



591

BEFORE THE NATIONAL GREEN TRIBUNAL,
EASTERN ZONE BENCH, KOKATA.

Original Application No.49 of 2024/EZ

IN THE MATTER OF:

Ankur Sharma

-VS -

.....Applicant

The State of West Bengal & Ors

.....Respondent

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PAUSHALI BANERJEE

ADVOCATE

7A, KIRON SHANKAR ROY ROAD,

KOLKATA-700001



SL. NO. 39 DT 29.08.2024 - X -

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**AFFIDAVIT OF COMPLIANCE ON BEHALF OF KOLKATA METROPOLITAN
DEVELOPMENT AUTHORITY.**

I, Tapabrata Bhowmick, son of Late Harilal Bhowmick, aged about 47 years, by occupation service, work for gain as Superintending Engineer, Housing Sector, Kolkata Metropolitan Development Authority, having office at Unnayan Bhavan, Block-A, Sector- II, Salt Lake City, Kolkata- 700-091, do hereby solemnly affirm and state as under:-

1. That I am the Superintending Engineer, Housing Sector, Kolkata Metropolitan Development Authority. I am well acquainted with the facts and circumstances of the case and I have been duly authorized to affirm this affidavit on behalf of the Kolkata Metropolitan Development Authority.



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2. I have been advised to traverse and/or deal with only those allegations made in the Original Application which are relevant for determination of the issues involved in the instant application and the rest of the allegations made therein will be deemed to have been denied by me in seriatim
3. Save what are matters of record, all the allegations made in paragraphs 1, 2, 3, 4, 5,6,7,8,9,10 & 11 of the said affidavit are denied and the Applicant is put to strict proof thereof.
4. With regard to paragraph 12 I submit that steps have been taken by the Respondent no.7 under several schemes for Kolkata Leather Complex and these schemes are partly funded by the State Government. The Steps taken by the answering respondent are as follows:

(a) Four new modules of Central Effluent Treatment Plant from 5 to 8 have already been constructed within Calcutta Leather Complex and pre-existing old modules from 1 to 4 have been rejuvenated to cater the raw tannery sewage load from the tannery unit situated within CLC up to an extent of approximately 40 MLD per day. Modules 5 to 8 are under operation and maintenance by the DBOT (Design Build Operate Transfer) contractor and functioning properly and modules 1 to 4 will be operable very soon on getting enhanced power connection from the WBSEDCL. Overall EC for the increased hyde production of KLC industry has been obtained (from 1000 MT per day to 1400 MT per day) and CTO for the new modules of Central Effluent Treatment Plant has already been obtained from

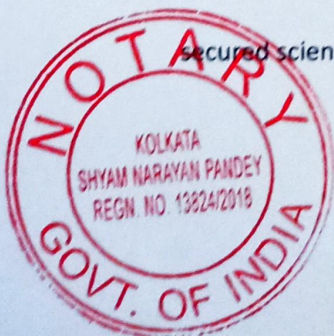


WBPCB. The main role and function of these eight numbers of CETP Modules are to treat raw tannery sewage coming from the individual tannery units (old & new) located within CLC, Bantala and to treat them through standard methodology to reduce the effluent standard of parameters of treated effluent before discharging it to the specified discharge point/outlet point of the Basanti Canal.

(b) One 0.8 MLD STP has been constructed by KMDA within ILPA Zone of CLC, Bantala to treat the domestic nature of sewage generated from office buildings, situated within that zone, Commissioning and trial run is already completed of that STP and operation and maintenance has already been started from June 2024. CTO is already obtained from the WBPCB against that STP. Treated sewage will be discharged at the specified point of Basanti Canal through underground HDPE pipes.

(c) An initiative has been taken by KMDA under the instruction of MSME&T Deptt, GoWB to lower down the TDS level of treated sewage before discharging it to Basanti Canal to maintain the quality of water in the said canal by means of installing RO machines at different locations of CLC, Bantala to carry the effluent through them. Initiative has already been taken to select one competent consultant through e-Tender process for finalizing the methodology for RO installation and related Salt management.

(d) Two solid waste management facilities have been developed in form of secured scientific land fill (SSLF) within CLC at Andulgori Mouza to cater/deposit

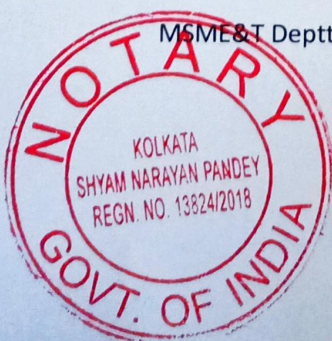


sludge generated from CETP Modules for an approximate increased hyde production activity @ 1400 MT. day

(e) Proposal has already been sent to the project proponent of CLC that is MSME&T Deptt. GoWB regarding construction of RCC Box drains along with sustainable development of greeneries in place of existing three nos. of storm water canals within CLC to efficiently carry out and dispose the surface run off of storm from the adjacent catchment area and also to eliminate any possibility of unwanted discharge of raw tannery sewage into those canals causing environmental pollution and emission of obnoxious odour throughout the entire campus. The proposal is under consideration of the MSME&T Dept. Government of West Bengal.

