

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE BENCH  
AT CHENNAI

OA No 40 OF 2024

IN THE MATTER OF:

NEWS ITEM PUBLISHED ON 25 JANUARY 2024 IN THE EENADU NEWSPAPER  
REGARDING DISCHARGE OF LIQUID WASTES IN LAKH LITERS INTO DIFFERENT  
RIVERS IN ANDHRA PRADESH

..... Applicant

Vs

THE CHIEF SECRETARY TO GOVT OF ANDHRA PRADESH AND OTHERS.

.... Respondents

**AFFIDAVIT FILED BY R3- KURNOOL MUNICIPAL  
CORPORATION**

DATE- 20.04.2024



**M/s MADHURI DONTI REDDY  
ADVOCATE**

**STANDING COUNSEL FOR GOVERNMENT OF ANDHRA PRADESH**

**A.P. POLLUTION CONTROL BOARD**

#26, S2, Royal Castle, Gill Nagar Extension, Choolaimedu, Chennai – 600 094.

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**IN THE HON'BLE NATIONAL GREEN TRIBUNAL,  
SOUTHERN ZONE, CHENNAI  
( Through Video Conference – Suo Motu )  
Original Application No.40 of 2024 (SZ)**

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Kurnool

DT: 27.03.2024

  
**Deponent**  
Commissioner  
Kurnool Municipal Corporation  
KURNOOL

**MEMORANDUM OF ORIGINAL APPLICATION  
(Rule-15 of the National Green Tribunal Act, 2010)  
IN THE HON'BLE NATIONAL GREEN TRIBUNAL, SOUTHERN  
ZONE, CHENNAI**

(Through Video Conference - suo motu)

**Original Application No.40 OF 2024 (SZ)**

**IN THE MATTER OF:**

Tribunal on its own motion SUO MOTU  
Based on the News Item in Eenadu  
Newspaper, dt 25.01.2024, "Liquid  
Wastes have been discharged into  
Different Rivers in the State of Andhra  
Pradesh".

.....Applicant

AND

1. **The Chief Secretary to Govt. of Andhra Pradesh,**  
1<sup>st</sup> Block, 1<sup>st</sup> Floor, Interim Government Complex,  
A.P Secretariat Office, Velagapudi, Guntur  
Andhra Pradesh- 522237  
Phone:8632441024, Email:cs@ap.gov.in
2. **Special Chief Secretary to Govt. of Andhra Pradesh,**  
**Department of Environment, Forest, Science and Technology,**  
4<sup>th</sup>Ground Floor,Room No:268,  
A.P Secretariat Office, Velagapudi, Guntur  
Andhra Pradesh- 522237  
Phone:8632444438. Email:splcs\_efst@ap.gov.in
3. **The Secretary to Govt. of Andhra Pradesh, Municipal  
Administration and Urban Development Department,**  
2<sup>nd</sup> Block,Ground Floor, Room No:140,  
A.P Secretariat Office, Velagapudi, Guntur  
Andhra Pradesh- 522237  
Phone:8632442024. Email: prlsecy\_maud@ap.gov.in
4. **The Chairman, Andhra Pradesh Pollution Control Board,**  
D.No.33-26-14 D/2, Near Sunrise Hospital,  
Pushpa Hotel Centre, Chalamavari Street,  
Kasturibaipet, Vijayawada -520010.  
Phone: 8662463202. Email: [chairman@appcb.gov.in](mailto:chairman@appcb.gov.in)

  
**COMMISSIONER**  
Municipal Corporation  
KURNOOL

5. **The Principal Secretary, Water Resources Department, Govt. of Andhra Pradesh,**

Address: 4th Block, 1st Floor Room No:216,

A.P Secretariat Office, Velagapudi,

Guntur - 522237

Phone: 0863-2444248 Email: [splcs-wrd@ap.gov.in](mailto:splcs-wrd@ap.gov.in)

... Respondent(s)

