

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

Original Application No. 33 of 2023 (SZ)

Nukatati Rajasekhar & another Applicants

-Vs-

Union of India,
Through its Secretary,
Ministry of Environment Forest and CC
& 6 others ... Respondents

**7TH RESPONDENT'S REPLY TO APPCB'S REPORT DATED
28.08.2024**

1. The 7th Respondent herein humbly submits that they have studied the report filed by the 4th Respondent APPCB in the above referred matter. On a perusal of the said report, it can be seen that the findings of the APPCB has only strengthened the fact the 7th Respondent has been complying with the conditions stipulated under the EC and Consents issued by the Authorities, except for a few conditions that are beyond their control.
2. The 5th Respondent is therefore necessitated to reply to and provide clarification only for such observations of the APPCB's report as follows:

S. No.	Direction	Compliance status
1.	The lease agreement of discharge of treated effluent to lagoons at Turuplanka island was expired in 1999 and yet to be renewed. The industry shall immediately renew the lease agreement for discharge of treated effluent to lagoons at	Under Progress with District Administration. The 7 th Respondent is diligently pursuing with the Administration and has been continuously sending letters to the District Collector for issuing the lease renewal order. <ul style="list-style-type: none"> • Principally approved for 33 years from 2009 onwards up to 2042 by APLMA & Commissioner of Industries • Now pending with District Collector Office for fixation of lease rental.



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Turupulanka sand shallows of River Godavari.

- Yearly lease rentals are being promptly paid to Thasildhar, Rajahmundry Urban, till date.
- Letters submitted to District Collector on 29.07.2023, 16.09.2023, 16.10.2023, 20.11.2023, 07.12.2023, 02.01.2024, 11.01.2024, 23.01.2024, 03.02.2024, 19.02.2024, 07.03.2024, 22.03.2024, 23.05.2024, 24.06.2024, 23.07.2024, 23.08.2024, 27.09.2024, 30.10.2024 & 20.11.2024
(Annexure 1)

totalling to 18 letters till date requesting to process lease renewal along with personal follow ups during meetings.

Present Status:

11.09.2024: The District Collector, East Godavari District has convened a meeting with all stake holders including the Joint Collector, Municipal Commissioner, Additional Director – Industries, Executive Engineer – Irrigation, Environmental Engineer - APPCB, RDO & Thasildar. The Collector has directed to conduct a joint inspection of Turupulanka lands and has sought input from each of the concerned departments to proceed forward for lease renewal. **(Annexure-2)**

17.10.2024: The Thasidhar – Urban Rajahmundry and the City/Town Planner along with their team, inspected Turupulanka for land survey and conducted physical surveying of the lands.

19.10.2024: Detailed Land survey conducted by Rajahmundry Thasidhar Office with land surveyors

14.11.2024: The 7th Respondent understands from the from the District Collector's Office that, the Environmental Engineer – APPCB, Executive Engineer – Godavari Head Works (Irrigation), Thasildhar – Rajahmundry Urban & Rajahmundry Municipal Corporation have submitted their reports on Turpulanka



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		<p>land to District Collector as on 14.11.2024.</p> <p>The fact remains that the 7th Respondent has been duly paying the lease rentals to the Thasildhar, Rajahmundry Urban who has been accepting the same and have been permitting the 7th Respondent to use the sand shoals in terms of the lease agreement till date without any disturbance or obstruction. The 7th Respondent herein has taken all possible efforts to get their Turpulanka lease renewed and have left no stone unturned to get the same done. The matter is now in the final stages of being approved and given effect to by the District collector and this Respondent shall abide by the conditions that may be laid down in this regard.</p>
7.	<p>The industry shall expedite plan of action for alternate disposal mode of treated wastewater along with treated sullage of Rajamahedravaram. The progress shall be reported every month to District Administration and to the Board.</p>	<p>Under Progress with District Administration & APPCB.</p> <p>Details of various communications and Current status is as follows:</p> <ol style="list-style-type: none"> 1) M/s. CII- Triveni Water Institute completed "Feasibility study for Exploring the alternative options for effluent discharge" on 20.01.2017 and was submitted to APPCB on 22.04.2017. (Annexure 16 in 7th Respondent's original Reply) 2) The District Collector constituted a District Level Implementation committee on 24.06.2022. 3) District Level Implementation Committee meeting held under the Chair of the District Collector to discuss the project modalities and way forward for implementation on 02.07.2022. Minutes of Meeting (MoM) was circulated for with various actions points across various departments. 4) As per the MoM action items No.4 & 7, the 7th Respondent has identified Professional agency and has informed APPCB - Regional office, Kakinada for on 01.10.2022 and had pursued them again on 22.12.2022 with copy to District

