

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- RAJAMAHENDRAVARAM
MUNICIPAL CORPORATION EAST GODAVERI DISTRICT**

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)

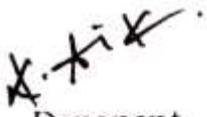
ORIGINAL APPLICATION NO. 40 of 2024(SZ)

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Chennai

Dt:- 20-04-2024


Deponent
COMMISSIONER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM

**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".

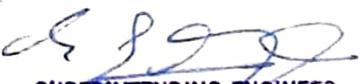
AND

... Respondent(s)

1. The Chief Secretary to Govt. of Andhra Pradesh, Velagapudi, Guntur.
2. Special Chief Secretary to Govt. of Andhra Pradesh, Velagapudi, Guntur.
3. The Secretary to Govt. of Andhra Pradesh, Municipal Administration and Urban Development Department, Velagapudi, Guntur.
4. The Chairman, Andhra Pradesh Pollution Control Board, Vijayawada.
5. The Principle Secretary, Water Resources Department, Govt. of Andhra Pradesh.

**AFFIDAVIT / RESPONSE FILED ON BEHALF OF THE
RESPONDENT NO 3**

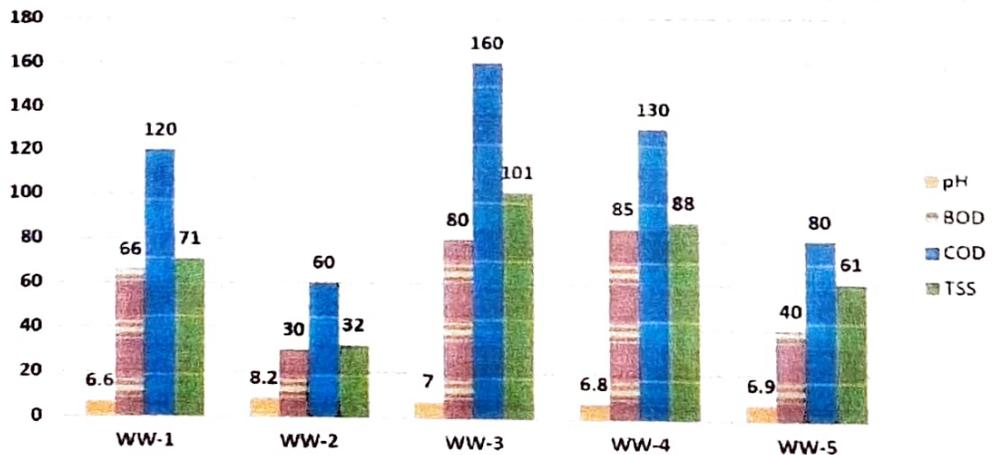
I, K.Dinesh Kumar, S/o. K.Srinivasa Rao aged about 30 years, working as Commissioner, Municipal Corporation, Rajamahendravaram, East Godavari District., do hereby solemnly and sincerely affirm and state as follows:


SUPERINTENDING ENGINEER
MUNICIPAL CORPORATION,
RAJAMAHENDRAVARAM.

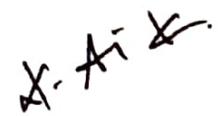

COMMISSIONER
MUNICIPAL CORPORATION,
RAJAMAHENDRAVARAM.

1) It is respectfully submit that, the holy Godavari River is flowing adjacent to the Rajamahendravaram City, The City is having open drainage system only. Collection of domestic waste and waste water from toilets connected to septic tanks and the supernatant liquid is carried through open drains are added to sullage. The BOD and COD values are 60 to 100 mg/l and 100 - 200 mg/l respectively. The drainage pattern is such that the Nalla channel and AWA drain are flowing towards river Godavari. The dry weather flow about 80% of daily water supply is 56 MLD is contributing to waste water is being intercepted and diverted to Hukumpeta where the sewage treatment plant of 30 MLD capacity is constructed under National River Conservancy Program and is functioning from the year 2005. The parameters of sewage collected at various locations are as below:

Sample Location	Effluent Parameters					
	pH	BOD	COD	TSS	Total P	Total N
Existing STP Inlet (WW-1)	6.6	66	120	71	2.09	20
Existing STP Outlet (WW-2)	8.2	30	60	32	1.58	14
NRCP Collection well (WW-3)	7	80	160	101	0.25	18
Kambala Tank Inlet (WW-4)	6.8	85	130	88	1.59	20
Kambala Tank Outlet (WW-5)	6.9	40	80	61	0.99	18




 SUPERINTENDING ENGINEER
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 RAJAMAHENDRAVARAM.


