

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

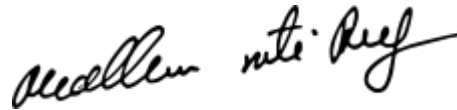
Vs

THE CHIEF SECRETARY TO GOVT OF ANDHRA PRADESH AND OTHERS.

.... Respondents

**AFFIDAVIT FILED BY R3- VIJAYAWADA 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

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
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

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Deponent
COMMISSIONER
Mpl. Corpn., Vijayawada

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, Swapnil Dinkar Pundkar, S/o. Dinkar Sakharam Pundkar, aged about 38 years, Occupation: Commissioner, Vijayawada 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 prime functions of Vijayawada Municipal Corporation for providing sewage system for the city population for discharging the sewage/ domestic wastewater from the households is one of the key environmental services being provided by VMC, apart from provision of potable water supply, solid waste management etc. Prior to launching the existing sewage system in Vijayawada by VMC, most of the households either using soak pits or septic tanks and were directly letting the fecal waste into the storm water drains, which was let out into low lying areas, nearest canals, natural drains and Krishna River. In this regard, the sewerage system of Vijayawada was established by VMC, which has arrested the pollution of ground water, canals, natural drains etc. that was earlier caused due to soak pits and septic tanks in each household. Thus, the VMC has been successful in arresting the

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historic pollution of ground water, canals, drains and Krishna River due to sullage / domestic sewage from about 3.06 lakh plus households residing in VMC area.

5. It is submitted that further, it may be noted that most of the civilizations in the world and so in India from ancient times have come into existence at the banks of Rivers, Canals and other water sources and Vijayawada is one such City that has spread on the banks of River Krishna. However, due to natural cleaning process in the Rivers, canals and any flowing waters, the pollutants in the upstream of River Krishna is cleaned up in the river course and is used for drinking purposes by many villages including various animals in the downstream. However, due to the natural cleaning process, Vijayawada population has been using fresh water from Krishna River, even before existence of VMC. The point that may be noted here is that it is very natural that upstream population pollutes River Water as part of their living needs and the same water is treated naturally (on its own due to water velocity, sand filtration, vegetation, ecology etc.) and the resultant fresh water is used by the population, flora and fauna in the downstream.

6. It is submitted that it is historically, the Vijayawada population, residing on the banks of River Krishna has been disposing the untreated sullage water into River Krishna for many decades, resulting in pollution of River Krishna. The Vijayawada Municipal Corporation, as part of providing its basic environmental functions as per constitution of India and in accordance with the CPHEEO guidelines amended from time to time has set up Eight Sewerage Treatment Plants (STPs) in various (Four) locations of Vijayawada with a total sewage treatment capacity of 150 MLD. One of the locations of STP is at Ramalingeswara Nagar, on the banks of River Krishna to treat the sewage that is generated specifically from the households situated abutting River Krishna.

7. It is submitted that the following Sewerage Treatment Plants were established in Vijayawada City prior to JNNURM and during the JNNURM Scheme sponsored by Government of India to meet the requirement for the Population by the year 2021.

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Table-1:

S.No.	Location of the STP	Capacity	Year of Commission	Outlet	Remarks
1	Ajith Singh Nagar	40 MLD	2011	Budameru	
2	Ajith Singh Nagar	20 MLD	2012	Budameru	
3	Ramalingeswara Nagar	20 MLD	2012	Krishna River (3.0 Km. far from Prakasam Barrage downstream side	
4	Ramalingeswara Nagar	10 MLD	2006	"	
5	Auto Nagar	10 MLD	2004	Guntutippa Drain	
6	Auto Nagar	10 MLD	2018	"	
7	Jakkampudi	20 MLD	2017	Budameru	
8	Jakkampudi	20 MLD	-	"	Under final completion stage
	Total	150			

8. It is further submitted that the said existing STPs as per above table are now designed for upgradation to achieve the latest NGT/ CPCB norms for discharge of treated effluent into inland water bodies. The eight STPs in the city have been constructed at various periods of time, starting from the year 2004. It is obvious that all the STPs in existence and in operation in VMC have been designed to conform to the old norms of 1986. Meanwhile, CPCB notified stringent effluent discharge standards in 2015, which were relaxed by the Ministry of Environment, Forest and Climate Change in 2017 for upcoming sewage treatment plants. In this connection, NGT constituted an expert committee to review the said relaxed standards. Based on the expert committee report, Hon'ble NGT passed order on April'30, 2019 in O.A No.59 to adopt the standards notified in 2015. In light of the April 2019 order passed by Hon'ble NGT, the existing STPs in Vijayawada city are being upgraded in order to meet the new standards (though it is relevant to new STPs).