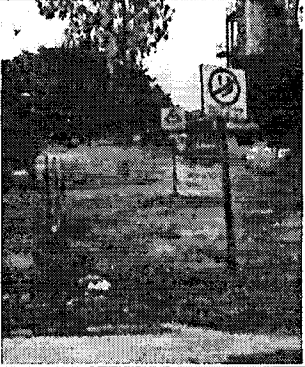
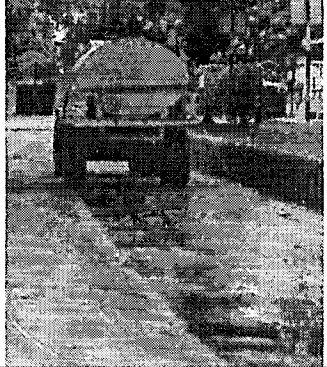



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		<p>Collector.</p> <p>Latest Status:</p> <p>APPCB External Advisory Committee (EAC - Task Force) reviewed during meeting on 13.01.2023 and passed the below directions:</p> <p>APPCB EAC committee noticed that the 7th Respondent has identified professional agency and profile of the agency forwarded to APPCB for review and suggestions. The Environmental Engineer - APPCB - Kakinada was directed to verify the competence of professional agency M/s. GSI Planning and management - New Delhi for preparation of DPR and tender document within a period of three (3) months for marine discharge pipe line. He was further directed to submit the data within 15 days, on all industries (having potential to discharge into surface water courses) located in the downstream of Andhra Paper to form a consortium for laying marine discharge pipe line into Bay of Bengal.</p>																								
9.	<p>The industry shall regularly operate the water sprinklers at coal yard and lime kiln area for suppression / containment of fugitive emissions. The industry shall provide flow meter with totalizer to quantify the water consumed for operation of the sprinklers and the records shall be kept accessible to inspecting officials.</p>	<p>Action Plans and Status:</p> <p>Water sprinklers provided at various locations to suppression fugitive dust. The Flow meters' procurement and installation will be completed by December, 2024 at an estimated cost of Rs.10.00 Lacs.</p> <p>The 7th Respondent has issued Purchase order to M/s. +HAUSER PVT LTD on 11.10.2024 with cost of Rs.10.0 Lac, and the delivery of the equipment is expected by 20.12.2024. (ANNEXURE 3)</p> <p>Permanent Water sprinklers provided as below :</p> <table border="1" data-bbox="760 1822 1435 2389"> <thead> <tr> <th>Area</th> <th>No of sprinklers</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Lime Kiln Road</td> <td>20</td> <td rowspan="3">51</td> </tr> <tr> <td>Coal yard to Chip dust feeding area at Boiler roads</td> <td>14</td> </tr> <tr> <td>Coal yard to Boiler Stack roads</td> <td>17</td> </tr> <tr> <td>Coal yard shed - 1</td> <td>39</td> <td rowspan="5">86</td> </tr> <tr> <td>Coal yard shed - 3</td> <td>12</td> </tr> <tr> <td>Coal yard shed - 4</td> <td>11</td> </tr> <tr> <td>Coal yard shed - 5</td> <td>8</td> </tr> <tr> <td>Coal yard shed - 6</td> <td>16</td> </tr> <tr> <td>Movable</td> <td>8</td> <td></td> </tr> </tbody> </table>	Area	No of sprinklers	Total	Lime Kiln Road	20	51	Coal yard to Chip dust feeding area at Boiler roads	14	Coal yard to Boiler Stack roads	17	Coal yard shed - 1	39	86	Coal yard shed - 3	12	Coal yard shed - 4	11	Coal yard shed - 5	8	Coal yard shed - 6	16	Movable	8	
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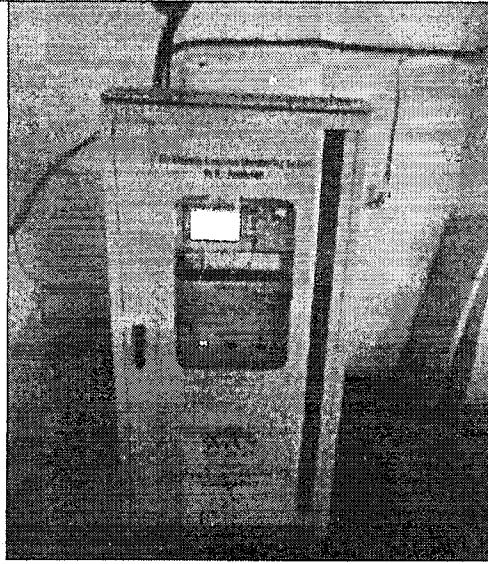


