

BEFORE THE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE
AT
CHENNAI

ORIGINAL APPLICATION No.97 OF 2022

Dr.M.S. Tejashwari

... Applicant

AND

Union of India & Others

.. Respondents

INDEX TO THE LIST OF DOCUMENTS

S.NO.	DATE	PARTICULARS	PAGE NO
1.	20.08.2025	Memo filed on behalf of the applicant	1-3
2.	08.08.2025	Water Analysis Report done by the applicant (sample Id:A178198)	4-7
3.	08.08.2025	Water Analysis Report (sample Id:A178199)	8-11

Place: CHENNAI

DATE: 20.08.2025

T. Hemalatha

COUNSEL FOR APPLICANT

BEFORE THE NATIONAL GREEN TRIBUNAL, SOUTHERN ZONE
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MEMO FILED ON BEHALF OF THE APPLICANT

It is respectfully submitted that as per the orders of the Honorable National Green Tribunal dated 1-7-2025, the Honorable Tribunal directed that water sample for analysis shall be taken in the presence of the applicant by following the prescribed procedures. A sample from the surface of the well and also from the bottom of the well was directed to be taken for analysis.

On 08.08.2025, the officials from the Pollution Control Board and Secunderabad Cantonment Board came with a 10 HP pump and with a flexible pipe usually used for firefighting purposes at measuring about 18 feet with a ball cock at the end of the pipe. The said pipe was thrown into the well and it was floating. Since the well was already full up to the surface on account of heavy rains, the pipe did not sink at all. It was floating on the surface and only surface water samples could be taken. The applicant protested and stated that a flexible pipe will not serve the purpose as the well is

nearly 120 feet deep and 18 feet of length is not depth of the well. The directions of the Honorable National Green Tribunal have to be honored scrupulously. However, the sample from the depth of the well bottom of the well could not be taken and only surface water samples were taken. After the samples were taken, one sample was given to the applicant who handed over to a private lab for analysis and the reports have also come and the same are enclosed here with showing presence of coliform and E-coli. In both the water analysis reports it has been noted that the water is unfit for drinking in view of **faecal contamination (E.coli present)** and **excess turbidity** and **ammoniacal nitrogen** coupled with stale smell. Since, samples were not taken in accordance with the directions of this Hon'ble Tribunal, the applicant has not signed the panchanama.

Further, it has been represented before this Hon'ble Tribunal when orders were passed on 1.7.2025 that the respondents have removed the sludge which is incorrect. As a matter of fact, the pollution control board could not even remove 15 feet of depth of water as it did not bring the appropriate motor pump. As per the expert opinion of Blue Energy has been submitted already, the water should be continuously pumped to empty it. Then the sludge has to be removed manually. Due to unprofessional work by the pollution control board, the walls of the well have become highly unstable and the shape of the well has got altered. The sludge continues to remain at the bottom of the well which is estimated to be about 80-90 feet thick.

The respondents are not really serious about remedying the situation and are only whiling away the time and the agony for the applicant continues. The sewage from the adjoining land continues to flow into the well. The same was discovered recently when the overgrown grass was cleared by the applicant near the walls.

It is therefore prayed that appropriate directions may be issued to the Pollution Control Board to address the situation in a scientific manner in accordance with the directions already issued by this Hon'ble Tribunal and thus render justice.

Dated at Chennai this 20th day of August 2025

T. Hemala / ka

Counsel for Applicant



Water Analysis Report



Sample Id: A178198

Received date: 08-08-2025, time: 13:42.

Report No. A178198DT18-08-2025

I. Description of Sample

The IHS Laboratory advises all clients to follow methods of sampling specified in IS 17614 Part 1:2021 for chemical tests and in IS1622:1981 for bacteriological tests or such other standards as applicable. However, each sample is collected in a specific context, under prevalent feasibility considerations. The following details about source of sample(s) and collection method is based on information gathered from the sample collector and the client, to aid interpretation of test results.