9. It is submitted that the following new STPs and upgradation of existing STPs as per Table-1 are sanctioned for Rs.136.95 Cr. under AMRUT 2.0 by the Government of India in order to meet the Population by 2035

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Table-2:

S.No.	Location of the STP	Capacity	Technology	Present stage of work	Target date for Commissioning
	STP Upgraded under UNIDO/VMC grant				
1	Ramalingeswara Nagar.	20 MLD	UASBR	Completed and Under Trail Run	April 2024

NEW STPs under AMRUT 2.0					
1	Ramalingeswara Nagar.	20 MLD	SBR	Approval of Designs is in process.	January' 2026
2	Auto Nagar	10 MLD	MBBR	"	
Upgradation of STPs under AMRUT 2.0					
1	Ajith Singh Nagar	40 MLD	UASBR	Work is in progress	January 2026
2	Ajith Singh Nagar	20 MLD	UASBR	"	
3	Ramalingeswara Nagar	10 MLD	Extended Aeration	Work to be started	
4	Auto Nagar	10 MLD	Extended Aeration	"	
5	Auto Nagar	10 MLD	MBBR	"	
6	Jakkampudi	20 MLD	UASBR	"	
7	Jakkampudi	20 MLD	UASBR	"	
	Total	180 MLD			

10. It is submitted that the following are the Two works for which Work Orders were issued for construction new STPs and upgradation of existing STPs.

- i) Rejuvenation and Upgradation of existing old 10MLD STP to 20MLD STP and new 10MLD MBBR Plant at Auto Nagar to NGT Norms in Vijayawada Municipal Corporation for an amount of Rs.47.30 Cr.
- ii) Upgradation of STPs at Ajith Singh Nagar (20+40MLD), Jakkampudi (20+20MLD) and R.L Nagar (10MLD) & DP Stations infrastructure, SCADA etc., to NGT Norms in Vijayawada Municipal Corporation with an estimated project cost of Rs.89.65 Cr.

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11. It is submitted that the said existing STPs are now designed for upgradation to achieve the latest NGT/ CPCB norms for discharge of treated effluent into inland water bodies.

12. It is submitted that River Krishna, 20MLD STP at Ramalingeswara Nagar is one of the Eight existing STPs was already upgraded under Rejuvenation Project sanctioned for Rs.14.93 Cr. under UNIDO Grant as the Ramalingeswara Nagar STP is VMC's prime priority. The other existing 10 MLD STP at Ramalingeswara Nagar constructed in the year 2004 is also proposed to upgrade as per NGT norms under AMRUT2.0 for which tender was finalised and designs submitted & work will be started after approval of designs. It is also proposed to Construct new 20 MLD STP at Ramalingeswara Nagar to meet NGT norms under AMRUT 2.0 for which tender was finalised and designs submitted & work will be started after approval of designs.

13. It is submitted that, in view of the above, Vijayawada Municipal Corporation has already initiated upgradation and rejuvenation of all the existing STPs. Ramalingeswara Nagar STP is Vijayawada Municipal Corporation's prime priority and so, VMC has already taken up construction activity for rejuvenation of Ramalingeswara Nagar STP. The STP is completed, and the trial run and commissioning of the STP is in progress.

14. It is submitted that with in-house Laboratories for everyday testing of sewage parameters at Inlet Chambers and Outlets of STPs before letting into streams / Riverbeds. Besides in-house testing, APPCB used to collect samples of sewage periodically and furnish the test reports to Vijayawada Municipal Corporation. It is also Proposed to install the Real time monitoring (RTM) system for online monitoring of effluent quality parameters by the Vijayawada Municipal Corporation.

15. It is submitted that APPCB is installing a Realtime Monitoring System (RTMS) for regular monitoring of the STPs functioning. Commissioning of RTMS in Ramalingeswara Nagar Plant has been completed and will be connected to the CPCB/APPCB dashboards.

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16. It is submitted that it is proposed to divert eight storm water drains leading to Krishna River carries grey water from households living on the bank of the River in dry weather condition by the Vijayawada Municipal Corporation. Already 5 drains diverted with pumping to nearest STP, the entry of grey water closed in two Drains and one drain at Dhobikhana is proposed to divert with pumping for which work was already sanctioned & is in tender stage and will be completed in eight months.

17. It is submitted that Vijayawada Municipal Corporation is hereby submitting that, Vijayawada Municipal Corporation ensuing the effective methods to treat the collected sewage to implement the latest effluent norms of Hon'ble NGT issued in April'2019 along with upgradation of existing STPs and setting up of additional STPs designed for treatment of additional sewage that is estimated to be generated till the prospective year of 2035, to discharge treated sewage effluents into Krishna River.