 COMMISSIONER
 MUNICIPAL CORPORATION
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Sewage Generation:

S. No	Catchment name	Swerage Generation			Available STP Capacity in MLD	Proposals STP Capacity in MLD	Remarks
		2025	2040	2055			
1	Katheru	8.54	10.49	12.82	0	10.49	Proposed 11 MLD STP at Katheru
2	Nalla Challal	26.74	31.50	36.63	55.60	0.00	50.60 MLD Commenced on 14.02.2024 & 5.00 MLD STP is in Progress
3	Awa Channal	17.08	19.83	22.62			
Grand Total		52.36	85.98	101.83	55.60	29.49	

The standards of sewage is being treated as per the CPHEEO Norms. The details of STPs taken up are here under.

2) On Going Projects:

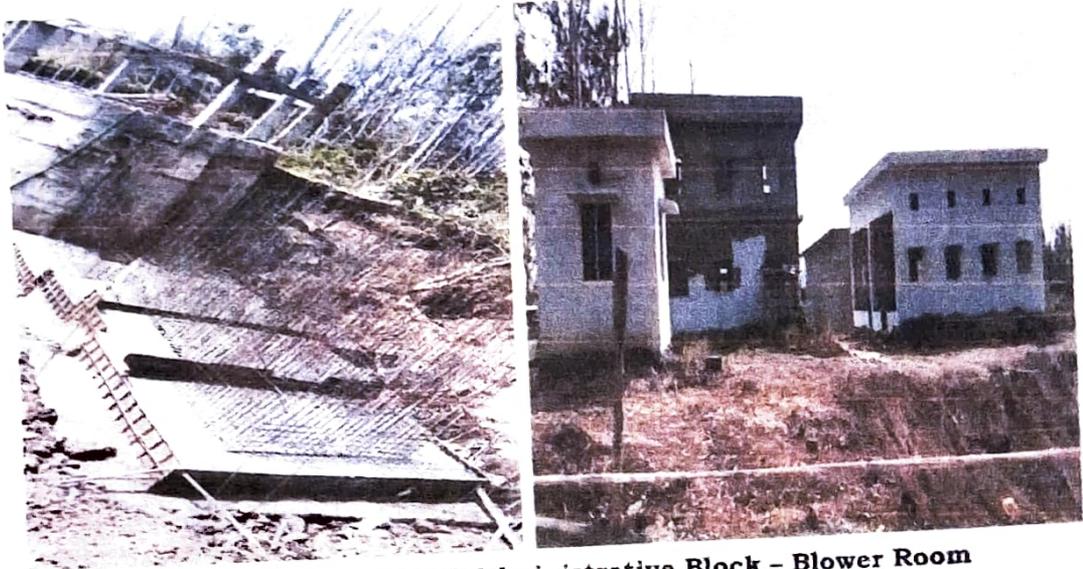
STP Capacity	Administrative Sanction	Status
5.00 MLD	G.O.Ms.No.82 M.A.& U.D.(UBS) Dept., Dt.03.03.2017 of Govt. of Andhra Pradesh.	The stage of Construction of the 5.00 MLD STP a. SBR Basins – Civil works completed. b. Sludge sump –Completed. c. Dosage tank – Completed. d. Blower Room – Civil works completed. e. CCT – Completed. f. Administrative Building - Completed. g. Staff Quarters – Completed h. Intake well cum Pump house- Completed up to floor slab level of Pump House and further work in progress i. Inlet works-Side wall work in progress. j. Electromechanical Equipment – Procurement Stage.

It is respectfully submit that, due to impose of lockdown in the 2nd phase of Covid-19 in the year 2021, the construction of STP plant has got delayed.