(f) KMDA has also taken up the project of installation of ETS & EPS and rejuvenation of EPS to provide and smooth and efficient system to carry raw tannery sewage safely through underground conduits (Gravity sewers and common manifolds) to the CETP Modules to treat the same efficiently and to bring down the values of toxic parameters within their permissible limit to abate the environmental pollution.

(g) KMDA has also taken some infrastructural developmental works within CLC Bantala under different components of schemes like roads, surface drains, boundary walls, entry gates, storm water pumping stations etc, as SPV of MSME&T Deptt. GoWB.



(h) KMDA does not look after the issue of abatement of Air Pollution within CLC complex.

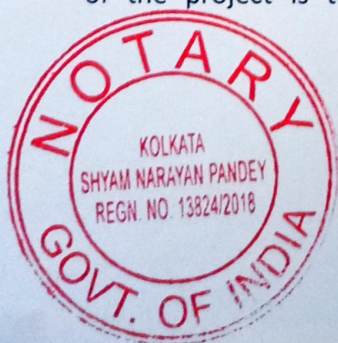
5. I submit with regard to paragraphs 13,14,15, 16,17, 18 and 19 that save what are matters of record, all the allegations made in the paragraphs of the said affidavit are denied and the Applicant is put to strict proof thereof. I say that the answering respondent in this project is acting in the capacity of SPV (Special Purpose Vehicle) only and doesn't have any control on activities of individual tanneries unless directed by the Project Proponent that is MSME&T Department.
6. I submit with regard to paragraphs 20, 21 and 22 that save what are matters of record, all the allegations made in the paragraphs of the said affidavit are denied. I repeat and reiterate the statements made by me in paragraph 4 of this Affidavit. I submit that the answering respondent have taken curative measures to abate pollution. The answering respondent have a very limited role and is not responsible for spilling of effluents into vacant plots and lanes.
7. I submit with regard to paragraphs 23,24, 25, 26,27 & 28 that save what are matters of record, all the allegations made in the paragraphs of the said affidavit are denied. I repeat that the answering respondent have completed the work of augmentation of CETP by means of



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constructing modules 5 to 8 to increase the capacity of CETP from 20 MLD to 40 MLD. I submit that Environmental Clearance has been granted to the answering respondent after proper evaluation by the concerned authority subject to condition that whatever be the influent generated from individual tannery units, the capacity of 8 nos. of CETP Modules will be limited to 40 MLD only and beyond that capacity it cannot function. KMDA has already started to comply specified EC conditions accordingly.

8. I submit that with regard to paragraphs no 29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51 & 52 that save what are matters of record, all the allegations made in the paragraphs of the said affidavit are denied. I repeat that the role of the answering respondent is limited and the answering respondent do not have any role in the matter of ground water and/or solid waste dumping, individual ETP's, Chrome recovery units by individual tanners. The answering respondent has undertaken the work of installation of new ETS to ensure leak proof transportation of raw tannery sewage to the CETP Modules. The work has been started and expected time line for completion of the project is tentatively within 31ST March'2025. The answering



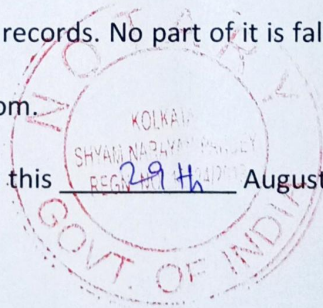
respondent has also constructed SWM facility in the form of SSLF within the area for dumping of CETP sludge as well as solid waste.

9. I submit that it is further denied that this application is made bonafide and for the ends of justice. I say that no case has been made out in the said Application therefore the relief claimed in the said Application may not be allowed.

VERIFICATION

I, the deponent above named do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge which are derived from the relevant office records. No part of it is false and nothing material has been concealed there from.

Verified at Kolkata on this 29th August, 2024.



Identified by me

Pankaj Banerjee
Advocate
sdhroet

T. Blomck

DEPONENT

Superintending Engineer
Circle-IV, Housing Sector
KMDA



Solemnly Affirm & Declared
Before Me on Identification
of Ld. Advocate

Pankaj

SHYAM NARAYAN PANDEY
NOTARY, GOVT. OF INDIA
REGN. NO. 13824/2018

29.08.2024

29 AUG 2024