**COUNTER AFFIDAVIT FILED BY THE RESPONDENT NO 3**

I, A.Bhargav Teja,S/o. Venkatesulu aged about 32 years, working as Commissioner, Municipal Corporation, Kurnool, do hereby solemnly and sincerely affirm and state as follows:

1. I am the 3rd Respondent herein and as such I am well acquainted with a fact of the case.
2. It is respectfully submit that, this respondent denies each and every averment made in the Suo Moto application as false and incorrect except those that are specifically admitted herein this counter affidavit.
3. It is respectfully submit that, the material allegations in the memorandum are all false. The material averments in the application all not true and correct and are hereby denied.
4. It is respectfully submit that, the Hon'ble National Green Tribunal, Chennai has registered the case Suo Motu on the basis of News Paper report published in the Eenadu Telugu News Paper on 25.01.2024 "Liquid Wastes have been discharged into different rivers in the State of Andhra Pradesh and most of the Sewage Treatment Plants are incomplete".
5. It is respectfully submit that, about 75 MLD of Drinking Water is being supplied to the Public of Kurnool Municipal Corporation. The generated Sullage from House Holds is about 50 MLD.
6. It is respectfully submit that, at present 3 Nos. of STPs of 0.8 MLD each capacity (total 2.4 MLD) is functioning near Sankalbagh, Jammi chettu and Old Tungabhadra Pump house in Kurnool city and treated about 2.4 MLD of sewerage.

  
COMMISSIONER  
Municipal Corporation  
KURNOOL

7. It is respectfully submit that, the Government of Andhra Pradesh vide G.O.Ms.No. 82 MA & UD (UBS) Department, dated.03-03-2017 has accorded Administrative Sanction for the above work for an amount of Rs.47.93 Crores under AMRUT scheme 2016-20 for construction of 2 Nos of STPs i.e., **2 MLD near Deva nagar at Hundri River and 10 MLD near Jammichettu at confluence point of Tungabhadra and Hundri Rivers.**
8. It is respectfully submit that, due to impose of lockdown in Covid-19 there was a delay in execution of work by the agency.
9. It is respectfully submit that, Construction of above 2 STPs are in brisk progress out which 2 MLD STP plant near Deva Nagar at Hundri River is nearing completion i.e., 95% of the construction is completed and it will be completed in full shape on or before 30.05.2024 and 10 MLD Plant near Jammichettu confluence point is in progress and at about 25% of the work is completed and it will be completed in full shape on or before 30.10.2024 (The connecting photographs are enclosed herewith).
10. It is respectfully submit that, Meanwhile the Kurnool Municipal Corporation has taken up several remedial and temporary measures for containment of river pollution.
11. It is respectfully submit that, Kurnool Municipal Corporation has provided Screeners at 5 outfall drains leading to river Tungabhadra, to arrest the floating material and organic matter.
12. It is respectfully submit that, about 45,200 households are contributing to waste water and leading to Tungabhadra River and 4400 of the households are provided with 6 No'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.
13. It is respectfully submit that, the domestic Sewage from kitchens, Bathrooms are contributing to the waste water which is being let into the river Tungabhadra through open drains. 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.

14. It is respectfully submit 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.
15. It is respectfully submit that, the Kurnool Municipal Corporation has also 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 STP's are insisted for the residential colonies there by preventing further pollution of river water.
16. It is respectfully submit 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.
17. It is respectfully submit that, For the balance quantity of about 35.60 MLD, the Government of Andhra Pradesh vide G.O.Ms.No. 12 MA & UD (UBS) Department, Dated.20-01-2023 has accorded Administrative Sanction for the above work "AMRUT 2.0- Investigation, Survey, Design, Construction of Diversion Structures, Conveyance System for Abatement of Sewage discharge in Tungabhadra River & Sewage Treatment Plants of 35 MLD on SBR Technology with Operation and Maintenance for 5 years (Including DLP of 2 years) in Kurnool Municipal Corporation" for an amount of Rs. 131.84 Crores.
18. It is respectfully submit that, the work was awarded to M/s.KIPL-EIPPL(JV), Hyderabad and the agency has concluded the Agreement with Departmental Authorities and recently ground clearance work has been initiated.
19. It is respectfully submit that, in the above circumstances, it is humbly prayed, the Hon'ble National Green Tribunal may be pleased to consider this respondent affidavit as the construction of Sewage Treatment Plants (2MLD + 10 MLD) which are under progress will complete by May and October 2024 respectively.

