



# INDIA JUDICIAL GOVERNMENT OF BIHAR e-Court Fee

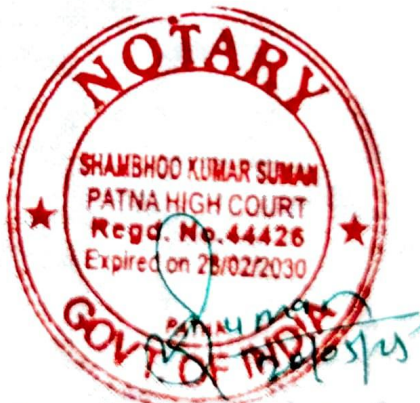


Certificate No. : BR-JS-XAVCFGNI8KFDKBZ  
 Certificate Issued Date & Time : 20-05-2025 09:23:15  
 Account Reference : NA  
 Description of Document : Courtfee with Litigant details  
 Name of Litigant : SAURAV NARAYAN  
 Amount : ₹100  
 Amount in Words : Rupees One Hundred

Sl No. 530 Date 20/05/2025



BR-JS-XAVCFGNI8KFDKBZ



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## Statutory Alert:

1. The authenticity of this certificate should be verified at <https://indiadigitalstamps.pitneybowes.com/> or using Mobile app. Any discrepancy in the details on this Certificate and as available on the website/Mobile App renders it invalid.
2. The onus of checking the legitimacy is on the user of the certificate.
3. In case of any discrepancy please inform the competent Authority.

1. Bindu Rajak s/o Late Ramanand Rajak aged about 61 years old, by

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
EASTERN ZONE BENCH AT KOLKATA  
ORIGINAL APPLICATION No. 188 OF 2024/EZ**

In the Matter of:

Saurav Narayan

...Applicant

-Versus-

Bihar Pollution Control Board & Ors.

...Respondents

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Date: 20/05/2025

Place: Patna, Bihar.

Filed by:

*Ghanshyam Pandey*

Mr. Ghanshyam Pandey,  
Advocate,

"Hastings Chamber", 7C,  
K. S. R. Road, 2<sup>nd</sup> Floor, Room  
No. 206, Kolkata- 700 001.

M: 9686750386

E: [ghanshyamlegal@gmail.com](mailto:ghanshyamlegal@gmail.com)



SI No. 530 Date 20/05/2025

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,  
EASTERN ZONE BENCH AT KOLKATA  
ORIGINAL APPLICATION No. 188 OF 2024/EZ**

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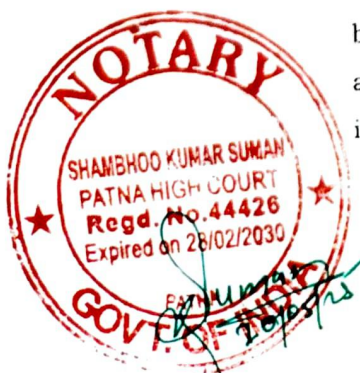
Bihar Pollution Control Board &  
Ors.

...Respondents

**Counter Affidavit filed on behalf of Respondent no. 2  
(i.e. Patna Nagar Nigam, Bihar)**

I, Bindu Rajak s/o Late Ramanand Rajak aged about 61 years old, by occupation- Government Service, presently posted as Chief Municipal Engineer, Patna Nagar Nigam, Bihar working for gain at the Office of Patna Municipal Commissioner, 2<sup>nd</sup> Floor, Block-C, Maurya Lok Complex, Budh Marg, Patna, Bihar- 800001, do hereby solemnly affirm and state as followed:

