

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

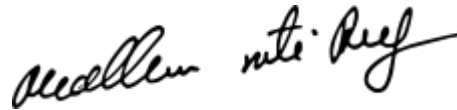
Vs

THE CHIEF SECRETARY TO GOVT OF ANDHRA PRADESH AND OTHERS.

.... Respondents

**AFFIDAVIT FILED BY R3- GUNTUR 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 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
GUNTUR MUNICIPAL CORPORATION
GUNTUR.

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,
 4thGround 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

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COMMISSIONER
 GUNTUR MUNICIPAL CORPORATION
 GUNTUR


 Deponent
COMMISSIONER
GUNTUR MUNICIPAL CORPORATION
GUNTUR.

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, Kirthi Chekuri, W/o B. Suneel Kumar Reddy, aged about 33 years, working as Commissioner, Guntur Municipal Corporation, Andhra Pradesh do hereby solemnly and sincerely affirm and make oath 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. 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. 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 Guntur Municipal Corporation is committed to upholding the highest environmental standards and complies with all applicable laws and regulations. We take our responsibility to protect the environment seriously and have implemented stringent measures to ensure the responsible management of both Solid and liquid waste.

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GUNTUR MUNICIPAL CORPORATION
GUNTUR

Deponent
COMMISSIONER
GUNTUR MUNICIPAL CORPORATION
GUNTUR.

5. It is submitted that Guntur Municipal corporation does not have any nearby riverbanks, and as such, the claim of liquid waste release into a river is factually inaccurate. As part of our commitment to the well-being of our community and the environment, Guntur Municipal corporation has proposed the establishment of new Sewage Treatment Plants (STPs) to address the growing challenges associated with solid and liquid waste management.
6. It is submitted that the Government have accorded an administrative sanction for Rs 903.82 Cr of which GoI share is Rs 540.00 Cr and Government of Andhra Pradesh share is Rs.363.82 Cr for "Comprehensive Underground Sewerage scheme in Guntur Municipal Corporation under OTSFA" A total number of 5 STPs are being proposed in the limits of Guntur Municipal Corporation. A total of 1082 Km laying of sewerage line is proposed out of which 505km has already been completed.

7. Progress of Work Achieved: -

Sl. No	Item of Work	Total Qty	So far completed under progress	Balance Qty to be done for full scope
1	Laying of Sewer Lines (in Kms)	1083.82	505.08	578.74
a)	Zone -I	147.75	131.99	15.76
b)	Zone-II	199.98	131.33	68.65
c)	Zone-III	254.94	119.21	135.73
d)	Zone-IV	277.24	16.76	260.48
e)	Zone-V	203.91	105.79	98.12
2.	Construction of STPs (in MLD)	123	98	25
a)	STP-1-10 MLD	i)Civil Works -90% Completed ii)Mechanical Works -50 % Completed		
b)	STP-2-20 MLD	i)Civil Works -90% Completed ii)Mechanical Works -25 % Completed		

c)	STP-3-25 MLD	Not Started		
d)	STP-4-41 MLD	i) Civil Works -20% Completed		
e)	STP-5-27MLD	i) Civil Works -20% Completed		
3	MAN Holes (in Nos)	43,574	20,376	23,198
4	Inspection Chamber (In Nos)	87,148	22,247	64,901
5	House Service Connections (in Nos)	1,40,000	300	1,39,700

8. It is submitted that Government of Andhra Pradesh has decided to safely close the project at a cost of Rs 560 Cr against original agreement cost of Rs 853.35 Crores (including construction of 5 STPs -123 MLD and 1,40,000 HSCs). Since the agency have procured total length of sewer pipes i.e 1042Km, it has not accepted the safe closure of work with reduced length of sewerage network and also requested for the same. GoAP have accorded permission to execute the above work to the full scope as per Memo 11376/UBS/2015 dated 14-02-2023
9. It is submitted that the agency agreed to resume the project only after release of RA 13,14 and 15th bills to the contractor, release of 5.50% FSD as per COVID G.O, creating a green channel PD account in CFMS for OTSFA schemes.
10. It is submitted that the Guntur Municipal Corporation will extend its complete cooperation and support to overcome these challenges and contribute to the successful resumption and completion of this project with utmost efforts.
11. It is submitted that the Guntur Municipal Corporation was identifying the critical importance of maintaining a healthy environment and committed to being responsible stewards of the ecosystems.
12. 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 21st day of March, 2024


Deponent
COMMISSIONER
GUNTUR MUNICIPAL CORPORATION
GUNTUR.
Before Me

Advocate

VERIFICATION

I, Kirthi Chekuri, W/o B. Suneel Kumar Reddy, aged about 33 years, working as Commissioner, Guntur Municipal Corporation, Andhra Pradesh, 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 21st day of March, 2024.


Deponent
COMMISSIONER
GUNTUR MUNICIPAL CORPORATION
GUNTUR.

FSTP SUDDHAPALLI DONKA

WORK PROGRESS PHOTOGRAPHS















