

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

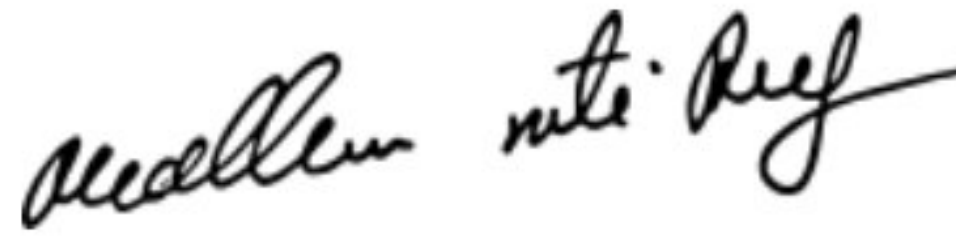
Vs

THE CHIEF SECRETARY TO GOVT OF ANDHRA PRADESH AND OTHERS.

.... Respondents

AFFIDAVIT FILED BY R3- SRIKALAHASTI
MUNICIPALITY - TIRUPATI 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.

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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

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


Commissioner
Srikalahasti 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. Ramesh Babu, S/o M. Malakondaiah Naidu, aged about 52 years, Occ. Municipal Commissioner, Srikalahasti Municipality, Srikalahasti, Tirupati District, 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. 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 holy Swarnamukhi River is crossing in the middle of the Srikalahasti Town and permeates entire Srikalahasti Town dividing into Eastern and Western sides. The Town was formed


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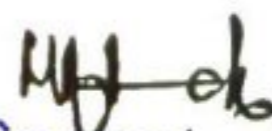
on both sides of the Swarnamukhi River and since ancient times, the sewage water was discharged into Swarnamukhi River. In the past decade, the Srikalahasti Town have been developing residentially, commercially, establishments and visiting of pilgrims to this holy shrine and as such, the discharge of sewage water into Swarnamukhi River have been increased.

5. It is submitted that, to address the merging of sewerage into holy river, the Government of Andhra Pradesh has taken up the Project under AMRUT 1.0, "Sewage and Septage Management with Construction of 7 MLD STP in Srikalahasti Municipality" with an estimated cost of Rs. 26.85 crores and the said work is being executed by the Public Health Division, Tirupati, as per specifications detailed below:

STP Capacity	Administrative Sanction	Functionality
7.0 MLD	G.O.Ms.No.437 MA & UD (UBS) Dept., Dated: 15-12-2017.	There is no sewerage and sewage treatment plant in the town. Sewage generated from Zone-II and III areas is being discharged to nearest natural drains without any treatment thus polluting the natural water bodies and the ground water table. In order to prevent this, a sewage treatment plant of 7 MLD capacity is proposed to treat the sewage flows generated from Zone II and III areas as per the prevailing standards.

6. It is submitted that, the above said Project has been grounded in the year 2018 at Survey No. 90/3(7), vide Agreement No. 15/2017-18, dt: 12.01.2018.

7. It is submitted that, the newly formed Government in the year 2019 has issued Memo No. 2820458/UBS/2019, dt: 03.09.2019 of MA&UD and instructed the "Works with progress of less than 25% & agreement signed but not grounded are to be verified for necessity by concerned Municipal Commissioners in consultation


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with local representatives (MLA) and submit report to the Managing Director, APUFIDC for further action”.

8. It is submitted that, the Municipal Commissioner and Hon'ble MLA, Srikalahasti has submitted the proposal to the Government of Andhra Pradesh to take up the above Project on 16.09.2019, which was completed only 12% as on the date and subsequently, the Government of Andhra Pradesh has accorded permission to take up the construction of STP.
9. It is submitted that, after duly according all technical approvals from the concerned Departments, the Srikalahasti Municipality has taken up 2nd phase of construction of STP in August-2020 due to lockdown imposed under 1st phase of Covid-19.
10. It is submitted that, subsequently, due to impose of lockdown in the 2nd phase of Covid-19 in the year 2021, the construction of STP plant has got further delayed.
11. It is submitted that, the present completion stage of STP construction as per the report of Public Health Division, Tirupati is 40% and Work-in-Progress Certificate and present construction stage photographs are herewith submitted. The stage of Construction of the STP 7.0 MLD capacity as per the Report of the Public Health Division, Tirupati are as follows:
 - a. SBR – completed.
 - b. Sludge sump –completed.
 - c. Dosage tank – completed.
 - d. Blower room - slab completed.
 - e. CCT – slab work in progress.
 - f. Admin Building - 1st floor roof slab completed.
 - g. Staff Quarters – slab work in progress.
 - h. RCC NP -3 400mm dia - 750m procured. 368m laying completed.
 - i. RCC NP-3 700mm dia - 250m procured.


