of its Status Report has stated that MECBL generated approximately 1,39,839 MT fly ash during April 2014 to March 2021, out of which only 0.04% (56MT) has been allegedly disposed in low lying area of village Bhengari. Be that as it may, the Oversight Committee, has incorrectly assumed that the entire fly ash dumped/ stored by MECBL within its premises or at village Bhengari is coal/lignite fly ash and has completely ignored the indisputable fact that 85% of said fly ash was actually biomass fly ash which is not governed by the Notifications issued by the Central Govt.. Thus, the quantum of fly ash governed by the Notifications issued by the Central Govt. is mere 15% which is utilised by MECBL and its agents to the extent of 100% in brick-making industries.

(v) It is further submitted that the Oversight Committee has, at pg. 14 of its Status Report, assumed the Initial date of compensation as 01.01.2018 and has accordingly calculated the number of days of alleged violation as 1429 days for the period of 01.01.2018 to 30.11.2021, which is false and not based on any evidence whatsoever. The earlier Report filed by CPCB on 16.04.2021 before this Hon'ble Tribunal shows that Committee held meetings during 15th-17th March, 2021 and also conducted field visits for the first time in respect of MECBL. Hence, if at all, the Initial date for

alleged violation could only be from 17.03.2021. Moreover, MECBL's biomass power plant was in operation only for a period averaging approx. 838 days during the period of 01.01.2018 to 30.11.2021 based on the actual availability of the power plant, hence the number of days of alleged violation assumed by the Oversight Committee is incorrect. During these 838 days, MECBL was neither generating electricity nor dumping/ storing any further fly ash. Copy of actual availability of MECBL plant during the period of 01.01.2018 to 30.11.2021 is marked and annexed as **Annexure R-1**.

(vi) The Oversight Committee has failed to consider the contents of the letter dated 03.09.2019 sent by MECBL to Chhattisgarh Environment Conservation Board ("CECB") on the issue of closure of fly ash dumping site which was also shared with the Oversight Committee during its meetings. The said letter of MECBL addressed to CECB in response to CECB's inspection done on 23.08.2019 states that MECBL is closing the fly ash dumping/storing site. It was further informed that MECBL has installed two brick manufacturing plants is using the fly ash generated from MECBL and will further sell the fly ash to few nearby brick manufacturers whose details had already been furnished to CECB alongwith monthly report on 100% fly ash utilisation. However, the Oversight Committee has ignored the said letter and agreements with brick manufacturers and has simply assumed the alleged violation to continue after 23.08.2019, which is contrary to record. Copy of the letter dated 03.09.2019 sent by MECBL to CECB is marked and annexed as **Annexure R-2**.

(vii) It is submitted that the Oversight Committee did not visit inside the plant premises of MECBL as per inspection carried out on 25.08.2021 and simply visited behind the premises where the dump was. At para 5, pg. 6 of the Status Report, the Oversight Committee has admitted that:

"The committee has visited few sites of fly ash dumping where proper strengthening and compaction of fly ash has not been ensured by M/s TRN Energy Pvt Limited resulting flow of fly ash in to adjoining fields and drains



leading to River. The location of fly ash dumping exits in village Bhengari, Nawapara, Tenda and Kantagdeeh. Even on the side of State High way unscientific fly ash dump has been found, also adjoining fields have been covered under fly ash dump. The committee also visited newly constructed ash dyke near the power plant in Nawapara. Visit of Sites of Ash Disposal by M/s Mahaveer Energy & Coal Benefication has also not done....."

MECBL respectfully submits that it has one machine installed within the premises of the plant which consumes about 20 tons of ash per day. When the Oversight Committee did not enter MECBL's premises to inspect the said machine then it is unfair and arbitrary to hold MECBL liable for failure to utilise 100% ash.

5. Assurance of compliance of norms by MECBL:

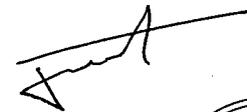
(i) MECBL vide its letter dated 26.11.2020 has written to SECL, Chhal Mines, Gharghoda to accept fly ash for disposal through OB dump and back-filling. However, no response has been received by MECBL to its request. Copy of the letter dated 26.11.2020 sent by MECBL to Chhal Mines, Gharghoda is marked and annexed as **Annexure R-3.**

(ii) MECBL has installed two brick-making manufacturing plants and is using the fly ash generated from MECBL to the extent of 100% alongwith sale to few nearby brick manufacturers whose details have already been furnished to CECB alongwith monthly report on 100% fly ash utilisation.