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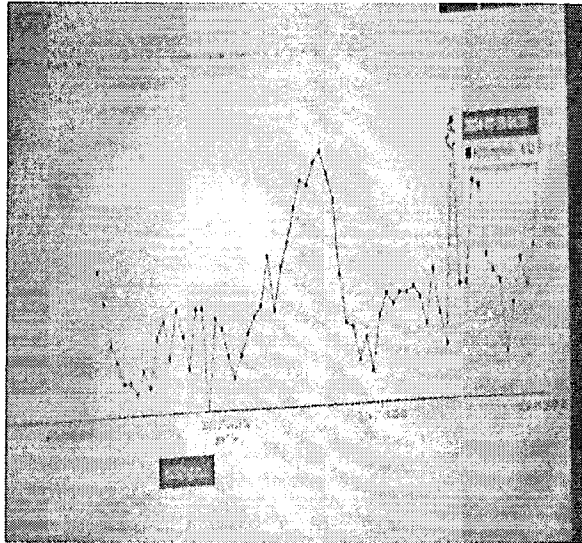
		sprinklers- coal yard		
				
13.	The industry shall complete reliability studies on the NCG collection and treatment system by 31.03.2024.	<p>Action Plans and Status:</p> <p>1) Pursuant to time extension requested by Andhra Paper from APPCB, based on technical expertise and subsequent commercial discussions, Andhra Paper awarded a purchase order to M/s. Chalamandalam MS Risk Services Limited on 19.07.2024 to carry out reliability studies on the NCG collection and treatment system & dispersion pattern of odours substances in the core zone and possible impacts in the surroundings of the industry. The purchase / service order copy is filed herewith as ANNEXURE 4.</p> <p>2) 01.08.24 to 02.08.24: Preliminary Site visit and assessment conducted by M/s. Chalamandalam MS Risk Services Limited.</p> <p>3) 17.09.24 to 23.09.24 : Reliability study & NCG sampling completed in core zone area done.</p> <p>The Report yet to be received from M/s. Chalamandalam and is expected in a month's time.</p>		
14.	The industry shall complete installation of H2S online stack analysers to rotary kiln - 1 & 2 and connectivity with website of APPCB & CPCB by 30.04.2024 for continuous display of the monitoring values in the online portal.	RLK.2 Stack with a Capital investment of Rs.14.00 Lacs installed and connected to CPCB & APPCB from 24.07.2024.		