Place & description of source, sampling point & sample container: Sri Sai Enclave, Survey No. 96,97,98 parts (Agricultural land), Thirumalagiri, Secunderabad-500015. **Open dug well** (Surface water II), (Depth 120 ft approx.). Using a motor, water is pumped from the well. The sample was then taken from the bucket by dipping a clean and dry IHSL (CBES) bottle and a sterile (SBT) bottle.





GPS Coordinates: Lat 17.476552, Long: 78.506319.

Sample collection date: 08-08-2025 , time: 12:25 AM, by Mr. Mallesh, M:91008 75898.

External temperature of sample container on receipt: Chem Lab: 28.1°C; Bio Lab: 21.8°C.

Other samples from same client:A178199. Past tests for same source, if any: 2025-08-12A178160SBPRpt, 2025-01-31A176968GPTRpt, 2024-06-05A175226GPTRpt, 2022-08-17CB02379GPTRpt.

Test Requested by: Ms. Dr. Tejashwari; M:7702892451; Email: mstejashwari@gmail.com.

Client Concerns: *Quality of water in the well which is exposed to sewage coming from the nearby residences and colony. General usage and drinking purpose.*

Desired Test Package & Code: *Groundwater Potability Tests (GPT)*

II. Test Results from Chemical Laboratory (Chem Lab)

Test dates: Physical: 12-08-2025 to 13-08-2025 ; Chemical: 12-08-2025 to 18-08-2025.

A. Physical & Sensory Characteristics:

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
1	Apparent Colour	Colourless	Rating	Colourless	--
	True Colour	<1	PCU (Hazen)	5	15
2	Odour	Stale smell	Rating	Agreeable	Agreeable
3	Turbidity	8.60	NTU	1	5
4	pH at 25°C	7.41	pH Value	6.5 to 8.5	No relaxation

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
5	Electrical conductivity (EC)	1282	μ Siemens/cm	≤ 2250 (CPCB, Class-E)	
6	Total dissolved solids (TDS)	652	mg/L	500	2000

¹ Apparent Colour as per IS3025Pt4 2.7.1 & True Colour, as per IS3025 Pt-4 2.7.2 platinum cobalt visual comparison of filtered (0.45 μ) sample. Detection limit: 1 Platinum Cobalt Units (PCU) aka Hazen Units.

² Odour rating: Odourless, Identifiable Odour, Agreeable or Disagreeable as per IS 3025 (Part 5).

³ Turbidity est. as in IS3025Pt10, using HI98703 Nephelo-Turbidimeter. Detection limit: 0.10NTU.

⁴ pH value at 25°C as per IS3025Pt11, by Hanna HI2002-02Edge (pH) instrument. Detection limit: 4 pH value.

⁵ EC at 25°C as per IS3025Pt14, by Hanna HI2003-02EdgeEC. Detection limit: 1 μ Siemens/cm. The Central Pollution Control Board (CPCB) best use classes A-C, which include drinking water do not specify any guideline value for EC. The CPCB reference value shown here is for class-E (irrigation water).
<https://cpcb.nic.in/water-quality-criteria/>.

⁶ TDS by gravimetry of residue from filtered sample as per IS3025 (Part-16). Detection limit: 4mg/L.

B. General Chemical Characteristics:

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
1	P-Alkalinity	0	As CaCO ₃ mg/L		
	Total Alkalinity	273	As CaCO ₃ mg/L	200	600
2	Total Hardness	368.16	As CaCO ₃ mg/L	200	600
3	Calcium	115.05	Ca ⁺⁺ mg/L	75	200
4	Magnesium	19.73	Mg mg/L	30	100
5	Ammoniacal Nitrogen	0.85	NH ₃ -N mg/L	0.50	No relaxation
6	Nitrite	0.06	NO ₂ mg/L	3.0 (WHO)	
7	Nitrate	8.41	NO ₃ mg/L	45	No relaxation
8	Fluoride	0.29	F ⁻ mg/L	1.0	1.5
9	Boron	0.02	B mg/L	0.5	2.4
10	Chloride	80.77	Cl ⁻ mg/L	250	1,000
11	Sulphate	114.81	SO ₄ mg/L	200	400
12	Iron	0.36	As Fe mg/L	1.0	No relaxation
13	Manganese	0.14	As Mn mg/L	0.1	0.3
BDL: Below detection limit of the test method.					

