

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH NEW DELHI**

IA No. 575/2024 IN O.A. No. 234/2020

In the matter of

Anuradha

Applicant

Versus

State of U.P. & Ors

Respondents

INDEX

S.No.	Particulars	Page No.
1.	Reply by Applicant to the IA no. 575 /2024 filed by the Respondent no.4	1-6
2.	Annexure A Actual pictures of residence of Satyapal and the nearby areas.	7-11

24.01.2025

Filed by



HASIL JAIN

Amicus Curie
Ch. No. 295 Block II
Delhi High Court
M.7838707338
advjain25@gmail.com

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH NEW DELHI**

IA No. 575/2024 IN O.A. No. 234/2020

In the matter of

Anuradha

Applicant

Versus

State of U.P. & Ors

Respondents

**REPLY BY THE APPLICANT TO THE IA NO. 575/2024 FILED
BY THE RESPONDENT NO.4**

MOST RESPECTFULLY SHOWETH:

1. That the Joint committee report dated 01.03.2021 at internal page no.7 observed that the Ground Water samples no. 01, 03 and 04 having shallow depth had high colour, conductivity, COD, Total hardness and Sulphate concentration. It is submitted that the Sample no. 03 is the residence of Satyapal, village Mahmadpur. And this observation of Joint Committee is now being defended by R-4 by saying that the high COD and BOD at that location is because of Cow Dung lying there and because of nearby Pond.
2. In this regard it is submitted that there are no ponds, Or the presence of cow dung in the vicinity of Sample no. 03 ,the residence of Satyapal, village Mahmadpur which the respondent is vehemently defending with respect to the sample's high colour, conductivity, COD, Total hardness and Sulphate concentration etc. on the basic of the same mentioned above.
3. Therefore, it is submitted that the R-4 is falsely claiming that there are cow dung heaps and pond present nearby sample no.

03. It is submitted that the photographs annexed with the IA does not represent the same handpump from which the sample was collected from and the pond shown and thus the R-4 is trying to mislead. In this regard the actual pictures of handpump and the residence of Satyapal and the nearby areas are enclosed within this reply as ANNEXURE A.
4. Without prejudice to the above submission it is submitted that R-4 has tried to explain the presence of high COD and high BOD in ground water by blaming the Cow Dung. However, the R-4 has failed to explain the presence of high Sulphates in the Ground Water. Cow dung has nitrates and not sulphates.
 5. That on previous occasion, the CPCB directions dated 04.11.2019 which have been annexed as ANNEXURE A/1 in the IA No. 351 of 2024, mentions the inspection dated **02.04.2019** wherein the R-4 was found releasing untreated waste water inside the premises and the ground water was found having colour 13 Hazen.
 6. That further on another previous occasion, vide inspection dated **06.03.2018**, the CPCB found that the R-4 has no provision of treatment of the spray pond overflow.
 7. Therefore, the previous findings dated 02.04.2019 AND 06.03.2018 coupled with the present findings related to presence of Sulphur, establishes that R-4 is continuing the discharge of sulphur effluents in the environment which is reaching Ground Water.
 8. That the R-4 in its IA has relied upon the study titled "Comparison of the Output voltage characteristics pattern of sewage sludge, kitchen waste, and cow dung in single chamber single electrode Microbial Fuel Cell". It is submitted that said study is with respect to the electric potential of cowdung as

substrate when used in Microbial Fuel Cell. It nowhere states that the Cow dung has significant potential to increase the COD, BOD, high colour, Total hardness and Sulphate concentration of the water stream. Therefore, the reliance on that study by R-4 is misleading and irrelevant.

9. Further, the R-4 is trying to give more value to a private sampling done by him and tested by 'Environmental and Technical Research Centre'. And in this manner trying to bypass the findings of the Joint Committee. It is submitted that such approach is liable to be discarded.

10. It is further submitted that after the establishment of R-4, the quality of water have been seriously impaired and worsened. And the rise of water borne disease, lack of access to clean drinking water, contamination of water sources have been the direct affects of improper waste management and treatment.

PRAYER

In light of the above submissions, it is humbly prayed before the Hon'ble Tribunal to dismiss the IA no. 575 of 2024 filed by the Respondent no.4.