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Kiln. 2 Stack H2S Online analyser



Screen Shot - Connected to APPCB & CPCB

RLK. 1 Stack :

Lime Kiln No: 1 is proposed to be replaced with new Lime Kiln in place of old kiln by adopting latest technologies with NEW ESP for dust control. In this regard, the CTE already had been obtained from Board. It is will be commissioned by the end of January 2025. This further helps to control emissions and to able to maintain all process control parameters like temperatures, O2 ratios etc. The New Kiln will be fitted with Online PM & H2S analysers.

<p>15. The industry shall undertake periodical study by an reputed organization to identify the dispersion pattern of odours substances in the core zone and possible impacts in</p>	<p>Please refer to response given to point No.13 above</p>
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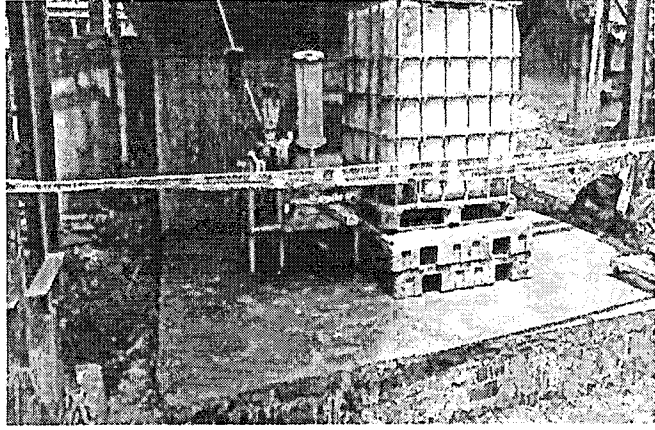
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	<p>the surroundings of the industry; to furnish short & long term plans to implement requisite containment measures to mitigate any odour nuisance in the surroundings. The study findings and implementation plan of action to alleviate odour nuisance in the surroundings shall be furnished to the Board within 3 months.</p>	
16.	<p>The industry to implement measures to control Hydrogen Sulphide emissions at Rotary Lime Kilns -1 & 2 to achieve compliance of H₂S concentration less than 10 mg/Nm³ within a month and other prescribed standards from the stack emissions of the rotary kilns.</p>	<p>Complied with</p> <p><u>A) Thermal Incineration :</u></p> <p>1) The rotary lime kiln temperature are always maintained higher than 1050 deg.c for 100 % calcination of Ca Co₃ to CaO, which is the output product to use in further manufacturing processes. At this elevated temperatures, there is scientifically no chance of H₂S emission from stacks.</p> <p>2) The Non Condensable Gases (NCG), which contain Sulphur compounds are incinerated in rotary lime-kilns across all pulp and paper industries and the same is a proven technology for treatment of these NCG gases.</p> <p>3) The temperature profile recorded during sampling period by CPCB on 15.05.2023 is attached as ANNEXURE 5.</p> <p>The temperature of KILN-1 is > 1290 deg.c & KILN-2 is > 1440 deg.c.</p> <p>4) The higher Kiln temperature indicates that H₂S presence in the NCG gases is completely decomposed. Hence, there is scientifically no chance of such high values reporting in stacks flue gases.</p> <p><u>B) H₂O₂ Dosing system for further improvement and care :</u></p> <p>In addition to above explanation, the 7th Respondent has recently installed H₂O₂ dosing to stack flue gases before ESP as</p>



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suggested by M/s. ANDRITZ TECHNOLOGIES PRIVATE LIMITED, (Finland based) Chennai - 600 032, India, and was commissioned on 20.09.2024.



C) Sampling by APPCB in Compliance :

The H₂S values of samples collected by APPCB on 24.10.2024 are within the norms and the same are filed herewith as **ANNEXURE 6.**

D) Sampling by 3rd Party M/S. Glens in compliance:

The H₂S values of samples collected by NABL accredited 3rd party M/S. Glens Innovation Lab Pvt. Ltd on 07.07.2023, 12.12.2023 & 14.12.2023 are within the norms.

