

**BEFORE THE HONOURABLE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI.**

**O.A. No. 13 of 2021**

**IN THE MATTER OF:**

Tribunal on its own motion Suo Motu  
based on the News Item in Deccan Chronicle English Newspaper,  
Dt. 10.12.2020, "Kurnool shocked by quality of KMC Water

..Applicants

Versus

1. Union of India  
Rep. by its Secretary,  
Ministry of Environment, Forest & Climate Change,  
Indira Paryavaran Bhavan,  
Jorbagh, New Delhi-110 003,  
Mail: [secy-moef@nic.in](mailto:secy-moef@nic.in)  
Phone: 011 – 24695262.

..... Respondents

**ADDITIONAL COUNTER AFFIDAVIT FILED BY 16<sup>TH</sup> RESPONDENT**

Date- 17-12-2021



**M/S MADHURI DONTI REDDY  
ADVOCATE**

**STANDING COUNCIL FOR GOVERNMENT OF  
ANDHRA PRADESH**

**A.P. POLLUTION CONTROL BOARD  
T.T.D. SUPREME COURT OF INDIA**

#S2, Royal Castle, 26, Gill Nagar Extension, Choolaimedu,  
Chennai – 600 094. Mobile: 98407 98460 / 6383121322

**COUNSEL FOR R2 to R10, R12 to R22**

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI  
Original Application No. 13 of 2021 (SZ)

IN THE MATTER OF

Tribunal on its own motion-SUO MOTU Based on the  
News item in Deccan Chronicle English Newspaper, Dated  
10.12.2020, "Kurnool shocked by quality of KMC water."

...Applicant

Versus

The District Collector,  
Kurnool District.

...Respondent(s)

**Counter affidavit filed by 16<sup>th</sup> Respondent in compliance to Hon'ble NGT (SZ)  
order dated 26.10.2021 in O.A. No. 13 of 2021**

1. I P. Koteswara Rao, S/o Prabhakara Rao, aged 56 years working as District Collector, Kurnool District do here by solemnly affirm and sincerely state on oath as follows.
  2. I am working as District Collector, Kurnool District, and I am the 16<sup>th</sup> respondent in original OA, as such I am well acquainted with the facts of the case.
  3. I submit that, The matters are pertaining to the news item in Deccan Chronicle English newspaper, dated: 10.12.2020 on the incident of "Kurnool shocked by quality of KMC water". The District Collector Kurnool earlier filed action taken reports on 26.02.2021 in O.A. No.13 of 2021.
  4. I submit that, the Hon'ble National Green Tribunal in its order dt. 26.10.2021 directed the District Collector, Kurnool Municipal Authority, Kurnool and the A.P. Pollution Control Board, Kurnool to come with temporary methods which they have taken for the purpose of avoiding discharge of untreated sewage water into the Tungabhadra River and also directed to file the respective reports to the Tribunal by e-filing. The Pollution control board is filing their affidavit before the Hon'ble Tribunal by the Competent Authority.
  5. I submit that, In compliance to the above order the further report is here under filed before the Hon'ble National Green Tribunal.
- a) The following Temporary methods are taken to avoid discharge of untreated sewage water into the Tungabhadra River are taken by Kurnool Municipal Corporation.
1. It is submitted that, 14 numbers of outfall Drains are identified which are being let into Tungabhadra river and Kurnool Municipal Corporation is having

  
Attestor  
District Panchayat Officer  
Kurnool

  
Deponent  
DIST. COLLECTOR  
KURNOOL.(A.P.)

2 no's of Sewage and Kurnool Municipal Corporation is having 2 no's of Sewage Treatment plants (STP) on Tungabhadra river bank and 1 No of STP on Hundri bank to treat the Sewage before leading to the river and also currently 5 outfall drains are intercepted and diverted to the existing STP's for Treatment.

2. It is submitted that, Kurnool municipal corporation has Provided Screeners at 5 outfall drains leading to river Tungabhadra, to arrest the floating material and organic matter.
3. It is submitted that, about 45,200 households are contributing to waste water and leading to Tungabhadra river and 4400 households are provided with 6No's of community toilets in the city, which are having septic tanks. The septage from the septic tanks with a frequency of desludging of about 3 years once is proposed to be tied up with existing STP's. This will be operational in 6 Months.
4. It is submitted that, the domestic Sewage from kitchens, Bathrooms are contributing to the waste water which is being let in to the river Thungabhadra through open drains. The characteristics of raw sewage is tested and the BOD and COD are slightly higher than the permissible standards, for which the STP's are constructed and more number of STP's are also sanctioned. Further 2 plants(10 MLD +2 MLD) aggregating to 12 MLD are under construction with SBR technology under AMRUT Phase II and also Co treatment for Faecal Sludge is sanctioned in both the STP's. During the monsoon period and KC canal running period due to leakages the sullage is diluted and also due to flow in the river, the sewage water is getting further diluted and meeting the standards.
5. It is submitted that, Kurnool Municipal Corporation has renovated and restored 6 No's of Community Toilets along river Tungabhadra to avoid open defecation and thereby preventing the pollution of river Tungabhadra.
6. It is submitted that, the Kurnool Municipal Corporation has issued instructions to the Hotels/ restaurants/ Hospitals/ Establishments etc., located on peripheral area of river Tungabhadra not to dispose/ discharge untreated Sewage and dumping of Solid Waste / Organic matter into nearby public drains or rivers and to handover to the municipal garbage collection vehicles. The mini STPs are insisted for the residential colonies thereby preventing further pollution of river water.

  
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7. It is submitted that, the Kurnool Municipal Corporation has conducted several awareness programs through sanitation and Environment staff of this department and also campaigns were conducted duly involving the public representatives regarding Solid Waste and Liquid Waste Management.
8. The following temporary measures taken to avoid discharge of untreated sewage water into the Tungabhadra River by concerned authorities at Mantralayam.
  1. The Gram Panchayat has laid an underground drainage pipe line to divert the sewage water which is being flowing towards Thungabhadra river and connected the same to an alternate canal by name "Nallakaluva" which is in no way connected to Thungabhadra river and taking away the drainage water to a different outlet.
  2. The other major source which is generating the sewage water at Mantralayam "Sri. Raghavendra Swamiji mutt" also diverted the flow of filthy sewage water to alternate outlet i.e Nallakaluva there by prevented the mixing of sewage water in to Thungabhadra River.
  3. The Gram Panchayat authorities have cleaned the entire one and half kilometer river bank by positioning the JCB's and lifted the waste garbage to prevent pollution of river water avoiding mixing of degenerated compost extracted with waste garbage.

C) It is submitted that, since there is no contamination of Thungabhadra River Water at Agasanur Village of Kosigi Mandal. The incident of "10 persons fall ill after drinking contaminated water in Kosigi" happened only due to consumption of raw river water and later there was no such incidence noted.

6. It is submitted that, this further report is submitted to the Hon'ble NGT in due compliance of the directions issued by this Hon'ble Tribunal. The District Collector will abide by all such directions as this Hon'ble Tribunal may deem fit and appropriate.

Solemnly and sincerely affirmed

On this Wednesday 15<sup>th</sup> day of December, 2021

and signed in my presence

  
DEPONENT  
DIST. COLLECTOR  
KURNOOL.(A.P.)

//before me//

  
Attestor  
District Panchayat Officer  
Kurnool.