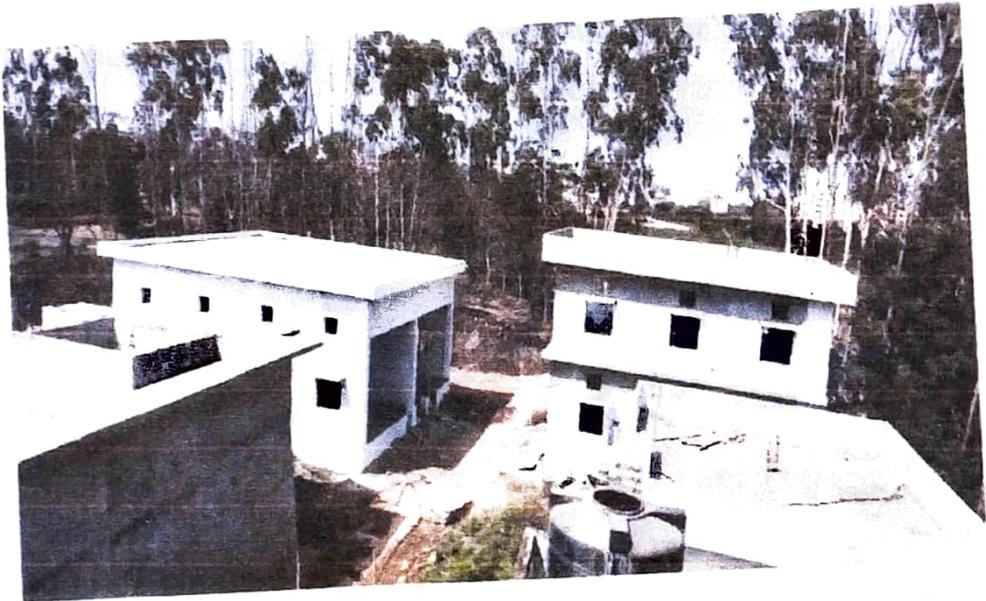

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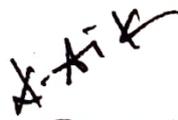
Photographs of 5.00 MLD STP of SBR Technology (Under Construction)



Primary Treatment Unit Administrative Block - Blower Room




Attester
**SUPERINTENDING ENGINEER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM.**


Deponent
**COMMISSIONER
MUNICIPAL CORPORATION
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SBR BASINS



Centrifuge Building



Chlorine Contact Tank


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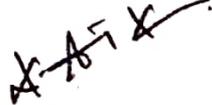
STP Capacity	Administrative Sanction	Status
50.60 MLD	1) Lr. Roc. No. F. No. J-24013/1/2020-NRCD-II of the Ministry of Jal Shakthi, Govt. of India, Dt. 17-03-2022 and 2) G.O. Rt. No. 236, MA&UD (C2) Department, Dt. 12-04-2023 of Govt. of Andhra Pradesh with an Estimated cost of Rs. 95.00 Crs.	The stage of Construction of the 5.00 MLD STP a. 50.6 MLD Capacity STP using SBR Technology – Survey Completed. Designs and drawings of all components are under preparation based on the GAD as per site conditions. b. Laying of RCC & DI Sewer Pipelines – 2177 Rmt– Survey Completed along the proposed alignment. Designs are in progress. c. Construction of Sewer Manholes – 84 Nos – Designs are in progress. d. Electromechanical Components & other Allied works – Designs are in progress. e. Boundary Wall, Internal Pathways, Greenery and Illumination etc.,

Photographs of 50.6 MLD Proposed STP



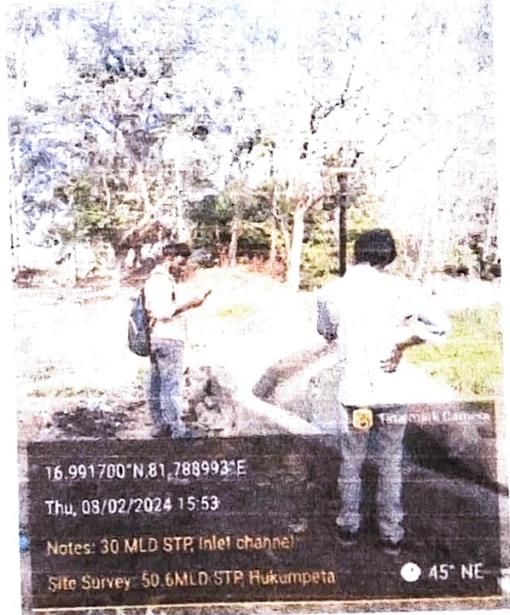
Bhumi Puja Ceremony


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Study of Ground Alignment Drawings