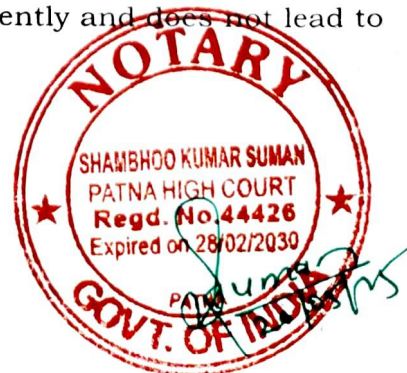
1. That I have made myself acquainted with the facts and circumstances of the Original Application filed by the applicant and I have thoroughly gone through all the documents pertaining to the subject matter of this instant case and I am competent to file the instant Affidavit before this Hon'ble Tribunal.
2. That the respondent no. 2 (shall be referred as PMC hereinafter) has been advised to deal with only those contentions which are relevant and material for effective and proper adjudication of the issues involved in the instant case and save controverts and refutes all





allegations contained in the said application. Save and except for what are specifically admitted, all other contentions and averments made in the said application are denied and disputed in seriatim.

3. That [REDACTED]  
[REDACTED]  
[REDACTED] the Corporation has been diligently performing its statutory duties within the limitations of the available resources and infrastructure.
4. That the respondent no. 2 through this Counter Affidavit would like to bring on record that as per the division of responsibilities between various government agencies, the construction, operation, and maintenance of Sewage Treatment Plants (STPs) and major drainage systems in Patna fall under the purview of the Bihar Urban Infrastructure Development Corporation (BUIDCO) and not directly under the Patna Municipal Corporation.
5. That the respondent no. 2 submits that the Patna Municipal Corporation has been regularly undertaking cleaning operations of the drains within its jurisdiction to prevent clogging and overflow. The Corporation has deployed dedicated teams for desilting and removal of solid waste from all major and minor drains.
6. That the respondent no. 2 submits that in furtherance of its duties, the Corporation has been conducting regular cleaning drives, especially before the monsoon season, to ensure that the drainage system functions efficiently and does not lead to waterlogging or overflow of drains.



**Copy of the coloured photographs of the cleaning being carried by the employees/agents of respondent no. 2 is annexed hereto and marked as Annexure R/1 Collectively.**

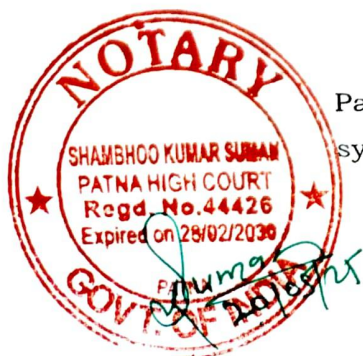
7. That the respondent no. 2 submits that the respondent No. 2 had vide a letter dated 16<sup>th</sup> May, 2025, addressed to the Chief General Manager, BUIDCO, Rajapul, Patna sought a detailed status of STPs and sewerage network in Patna with reference to the present NGT Application No. 188/of 2024.

**Copy of the Letter dated 16<sup>th</sup> May, 2025, address to the Chief General Manager, BUIDCO, is annexed hereto and marked as Annexure R/2.**

8. That the respondent no. 2 states that the vide the letter dated 16<sup>th</sup> May, 2025, the Respondent No. 2 has specifically highlighted the recommendations made by the Committee constituted by the Hon'ble Tribunal vide order dated 18/12/2024, which advised that:

- (i) The construction of two under-construction STPs should be expedited and utilization of four existing STPs be optimized, and;
- (ii) Steps should be taken to ensure stormwater remains separate from sewage with all sewage channelled exclusively through the sewerage network.

The said letter dated 16/05/2025, further expressed Patna Municipal Corporation's desire to adjoin the drainage system to the existing STPs during the rainy season for



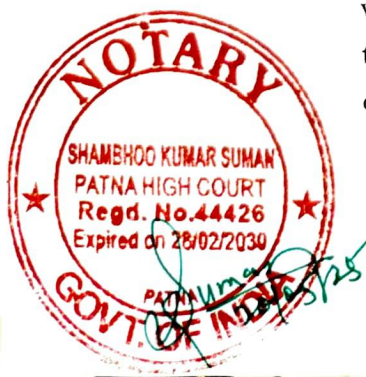
controlling and managing pollution. The Respondent No. 2 specifically requested BUIDCO to provide information about sewer networks located alongside or near the six ghats in Patna (namely Loharwa Ghat, Baharwa Ghat, Gaay Ghat, Rani Ghat, Anta Ghat, and Masjid Ghat) for adjoining the said drains to the sewage network.