(iii) MECBL is a small sized biomass power plant which is renewable energy. The fly ash from renewable sources is on a different footing than fly ash from coal/lignite fuel. MECBL assures this Hon'ble Tribunal that it has always fully complied with the 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications issued by the Central Government from time to time to the extent of 15% fly ash from coal/lignite fuel. In view of the above, MECBL humbly requests the Hon'ble Tribunal to take a lenient view and exonerate MECBL.

6. Prayer:

In view of the foregoing, it is respectfully submitted that the reply/ submissions of the Affected Party MECBL be taken on record and the Hon'ble Tribunal be pleased to expunge and reject the findings/ recommendations of the Oversight Committee in respect of MECBL in view of the non-applicability of 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications issued by the Central Government from time to time which are in fact applicable only in case of "fly ash", including all categories or groups of coal or lignite ash, generated at the thermal power plants (including captive and / or co-generating stations). The Hon'ble Tribunal be pleased to further hold that MECBL is not liable to pay any compensation / penalty/ fine for alleged violation of the 1999, 2003, 2009, 2014, 2016, 2019, 2020 and 2022 Notifications issued by the Central Government.



**MAHAVIR ENERGY & COAL BENEFICATION
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**PLACE: NEW DELHI
DATE: 10.01.2022**



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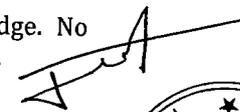
**MAHAVIR ENERGY & COAL BENEFICATION
LIMITED**

....AFFECTED PARTY

AFFIDAVIT

I, Mr. Pramod Kumar Jain, aged about 55 years, S/o Mr. Lakhmi Chand Jain, Authorized Representative of the Affected Party herein, Mahavir Energy & Coal Benefication Limited, having its registered office at Vardhman Complex, 1st Floor, Parsada, Raipur Road, Bilaspur, Chhattisgarh - 495 223, presently at New Delhi, do hereby solemnly affirm and state as under:-

1. That I am the Authorised Representative of the Company herein and an interested party / affected party and hence well conversant with the facts and circumstances of the instant case and thereby competent and authorized to affirm this affidavit.
2. That the contents of the accompanying Reply/ submissions have been drafted by my counsel upon my instructions based on the official records maintained by the Company during the ordinary course of business and the contents thereof are believed to be true and correct based on legal advice.
3. That the annexure are true copies of their respective originals.
4. That the facts stated in the aforesaid affidavit are true to my knowledge. No part of the same is false and nothing material has been concealed therefrom.

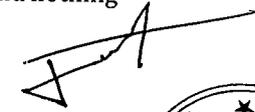

DEPONENT



VERIFICATION:

I, the above named deponent do hereby verify that the facts stated in paras 1 - 4 in the above affidavit are true to my knowledge. No part of the same is false and nothing material has been concealed there from.

Verified at Delhi on this 10 JAN day of 2022.


DEPONENT



IDENTIFIED



ATTESTED


**NOTARY PUBLIC, DELHI
GOVT. OF INDIA**

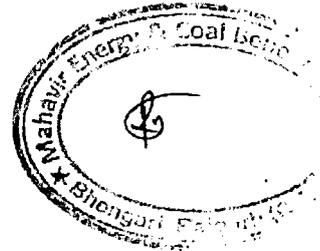
10 JAN 2022



MAHAVIR ENERGY & COAL BENEFICATION LIMITED

(ISO-9001-2008, 14001:2015, ISO 50001:2011 & OHSAS 18001:2007 Certified Company)
Works : VIII.-Bhengari, P.O.Navapara (Tenda), Teh.: Gharghoda, Distt. Raigarh (C.G.)