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Srikalahasti Municipality

12. It is submitted that, the Govt. of Andhra Pradesh has accorded the Project for establishment of "Sewerage and Septage Management and recycle/reuse of treated water" under AMRUT 2.0 to the Srikalahasti Municipality for the year 2023 with an estimated cost of Rs. 9.50 crores and as such, the Srikalahasti Municipality has proposed for Establishment of additional STP with capacity of 3 MLD at survey No. 214 under AMRUT 2.0 for Sewerage and Septage Management and Recycle/Reuse of treated water and thereby protecting totally Swarnamukhi River free from merging sewerage water. The present status of STP as per the report of Public Health Division, Tirupati and its stage of construction are as follows

STP Capacity	Administrative Sanction	Functionality	Stage of construction
3.0 MLD	G.O.Ms.No.68 MA & UD (UBS) Dept., Dated: 19-05-2023	As per the projected population of Srikalahasti town, STP of 9.20 MLD capacity is required to meet future requirements. In order to prevent the discharge of sewage generated from Zone I areas, an additional STP of 3.0 MLD capacity is proposed for construction at Sy No. 214, Srikalahasti Municipality.	Technical sanction to be accorded.

13. It is submitted that, the present generated sewerage in the Srikalahasti Town is 7.3 MLD (out of which approximately 5.0 MLD is merging into Swarnamukhi River) and the Srikalahasti has taken Two STPs with total capacity of 10.0 MLD keeping in view of future requirements and the Public Health Division, Tirupati is committed and closely monitoring the completion of aforementioned STPs at earliest.

14. It is submitted that, in addition to the above mentioned Two STPs of total capacity of 10 MLD, it has been proposed exclusively Two STPs with total capacity of 1.90 MLD for AP TIDCO Colonies and


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Srikalahasti Municipality

95% works have been completed and the Trial Run of STPs is in progress.

15. 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 26th day of March, 2024


Commissioner
Srikalahasti Municipality

Before Me

Advocate

VERIFICATION

I, M. Ramesh Babu, S/o M. Malakondaiah Naidu, aged about 52 years, Occ. Municipal Commissioner, Srikalahasti Municipality, Srikalahasti, Tirupati District, Andhra Pradeshon 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 26th day of March, 2024.