Further the respondent no. 2 has also sought from BUIDCO to provide the timeline for completion of the STP plants. That the Respondent No. 2 is fully committed to implementing the recommendations made by the committee in its report and has already initiated steps in this direction.

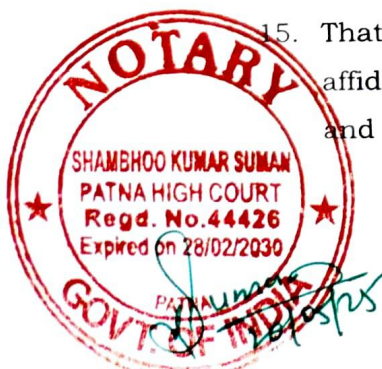
9. That the respondent No. 2 states that they have been regularly by I.E.C. (Information, Education & Communication) activities making public announcements to increase awareness among citizens about proper waste segregation & disposal practices. These awareness campaigns aim to discourage citizens from throwing garbage into drains and instead encourage them to hand over their waste to the designated garbage collectors employed by the Corporation.

**Copy of the coloured photographs of the IEC activities being carried by the employees/agents of respondent no. 2 is annexed hereto and marked as Annexure R/3 Collectively.**

10. That the respondent No. 2 states that the Corporation has intensively implemented a door-to-door waste collection system in the areas of Patna City to ensure that the household waste is properly segregated, collected and disposed of, thereby reducing the likelihood of waste being dumped into drains.



11. That the respondent No. 2 states that as per information received from BUIDCO, they have already floated tenders and allotted contracts for setting up of Sewage Treatment Plants (STPs) in various locations in Patna, which are expected to be completed within a time frame specified by BUIDCO.
12. That the respondent No. 2 submits that with regard to the specific allegations concerning the condition of drains at Loharwa Ghat, Baharwa Ghat, Gaay Ghat, Rani Ghat, Anta Ghat, and Masjid Ghat, it is submitted that while these drains might have shown elevated levels of certain parameters as alleged in the Application, the respondent no. 2 has been regularly cleaning these drains to remove solid waste and reduce the pollution load.
13. That the Patna Municipal Corporation's role is limited to cleaning of drains and solid waste management within the city, and it has been discharging these duties to the best of its abilities.
14. That the answering respondent (i.e. Chief Municipal Engineer, Patna Municipal Corporation) states and submits that they are ready and willing to abide by the order/s direction/s made by this Hon'ble Tribunal and has taken all possible steps to comply with the directions of the Hon'ble Tribunal and the Inspection Committee.
15. That I have thoroughly gone through the contents of this counter affidavit and I have fully understood the same I am competent to file and sign the instant Affidavit before this Hon'ble Tribunal vide an





Authorization granted in my favour by the Municipal Commissioner,  
Patna.

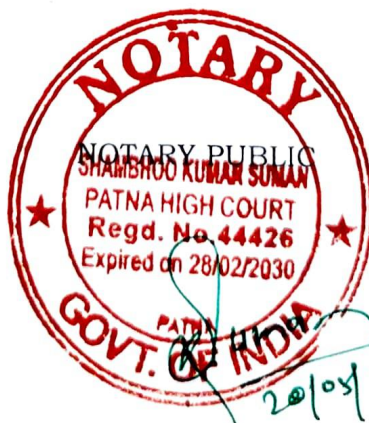
**Copy of the Authorization along with Aadhar Card is annexed  
hereto and marked as Annexure R/4.**

16. I state that the statements contained in Paragraphs no. 1 - 15 are true to the best of my knowledge and belief, except those made in paragraph no. 6, 7, 9 & 15 are based on records and the rest are my humble submissions before this Hon'ble Court.