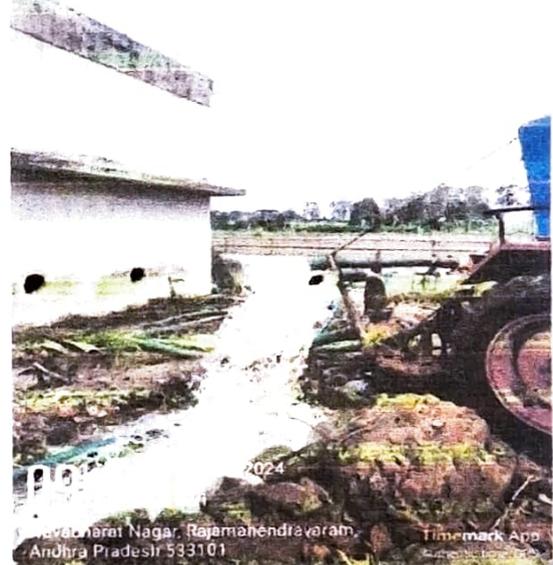
Conducting Survey using Total Station


Attester
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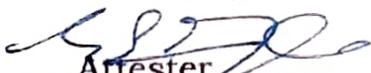


Jungle Clearance



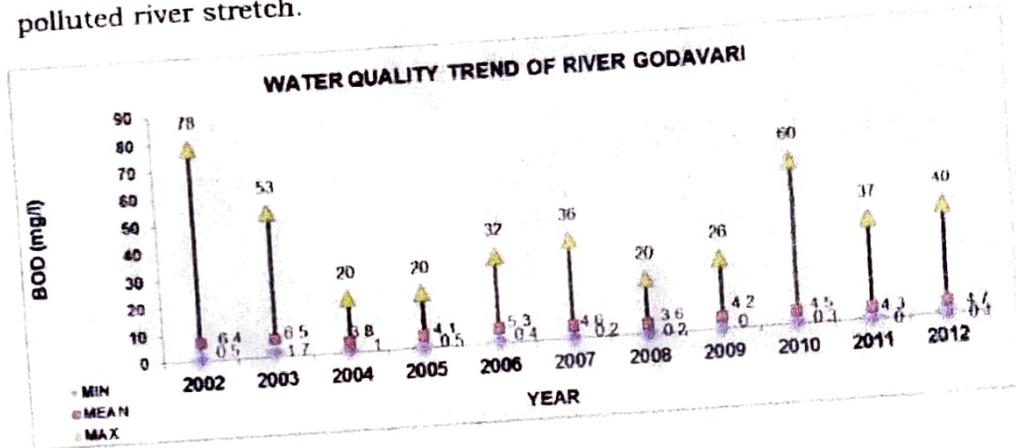
Dewatering from Proposed STP site

- 3) It is respectfully submitted that ,the Godavari river stretch from Rayanpeta to Rajahmundry is declared as pollution free as per the assessment by Central Pollution Control Board(CPCB), New Delhi in the year 2022 based on observed improvement in the monitored data during 2019 and 2021.At the outset the river Godavari stretch from Rayanpeta to Rajahmundry is categorized under Priority – 5 as shown in the Report on “Polluted River Stretches for Restoration of Water Quality – 2022” which classifies monitoring locations with Biochemical Oxygen Demand (BOD) between 3.0 to 6.0 mg/l which is considered as non-polluted river stretch.


Superintending Engineer
Municipal Corporation
Rajahmundry


Commissioner
Municipal Corporation
Rajahmundry

Demand (BOD) between 3.0 to 6.0 mg/l which is considered as non-polluted river stretch.



POLLUTED RIVER STRETCHES FOR RESTORATION OF WATER QUALITY



CPCB
WATER QUALITY MANAGEMENT (I) DIVISION
 Central Pollution Control Board (CPCB)
 Ministry of Environment, Forests & Climate Change (MoEF & CC)
 Parivesh Bhawan, East Arjun Nagar,
 Delhi - 110032
 November, 2022

[Signature]
 Attester
SUPERINTENDING ENGINEER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM.

[Signature]
 Deponent
COMMISSIONER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM

1.4 CRITERIA FOR IDENTIFICATION AND CLASSIFICATION OF PRS

The locations/ stretches of rivers not meeting with the Primary water quality criteria for outdoor bathing for BOD parameter (i.e. more than 3 mg/l) are identified as polluted locations or polluted stretches.