Month	Days	Plant Running Hrs	DAYS / Hrs
Jan-18	31	673:24:00	28 days 01 hr 24 min
Feb-18	28	623:32:00	25 DAYS 23 HRS 32 MIN
Mar-18	31	202:00:00	08 DAY 1 HRS
Apr-18	30	0:00	
May-18	31	0:00	
Jun-18	30	0:00	
Jul-18	31	0:00	
Aug-18	31	0:00	
Sep-18	30	453:47:00	18 DAYS 21 HRS 47 MIN
Oct-18	31	409:00:00	17 DAYS 01 HRS
Nov-18	30	155:19:00	6DAYS 11 HRS 19 MIN
Dec-18	31	688:48:00	28 DAYS 16 HRS 48 MIN
Jan-19	31	529:16:00	22 DAYS 1 HRS 16MIN
Feb-19	28	611:02:00	25 DAYS 11 HRS 2 MIN
Mar-19	31	631:24:00	26 DAYS 7 HRS 24 MIN
Apr-19	30	675:50:00	28 DAYS 3 HRS 50 MIN
May-19	31	580:24:00	24 DAYS 4 HRS 24 MIN
Jun-19	30	149:15:00	6 DAYS 5 HRS 15 MIN
Jul-19	31	514:15:00	21 DAYS 10 HRS 15
Aug-19	31	495:50:00	20 DAYS 15 HRS 50 MIN
Sep-19	30	356:17:00	14DAYS 20 HRS 17MIN
Oct-19	31	142:45:00	5 DAYS 22 HRS 45 MIN
Nov-19	30	0:00:00	
Dec-19	31	0:00:00	
Jan-20	31	419:12:00	17 DAYS 11 HRS 12MIN
Feb-20	29	521:54:00	21 DAYS 17 HRS 54MIN
Mar-20	31	403:10:00	16 DAYS 19HRS 10MIN
Apr-20	30	622:06:00	25 DAYS 22HRS 06MIN
May-20	31	740:45:00	30 DAYS 20 HRS 45MIN
Jun-20	30	406:43:00	16 DAYS 22 HRS 43MIN



Page - 1/2

Bilaspur Office : Vardhman Complex, 1st Floor, Parsada, Raipur Road, Bilaspur (C.G.) 495223
Email : mecbl@rediffmail.com, mecbl@yahoo.com Ph.: (07752) 252250

True Copy

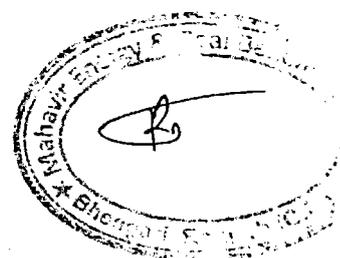


MAHAVIR ENERGY & COAL BENEFICATION LIMITED

(ISO-9001-2008, 14001:2015, ISO 50001:2011 & OHSAS 18001:2007 Certified Company)

Works : VIII.-Bhengari, P.O.Navapara (Tenda), Teh.: Gharghoda, Distt. Raigarh (C.G.)

Month	Days	Plant Running Hrs	DAYS / Hrs
Jul-20	31	432:24:00	018 DAYS 00 HRS 24MIN
Aug-20	31	430:35:00	17 DAYS 22 HRS 35 MIN
Sep-20	30	568:55:00	23 DAYS 16 HRS 55 MIN
Oct-20	31	640:20:00	26 DAYS 16 HRS 20 MIN
Nov-20	30	672:42:00	28 DAYS 00 HRS 42 MIN
Dec-20	31	670:08:00	27 DAYS 22 HRS 08 MIN
Jan-21	31	742:45:00	30 DAYS 22 HRS 45 MIN
Feb-21	28	614:13:00	25 DAYS 14 HRS 13 MIN
Mar-21	31	137:54:00	05 DAYS 17 HRS 54 MIN
Apr-21	30	406:06:00	16 DAYS 22 HRS 06 MIN
May-21	31	635:07:00	26 DAYS 11 HRS 07 MIN
Jun-21	30	654:23:00	27 DAYS 06 HRS 23 MIN
Jul-21	31	587:24:00	24 DAYS 11 HRS 24 MIN
Aug-21	31	503:37:00	20 DAYS 23 HRS 37 MIN
Sep-21	30	116:15:00	04 DAYS 20 HRS 15 MIN
Oct-21	31	578:28:00	24 DAYS 02 HR 28 MIN
Nov-21	30	713:26:00	29 DAYS 17 HR 26 MIN
	1430	20110:40:00	
Total	Plant running hrs	20110 hrs 40 min	
	Plant running Day	837 days 22 hrs 40 min	



True Copy



MAHAVIR ENERGY & COAL BENEFICATION LIMITED

(ISO - 9001:2008, 14001: 2015, ISO 50001:2011 & OHSAS 18001:2007, Certified company)

Works Vill. - Bhengari, P.O.- Navapara Tenda, Teh : Gharghoda, Distt - Raigarh (C.G.)

