

ENVIRONMENTAL JUSTICE FORUM

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To,

The Chairman

State Environment Impact Assessment Authority (SEIAA), Andhra Pradesh
3rd Floor, AP MARKFED Building, APIIC Colony Road, Auto Nagar
Vijayawada – 520007

Sub: Environmental Clearances to (i) M/s Vizag Mega Data Center Park Ltd., Tarluvada (EC dt. 18.04.2026; File No. AP INFRA2 EC VSP 04 2026 2517) and (ii) M/s Vizag Rambilli Data Center Park Ltd., Rambilli (Anakapalli) - fundamental failures of science, ethics, and public responsibility - request for review and suspension pending fresh appraisal.

Respected Sir / Madam,

We, from the **Environmental Justice Forum** are a community of engineers, scientists, academics and environmentalists committed to the public-interest application of scientific and environmental knowledge for facilitating environmental justice to the common people. We write to you with respect for the constitutional function of the SEIAA, and with the precision that our discipline obliges. Our examination of the two Environmental Clearances cited above, the supporting Environmental Management Plans (EMPs) prepared by the same consultant, and the SEAC minutes of 10.04.2026, leads us to a single, unavoidable scientific conclusion: the appraisals on which these clearances rest are not adequate to the facilities they purport to govern. We place our submission below.

I. THE FAILURE OF SCIENCE

A data centre is, in physics, a heat-generation machine. Every kilowatt of electricity that enters the facility leaves it as heat. The Tarluvada park (1,000 MW IT load) and the Rambilli park (697 MW IT load) together represent a continuous thermal release of approximately 1,700 MW, comparable in magnitude to a medium thermal power station. The first engineering question for any appraisal of such facilities is: how is this heat removed?

We have searched both Environmental Clearance orders for the word “**cooling.**” It does not appear. Neither EC nor the SEAC minutes specifies, requires, caps, or even

names the cooling architecture of these projects. **A 1,700 MW combined thermal facility has been cleared without the regulator stating how the heat will be managed.**

The water budgets confirm this gap. Tarluvada declares 267 KLD; Rambilli declares 234 KLD. The largest single item in both is gardening (172 KLD and 140 KLD). **Neither budget contains a line item for server cooling, chiller make-up water, cooling-tower blowdown, or humidification.** The IEA benchmark for a 100 MW hyperscale data centre is approximately 2,000 KLD per day; the industry-average Water Usage Effectiveness of 1.8 L/kWh implies an actual cooling-water demand of order 30,000 KLD (Tarluvada) and 21,000 KLD (Rambilli) at full IT load on conventional cooling. The declared figures are 0.6%–1.5% of these benchmarks. Either the design is fully air-cooled, in which case it must be written into the EC as a binding condition, or the budget is a misrepresentation. The Authority has pursued neither possibility.

II. THERMAL POLLUTION - A DOCUMENTED CONCERN, COMPLETELY ABSENT

Waste heat does not stay inside the fence. Recent international research (Marinoni et al., arXiv:2603.20897, 2026), based on twenty years of NASA MODIS land-surface-temperature data covering 6,000+ hyperscale data centres, finds that land surface temperatures rise by 2°C on average, and by up to 9°C in extreme cases, after a hyperscale facility begins operations, with the warming signal extending up to 10 km from the site. Documented regional examples include Bajío (Mexico), Aragón (Spain), and northeastern Brazil. The methodology of this paper remains the subject of legitimate scientific debate; the magnitude is not settled. The phenomenon, however, is real and under active inquiry.

Neither EC, nor EMP, and neither set of minutes contains the word **“thermal.”** There is no microclimate assessment, no land-surface-temperature baseline, no waste-heat dissipation calculation, and no thermographic monitoring requirement. For Tarluvada (1.53 km from Kambalakonda Wildlife Sanctuary, a leopard and pangolin habitat dependent on a cool, moist forest microclimate) and for Rambilli (1.3–2.0 km from four Reserve and Protected Forests), this is a regulatory void with direct ecological consequences.

III. AIR POLLUTION FROM 359 DIESEL GENERATORS - NEGLECTED

The two clearances together permit **359 diesel generator sets totalling approximately 971.5 MW** (Tarluvada: $200 \times 2.75 \text{ MW} + 5 \times 1 \text{ MW} = 555 \text{ MW}$; Rambilli: $150 \times 2.75 \text{ MW} + 4 \times 1 \text{ MW} = 416.5 \text{ MW}$), a combined installed capacity comparable to a medium thermal power station. International peer-reviewed research has established that diesel generators emit between 200 and 600 times more nitrogen oxides per kWh than natural gas; a 2024 Caltech / UC Riverside study estimated 600,000 asthma-related cases attributable to data-centre emissions in the US alone.

Against this, the appraisals require:

- No quantitative dispersion modelling (AERMOD, CALPUFF, or equivalent) at any sensitive receptor.
- No Best Available Control Technology, no SCR, no DPF, no DOC, though Tier 4-equivalent BACT is presumptive in Virginia (USA) for data-centre generators from July 2026.
- No Continuous Emissions Monitoring System on any of the 359 stacks.
- No monthly or annual run-hour cap.
- No health-risk assessment for diesel particulate at the nearest school or PHC.

The entire treatment of operational air emissions in the EMPs is a single table of stack heights. **That is the appraisal of 971.5 MW of stationary diesel combustion in the public record.** The baseline ambient air-quality monitoring is a single station in each case; CPCB EIA protocol requires eight stations and ninety days of seasonal data. Tarluvada's reported PM₁₀ of $70 \mu\text{g}/\text{m}^3$ is already 70% of the NAAQS; the cumulative loading from 555 MW of diesel has not been added to it.