Rotary Lime Kiln - 1 H₂S values are 9.1 mg/ Nm³ & 8.0 mg/ Nm³ respectively against the norm of 10 mg/Nm³.

Rotary Lime Kiln - 2 H₂S value is 8.5 mg/ Nm³ & 7.2 mg/ Nm³ respectively against the norm of 10 mg/Nm³.

The same are filed herewith as **ANNEXURES 7 & 8.**

E) Monthly sampling by M/s.SV Enviro in compliance:

NABL accredited 3rd party is testing the samples once in a month and the H₂S values are within the norms and the same reports are being submitted to APPCB Regional Office on monthly basis. The 3rd party test reports of last two months, i.e., September and October 2024 are filed herewith as **ANNEXURE 9.**


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3. The present status of the 7th Respondent's compliance of the conditions in CPCB's report dated 10.08.2023, as pointed out in the APPCB's report dated 28.08.2024, is set out as follows:

CPCB's Observation in its Report	Compliance status
<p>Page No: 22 S. No : 18 Point No: (1)</p> <p>To renew the lease agreement for discharge of treated effluent to lagoons at Turupulanka.</p>	<p>Under Progress with District Administration. The 7th Respondent is diligently pursuing with the Administration and has been continuously sending letters to the District Collector for issuing the lease renewal order.</p> <ul style="list-style-type: none"> • Principally approved for 33 years from 2009 onwards up to 2042 by APLMA & Commissioner of Industries • Now pending with District Collector Office for fixation of lease rental. • Yearly lease rentals are being paid to Thasildhar, Rajahmundry Urban. • Letters submitted to District Collector on 29.07.2023, 16.09.2023, 16.10.2023, 20.11.2023, 07.12.2023, 02.01.2024, 11.01.2024, 23.01.2024, 03.02.2024, 19.02.2024, 07.03.2024, 22.03.2024, 23.05.2024, 24.06.2024, 23.07.2024, 23.08.2024, 27.09.2024, 30.10.2024 & 20.11.2024 (Annexure 1 above) <p>totalling to 18 letters till date requesting to process lease renewal along with personal follow ups during meetings.</p> <p><u>Present Status:</u></p> <p><u>11.09.2024:</u> The District Collector, East Godavari District has convened a meeting with all stake holders including the Joint Collector, Municipal Commissioner, Additional Director - Industries, Executive Engineer - Irrigation, Environmental Engineer - APPCB, RDO & Thasildar. The Collector has directed to conduct a joint inspection of Turupulanka lands and has sought input from each of the concerned departments to proceed forward for lease renewal. (Annexure 2 above)</p>



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	<p>17.10.2024: The Thasidhar - Urban Rajahmundry and the City/Town Planner along with their team, inspected Turupulanka for land survey and conducted physical surveying of the lands.</p> <p>19.10.2024: Detailed Land survey conducted by Rajahmundry Thasidhar Office with land surveyors.</p> <p>14.11.2024: The 7th Respondent understands from the from the District Collector's Office that, the Environmental Engineer - APPCB, Executive Engineer - Godavari Head Works (Irrigation), Thasildhar - Rajahmundry Urban & Rajahmundry Municipal Corporation have submitted their reports on Turpulanka land to District Collector as on 14.11.2024.</p> <p>The fact remains that the 7th Respondent has been duly paying the lease rentals to the Thasildhar, Rajahmundry Urban who has been accepting the same and have been permitting the 7th Respondent to use the sand shoals in terms of the lease agreement till date without any disturbance or obstruction. The 7th Respondent herein has taken all possible efforts to get their Turpulanka lease renewed and have left no stone unturned to get the same done. The matter is now in the final stages of being approved and given effect to by the District collector and this Respondent shall abide by the conditions that may be laid down in this regard.</p>
<p>Page No: 22 S. No : 18 Point No : ii</p> <p>To augment air pollution control devices at recovery boiler and coal fired boiler to control particulate matter emissions.</p>	<p>Complied with</p> <p>During planned Mill Annual shut from 10.02.24 to 30.03.24, the following actions have been taken under preventive and predictive maintenance program on ESPs of Recovery Boiler and Coal Fired Boiler :</p> <p>Recovery Boiler : Source emissions from the stacks are controlled by Electrostatic Precipitators (ESP). There are 3 ESPs with total of 11 no's (3+3+5) of electric fields.</p>