¹ P- & T-Alkalinity by titration with 0.02N H₂SO₄, as per IS3025Pt23:2023. Detection limit: 5mg/L.

² Hardness by titration in alkaline buffer (pH \approx 10) with standard EDTA; using EBT as indicator; as per IS3025Pt21, 2009RA2023. Detection limit: 5.0 mg/L.

³ Calcium: titration of strongly alkalinized sample (12 \leq pH \leq 13) with EDTA; using P&R indicator, as per IS 3025 (Part 40), 2024, sec 5. Detection limit: 2.0 mg/L.

⁴ Magnesium as per IS 3025 (Part 46), sec 6: Volumetric method. Detection limit: 2mg/L.

⁵ Ammoniacal-N: Indophenol colour development & spectrophotometry at 640 nm, as per IS 3025 (Part 34/Sec 1), 5.4 Phenate Method. Detection limit: 0.10mg/L.

⁶ Nitrite as NO₂ mg/l, by APHA 4500-NO₂-Colorimetric. The reference value for NO₂ shown here is based on WHO guideline. No specification for Nitrite in IS10500. Detection limit: 0.01mg/L.

⁷ Nitrate by UV spectrophotometric screening as per APHA 4500-NO₃B. Detection limit: 0.10mg/L. The WHO guideline value for nitrate is 10mg of NO₃-NL. This is equivalent to 10 X 4.4268 = 44.268 mg of NO₃, which is almost the same as the IS10500 guideline value of 45 mg/l of NO₃.

⁸ Fluoride by APHA 4500-F- D. SPADNS method. Detection limit: 0.10mg/L.

⁹ Boron by APHA Standard Methods 24th Ed. 4500 B Curcumin Method. Detection limit: 0.02 mg/L.

¹⁰ Chloride by titration with 0.0141N AgNO₃ & K₂CrO₄ indicator as per IS3025Pt32. Detection limit: 2mg/L. Chloride mg to milli equivalent (meq) conversion factor: 0.028206.

- ¹¹ Sulphate by IS3025Pt24 Turbidity method based on nephelometry. Detection limit: 4.0mg/L. Sulfate mg to milli equivalent (meq) conversion factor: 0.0208195.
- ¹² Iron by IS:3025Pt53(R2019), Phenanthroline, direct determination of soluble iron. Detection limit: 0.02mg/L
- ¹³ Manganese by IS:3025Pt59(R2017), Formaldoxime Spectrophotometry. Detection limit: 0.02mg/L

Authorised Signatory: A. Santhosh Kumar

End of II: Chemical Lab Report

Interpretation of General Chemical Characteristics: The acceptable limit is the primary guideline value. In the absence of an alternative source, values within the permissible limit may be tolerated. (IS 10500, Table-2, Note 2).

III. Test Results from Microbiology Laboratory (Bio Lab)

Test dates: 12-08-2025, to: 13-08-2025.

C. Bacteriological Analysis:

Sl	Method	Parameter	Result	Units	IS10500 Ref. Values
1	MFC	Total coliforms	Present	Absent/Present	
2		<i>E. coli</i>	Present	Absent/Present	Absent in any 100 ml sample

- ¹ ESA: Enzyme Substrate Auto-analysis for detection of coliforms & *E. coli*, using premeasured sterile chromogenic substrate (ONPG) for total coliforms and fluorogenic substrate MUG for *E. coli* as per APHA Standard Methods 24th Ed. 9223 B. Enzyme Substrate Test. OR
- ² MFC: Filter 100 ml sample and incubate the membrane in chromogenic agar for 21 ± 3h and confirm by oxidase test, as per IS 15185, 2016 RA 2021.