Ref. No. MECBL/P&A/19-20/42

O/C

03.09.2019

To,
The Regional Officer,
Chhattisgarh Environment Conservation Board
T.V. Tower Road, Raigarh - C.G.

Ref. No. Your letter no. 754/che.kar/parya.san.man./2019 dated 23.08.2019

Sub: Closing of Fly Ash dumping site - Reg.

Dear Sir,

With reference to above letter & subject matter we are here to inform you that we are closing our dumping site which was inspected by you on 23rd August, 2019 & shall be reclaimed biologically as per your stipulated time.

We have already two Bricks manufacturing Plants & we are making Bricks also in addition to that we are supplying Fly Ash to 3-4 nearby Bricks manufacturers whose detail is already given to you & a monthly report is been given to you on regular basis.

Whenever, due to any reason we are giving Fly Ash to any party or self dumping at our own site we ensure proper levelling & covering with soil simultaneously.

We ensure you that no stone shall be returned for fulfilling the compliances as given by your good office.

Thanking You,

Yours Faithfully,

For, Mahavair Energy & Coal Benefication Ltd.

R.K. Shrivastava

Executive Director - Power



H(1)

Bilaspur Office: Vardhan Complex 1st floor Parsada, Raipur Road, Bilaspur (C.G.) 495223

Email : mecbl@rediffmail.com, mecbl@yahoo.com ph (07752) 252250

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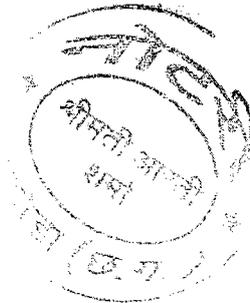
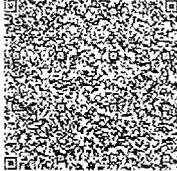


सत्यमेव जयते

INDIA NON JUDICIAL
Government of Chhattisgarh

e-Stamp

Certificate No. : IN-CG18371620312885S
 Certificate Issued Date : 04-Dec-2020 01:42 PM
 Account Reference : CSCACC (GV)/ cgcsceg07/ CG-RGNAR0703/ CG-RG
 Unique Doc. Reference : SUBIN-CGCGCSCEG0726176956165233S
 Purchased by : RAJEEV SOLANKI
 Description of Document : Article 5 Agreement or Memorandum of an agreement
 Property Description : AGREEMENT
 Consideration Price (Rs.) : 0
 (Zero)
 First Party : MAHAVEER ENERGY
 Second Party : NARESH KUMAR AGRAWAL
 Stamp Duty Paid By : MAHAVEER ENERGY
 Stamp Duty Amount(Rs.) : 50
 (Fifty only)



Attested
 Smt. Anil Sharma
 Notary
 Bharghoda, Dist - Raigarh



Please write or type below this line.....

इकरारनामा

यह इकरारनामा आज दिनांक 04/12/2020 को श्री सरोज कुमार पिता श्री प्रभाकर कुमार, उम्र 45 वर्ष, प्राधिकृत हस्ताक्षरकर्ता मेसर्स महावीर एनर्जी एंड कोल् बेनेफिकेशन लिमिटेड, ग्राम- भंगारी, तहसील- घरघोड़ा, जिला - रायगढ़ (छ.ग.) जिसे आगे "प्रथम पक्षकार" कहा गया है तथा श्री नरेश अग्रवाल (ब्रिक निर्माता) जिसे आगे "द्वितीय पक्षकार" कहा गया है के मध्य निष्पादित किया गया है।

MAHAVEER ENERGY & COAL BENEFICATION LTD.