Prepared in my office.  
*Ghanshyam Pandey*  
Ghanshyam Pandey,  
Advocate

*Bindu Rajat*  
*20/5/25*  
DEPONENT

BEFORE ME





**VERIFICATION**

Verified at Patna, Bihar by the deponent above named on this the 20<sup>th</sup> day of May, 2025, and say that the contents of this affidavit made in paragraph nos. 1 to 16 are true to my knowledge, those made in paragraph no. 6, 7, 8 & 15 are information derived from records which I verily believe to be true and the rest are my respectful submissions before this Hon'ble Tribunal.

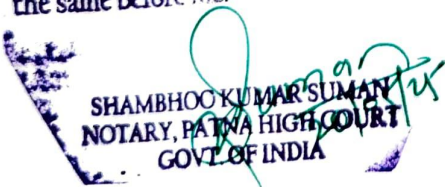


Bindu Rajak  
20/5/25  
 DEPONENT

I identify the signature/thumb impression  
 of the deponent/executed who signed/  
 thumb impression in my presence  
 Advocate [Signature]  
 Regd. No. BR/379/2020

Sri/Smt. Mr./Mrs. Bindu Rajak  
 who has identified by Sudai Prakash  
 Advocate, solemnly affirmed & declared  
 the same before me.

D.W.  
 (P.H.-C)









J55W+HPF, Shershah Rd, near Pitambra Mandir, Gulzarbagh, Muhammadpur,  
Patna, Bihar 800007, India