Delhi

24.01.2025


Applicant

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

PRINCIPAL BENCH NEW DELHI

IA No. 575/2024 IN O.A. No. 234/2020

In the matter of

Anuradha

Applicant

Versus

State of U.P. & Ors

Respondents

AFFIDAVIT

I, Anuradha W/o Dharamveer Singh aged about 46 years R/o village Sarakthal, town Pipli Nayak, District Rampur, P.O. Pipli Nayak U.P. 244925 do hereby solemnly affirm and declare as under :

1. That I am the Applicant in the Original Application and well being and acquainted with facts and circumstances of the case and thus competent to swear this affidavit.
2. That the accompanying Reply to the Application filed by R-4 has been drafted under the guidance of the amicus curie and contents thereof have been read over and explained to me in my vernacular which are true and correct to my knowledge, the contents thereof may kindly be read as part and parcel to this affidavit also and not repeated herein.
3. The contents as stated above are true and correct to my knowledge and belief.

Deponent/Declarant

Anuradha
DEPONENT

Verification

It is verified at Swan on 24.1.25 that the contents of the present application are true and correct and nothing has been concealed therefrom.

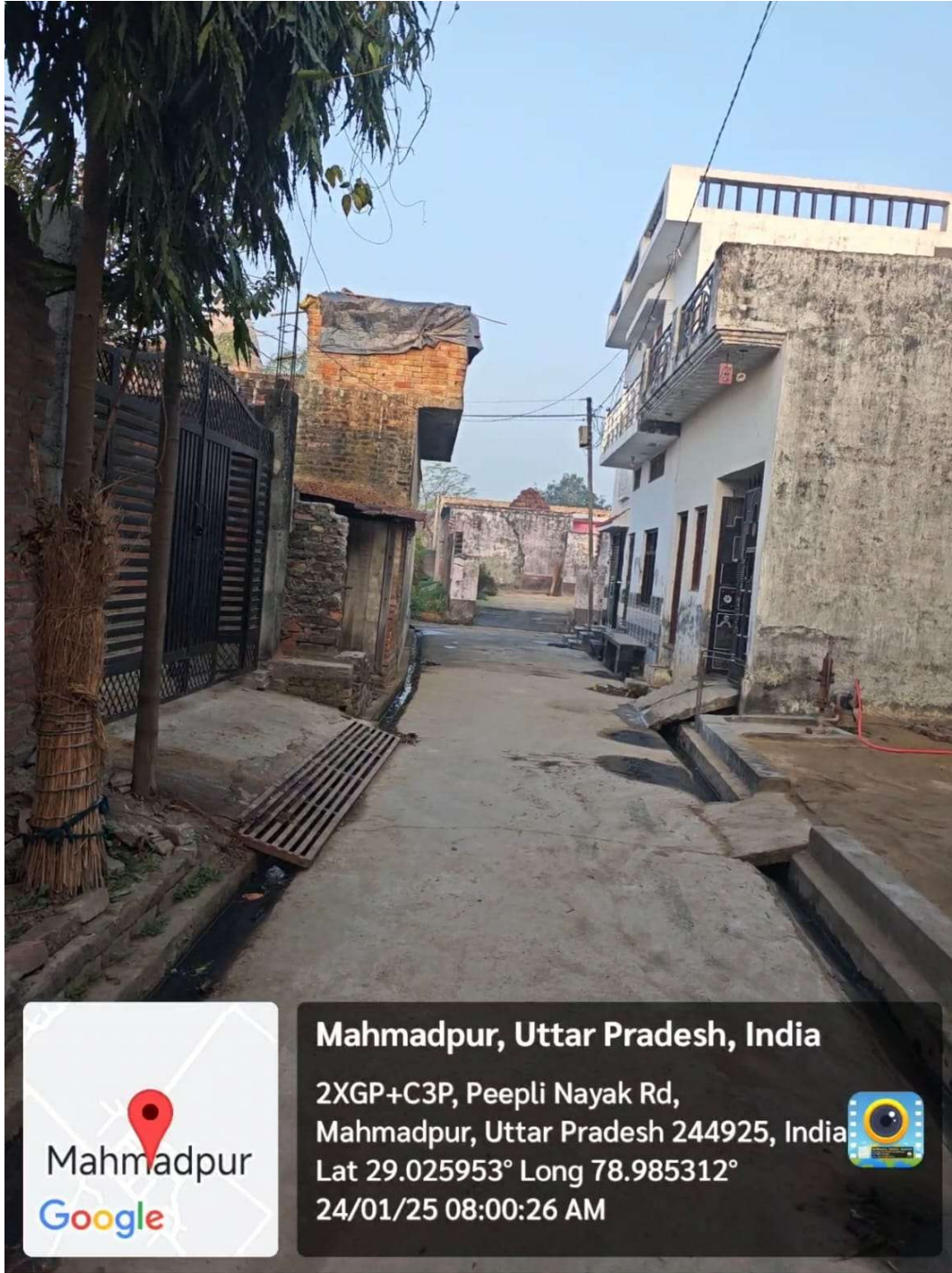
Deponent/Declarant

Anuradha
DEPONENT

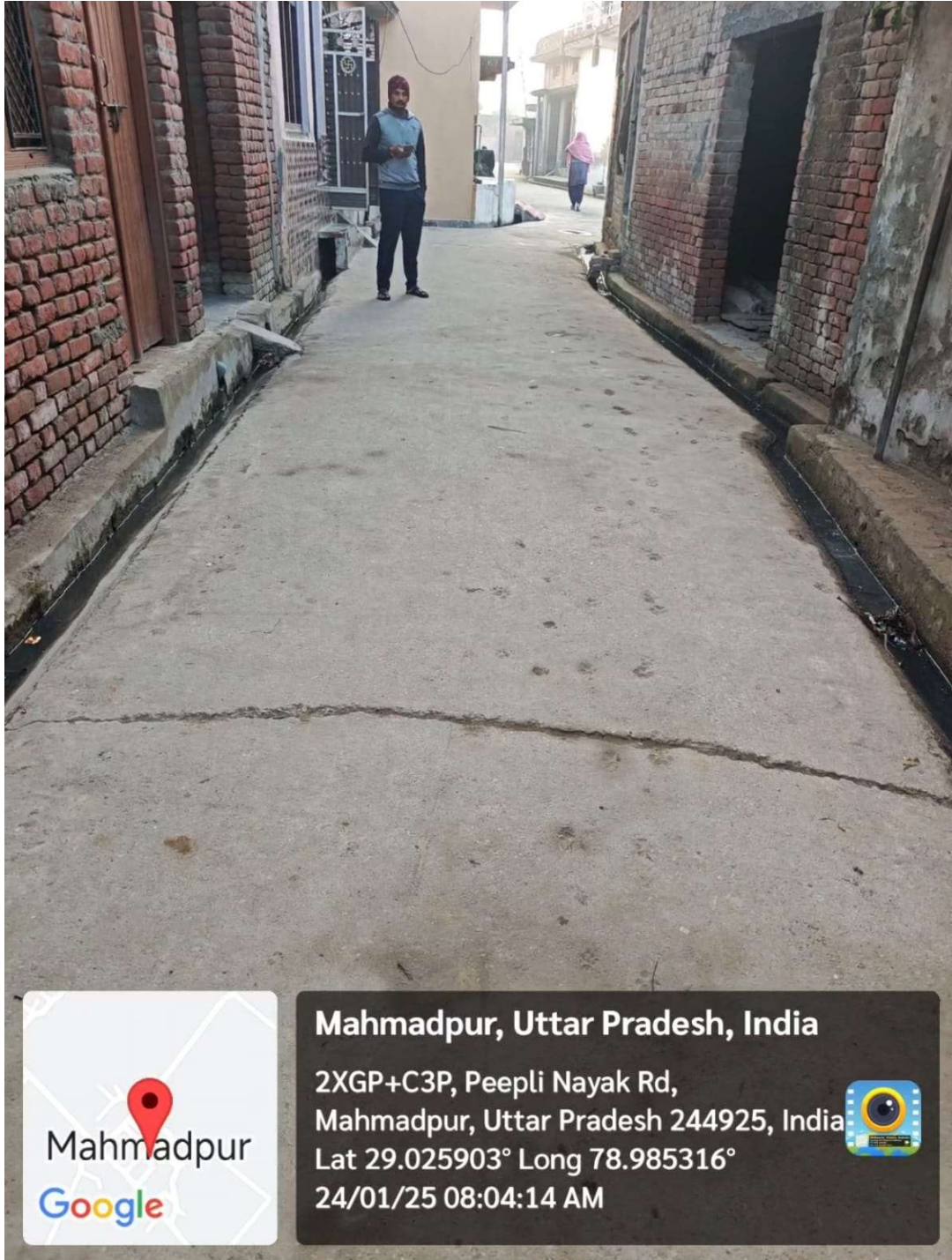


RESIDANCE OF SATYAPAL, from which sample no-3 was collected.