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1) During 2024 Annual Mill shut : ESP No.3 fields 1 to 4 Renovation done as per details given below :

- The field internals for 1 to 4 were replaced at a cost of Rs.13.00 Crores. Company engaged M/s. KC Cottrell Engineering services, Chennai for this project.
- Common ash collection conveyers and related ducting were renovated
- Inlet & Outlet ducting for ESP.3 renovated.
- Inlet & Outlet Cone of ESP.3 modified to balancing flue gas distribution among all ESPs.
- Rapping mechanism also undertaken for maintenance and repairs to improve dust collection.
- Addressed thoroughly for Air ingress issue in ESP ducting / cones etc... to avoid negative pressure, aging, leakages and corrosion of ESP internal components to increase the efficiency dust collection.

2) During 2022 Annual Mill Shut: ESP.1 & 2 Renovation:

All the internal fields for ESP 1 & 2 completely replaced at a cost of Rs.8.69 Crores.

3) During 2021 Annual Mill Shut : ESP - 3 field - 5th Renovation:

The 5th field internals were replaced at a cost of Rs.95.0 Lacs.

Coal fired Boiler :

Coal fired boiler Source emissions from the stacks are controlled by Electrostatic Precipitators (ESP). There is 1 ESP with a total of 3 electric fields.

1) During 2024 Annual Mill Shut : ESP



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	<p>fields renovation :</p> <p>90 No's of ESP collecting electrode plates for 2 & 3 fields replaced with new due to heavy damages. Air ingress issues in ducting addressed.</p> <p>All the above jobs with respect to recovery boiler and coal-fired boiler are being done as a part of improvement plan. Replacement of aged equipment and spares in a phased manner for reliable operations and controls is being done. Every year during annual maintenance shut overhauling, cleaning and maintenance of ESPs will be undertaken. Further in this regard, this Hon'ble Tribunal may kindly note that</p> <p>1) NABL accredited 3rd party has been testing once in a month and the PM values are within the norms. The 3rd party test reports of last two months i.e., for SEP & OCT 2024 are filed herewith as ANNEXURE - 10</p> <p>2) The PM values of samples collected by APPCB on 24.10.2024 are within the norms. The APPCB reports of the collected samples are filed herewith as ANNEXURE 11 for effluents and ANNEXURE 12 for Stack emission.</p> <p>3) Previously the PM values of samples collected by M/s. Glens Innovation Labs Pvt. Ltd on 12.12.2023 & 14.12.2023 is within the norms and the same are filed herewith as ANNEXURE 13.</p>
<p>Page No: 22 S. No : 18 Point No : iii</p> <p>To implement measures to control Hydrogen Sulphide emissions at Rotary Lime Kilns -1 and Rotary Lime Kilns - 2 and comply with the source emission standards.</p>	<p>Complied with</p> <p><u>A) Thermal Incineration :</u></p> <p>1) The rotary lime kiln temperature are always maintained higher than 1050 deg.c for 100 % calcination of Ca Co₃ to CaO, which is the output product to use in further manufacturing processes. At this elevated temperatures, there is scientifically no chance of H₂S emission from stacks.</p> <p>2) The Non Condensable Gases (NCG), which contain Sulphur compounds are incinerated</p>



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in rotary lime-kilns across all pulp and paper industries and the same is a proven technology for treatment of these NCG gases.