Deponent
Srikalahasti Municipality



7 MLD STP - SRIKALAHASTI

19-02-2024
SRIKALAHASTI
ANDHRA PRADESH

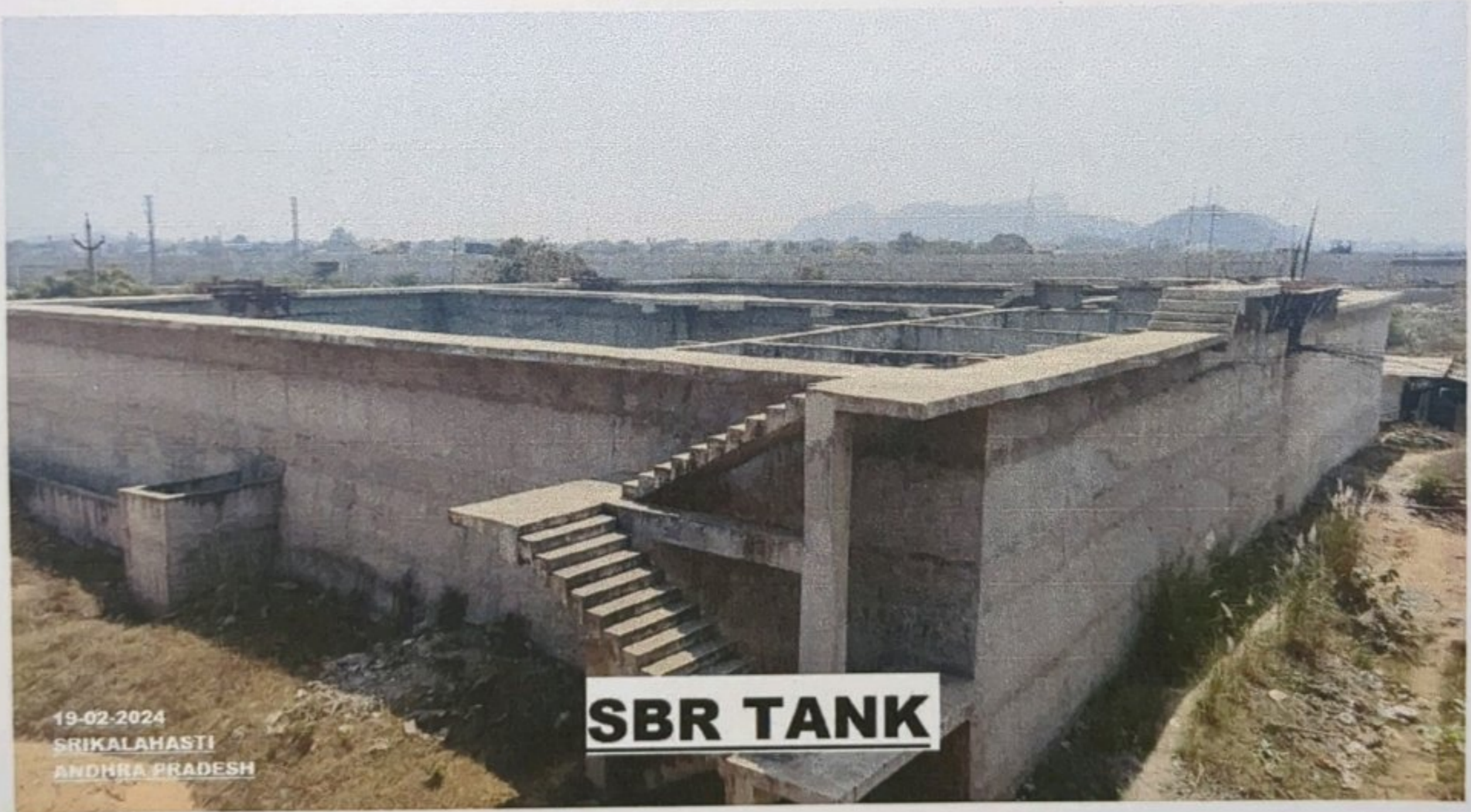


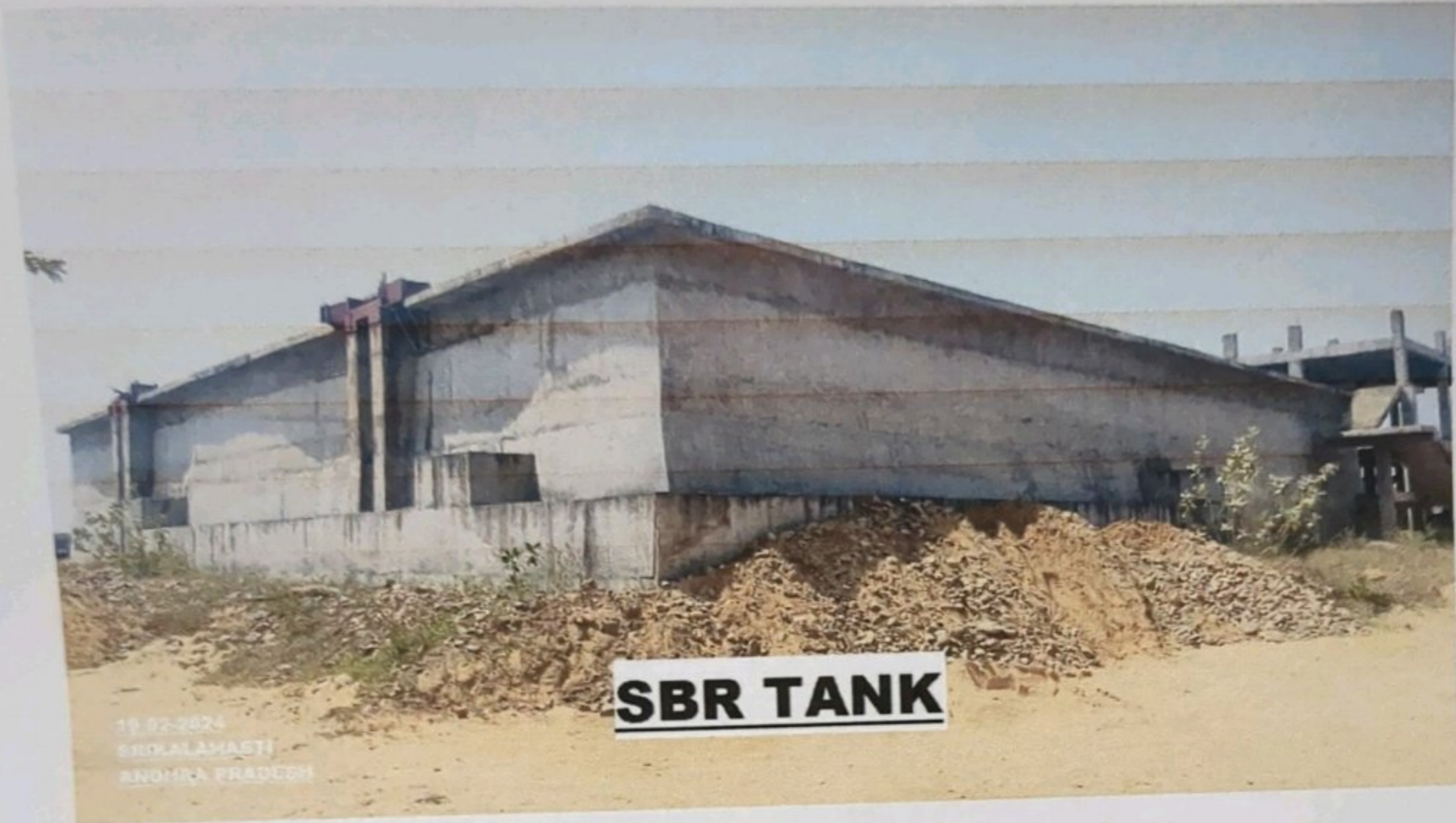
ADMIN BUILDING

19-02-2024
SRIKALAHASTI
ANDHRA PRADESH









APTIDCO Houses STPs