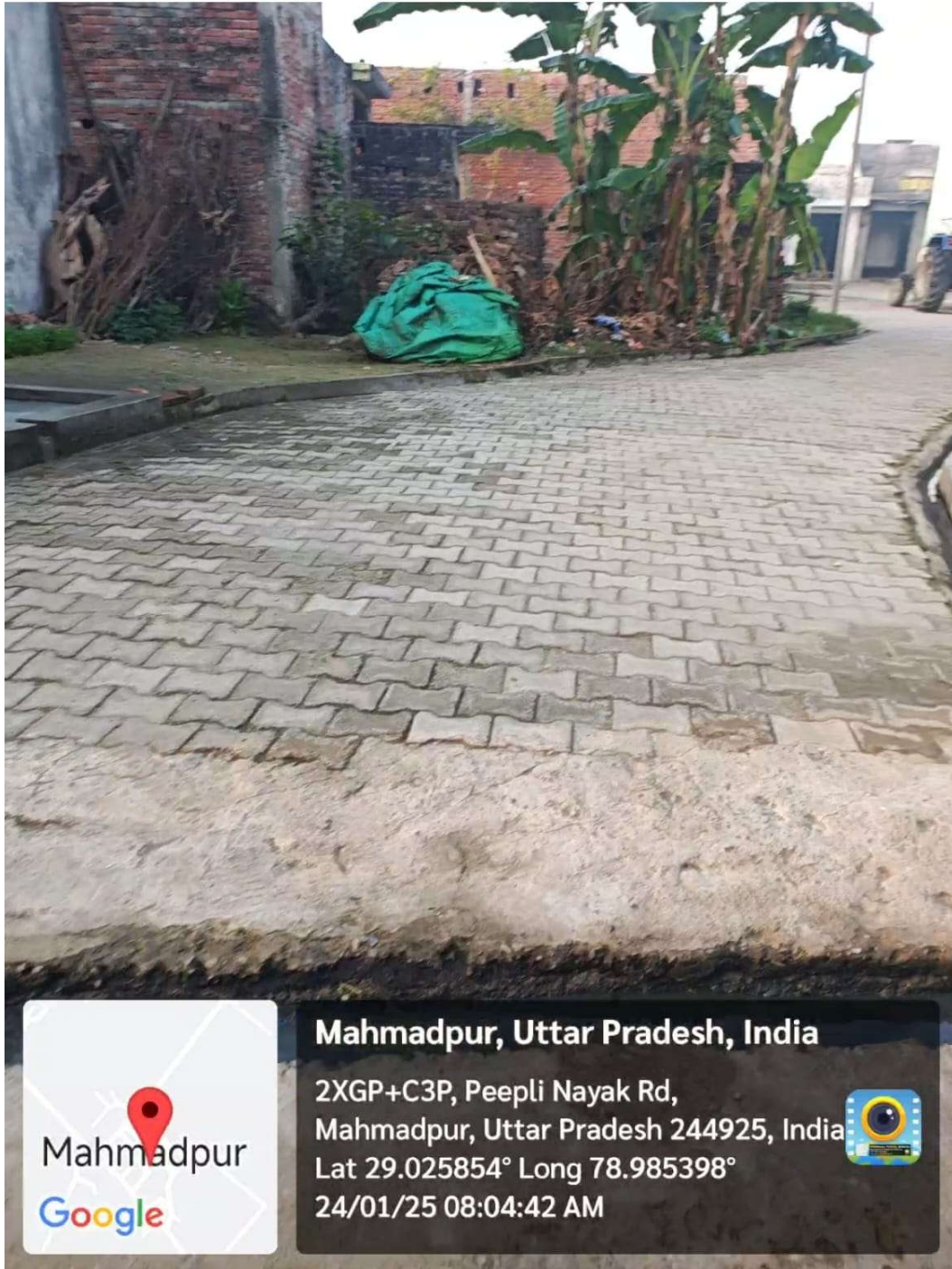
Satyapal standing in front of his residence.