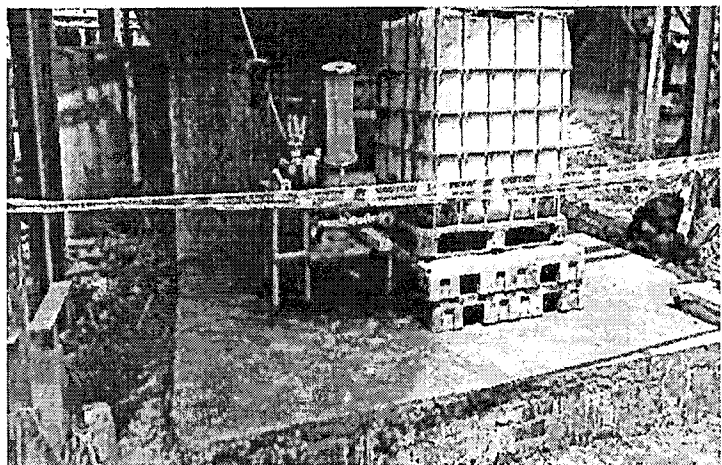
3) The temperature profile recorded during sampling period by CPCB on 15.05.2023 is attached as **(ANNEXURE 5 above)**.

The temperature of
KILN-1 is > 1290 deg.c &
KILN-2 is > 1440 deg.c.

4) The higher Kiln temperature indicates that H₂S presence in the NCG gases is completely decomposed. Hence, there is scientifically no chance of such high values reporting in stacks flue gases.

B) H₂O₂ Dosing system for further improvement and care :

In addition to above explanation, the 7th Respondent has recently installed H₂O₂ dosing to stack flue gases before ESP as suggested by M/s. ANDRITZ TECHNOLOGIES PRIVATE LIMITED, (Finland based) Chennai - 600 032, India, and was commissioned on 20.09.2024.



C) Sampling by APPCB in Compliance :

The H₂S values of samples collected by APPCB on 24.10.2024 are within the norms. **(ANNEXURE 6 above)**

D) Sampling by 3rd Party M/S. Glens in compliance:

The H₂S values of samples collected by NABL accredited 3rd party M/S. Glens Innovation Lab Pvt. Ltd on 07.07.2023,



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	<p>12.12.2023 & 14.12.2023 are within the norms.</p> <p>Rotary Lime Kiln - 1 H₂S values are 9.1 mg/ Nm³ & 8.0 mg/ Nm³ respectively against the norm of 10 mg/Nm³.</p> <p>Rotary Lime Kiln - 2 H₂S value is 8.5 mg/ Nm³ & 7.2 mg/ Nm³ respectively against the norm of 10 mg/Nm³.</p> <p>(ANNEXURE - 7 & 8 above)</p> <p>E) Monthly sampling by M/s.SV Enviro in compliance:</p> <p>NABL accredited 3rd party is testing the samples once in a month and the H₂S values are within the norms and the same reports are being submitted to APPCB Regional Office on monthly basis. The 3rd party test reports of last two months, i.e., September and October 2024. (ANNEXURE 9 above)</p>
<p>Page No : 22 S. No : 18 Point No : iv</p> <p>To calibrate and operate the OCEMS installed for monitoring particulate matter emissions, properly and record the actual concentrations.</p>	<p>Complied With</p> <p>1) Calibration :</p> <p>Annual Calibration schedule is in place for once in a quarter. The recent calibrations of OCEMS done in March'2024, May'2024 & Aug'24. The calibration reports indicates which are in the acceptable range. Such recent calibration report is herewith filled as ANNEXURE 14.</p> <p>2) Maintenance & quality control checks :</p> <p>All stack PM online sensors were undertaken for comprehensive maintenance and quality control checks in the month of April,2024 (Mill shut from 19.02.2024 to 30.04.2024 for annual maintenance and further workers unrest) by Equipment Supplier M/S. Swan Environmental Pvt. Limited, Hyderabad. The same reports are filed herewith as ANNEXURES 15, 16, 17 & 18.</p>