Authorised signatory: B. Bhargavi

End of III: Bio Lab Report

IV. Notes and Recommendation

1. High turbidity of the sample indicates high levels of the total suspended solids (TSS) consisting of particulate matter including: (sediment – especially clay and silt), (b) fine organic and inorganic matter, (c) soluble colored organic compounds, algae, and other microscopic organisms.
2. Excess of ammonia, in the presence of nitrites, indicates probable sewage contamination. Ammonia indicates continuing contamination. Nitrites indicate recent contamination. Nitrates indicate older contamination.
3. **The water is unfit for drinking in view of faecal contamination and excess turbidity and ammoniacal nitrogen coupled with stale smell**, environmental and faecal contamination. Domestic use of water carries the risk of water borne diseases due to contamination through washed utensils, washed fruits, inadvertent swallowing while bathing, showering, brushing or face washing.

End of Report

Dr. Prasanta Mahapatra, Director

Test results are given only in relation to sample(s) tested for desired test service, & based on sampling information provided by the client. The test report shall not be reproduced except in full, without prior written approval of the laboratory.

References:

IS10500. 2012. Indian Standard Drinking Water Specification. 2nd Revision. New Delhi: Bureau of Indian Standard (BIS); 2012 May, RA2023Amd4.

CPCB. Water Quality Criteria [Web Page]. 2019. Available at: <https://cpcb.nic.in/water-quality-criteria>.



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Water Analysis Report



Sample Id: A178199

Received date: 08-08-2025, time: 13:42.

TC-7658

Report No. A178199DT18-08-2025

I. Description of Sample

The IHS Laboratory advises all clients to follow methods of sampling specified in IS 17614 Part 1:2021 for chemical tests and in IS1622:1981 for bacteriological tests or such other standards as applicable. However, each sample is collected in a specific context, under prevalent feasibility considerations. The following details about source of sample(s) and collection method is based on information gathered from the sample collector and the client, to aid interpretation of test results.

Place & description of source, sampling point & sample container: Sri Sai Enclave, Survey No. 96,97,98 parts (Agricultural land), Thirumalagiri, Secunderabad-500015. **Open dug well** (Surface water I), (Depth 120 ft approx.). The water sample was collected by dipping a clean and dry IHSL (CBES) bottle and a sterile (SBT) bottle.



GPS Coordinates: Lat 17.476434, Long: 78.506384.

Sample collection date: 08-08-2025, time: 11:25 AM, by Mr. Mallesh, M:91008 75898.

External temperature of sample container on receipt: Chem Lab: 21.9°C; Bio Lab: 21.7°C.

Other samples from same client: A178198. Past tests for same source, if any: 2025-08-12A178160SBPRpt, 2025-01-31A176968GPTRpt, 2024-06-05A175226GPTRpt, 2022-08-17CB02379GPTRpt.

Test Requested by: Ms. Dr. Tejashwari; M:7702892451; Email: mstejashwari@gmail.com.

Client Concerns: *Quality of water in the well which is exposed to sewage coming from the nearby residences and colony. General usage and drinking purpose.*

Desired Test Package & Code: *Groundwater Potability Tests (GPT)*

II. Test Results from Chemical Laboratory (Chem Lab)

Test dates: Physical: 12-08-2025 to 13-08-2025 ; Chemical: 12-08-2025 to 18-08-2025.

A. Physical & Sensory Characteristics:

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
1	Apparent Colour	Pale yellow	Rating	Colourless	--
	True Colour	<1	PCU (Hazen)	5	15
2	Odour	Stale smell	Rating	Agreeable	Agreeable
3	Turbidity	5.40	NTU	1	5
4	pH at 25°C	7.45	pH Value	6.5 to 8.5	No relaxation
5	Electrical conductivity (EC)	1215	µSiemens/cm	≤ 2250 (CPCB, Class-E)	
6	Total dissolved solids (TDS)	624	mg/L	500	2000

¹ Apparent Colour as per IS3025Pt4 2.7.1 & True Colour, as per IS3025 Pt-4 2.7.2 platinum cobalt visual comparison of filtered (0.45µ) sample. Detection limit: 1 Platinum Cobalt Units (PCU) aka Hazen Units.

² Odour rating: Odourless, Identifiable Odour, Agreeable or Disagreeable as per IS 3025 (Part 5).