  
COMMISSIONER  
Municipal Corporation  
KURNOOL

In view of the above submitted circumstances in construction of STPs and progress Report submitted in completion of STPs, it is humbly praying the Hon'ble National Green Tribunal (SZ), Chennai to consider the merits thereof and pass appropriate orders.

The above circumstances, it is humbly prayed that this Hon'ble Tribunal maybe pleased to pass an appropriate order in the above OA No. 40 of 2024 and pass such further or other orders, as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of the case and thus render justice.

Solemnly affirmed and signed  
his name in my presence  
on this 27th day of March, 2024

  
Before Me  
Commissioner  
Kurnool Municipal Corporation  
KURNOOL  
Advocate

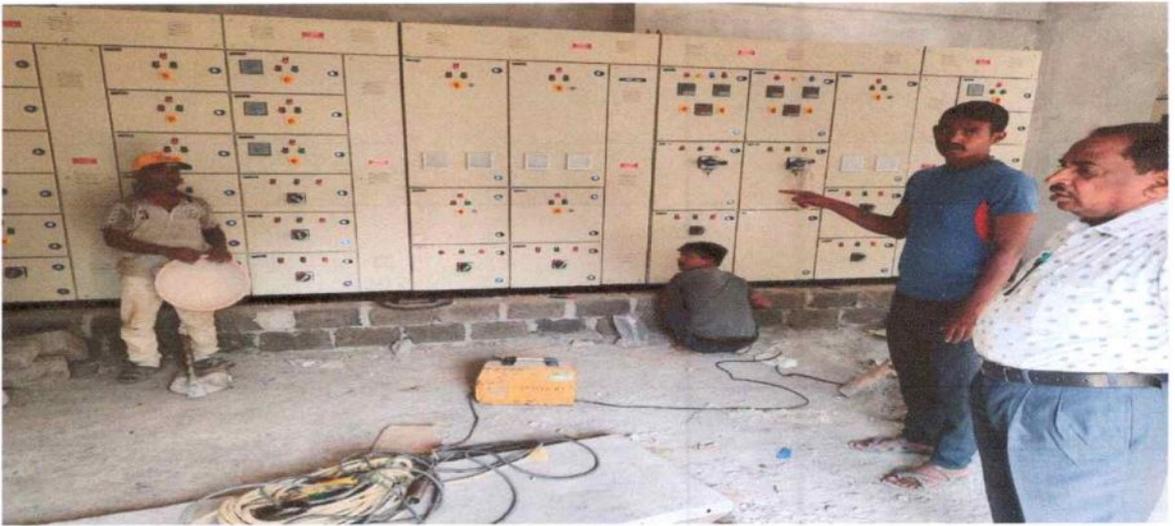
### **VERIFICATION**

I A.Bhargav Teja S/o A. Venkatesulu Aged 32 years about Working as Commissioner, Kurnool Municipal Corporation, Kurnool, Andhra Pradesh, on behalf of the respondents 3 do hereby verify that the contents of paras of Counter Affidavit are based on record and information are true to the best of my Knowledge and belief.

Hence verified on the 27th day of March 2024 at Kurnool

  
**Deponent**  
COMMISSIONER  
Municipal Corporation  
KURNOOL

**Current Photographs of the 2 MLD and 10 MLD STPs**



  
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### Awareness Programme conducted on Solid Waste Management Rules



  
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