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Page No : 22

S. No : 18

Point No : v

To reduce the temperature of the effluent to less than 35°C prior to microbial treatment

Complied with

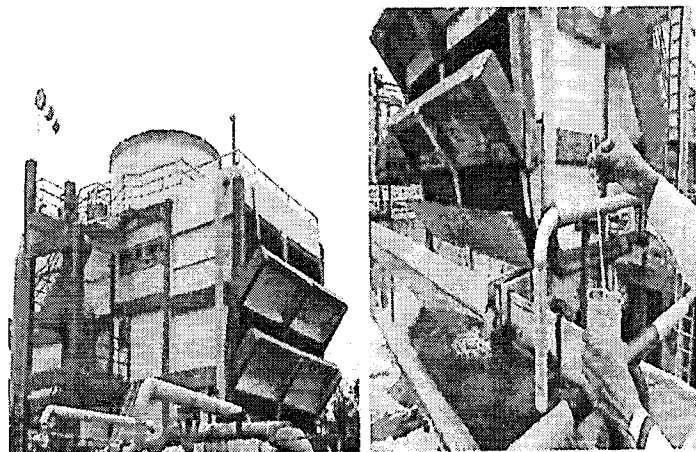
Compliance report submitted to Regional office - APPCB vide letter no. APL/ENV/2023/11-594, 08.11.2023.

The same reports is filed herewith as **ANNEXURES 19.**

Existing ETP cooling tower was rebuild as per below and successfully commissioned in the 3rd week of August, 2023.

- Entire civil tank and structures renovated.
- Cooling tower internal replaced
- Heat exchange surface area increased
- Wings increased from 4 to 8 No's of new set, accordingly gear new gear box installed
- Motor capacity increased from 50 HP to 100 HP.
- Drip eliminators replaced.
- Modification of inlet effluent distribution header line.
- Safety handrails replaced with SS pipe.
- Hot well slope readjusted to maintain equivalence
- Effluent inlet nozzles replaced

The project work has been assigned to M/s. S.V.Cooling Towers (P) Ltd. E-32 Kavi Nagar Industrial Area, Sector-17, Ghaziabad-201002, U.P, India with a Cost of Rs.73.74 Lakhs.



4. This Respondent submits that the 5th Respondent, in its Report dated 28.08.2024 at page No.2 has point No.1, last paragraph has

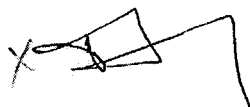


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observed that the BOD level has been recorded from the treated effluent samples taken during the month of February, 2023, January 2024, February 2024 and June 2024. However, the test report of the same samples collected by the APPCB and tested at the independent NABL Accredited Lab shows that the BOD levels are well within the acceptable norms. The effluent test reports of the 3rd party NABL accredited labs are filed herewith as **ANNEXURE 20.**

5. Apart from the issues to which the 7th Respondent has replied to above, the APCPC has found that the 5th Respondent has been in compliance of the conditions laid down by it under the EC and Consent issued by them, and of all other recommendations issued by them from time to time. Further, notwithstanding any conditions laid down by the APPCB or CPCB, this Respondent has been constantly upgrading its pollution control measures by implementing the first in the industry processes and technologies. This respondent, over the years has voluntarily implemented many systems and practices to achieve its objective of a sustainable manufacturing process.
6. This Respondent humbly prays that this Hon'ble Tribunal may be pleased to take this responses to the APPCB's report dated 28.08.2024 on file and render justice.

Dated at Chennai on this 28th day of November, 2024.



7th Respondent



Counsel for the 7th Respondent

Verification

I, **Sura Reddy Mallidi**, the **Sr. Vice President (Operations) & Mill Manager and Authorised Signatory of the 7th Respondent** herein, now come over to Chennai do hereby verify that the statements made in paragraphs 1 to 6 and the table above have been explained to me and are affirmed to be true to the best of my knowledge, belief and information.




7th Respondent
M. SURA REDDY
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