

**BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI**

ORIGINAL APPLICATION No. 15 OF 2022 (SZ)

IN THE MATTER OF:

Gummi Narender Reddy,
Anthammagudem (V),
Pochampally (M),
Yadadri – Bhuvanagiri District

....

Applicant(s)

Versus

Union of India,
rep. by its Secretary,
New Delhi & Ors.

....

Respondent(s)

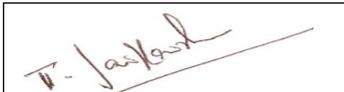
**REPORT OF THE TELANGANA STATE POLLUTION CONTROL BOARD
(RESPONDENT No. 3)**

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Place: Hyderabad

Date: 14-03-2024.



COUNSEL FOR RESPONDENT No. 3

REPORT DATED 12-03-2024 OF TELANGANA STATE POLLUTION CONTRL BOARD (R3) IN OA No. 15 OF 2022 FILED BY SRI GUMMI NARENDAR REDDY, S/o.G.RANGA REDDY, ANTHAMMAGUDEM VILLAGE, POCHAMPALLY MANDAL, YADADRI-BHUVANAGIRI DISTRICT AGAINST M/S. BRUNDAVAN LABORATORIES (P) LTD.

Sri Gummi Narender Reddy, S/o. G. Ranga Reddy, Anthammagudem Village, Pochampally Mandal, Yadadri-Bhuvanagiri Distirct has filed O.A.No.15 of 2022 in Hon'ble National Green Tribunal (NGT), Southern Zone, Chennai against the pollution caused by Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri-Bhuvanagiri District.

M/s. Brundavan Laboratories (P) Ltd., is located at Yellagiri (V), Choutuppal (M), Yadadri-Bhuvanagiri Distirct and engaged in manufacturing of Bulk Drugs & Intermediates.

Earlier, the Board has filed reports before the Hon'ble NGT, Chennai, the latest report was submitted on 25.09.2023 submitting the details of action taken on Respondent industry in another case i.e., OA No. 97 of 2021 filed by Sri Ravula Linga Swamy and Others of Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before the Hon'ble NGT, Chennai.

In this regard, the present status is submitted as below: -

1. The Respondent industry is also reviewed by the Hon'ble NGT (SZ) in another case in OA No. 97 of 2021 filed by Sri Ravula Linga Swamy and Others of Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District. The Respondent Board vide order dated 20.06.2023 levied Environmental Compensation (EC) of Rs.45,00,000/- (Rupees Forty Five Lakhs Only) on Respondent industry. **(Annexure - I)**
2. Subsequently, Respondent industry has filed a WP No. 19039 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the order No: NLG-50/TSPCB/TF/HO/2023-440, dated 20.06.2023 issued by the Respondent Board directing the petitioner industry to deposit an amount of Rs.45,00,000/- towards Environmental Compensation as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.

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3. Subsequently, the Hon'ble High Court vide order dt.08.08.2023 disposed of the Writ Petition with the following direction:

".....The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023." (**Annexure – II**)
4. Accordingly, as per orders of the Hon'ble High Court, the Respondent Board called the Respondent industry before the Task Force Committee meeting held on 28.08.2023, comprising of External Expert Members, for reviewing the industry and taking necessary action regarding levy of Environmental Compensation. After detailed discussions, the Committee recommended to issue Extension of temporary revocation of Closure orders for a period up to 31.10.2023 stipulating certain directions to the Respondent industry including directions for payment of Environmental Compensation.
5. In compliance to the Hon'ble High Court Order dated 08.08.2023 and recommendations of the Task Force Committee, the respondent Board vide order No.NLG-54/TSPCB/TF/HO/2023-768 & 769, Dt.13.09.2023 again issued fresh directions to Respondent industry levying Environmental Compensation (EC) of Rs.45,00,000/- (Rupees Forty Five Lakhs Only) (**Annexure – III**).
6. Subsequently, the industry has paid part payment of Rs. 11,25,000/- i.e, 25% of Environmental Compensation (EC) levied vide DD No.467455, Dt:27.12.2023 (AXIS Bank). (**Annexure – IV**).
7. The Respondent Board again called the Respondent industry before the Task Force Committee meeting held on 03.01.2024, comprising of External Expert Members, for reviewing the industry and taking necessary action. After detailed discussions, the Committee recommended to issue Extension of temporary revocation of Closure orders for a period of three months stipulating certain directions to the Respondent industry including directions for payment of balance Environmental Compensation (EC) amount within 06 months period.
8. As per the recommendations of the Task Force Committee, the respondent Board vide orders No.NLG-54/TSPCB/TF/HO/2024-1475 & 1476, Dt.03.01.2024 issued Extension of Temporary Revocation of Closure Orders for a period of three months

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time i.e, up to 03.04.2024 stipulating certain directions to comply including a direction that the industry shall pay balance Environmental Compensation (EC) amount within 06 months period. (**Annexure - V**).