- If there is a single location on river, rivulet or stream and the location is not complying to BOD, it is identified as Polluted Location.
- Two or more polluted locations identified on a river in a continuous sequence are considered as a stretch and defined as Polluted River Stretch.

PRS are categorized under five Priority classes (I-V) on the basis of maximum BOD level observed. The criteria for prioritization of river stretches is given below.

Priority - I

- Monitoring locations exceeding BOD level of more than 100 mg/l.

Priority - II

- Monitoring locations having BOD between 50 - 100 mg/l.

Priority - III

- Monitoring locations having BOD between 10 - 50 mg/l.

Priority - IV

- Monitoring locations having BOD between 5 - 10 mg/l.

Priority - V

- Monitoring locations having BOD between 2 - 5 mg/l.

State-wise list of 106 PRS removed from the earlier list of 351 PRS (identified during Year 2018) based on observed improvement in the monitored data during 2019 & 2021

S.No	State	River	Stretch	Priority class during the year 2018
1.		GODAVARI	RAYANPETA TO RAJAHMUNDRI	V
2.		KRISHNA	AMRAVATHI TO HANSALA DEEVI	V
3.	ANDHRA PRADESH	KUNDU	NANDYAL TO MADURU	IV
4.		NAGAVALI	ALONG THOTAPALLI	V
5.		TUNGABHADRA	MANTRALAYAM TO BAVAFURAM	IV
6.		BARAK	PANCHGRAM TO SILCHAR	V
7.		FAROI	DOWNSTREAM OF BRIDGE AT NH 52	V
8.		SEKI	BARPETA ROAD TO JYOTIGADN	V
9.		BHOGDOI	JORHAT TO DELJAGADN	V
10.		BOGHADI	LAKHIMPUR TO DIBRUGARH	V
11.		ECORSOLA	ALONG SARABHATTI, GUWAHATI	I
12.		BRAHMAPUTRA	KHERGHAT TO DHUBRI	IV
13.		DUKHOM	NAGINI MORA TO DIKHOMUKH	V
14.		DIKRONG	ALONG BARDARDEWA	V
15.		DISANG	DULGHAT TO GUNDAMGHAT	V
16.	ASSAM	LABHARU	ALONG TUMILINI, SONITPUR	V
17.		JHANA	JORHAT TO CHANDANG	V
18.		KAIBHARALI	ALONG SONITPUR	V
19.		KAPLI	NAGAON TO KAMPUR TOWN	V
20.		KELING	ALONG MIREGAON	V
21.		KHEKHA	KHORA TO MCHPARA	V
22.		KULONG	NAGAON TO MORI KALONG	V
23.		PANCHVAL	CRANG TO BORSALA	II
24.		PULIHIMARI	ALONG PULIHIMARI	V
25.		RANGA	ALONG GERAMBURH	V
26.		SANKOSH	ALONG GOLAKGANI	V
27.		SONAL	SUNAI TO DAKSHIN MOHANPUR	V
28.		ASSOHORA	ASSOHORA TO SIPSAIM	V
29.		BICHOLIA	BICHOLIUM TO CUPCHIREM	V
30.		CHAPORA	PERNEM TO MORJUM	V
31.	GOA	SPRIGUERIM	ALONG CANDOLIM	V
32.		JALPOINA	ALONG CANACONA	IV
33.		TIRACOL	ALONG TIRACOL	V
34.		VALVANI	SANKLI - BICHOLIA TO PUNILIM	V
35.	GUJARAT	AMRAYATI	ALONG DADHAL ANKALSHWAR	IV

In view of the above I submit that The Municipal Corporation, Rajamahendravaram is committed to the critical importance of maintaining a healthy environment and committed to being responsible stewards of the ecosystem. It is humbly praying the Hon'ble National Green Tribunal (SZ), Chennai to consider the merits thereof and pass appropriate orders.

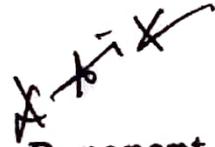
Solemnly affirmed and signed
on this 14th day of March, 2024


Deponent
COMMISSIONER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM

VERIFICATION STATEMENT

I, K. Dinesh Kumar, S/o K. Srinivasa Rao, aged about 30 years, working as Commissioner, Municipal Corporation, Rajamahendravaram, East Godavari District, on behalf of the respondent No 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 14th day of March 2024.



Deponent
COMMISSIONER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM

COMMISSIONER
MUNICIPAL CORPORATION
RAJAMAHENDRAVARAM