³ Turbidity est. as in IS3025Pt10, using HI98703 Nephelo-Turbidimeter. Detection limit: 0.10NTU.

⁴ pH value at 25°C as per IS3025Pt11, by Hanna HI2002-02Edge (pH) instrument. Detection limit: 4 pH value.

⁵ EC at 25°C as per IS3025Pt14, by Hanna HI2003-02EdgeEC. Detection limit: 1 µ Siemens/cm. The Central Pollution Control Board (CPCB) best use classes A-C, which include drinking water do not specify any guideline value for EC. The CPCB reference value shown here is for class-E (irrigation water).

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⁶ TDS by gravimetry of residue from filtered sample as per IS3025 (Part-16). Detection limit: 4mg/L.

B. General Chemical Characteristics:

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
1	P-Alkalinity	0	As CaCO ₃ mg/L		
	Total Alkalinity	267.78	As CaCO ₃ mg/L	200	600
2	Total Hardness	341.36	As CaCO ₃ mg/L	200	600
3	Calcium	100.87	Ca ⁺⁺ mg/L	75	200
4	Magnesium	24.80	Mg mg/L	30	100
5	Ammoniacal Nitrogen	0.56	NH ₃ -N mg/L	0.50	No relaxation
6	Nitrite	1.03	NO ₂ mg/L	3.0 (WHO)	
7	Nitrate	3.69	NO ₃ mg/L	45	No relaxation
8	Fluoride	0.94	F ⁻ mg/L	1.0	1.5

Sl	Parameter	Result	Units	IS10500 Ref. Values	
				Acceptable	Permissible
9	Boron	BDL	B mg/L	0.5	2.4
10	Chloride	78.95	Cl ⁻ mg/L	250	1,000
11	Sulphate	93.88	SO ₄ mg/L	200	400
12	Iron	0.26	As Fe mg/L	1.0	No relaxation
13	Manganese	0.18	As Mn mg/L	0.1	0.3
BDL: Below detection limit of the test method.					

- ¹ P- & T-Alkalinity by titration with 0.02N H₂SO₄, as per IS3025Pt23:2023. Detection limit: 5mg/L.
- ² Hardness by titration in alkaline buffer (pH ≈ 10) with standard EDTA; using EBT as indicator; as per IS3025Pt21, 2009RA2023. Detection limit: 5.0 mg/L.
- ³ Calcium: titration of strongly alkalinized sample (12 ≤ pH ≤ 13) with EDTA; using P&R indicator, as per IS 3025 (Part 40), 2024, sec 5. Detection limit: 2.0 mg/L.
- ⁴ Magnesium as per IS 3025 (Part 46), sec 6: Volumetric method. Detection limit: 2mg/L.
- ⁵ Ammoniacal-N: Indophenol colour development & spectrophotometry at 640 nm, as per IS 3025 (Part 34/Sec 1), 5.4 Phenate Method. Detection limit: 0.10mg/L.
- ⁶ Nitrite as NO₂ mg/l, by APHA 4500-NO₂-Colorimetric. The reference value for NO₂ shown here is based on WHO guideline. No specification for Nitrite in IS10500. Detection limit: 0.01mg/L.
- ⁷ Nitrate by UV spectrophotometric screening as per APHA 4500-NO₃B. Detection limit: 0.10mg/L. The WHO guideline value for nitrate is 10mg of NO₃-NL. This is equivalent to 10 X 4.4268 = 44.268 mg of NO₃, which is almost the same as the IS10500 guideline value of 45 mg/l of NO₃.
- ⁸ Fluoride by APHA 4500-F- D. SPADNS method. Detection limit: 0.10mg/L.
- ⁹ Boron by APHA Standard Methods 24th Ed. 4500 B Curcumin Method. Detection limit: 0.02 mg/L.
- ¹⁰ Chloride by titration with 0.0141N AgNO₃ & K₂CrO₄ indicator as per IS3025Pt32. Detection limit: 2mg/L. Chloride mg to milli equivalent (meq) conversion factor: 0.028206.
- ¹¹ Sulphate by IS3025Pt24 Turbidity method based on nephelometry. Detection limit: 4.0mg/L. Sulfate mg to milli equivalent (meq) conversion factor: 0.0208195.
- ¹² Iron by IS:3025Pt53(R2019), Phenanthroline, direct determination of soluble iron. Detection limit: 0.02mg/L
- ¹³ Manganese by IS:3025Pt59(R2017), Formaldoxime Spectrophotometry. Detection limit: 0.02mg/L