In view of the above, it is kindly submitted that the industry has made part payment of Rs. 11,25,000/- (i.e, 25% of Environmental Compensation (EC) levied) on 27.12.2023. The Respondent Board will closely monitor the industry for environmental compliance and for payment of balance Environmental Compensation (EC) levied.

Place: Nalgonda.

Date:12.03.2024


ENVIRONMENTAL ENGINEER

**ENVIRONMENTAL ENGINEER
T.S. Pollution Control Board,
Regional Office, Nalgonda.**



BY REGD. POST WITH ACK. DUE

ANNEXURE - I

Order No. NLG-50/TSPCB/TF/HO/2023- 440

Dated: 20.06.2023

Sub : TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Causing of damage to the Environment due to operation of the industry - **LEVYING OF ENVIRONMENTAL COMPENSATION** and Water (Prevention and Control of Pollution) Amendment Act, 1988 - Air (Prevention and control of Pollution) Amendment Act, 1987 - **ADDITIONAL DIRECTIONS - ORDERS ISSUED** - Reg.

- Ref :**
1. CFO&HWA Order dt.13.01.2023 with a validity upto 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. Extension of Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2022-, Dt:06.12.2022.
 7. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 8. M/s. EPTRI, Hyderabad study report dated:24.04.2023.
 9. Show Cause Notice dated:22.05.2023.
 10. Hearing held on 11.05.2023.

* * * * *

1. **WHEREAS**, you are operating the Bulk drugs & Intermediates manufacturing unit at Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 13.01.2023 with a validity up to 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued certain directions to the Board in connection with O.A No. 97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT (SZ) Chennai.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued directions to the Board to implement the directions given by the CPCB to the Board and also assess the compensation for the alleged deliberate violations found in the CPCB report.
7. **WERHEAS**, vide reference 6th cited, the Board issued Extension of Temporary Revocation of Closure Order to industry on 06.12.2022 for a period of Six months with certain directions to comply based on the observation made in the CPCB report.
8. **WHEREAS**, vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 directed the TSPCB to furnish the compliance report on water & soil analysis.

9. **WHEREAS**, vide reference 8th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
10. **WHEREAS**, The TSPCB filed a report dt.25.04.2023 before Hon'ble NGT submitting that the TSPCB will take necessary action, based on the finding of the study report dated 24.04.2023 of M/s Environment Protection Training & Research Institute (EPTRI), Gachibowli, Hyderabad.
11. **WHEREAS**, vide reference 9th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) to all eight industries located in Dothigudem industrial cluster.
12. **WHEREAS**, the Board calculated the Environmental Compensation (EC). The details are as mentioned below:

1. The Environmental Compensation (EC) is estimated base on the pollution index method developed by Central Pollution Control Board in the guidelines "Policy for levying Environmental Compensation (EC) for Industries" Vide Order No:B-400 (S)/IPC-III/2019-20/1162, Dt.4.09.2019 and action plan to utilize the fund. The Hon'ble NGT has accepted the method and mentioned in the order dt.19.02.2019 in the matter of Original Application No.593/2017, (W.P) (Civil) No. 375/2012, Paryavaran Suraksha Samiti & Anr. Versus Union of India & Ors.

2. The following equation is used for estimating Environmental Compensation (EC):

$$\text{Environmental Compensation (EC)} = P_i \times N \times R \times S \times L_f$$

Where

P_i - Pollution index of industrial sector

N - No of days of violation took place

R - A factor in Rupees for EC

S - Factor for scale of operation

L_f - Location factor

3. Pollution index of industrial sector (PI): The Telangana State Pollution Control Board categorized these industries into 'Red' category and accordingly the combined CFO & HWA order has been granted. For 'Red' category of industries, average pollution index is 80. **Thus P_i is considered as 80 in the EC estimation for this industry.**
4. Factor in Rupees ® (Rs): As per the environmental compensation estimation guidelines, factor of rupees may be minimum of Rs. 100/- and maximum of Rs. 500/-. In the guidelines it is suggested to consider R as Rs.250/-, as environmental compensation in case of violation. Hence, **Factor in Rupees (R) for EC estimation is considered as 250.**
5. Scale of operation (S):