IV. THE FAILURE OF SCIENTIFIC ETHICS

Scientific ethics requires that documents submitted to a regulator are project-specific, that statements of fact are factually verified, and that internal contradictions are resolved. We must record:

1. The Tarluvada EMP, on page 52, refers to the project as "*the shopping mall*," and describes data-centre wastewater as containing "*food matter*." The document is a recycled template, identical to the content in EIA for AMBI Mall, Vasant Kunj (Page 158).
2. The Rambilli EMP declares "*Any ecologically sensitive areas within 10 km radius - Nil*" on the same pages where it lists Kalavalapalli RF (1.98 km), Rambilli RF

(1.3 km), Sitapalem PF (1.9 km), and Rambilli PF (1.6 km). Both statements cannot be true.

3. The two EMPs share identical engineering parameters that no two independent assessments could share: diesel storage of $14 \times 90 \text{ KL} = 1,260 \text{ KL}$ exactly, fuel rate of 110 KL/hour exactly, equipment cleaning of 60 KLD exactly, and a verbatim wildlife dismissal sentence. Both built-up areas have been pinned within 1% of the 1,50,000 sqm Schedule 8(a) ceiling, the operational signature of fitting the project to the regulatory door.
4. The Tarluvada EMP records STP capacity as " $3 \times 15 \text{ KLD}$ " on page 13 and " $3 \times 35 \text{ KLD}$ " on page 27, and gives three different distances (1.0, 1.53, 1.7 km) for the same wildlife sanctuary. Water-balance subtotals do not arithmetically add to declared totals.
5. The SEAC minutes of 10.04.2026 record at point (I) that the committee *"appraised the application from the Environmental point of view only with respect to liquid, solid and air pollution management."* For a 1,000 MW industrial facility with 90% of its land within a Reserve Forest, this self-narrowing is disclosed but not justified.

We do not raise these points to embarrass any institution. We raise them because they are the grounds on which any scientific peer would refuse to certify these documents as fit for the regulatory purpose. The Authority cannot be held responsible for falsehoods it did not generate; only for failing to detect them.

V. ENVIRONMENTAL JUSTICE AND PUBLIC RESPONSIBILITY

The process has failed the residents of Tarluvada and Rambilli in 3 concrete ways.

First, they were never asked: Schedule 8(a) Category B2 exempts both projects from a Public Hearing.

Second, the protection extended is below comparable international standards: the EU EIA Directive would require full EIA and a 30-day public consultation; German law would require EIA on the diesel capacity alone; Virginia (USA) would require Tier 4-equivalent BACT on every generator; Habitats-Directive equivalents would require formal, appropriate assessment for projects so close to protected forests.

Third, the scale is generational: ₹26,400 crore declared at Tarluvada; the Rambilli proponent registered at the Adani Group corporate headquarters in Ahmedabad; combined grid demand of 1,626 MW; 359 diesel engines; and a clearance issued in nine days from the date of application. The right

to a clean environment, recognised by the Supreme Court of India under Article 21, does not weaken because the regulator chose a convenient Schedule entry.

VI. REQUEST FOR REVIEW

We respectfully request that the Authority be pleased to:

1. Suspend, with immediate effect, both Environmental Clearances pending fresh appraisal.
2. Direct fresh, project-specific Environmental Impact Assessments by accredited consultants other than M/s Pridhvi Envirotech (P) Limited, covering:
 - (a) cooling architecture with a binding Water Usage Effectiveness target and absolute water-draw cap;
 - (b) quantitative dispersion modelling of the entire DG fleet;
 - (c) Best Available Control Technology determination with Tier 4-equivalent SCR + DPF + DOC as the presumptive standard;
 - (d) thermal pollution and microclimate assessment;
 - (e) National Board for Wildlife referral;
 - (f) PESO compliance verification under the Petroleum Rules, 2002 for the combined 2,520 KL of HSD storage;
 - (g) MSIHC Rules, 1989 hazardous-chemicals notification; *and*
 - (h) Ministry of Defence consultation for the Rambilli project, given its proximity to Project Varsha.
3. Convene statutory Public Hearings at Tarluvada and Rambilli villages, in Telugu, with adequate notice, irrespective of the Schedule under which the projects are finally classified.
4. Refer to MoEFCC the question whether hyperscale data centres should continue to be classified under Schedule 8(a) "Building / Construction," and whether a dedicated Schedule entry, with thresholds, mandatory public hearing, BACT mandates, and water-usage caps, is now an urgent regulatory necessity.
5. Place in the public domain the full proposal files, attendance records, written submissions, deliberations, and dissent (if any) of the SEAC and SEIAA on these two projects.

Sir, we wrote to you because the Authority you chair occupies a unique constitutional position: it is the last institutional safeguard between an industrial proposal and the community that will live with its consequences. When that

safeguard accepts an EMP that calls a 1,000 MW data centre a “shopping mall,” when it issues a clearance for a 1,700 MW thermal facility without the word “cooling,” and when it permits 359 diesel engines on the strength of a stack-height table, the safeguard has, with respect, not been engaged. The **Environmental Justice Forum** stands ready to assist the Authority with technical materials, peer-reviewed references, and on-the-record submissions in any manner the Authority finds useful.

With kind regards,

Environmental Justice Forum (EJF) under LEAD Foundation, Hyderabad

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Copy to:

- The Secretary, MoEFCC, Government of India
- The Member Secretary, Central Pollution Control Board
- The Special Chief Secretary, EFS&T, Government of Andhra Pradesh
- The Member Secretary, Andhra Pradesh Pollution Control Board
- Expert Members of SEAC
- The District Collectors, Visakhapatnam and Anakapalli
- The Chairman, National Board for Wildlife, MoEFCC
- The Registrar, NGT Southern Zone Bench, Chennai
- The Chief Controller of Explosives, PESO, Nagpur