M/s. Naresh Kumar Agrawal

Authorised Signatory

Proprietor

0008455508

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यह इकरारनामा निम्नानुसार साक्ष्यांकित करता है।

1. यह कि प्रथम पक्षकार का ग्राम भेंगारी में बायोमास आधारित 12 मेगावाट क्षमता का विद्युत् उत्पादन संयंत्र स्थापित है, जिसमे टोस अपशिष्ट के रूप में राखड़ जनित होता है।
2. यह कि द्वितीय पक्षकार को फ्लाई ऐश ईट बनाने के लिए लगभग 50 से 60 टन प्रतिदिन फ्लाई ऐश कि जरूरत है। जिसकी आपूर्ति हेतु द्वितीय पक्षकार ने प्रथम पक्षकार से निवेदन किया है और प्रथम पक्षकार ने उक्त मात्रा कि उपलब्धता के अनुसार आपूर्ति हेतु सहमति दी है।
3. यह की द्वितीय पक्षकार फ्लाई ऐश का उपयोग स्वयं के ब्रिक प्लांट में ईट निर्माण में ही करेगा तथा वह फ्लाई ऐश को इधर-उधर कहीं भी डंप नहीं करेगा जिससे पर्यावरण को नुकसान हो।

यह इकरारनामा आज दिनांक 04/12/2020 को दो गवाहों के समक्ष निष्पादित किया गया।

गवाहों के हस्ताक्षर

हस्ताक्षर (प्रथम पक्षकार)

हस्ताक्षर (द्वितीय पक्षकार)

1. 
रंजीत सिंह

MAHAVIR ENERGY & COAL BENEFICIATION LTD


Authorized Signatory

M/s. Naresh Kumar Agrawal

नेरेश
Proprietor

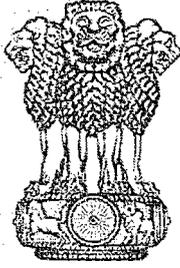
2. 
Vidma Sahu

Attested

Smt. Anu Sharma
Notary
Jharghandi, Rajnagar




True Copy



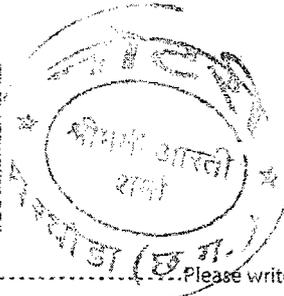
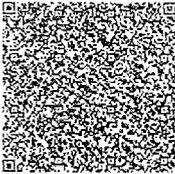
सत्यमेव जयते

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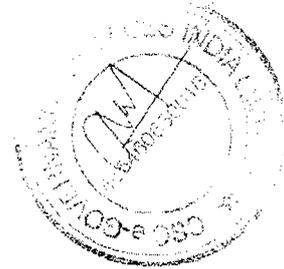
Government of Chhattisgarh

e-Stamp

Certificate No. : IN-CG18371712970230S
 Certificate Issued Date : 04-Dec-2020 01:44 PM
 Account Reference : CSCACC (GV)/ cgcsceg07/ CG-RGNAR0703/ CG-RG
 Unique Doc. Reference : SUBIN-CGCGCSCEG0726175889610531S
 Purchased by : RAJEEV SOLANKI
 Description of Document : Article 5 Agreement or Memorandum of an agreement
 Property Description : AGREEMENT
 Consideration Price (Rs.) : 0
 (Zero)
 First Party : MAHAVEER ENERGY
 Second Party : PADUM LAL PATEL
 Stamp Duty Paid By : MAHAVEER ENERGY
 Stamp Duty Amount(Rs.) : 50
 (Fifty only)



Attested
 Smt. Ardi Sharma
 Notary
 Bharghoda, Dist -Raigam



Please write or type below this line

इकरारनामा

यह इकरारनामा आज दिनांक 04/12/2020 को श्री सरोज कुमार पिता श्री प्रभाकर कुमार, उम्र 45 वर्ष, प्राधिकृत हस्ताक्षरकर्ता मेसर्स महावीर एनर्जी एंड कोल् बेनेफिकेशन लिमिटेड, ग्राम- भेंगारी, तहसील- घरघोड़ा, जिला - रायगढ़ (छ.ग.) जिसे आगे "प्रथम पक्षकार" कहा गया है तथा श्री पदुमलाल पटेल (ब्रिक निर्माता) ग्राम पानीखेत, पोस्ट देहरिदिहि, तहसील- घरघोड़ा, जिला - रायगढ़ (छ.ग.) जिसे आगे "द्वितीय पक्षकार" कहा गया है के मध्य निष्पादित किया गया है।