S.No	Name of the industry	Small / Medium / Large	Scale of operation (S).
i.	M/s. Brundavan Laboratories (P) Ltd., (Gross Block/Fixed assests:63.72 Crores)	Medium	1
<p>➤ As per website of Ministry of Micro, Small & Medium Enterprises, the small scale unit criteria is upto Rs. 10 Crore of investment and Rs 50 Crore of turnover and medium scale unit criteria is upto Rs. 50 Crore of investment and Rs. 250 Crore of turnover.</p> <p>➤ Accordingly, the medium scale unit criteria has considered upto Rs 50 Crores of investment.</p> <p>➤ Turnover of the industry is not considered for above calculation.</p>			

6. Location Factor (LF): The industries are located in Dhotigudem village of Pochampally Mandal and Yellagiri (V), Choutuppal (M), of Yadadri Bhuvangiri District and no other eco sensitive regions are located in the region. The total population in the region is less than one million. **Thus location factor (LF) is considered as 1 for EC estimation.**
7. No of days of violation took place (N): The details of the violations and dates considered for calculation of period of violation for estimating EC is given as below:

S.No.	Date of violation observed	Action taken for violation	Date of compliance observed	Number of days of violation	Remarks, if any. Summarise the violations.
M/s. Brundavan Laboratories (P) Ltd:					
1.	23.03.2022 (CPCB team inspection)	Issued directions vide order dt. 06.12.2022. (Earlier, Board Closure orders issued on 02.03.2022 and Temporary Revocation of Closure order issued on 26.04.2022.)	--	225 (From 26.04.2022 to 06.12.2022)	<u>CPCB observations:</u> The above industry and other adjacent pharmaceutical industries have discharged their untreated/partially treated effluent on land as well as contributing to VOC emission in Ambient Air.
Number of days of violation				225	

Based on the above factors, the Environmental Compensation (EC) is estimated as given below:

S.No	Name of the industry	Environmental Compensation (EC) $= P_1 \times N \times R \times S \times L_F$	Environmental Compensation (EC) is estimated. (Rs)
1.	M/s. Brundavan Laboratories (P) Ltd	80 x 225 x 250 x 1 x 1.5	67,50,000/-

WHEREAS, vide reference 10th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 13.06.2023. The industry representative attended the meeting and stated that, the unit was small scale unit with the investment of only Rs.17.60 Crores till 23.03.2023, whereas the investment after expansion i.e. Rs.63.72 Crores was considered by the Board for the calculation of compensation. After detailed discussion, the committee examined the request of the industry and recommended to revise Environmental Compensation based on the investment of the industry during the period of violation and levy the same. Further the committee also recommended to issue additional directions to the industry. Subsequently, based on the recommendation of the Task Force Committee, the revised Environmental Compensation duly considering the investment of the industry during the period of violation is Rs. 45,000,00/-.

13. **WHEREAS**, after careful consideration of the material facts of the case, **the Board is hereby issues the following Additional Directions to your industry to comply:**

1. The industry shall maintain sufficient free board to avoid over flows in effluent collection tanks and shall dispose the same as per CFO&HWA conditions.

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2. The industry shall not stock the effluents in the collection tanks and shall send the excess effluents to CETP/ to treat in ZLD system in view of the rainy season.
14. **WHEREAS**, the Task Force Committee has recommended to levy the Environmental Compensation (EC) of Rs.45,00,000/- as per the Joint Committee recommendations, you are hereby directed to deposit an amount of Rs.45,00,000/- (Rupees Forty Five Lakhs Only) towards Environmental Compensation within 15 days. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
15. These directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.
16. The above mentioned directives shall comply by the industry, failing which legal action will be initiated against your industry under Section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 which also includes closure of the industry in the interest of Public Health and Environment, without further notice.

Sd/-
MEMBER SECRETARY

To
M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.

//T.C.F.B.O//

P. S. S. S.
Senior Environmental Engineer
(TF, UH-IV)

Recd on 23/06/2023
At 15:30pm.

M. S.
23/06/23.



THE HON'BLE THE CHIEF JUSTICE ALOK ARADHE

AND

THE HON'BLE SRI JUSTICE T.VINOD KUMAR

WRIT PETITION No.19039 of 2023

ORDER: *(Per the Hon'ble the Chief Justice Alok Aradhe)*

Mr. P.Subash, learned counsel for the petitioner.

Mr. Kondaparthi Srinivas, learned Government Pleader for Industries and Commerce Department for respondent No.1.

Mr. Pranav Munigela, learned Additional Standing Counsel for respondent Nos.2 and 3.