Latitude  
25.60880146°

Local 09:04:59 AM  
GMT 03:34:59 AM

Longitude  
85.19667649°

Altitude 55 meters  
Thursday, 15.05.2025









GPS Map Camera



Google

Patna, Bihar, India

H6x8+rg8, Patna, Bihar 800008, India

Lat 25.599676° Long 85.216495°

15/05/2025 08:03 AM GMT +05:30





GPS Map Camera



Patna, Bihar, India

H6x8+rg8, Patna, Bihar 800008, India

Lat 25.599641° Long 85.216507°

15/05/2025 08:02 AM GMT +05:30





GPS Map Camera

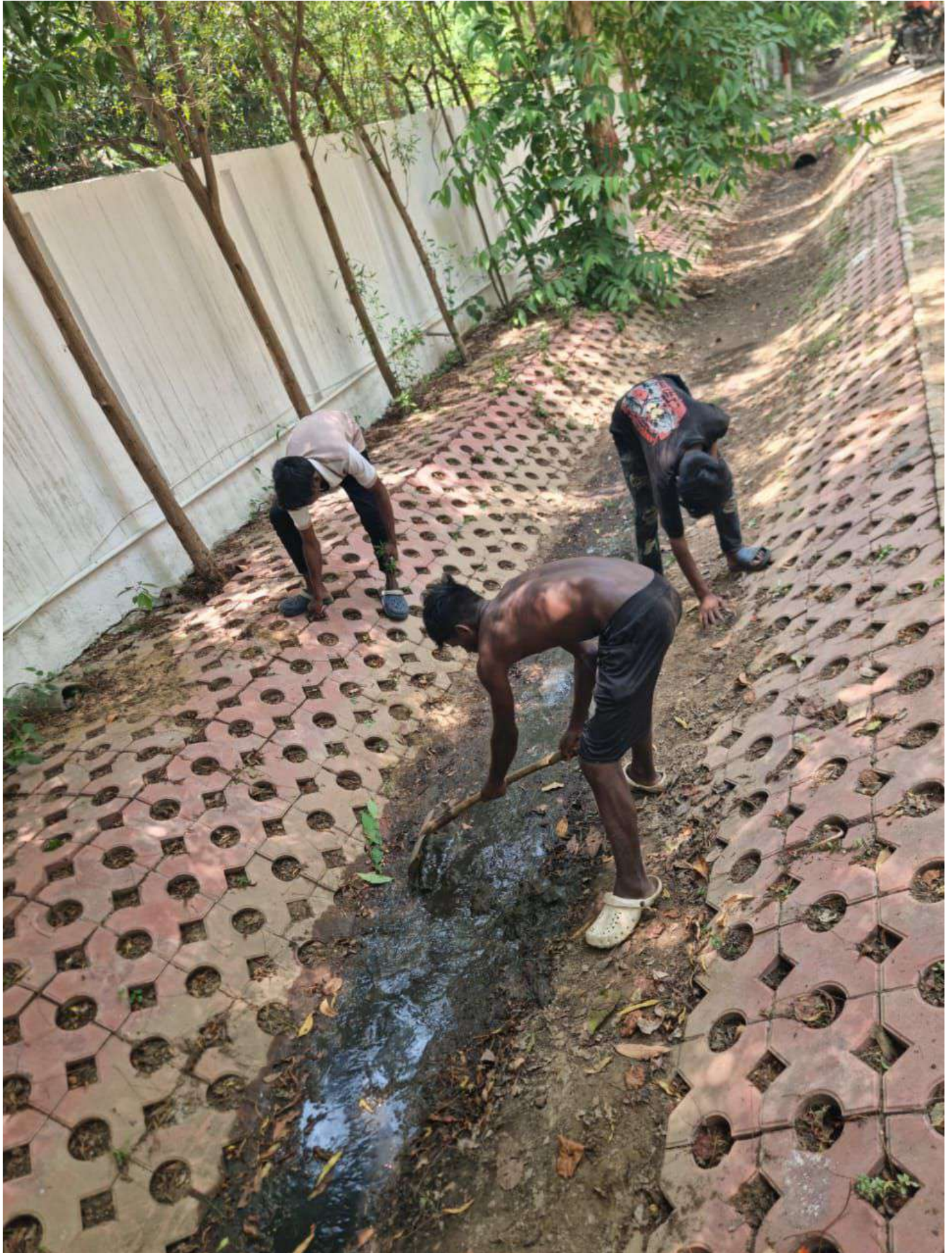
Patna, Bihar, India

H6w8+226, Mughal Pura, Sadikpur, Patna, Bihar  
800008, India

Lat 25.594926° Long 85.215078°  
15/05/2025 09:17 AM GMT +05:30

Google











पटना नगर निगम  
پتنہ میونسپل کارپوریشن  
PATNA MUNICIPAL CORPORATION



Letter No. / पत्रांक: 7232

Date / दिनांक: 16/05/2025

To,

**The Chief General Manager**  
BUIDCO  
Rajapul, Patna.

Sub: Regarding status of STP's and sewerage network in patna.

Ref: NGT application no 188/of 2024.

Sir,

This is to bring to your kind information that in the above mentioned matter being OA no 188/of 2024, in the matter of Saurav Narayan vs BPCB & others pending before the Hon'ble NGT, EZ, the Committee constituted by the Hon'ble Tribunal vide order dated 18/12/2024, advised certain recommendation as stated below: "...Recommendations:-

1. The construction of the two under-construction STPs should be expedited, and efforts should be made to optimize the utilization of the four existing STPs to ensure they operate at their maximum capacity.
2. Steps should be taken to ensure that stormwater remains separate from sewage.

All sewage should be channeled exclusively through the sewerage network to prevent any leakage into stormwater drains. BUIDCO, Patna shall be instructed to assess the situation and plan the diversion of sewage to nearest STP..."

In view of the recommendation the Patna Municipal Corporation wishes to adjoin the drainage system to the existing STPs during the rainy season for controlling the pollution.