MAHAVEER ENERGY & CO., BENEFICIARY

Authorized Signatory

Notary

0008455507

Statutory Alert

- The authenticity of the E-Stamp certificate issued by the Government of Chhattisgarh is guaranteed by the Government of Chhattisgarh.
- The authenticity of the E-Stamp certificate issued by the Government of Chhattisgarh is guaranteed by the Government of Chhattisgarh.
- The date of purchase of the E-Stamp certificate is on the date of the purchase.
- In case of any discrepancy please inform the Competent Authority.

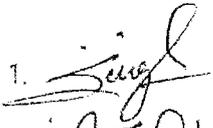
True Copy

यह इकरारनामा निम्नानुसार साक्षात्कृत करता है।

1. यह कि प्रथम पक्षकार का ग्राम भेंगारी में बायोमास आधारित 12 मेगावाट क्षमता का विद्युत् उत्पादन संयंत्र स्थापित है, जिसमें ठोस अपशिष्ट के रूप में राखड़ जनित होता है।
2. यह कि द्वितीय पक्षकार को फ्लाई ऐश ईट बनाने के लिए लगभग 20 टन प्रतिदिन फ्लाई ऐश कि जरूरत है। जिसकी आपूर्ति हेतु द्वितीय पक्षकार ने प्रथम पक्षकार से निवेदन किया है और प्रथम पक्षकार ने उक्त मात्रा कि उपलब्धता के अनुसार आपूर्ति हेतु सहमति दी है।
3. यह की द्वितीय पक्षकार फ्लाई ऐश का उपयोग स्वयं के ब्रिक प्लांट में ईट निर्माण में ही करेगा तथा वह फ्लाई ऐश को इधर-उधर कहीं भी डंप नहीं करेगा जिससे पर्यावरण को नुकसान हो।

यह इकरारनामा आज दिनांक 04/12/2020 को दो गवाहों के समक्ष निष्पादित किया गया।

गवाहों के हस्ताक्षर

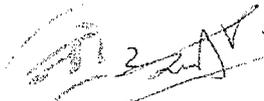
1. 
रजत सिंह

हस्ताक्षर (प्रथम पक्षकार)
LAHAVR ENERGY & COAL BENEFICIATION

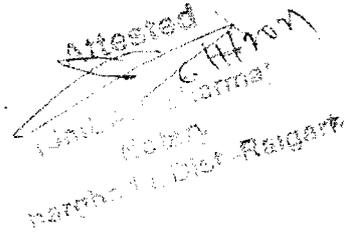

Authorised Signatory

हस्ताक्षर (द्वितीय पक्षकार)

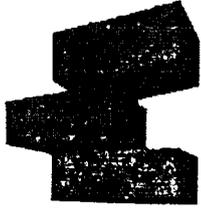



Kiran Sahu


लोहरी भारती शर्मा


G. H. Prasad
Nandan
Nandan Lal Dier Rajgare


True Copy



NARESH KUMAR AGRAWAL

Fly Ash Bricks Manufacturer

VIII. Nawapara (Tenda), Teh.-Gharghoda, Distt. - Raigarh (C.G.)

Ref No

Date. 02/04/2020

श्रीमान प्रबन्धक महोदय,
महावीर एनार्श एंड कोल्ड डेजिकेराग लिमि.
नकापारा रोड, जाम भेगादी.

विषय :- ईंट बनाने हेतु फ्लाई एश व
शल्क का आवश्यकता।

श्रीमान,

निवेदन है कि मुझे ईंट बनाने के लिए
प्रतिदिन 50 से 60 टन शल्क और
(फ्लाई एश) की आवश्यकता है।

अतः कृपयाक कृपया निवेदन है कि
मुझे प्रतिदिन 50 से 60 टन शल्क (फ्लाई एश)
उपलब्ध कराया जाय।

धन्यवाद,

Naresht Kumar Agrawal (HUF)

नरेश
Karta

True copy

कार्यालय ADV FLY ASH BRICKS

ग्राम - भेंडा पोस्ट- बैहामुडा तहसील- घरघोड़ा जिला- रायगढ़ (छ.ग.)