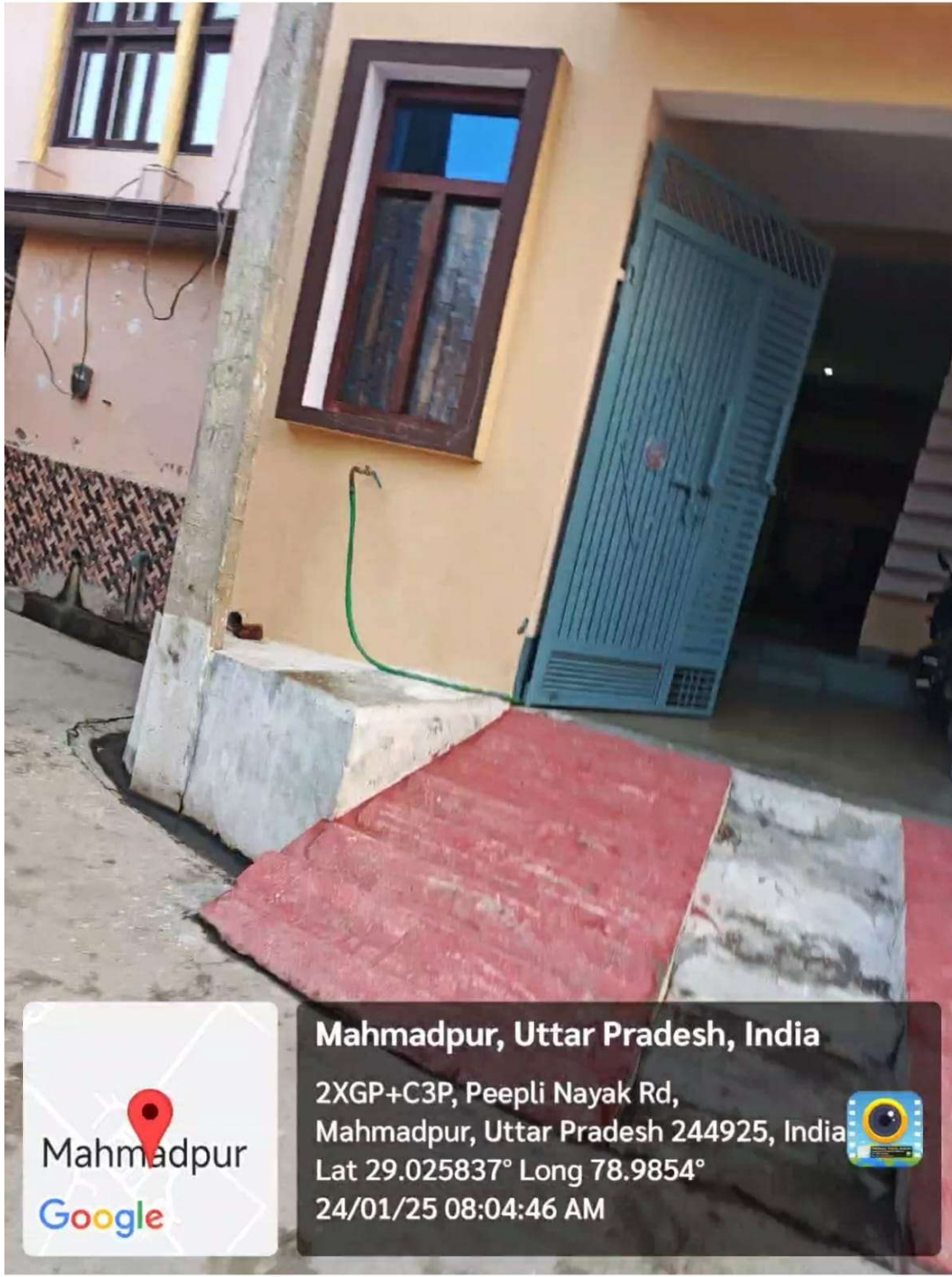
Nearby area of Satyapal residence (Mahmadpur)



Nearby area of Satyapal residence (Mahmadpur)



Nearby area of Satyapal residence (Mahmadpur)



Nearby area of Satyapal residence (Mahmadpur)



hasil jain <advjain25@gmail.com>

Reply by Anuradha to IA no. 575 2024 in OA 234/2020

1 message

hasil jain <advjain25@gmail.com>

Sat, Jan 25, 2025 at 10:32 AM

To: Anunaya Mehta <anunaya.mehta@gmail.com>, pradeepmisra@yahoo.com, daleepdhayani@yahoo.co.in

Sir

Please find attached the reply filed by the Applicant to the IA 575 2024 filed R-4 in OA 234/2020

Thanking You

Hasil Jain

Amicus Curie

7838707338



Reply by Anuradha in IA 575 2024.pdf

3854K