As such kindly provide the sewer works located alongside below mentioned ghats in patna:

1. Loharwa Ghat
2. Baharwa Ghat
3. Gaay Ghat
4. Rani Ghat
5. Anta Ghat
6. Masjid Ghat

Furthermore, kindly provide the time line for the completion of the STP plants. A copy of the order dated 18.12.2019 passed by the Hon'ble National Green Tribunal is hereby attached for your ready reference.

Hence, You are requested to provide the present status along with expected timelines of STP & Sewer works located alongside the above mentioned ghats in patna so that a reply can be filled by us before NGT by 17.05.2025.

Thanking You,

Yours faithfully

Chief Municipal Engineer  
Patna Municipal Corporation

BUIDCO, Patna



H3RX+644, Patna, Bihar 800014, India

Latitude  
25.590318333333336°

Longitude  
85.098073333333335°

Local 08:51:12 AM  
GMT 03:21:12 AM

Altitude 54 meters  
Thursday, 15.05.2025

















GPS Map  
Camera Lite

H3QX+W99, Railway Gumti, Phulwari Sharif, Patna, Bihar 800014,  
India

Latitude  
25.589813333333336°

Longitude  
85.09863166666668°

Local 08:29:57 AM  
GMT 02:59:57 AM

Altitude 55 meters  
Friday, 16.05.2025





H3RX+C5P, Polo Rd, BIT Campus, Patna, Bihar 800014, India

Latitude

25.591675000000002°

Longitude

85.09759666666666°

Local 07:53:41 AM

GMT 02:23:41 AM

Altitude 55 meters

Thursday, 15.05.2025





H4WG+275, Near mini market, Punaichak, Gardanibagh, Patna,  
Bihar 800023, India

Latitude  
25.594978333333334°

Longitude  
85.12572666666668°

Local 08:30:43 AM  
GMT 03:00:43 AM

Altitude 57 meters  
Wednesday, 14.05.2025










**Authorization letter**

Subject: Authorization letter in Original Application No. 188 of 2024 titled "Saurav Narayan Vs. Bihar Pollution Control Board & Ors. Before the Hon'ble National Green Tribunal, Eastern Zone, Kolkata

Sir/Ma'am,

This is to certify that Mr. Bindu Rajak, son of Ramanand Rajak, aged about 61 year, occupation - service, working as Chief Municipal Engineer, Patna Municipal Corporation, is hereby authorized to sign Vakalatnama, Affidavits, and other legal documents on behalf of the undersigned and Patna Municipal Corporation and to appear before the Hon'ble National Green Tribunal, Eastern Zone, Kolkata in Original Application No. 188 of 2024 titled "Saurav Narayan Vs. Bihar Pollution Control Board & Ors."

This authorization shall remain valid for the entire duration of the proceedings or connected proceedings in the above-mentioned case, unless revoked earlier.

  
(Animesh Kumar Parashar)  
Municipal Commissioner  
Patna Municipal Corporation



भारत सरकार  
Government of India

बिंदु राजक  
Bindu Rajak  
जन्म तिथि/DOB: 26/01/1964  
पुरुष/ MALE

6186 4715 0640  
VID: 9195 2447 6598 1176

मेरा आधार, मेरी पहचान

भारत सरकार  
Government of India

यूनिफाइड विधिगत पहचान प्रमाणिका  
Unique Identification Authority of India

पता:  
C/O रामानंद राजक, 374, वास्तु गंगा कोलोनी, गोला रोड,  
डी.ए.वी. विद्यालय के पास, दानापुर, पटना,  
बिहार - 801503

Address:  
C/O Ramanand Rajak, 374, Vastu Ganga  
Colony, Gola Road, Near D.A.V. School,  
Danapur, Patna,  
Bihar - 801503

6186 4715 0640  
VID: 9195 2447 6598 1176

help@uidai.gov.in www.uidai.gov.in

Bindu Rajak