18. 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.

Sworn and signed before me on
this 28th day of March, 2024.

Before me


Deponent
COMMISSIONER
Mpl. Corpn., Vijayawada

Attester

VERIFICATION

I, Swapnil Dinkar Pundkar, S/o. Dinkar Sakharam Pundkar, aged about 38 years, Occupation: Commissioner, Vijayawada 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 28th day of March, 2024.


Deponent
COMMISSIONER
Mpl. Corpn., Vijayawada

WORK PROGRESS PHOTOGRAPHS



PRE AERATION TANK& DNT TANK



ADDITIONAL AERATION TANK



AIR BLOWER ROOM at RL Nagar



SUMP CUM PUMP HOUSE for Tertiary treatment Completed



Pressure Sand Filter at RL Nagar for Tertiary treatment Completed





Gas Engine for Power generation



GAS BALLOONS



500 KVA Transformer Erected and Commissioned

Upgradation of STP at Ajith Singh Nagar 40 MLD Pre-Aeration Tank & De Nitrification Tank



Upgradation of STP at Ajith Singh Nagar 40 MLD Pre-Aeration Tank & De Nitrification Tank



▣ gradation of STP at Ajith Singh Nagar 40 MLD Additional - Aeration Tank



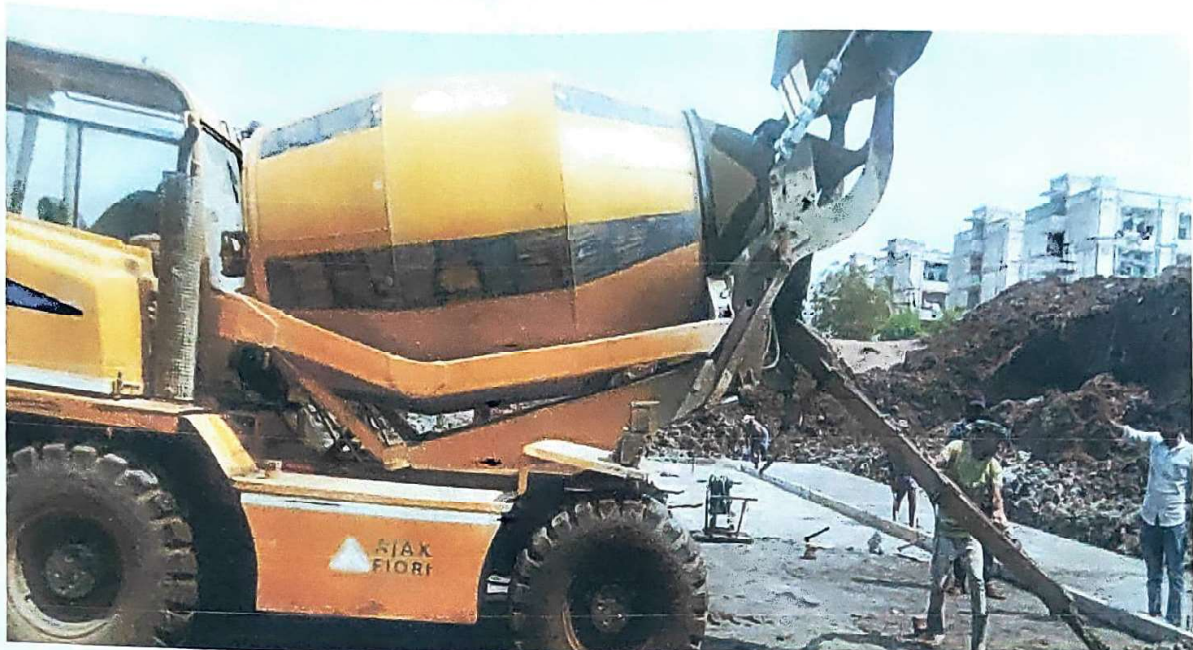
Upgradation of STP at Ajith Singh Nagar 40 MLD Additional - Aeration Tank



Upgradation of STP at Ajith Singh Nagar 20 MLD Additional - Aeration Tank



Upgradation of STP at Ajith Singh Nagar 20 MLD Additional - Aeration Tank



Upgradation of STP at Jakkampudi 20 MLD (Diversion of Existing Pipeline for Laying of Foundation to Additional - Aeration Tank)



Upgradation of STP at Jakkampudi 20 MLD (Diversion of Existing Pipeline for Laying of Foundation to Additional - Aeration Tank)



Upgradation of STP at Jakkampudi 20 MLD
(Diversion of Existing Pipeline for Laying of
Foundation to Additional - Aeration Tank)