Email:- advflyashbricks@gmail.com Contact 9171276128

प्रति,

महाप्रबंधक

महावीर एनर्जी एण्ड कोल बेनिफिकेशन -नवापारा टेंडा

तहसील- घरघोड़ा जिला- रायगढ़ (छ.ग.)

विषय- ADV FLY ASH BRICKS BHENDRA हेतु Bad मटेरियल प्लाई ऐश उपलब्ध कराने /अनुमति के संबंध में।

उपरोक्त विषयांतर्गत लेख है ग्राम भेंडा पोस्ट बैहामुडा तहसील घरघोड़ा जिला रायगढ़ (छ.ग.) में प्लाई ऐश ब्रिक्स प्लांट - 'ADV FLY ASH BRICKS' नाम से पंजीकृत कर वर्तमान संचालित है। प्लाई ऐश ब्रिक्स निर्माण हेतु आपके औद्योगिक संस्थान से Bad मटेरियल प्लाई ऐश की आवश्यकता है।

अतः आपसे निवेदन है कि 'ADV FLY ASH BRICKS' हेतु प्लाई ऐश ब्रिक्स निर्माण के लिए Bad मटेरियल प्लाई ऐश सप्लाई / उपलब्ध कराने / अनुमति प्रदान करने / की कृपा करेंगे। 'ADV FLY ASH BRICKS' की ओर से आपकी निवेदन पत्र सादर प्रस्तुत है।

संलग्न- 1. Unit Registration Documents Copy.

2. Registration- District Trade & Industries Center , Raigarh, Chhattisgarh Copy.

3. No Objection Certificate – Gram Panchyat Bhendra Copy.

दिनांक 07/05/2020


प्रबंधक

ADV FLY ASH BRICKS- BHENDRA

P.O.- BAIHAMUDA

TAHSHIL-GHARGHODA

DIST-RAIGARH (C.G.)


True Copy

जिला- रायगढ़ (छ.ग.)

अनापत्ति प्रमाण पत्र

प्रमाणित किया जाता है कि कु विनीता एक्का पिता श्री निकोलस एक्का ग्राम - बसाडीह पोस्ट - सरईपानी तहसील बगीचा जिला- जशपुर (छ.ग.) निवासी के द्वारा ग्राम पंचायत भेंड़ा के अन्तर्गत ग्राम भेंड़ा पोस्ट बैहामुड़ा तहसील घरघोड़ा जिला रायगढ़ (छ.ग.) में श्रीमती अभयदीपा एक्का पति विनोद एक्का ग्राम कसैया घरघोड़ा तहसील घरघोड़ा जिला रायगढ़ (छ.ग.) निवासी के स्वामित्व भूखंड खसरा क्रमांक 163/1 रकबा 0.4300 में फलाई ऐश ब्रिक्स इकाई स्थापित व बिजली कनेक्शन प्राप्त करने हेतु आवेदन प्रस्तुत किया गया है। भूस्वामी से फलाई ऐश ब्रिक्स इकाई स्थापना के संबंध में सहमति प्राप्त कर चुकी है।

प्रस्तावित फलाई ऐश ब्रिक्स इकाई ADV FLY ASH BRICKS- BHENDRA, POST- BAIHAMUDA, TAHSIL- GHARGHODA DIST- RAIGARH (C.G.) को उक्त भूखंड में उद्योग स्थापना, उत्पादन व बिजली कनेक्शन प्राप्त करने हेतु किसी तरह की कोई आपत्ति नहीं है। अतः आवेदिका को आवेदित ADV FLY ASH BRICKS स्थापना, उत्पादन व बिजली कनेक्शन हेतु ग्राम पंचायत भेंड़ा तहसील घरघोड़ा जिला- रायगढ़ (छ.ग.) अनुमति प्रदान की जाती है।

दिनांक 18.11.19

सुवर्णा राय
समस्त

ग्राम पंचायत- घरघोड़ा
जिला- रायगढ़ (छ.ग.)

