

**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

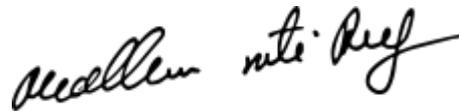
Vs

THE CHIEF SECRETARY TO GOVT OF ANDHRA PRADESH AND OTHERS.

.... Respondents

COUNTER FILED BY R3- BHIMAVARAM MUNICIPALITY

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.

**Mobile: 98407 98460 / 63831 21322,
Email: reddymadhuri09@gmail.com**

**IN THE HON'BLE NATION GREEN TRIBUNAL,
SOUTHERNZONE CHENNAI**

(Through video conference – Suo Motu)

ORIGINAL APPLICATION NO. 40 of 2024(SZ)

INDEX TO MATERIAL PAPER

SL.NO	DATE	DESCRIPTION OF DOCUMENT	PAGE NO
1.		Affidavit filed by the Respondent No.3	1 - 5
2.		Photographs of 5.00 MLD STP construction Stage	6 - 8

Chennai

Dt:- 20-04-2024


Commissioner,
Bhimavaram Municipality

**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:

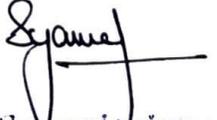
Tribunal on its own motion SUO MOTU
Based on the News Item in Eenadu
Newspaper, dt 25.01.2024, "Liquid
Wastes have been discharged into
Different Rivers in the State of Andhra
Pradesh".

.... Applicant

AND

1. **The Chief Secretary to Govt. of Andhra Pradesh,**
1st Block, 1st 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,
4th 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,
2nd Block, Ground Floor, Room No:140,
A.P Secretariat Office, Velagapudi, Guntur
Andhra Pradesh- 522237
Phone:8632442024. Email: prlsecy_maud@ap.gov.in

// Attested //
K. Anand
Dy. Executive Engineer
Bhimavaram Municipality


Commissioner,
Bhimavaram Municipality

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
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

... Respondent(s)

COUNTER AFFIDAVIT FILED BY THE RESPONDENT NO 3

I, M.Syamala, W/o. Ch. Narsimha raju, aged 54 years, Occupation: Commissioner, Bhimavaram Municipality, Andhra Pradesh do hereby solemnly and sincerely affirm and make oath and state as follows:

1. I am the Commissioner of Bhimavaram Municipality herein and as such I am well acquainted with the facts of the case.
2. I deny each and every averment made in the news item published in Eenadu newspaper dt.25-01-2024 with the caption "Liquid Wastes have been discharged into Different Rivers in the State of Andhra Pradesh" and the same are false and incorrect except those that are specifically admitted herein in this counter affidavit.
3. 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 submitted that the Bhimavaram Town is a special grade municipality with a population of 1,42,184 as per 2011 census. The quantity of Water supplied to the population is at

11 Attested 11
H. Annam
Dy. Executive Engineer
Bhimavaram Municipality

Syamala
Commissioner,
Bhimavaram Municipality

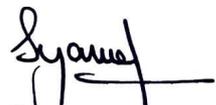
135 liters per capita. The quantity of Sewage generated is 108 liters per capita. Presently, there is no Under Ground Drainage network in the Town.

5. It is submitted that the Bhimavaram municipality is comprising of two Towns (One town and Two town) is divided by Yanamudurru major drain which passes through the middle of town and finally discharges into Bay of Bengal.
6. It is submitted that the sewage generated by entire town is discharged into Yanamudurru drain at following locations.

S.No	Town-1	Town-2
1	At Mira miya kodu	At Ram lakshman nagar.
2	At BMK rice mill.	At Irrigation office (Losari road)
3	At Elementary school (Passimugala Pathasala)	At Lankapeta sluice (near railway bridge)
4	At Chinavanthina, Government area Hospital.	At Durgapuram.

7. It is submitted that Since, The Yanamudurru drain is not irrigation canal and not used for irrigation purpose. The liquid waste is disposed into Yanamudurru major Drain only after primary treatment and no liquid waste is discharged into any irrigation canal in the Town Limits.
8. It is submitted that In Bhimavaram municipality, The total Quantity of sewage generated is 15.35 MLD and Quantity of sewage being treated as on date is 0 MLD.
9. It is submitted that the government under AMRUT Scheme has sanctioned 5 MLD Sewage treatment plant near Tidco Houses as there is UGD Network and the work is under execution by the Public Health Engineering department and work is under progress (90% of work completed) and remaining balance work will be completed and commissioned by 31.03.2024.

11/Attested/
H. Anand
Dy. Executive Engineer
Bhimavaram Municipality


Commissioner,
Bhimavaram Municipality

10. It is submitted that a new 1.60 MLD of STP is sanctioned under AMRUT 2.0 and work will commence after Finalizing Agency.
11. It is submitted that for additional 8.75 MLD STP and Under Ground Drainage Network should be taken up by other schemes upon sanction from Government.
12. It is submitted that upon completion of 5 MLD sewage treatment plant, the septage in septic tanks will be transported to 5 MLD sewage treatment plant and treated as it is having a separate septage holding tank to treat and thereby disposing after treatment.
13. It is submitted that this respondent craves leave of this hon'ble tribunal to raise the additional counter in the course of proceedings, if required.

