

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI**

O.A. NO. 199 of 2021 (SZ)

IN THE MATTER OF:

Sri. Shankar Narayanan Bala Krishnan,
Telangana and Ors

...Applicant(s)

Versus

State of Telangana and Ors

...Respondents(s)

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Place: Hyderabad

Date: 25.08.2022

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Sri. Shankar Narayanan Bala Krishnan,
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State of Telangana
Rep. by its Chief Secretary,
Hyderabad and Ors

...Respondents(s)

REPLY MEMO FILED BY THE 6th RESPONDENT

1. That at the outset, the 6th Respondent most respectfully submits that all the claims made by the Applicants are false. The photographs enclosed by the Applicants dated 13.07.2022 clearly shows the overflowing water from the Tank (Dammaiguda tank). In fact, entire sewerage water from the upstream residential areas of Dammaiguda and Jawahar Nagar Corporation is flowing into this tank. Further, there is no surplus nala for the safe discharge of overflowing water from this tank and hence the downstream colonies are submerged during the recent heavy rainfall. The authorities of GHMC have inspected the site and the tank on 16.07.2022 (Photographs enclosed) and found that there is no overflowing leachate from the Integrated Municipal Solid Waste Management plant of GHMC operated by the 9th Respondent. However, storm water from the Jawahar Nagar site along with run-off from upstream catchment area of Dammaiguda Municipality and Jawahar Nagar Municipal Corporation flows into the Dammaiguda tank as the part of Jawaharnagar site also comes under the catchment of that tank. Due to recent heavy rains, unexpected flooding from the upstream catchment storm water entered into the tank and caused flooding in the colonies as there is no surplus nala. The reason for black color in the tank is

assumed to be due to joining of sewerage from the habitation in the above catchment area into the tank as sewage like smell was noticed. However, laying of diversion pipeline for sewage is taken up by the Hyderabad Metropolitan Development Authority (HMDA) and the same is in progress. The Jawaharnagar plant is equipped with state of the art leachate treatment plant to treat and dispose the leachate generated during the processing and disposal of daily waste for which details were submitted in the reply. Further, all necessary measures are being taken by the Concessionaire to divert the Leachate into the plant and not to overflow from the site and the same is monitored by Environment Protection Training and Research Institute (EPTRI), who is the Independent Engineer. Hence, it is to submit that there is no possibility of leachate overflowing from site and mixing in the tank. However, the samples were sent for testing by EPTRI for further examination.



Photograph1 (taken at same location as in the Memo filed by applicants) showing the overflowing water from the Tank


Commissioner,
Greater Hyderabad Municipal Corporation



Black water noticed in the tank



Flooding of Colonies as there is no surplus nala



Flooding of Colonies as there is no surplus nala

Further, the legacy leachate which is impounded in the Malkaram tank and few other artificial ponds is located on the downstream side of this tank (Dammaiguda tank) and hence there is no possibility of mixing of legacy leachate also. Further, the MVRE technology plant proposed for treatment of legacy leachate has also commissioned on 25.07.2022 (Photographs enclosed).


Commissioner,
Greater Hyderabad Municipal Corporation.

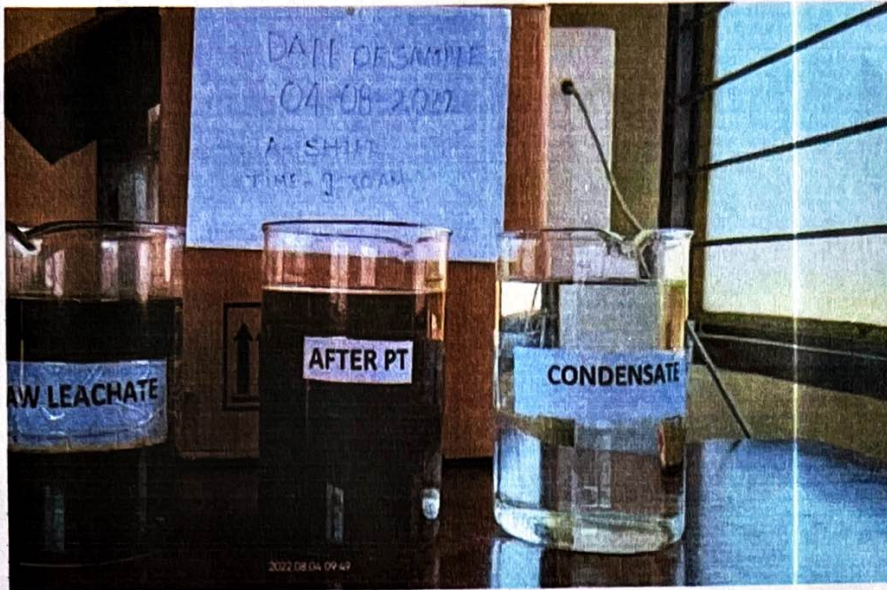
11/14



Legacy Leachate Treatment plant with MVRE Technology



Fresh water (permeate/ condensate) disposed off



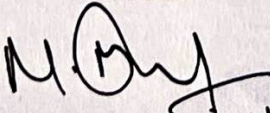
Leachate before and after treatment

2. That in light of the above facts and circumstances, it is humbly prayed that this Hon'ble Tribunal may be pleased to:
- Dismiss the present application to the extent of the submissions made against the 6th Respondent.
 - Pass any such order, as the Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case.

Sworn and signed on this the
25th Day of Aug, 2022 at Hyderabad


DEPONENT
Commissioner,
Greater Hyderabad Municipal Corporation

Before me
Attestor


MS-3486/21
A5-99, 2nd street
Annanager - 40.

VERIFICATION

I, D.S. Lokesh Kumar, S/o. Sri. Somaraju, aged about 43 years, Occ: Commissioner, Greater Hyderabad Municipal Corporation (GHMC), R/o. Hyderabad, do hereby declare that the contents made in the above paragraphs are true and correct to the best of my knowledge and based on records available with Respondent Corporation and I believe the same to be true and correct. Hence verified on this day of 25th Aug, 2022.



ADVOCATE



DEPONENT
Commissioner,
Greater Hyderabad Municipal Corporation.

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NATIONAL GREEN
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In the matter of O.A no: 199 of
2021

Between :

Sri. Shankar Narayanan Bala
Krishnan and Others

....Applicants

AND

State of Telangana and Others

....Respondent

Report filed by Respondent 6

M/s. D. Sreenivasan, Counsel
for Respondent no.6