True Copy

नर्मदा फलाई एश ब्रिक्स

छाल - धरमजयगढ़ बाईपास रोड - घरघोड़ा, जिला - रायगढ़ (छ.ग.)

मो.: 9907112600, 7000967665

क्रमांक ...

दिनांक 14.10.2020

प्रति,

श्रीमान महाप्रबंधक

महावीर एनर्जी

भेंगारी, घरघोड़ा

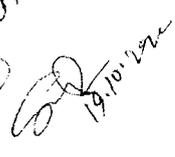
विषय :- फलाईएश एवं बेड मटेरियर के संबंध में ।

महोदय,

निवेदन है कि मेरी फर्म नर्मदा फलाई एश ब्रिक्स, छाल रोड घरघोड़ा, जिला रायगढ़ (छ.ग.) में फलाई एश एवं बेड मटेरियल से ईटा बनाने का कार्य किया जाता है जिसमें हर सप्ताह लगभग 03 ट्रीप फलाई एश एवं 02 ट्रीप बेड मटेरियल की आवश्यकता होती है

अतः श्रीमान जी से निवेदन है की आपकी कंपनी से फलाई एश एवं बेड मटेरियल प्रदान करने की कृपा करें ।

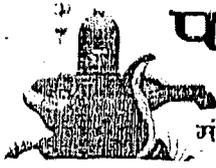



 Pl. provide Ash/Bed mixture
 as 4:1 Ratio Basis. as attached

 14.10.2020



भवदीय
 जगदीश अग्रवाल
 घरघोड़ा


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पटेल फलाई एश ट्रस्ट

मंदिर के पास

छाल

सुखनाथ पटेल

TIN. NO. 224030332

गो. नं. 9009045784

क्रमांक 5/1015

दिनांक 10/11/01

आचार्य पटेल फलाई एश ट्रस्ट के अध्यक्ष सुखनाथ पटेल जी के द्वारा
 अपने कोष से 10000 रुपये का चेक नं. 1015 दिनांक 10/11/01 को
 बैंक खाते में जमा कराया गया है। इसका प्रमाण बैंक स्टाम्प से
 यह प्रमाण पत्र जारी किया जाता है।



Ⓢ
 True Copy



MAHAVIR ENERGY & COAL BENEFICATION LIMITED

ANNEXURE R-3

(ISO - 9001:2008, 14001: 2015. ISO 50001:2011 & OHSAS 18001:2007, Certified company)

Works VIII. - Bhengari, P.O.- Navapara Tenda, Teh : Gharghoda, Distt - Raigarh (C.G.)

MECBL/HR/2020-21/ 34

e/c-

दिनांक : 26.11.2020

प्रति,

क्षेत्रीय प्रबंधक

दयाल माइंस

घरघोड़ा

विषय : Abundant Mines की जानकारी हेतु

महोदय ,

हमारा प्लांट महावीर एनर्जी एवं कोल बेनीफिकेशन लिमिटेड जो कि ग्राम भेंगारी, पोस्ट नवापारा टेंडा, तहसील घरघोड़ा जिला रायगढ़ में स्थापित है।

दिनांक 07/09/2020 को माननीय कलेक्टर के निर्देशानुसार जिले में पॉवर प्लांट से जनित फ्लायैश का निचले क्षेत्रों में भूमि भराव के कार्य को प्रतिबंधित किया गया है (आदेश की प्रति इस पत्र के साथ संलग्न है) अतः हमें फ्लायैश डंप करने हेतु abundant माइंस की आवश्यकता है।

अतः आपसे निवेदन है की फ्लायैश डंप करने हेतु महावीर एनर्जी एवं कोल बेनीफिकेशन लिमिटेड के आसपास के क्षेत्रों में abundant माइंस की जानकारी उपलब्ध कराई जाये जिससे की हम फ्लायैश डंप कर सके और हमारा प्लांट सुचारू रूप से चलता रहे।

महावीर एनर्जी एवं कोल बेनीफिकेशन लिमिटेड

अधिकृत हस्ताक्षर