Authorised Signatory: A. Santhosh Kumar

A. Santhosh Kumar

End of II: Chemical Lab Report

Interpretation of General Chemical Characteristics: The acceptable limit is the primary guideline value. In the absence of an alternative source, values within the permissible limit may be tolerated. (IS 10500, Table-2, Note 2).

III. Test Results from Microbiology Laboratory (Bio Lab)

Test dates: 12-08-2025, to: 13-08-2025.

C. Bacteriological Analysis:

Sl	Method	Parameter	Result	Units	IS10500 Ref. Values
1	MFC	Total coliforms	Present	Absent/Present	
2		<i>E. coli</i>	Present	Absent/Present	Absent in any 100 ml sample

¹ ESA: Enzyme Substrate Auto-analysis for detection of coliforms & *E. coli*, using premeasured sterile chromogenic substrate (ONPG) for total coliforms and fluorogenic substrate MUG for *E. coli* as per APHA Standard Methods 24th Ed. 9223 B. Enzyme Substrate Test. OR

² MFC: Filter 100 ml sample and incubate the membrane in chromogenic agar for 21 ± 3h and confirm by oxidase test, as per IS 15185, 2016 RA 2021.

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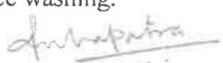
B. Bhargavi

End of III: Bio Lab Report

IV. Notes and Recommendation

1. High turbidity of the sample indicates high levels of the total suspended solids (TSS) consisting of particulate matter including; (sediment – especially clay and silt), (b) fine organic and inorganic matter, (c) soluble colored organic compounds, algae, and other microscopic organisms.
2. Excess of ammonia, in the presence of nitrites, indicates probable sewage contamination. Ammonia indicates continuing contamination. Nitrites indicate recent contamination. Nitrates indicate older contamination.
3. Very hard water affects domestic usability. Hardness of this water may affect all kinds of cleaning tasks such as washing of clothes, dishes. Water distribution pipes, hot geysers etc, would be vulnerable to scaling. Washing machines and other home appliances would require of appropriate antiscalant and/or frequent descaling, in accordance with respective product specifications.
4. **The water is unfit for drinking in view of faecal contamination and excess turbidity and ammoniacal nitrogen coupled with stale smell**, environmental and faecal contamination. Domestic use of water carries the risk of water borne diseases due to contamination through washed utensils, washed fruits, inadvertent swallowing while bathing, showering, brushing or face washing.

End of Report


Dr. Prasanta Mahapatra, Director

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References:

- IS10500. 2012. Indian Standard Drinking Water Specification. 2nd Revision. New Delhi: Bureau of Indian Standard (BIS); 2012 May, RA2023Amd4.
- WHO, 2022. Guidelines for drinking-water quality. 4th Edition, 1st & 2nd addenda. Geneva: WHO, 2022. <https://www.who.int/publications/i/item/9789240045064>.
- WHO, 2003. Total dissolved solids in Drinking-water. Background document for development of WHO Guidelines for Drinking-water Quality. Geneva: World Health Organization (WHO); 2003. <https://cdn.who.int/media/docs/default-source/wash-documents/wash-chemicals/tds.pdf>
- CPCB. Water Quality Criteria [Web Page]. 2019. Available at: <https://cpcb.nic.in/water-quality-criteria/>.



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ORIGINAL APPLICATION No.97 OF 2022

Dr.M.S. Tejashwari

... Applicant

AND

Union of India & Others

.. Respondents

MEMO FILED ON BEHALF OF THE APPLICANT

T.HEMALATHA & S.DEEPIKA

COUNSEL FOR APPLICANT

9940294233/7358042107