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 ___ th day of March, 2024


Commissioner,
Bhimavaram Municipality

Before Me

Advocate

11 Attested 11
H. Anant

By Executive Engineer
Bhimavaram Municipality

VERIFICATION

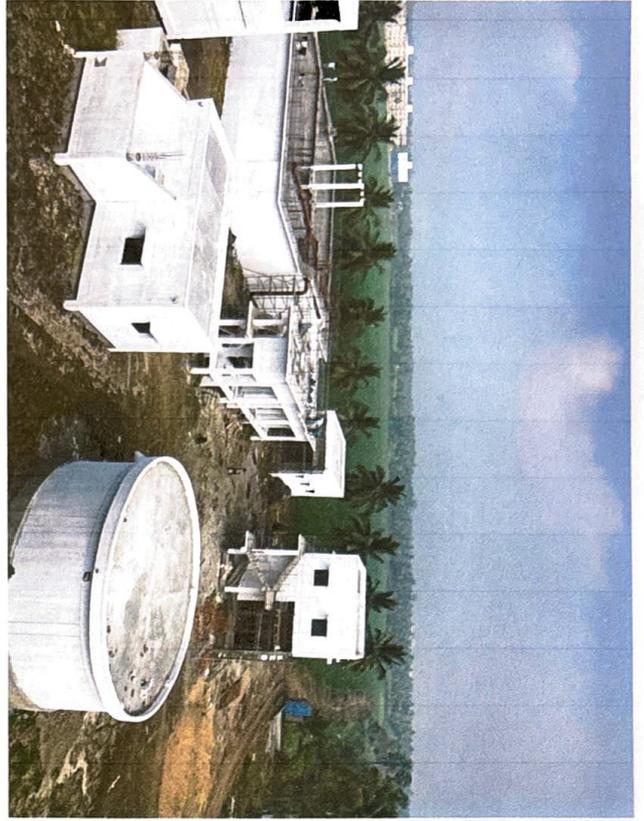
I, M.Syamala W/o Ch. Narasimha raju, aged about 54 years, Hindu, Commissioner of Bhimavaram Municipality, Bhimavaram, on behalf of the respondent 3 do hereby verify and state that the contents of the above paras of the Affidavit are true and correct to the best of my knowledge and belief, based on information and records available.

Hence verified on this

day of March, 2024.

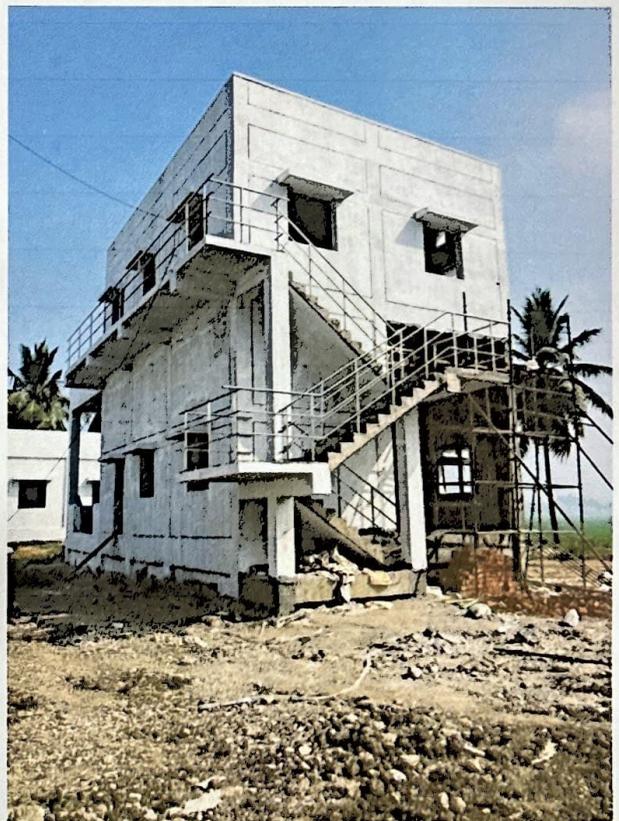
11/11/24
H. Appaiah
Dy.Executive Engineer
Bhimavaram Municipality

Syamala
Commissioner,
Deponent
Bhimavaram Municipality



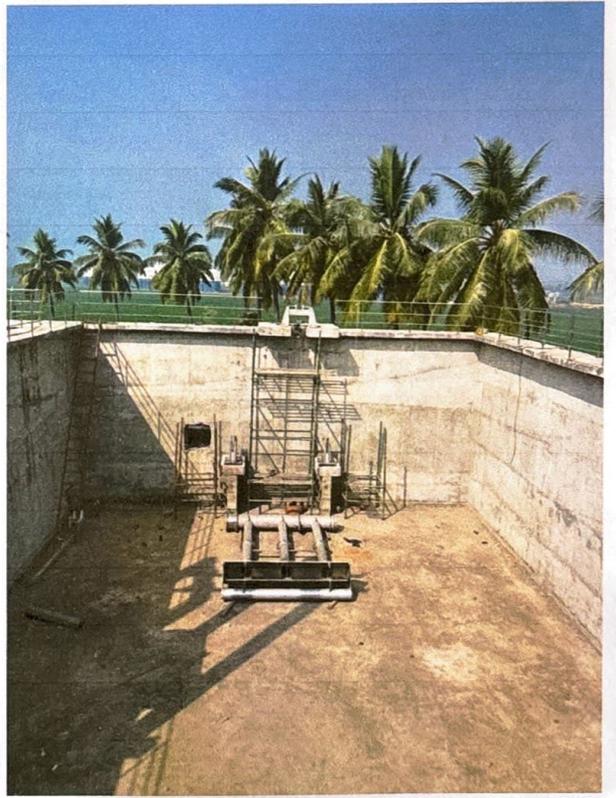
Syam
Commissioner,
Bhimavaram Municipality

H. Anurag
Dy. Executive Engineer
Bhimavaram Municipality



S. Jeyaraj
Commissioner,
Bhimavaram Municipality

H. Anand
Dy. Executive Engineer
Bhimavaram Municipality



Syau
**Commissioner,
Bhimavaram Municipality**

K. Arun
**Dy. Executive Engineer
Bhimavaram Municipality**