2. The petitioner which is a bulk drug and intermediate drug manufacturing company in this petition has assailed the validity of the composite order dated 20.06.2023 *vide* No.NLG-50/TSPCB/TF/HO/2023-440 passed by the Telangana State Pollution Control Board (briefly referred to hereinafter as 'the Board') in exercise of powers under Section 33A of the Water (Prevention and Control of Pollution) Act, 1974 (briefly referred to hereinafter as 'the Water Act') and Section

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31A of the Air (Prevention and Control of Pollution) Act, 1981 (briefly referred to hereinafter as 'the Air Act').

3. For the reasons assigned by us by a separate order dated 08.08.2023 passed in W.P.No.17179 of 2023, the composite order dated 21.06.2023 *vide* No.NLG-48-TSPCB/TF/HO/2023-441 passed by the Board is quashed and set aside and the operative portion of the order reads as under:

"12. For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter."

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4. Accordingly, the Writ Petition is disposed of. There shall be no order as to costs.

As a sequel, miscellaneous applications pending, if any, in this Writ Petition, shall stand closed.

ALOK ARADHE, CJ

T. VINOD KUMAR, J

Date: 08.08.2023
KL



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TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

ANNEXURE-III

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No.NLG-54/TSPCB/TF/HO/2023- 769

Date:13.09.2023

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **Extension of Temporary Revocation of Closure Order for a period up to 31.10.2023 - Orders Issued** - Reg.

- Ref :**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 5. The Board issued additional directions on 21.06.2023 for Levying of Environmental Compensation.
 6. Extension of Temporary Revocation of Closure Order issued on 26.06.2023 for a period up to 31.07.2023.
 7. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding colored water stagnation in the Dothigudem area and also same complaint forwarded by the District Collector, Yadadri Bhuvanagiri District.
 8. The RO-Nalgonda Officials report dated 01.08.2023.
 9. Hearing held on 07.08.2023.
 10. Hon'ble High Court orders in WP.No.19039 of 2023 dt.08.08.2023 regarding Environmental Compensation Levied by the TSPCB.
 11. The Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023.
 12. Hearing held on 28.08.2023.

* * * * *

1. **WHEREAS**, you are operating the industry located at Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District and engaged in Bulk drugs & Intermediates manufacturing unit.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period upto 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 directed the TSPCB to furnish the compliance report on water & soil analysis.
6. **WERHEAS**, vide reference 5th cited, the Board issued additional directions to the industry on 21.06.2023 for Levying of Environmental Compensation (EC).
7. **WERHEAS**, vide reference 6th cited, the Board issued Extension of Temporary Revocation of Closure Order to the industry on 26.06.2023 for a period up to 31.07.2023.
8. **WHEREAS**, the industry have filed a Writ Petition before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.

Sd/-
DESPATCH NO.
DATE: 14 SEP 2023

9. **WHEREAS**, the Hon'ble High Court passed an orders dt.08.08.2023 in the WP No.19039 of 2023, the composite order dated: 21.06.2023 issued to the industry by the Board is quashed and set aside and the operative portion of the order reads as under.

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter".

10. **WERHEAS**, vide reference 7th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding colored water stagnation in the Dothigudem area and also same complaint forwarded by the District Collector, Yadadri Bhuvanagiri District.

11. **WHEREAS**, vide reference 8th cited, the RO-Nalgonda officials inspected the industry and submitted report to the Board office on 01.08.2023 and the following observations were made:

1. The industry is in operation during inspection.
2. The compliance status of the industry on the directions stipulated in the Extension of Temporary Revocation of Closure Order dt: 26.06.2023 is as follows:

(A) Water Act:

S. No	Direction	Compliance
1	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	Compliance of the CFO Order dt. 13.01.2023 Submitted.
2	The industry shall continue to segregate the effluents into HTDS and LTDS.	<ul style="list-style-type: none"> • Complied. • The industry has provided separate collection tanks for HTDS & LTDS effluent collection.
3	The industry shall regularly operate the New ZLD system for treatment of effluents. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.	<ul style="list-style-type: none"> • Complied. • The industry has provided ZLD (125 KLD) consists stripper (125 KLD), MEE (4 Calendrias) (125 KLD), ATFD (20 TPD), Biological ETP (125 KLD) and RO plant (125 KLD). • Biological ETP consist of collection tanks & holding tanks, flash mixers, primary clarifier (39 KL), overflow syntex, press filter, stipper holding tank, MEE condensate holding tank, utility holding tank (for LTDS), Aeration tank -I (650 KL), secondary Clarifier-I (25 KL), Aeration tank -II (100 KL), Secondary clarifier -II (15 KL), Storage tank (10 KL), Sand filter & carbon filters and RO plant (125 KL). • During inspection, MEE system was not in operation and Biological ETP is under operation.

4	The industry shall install online TDS meter for HTDS effluent generation and connect the same to TSPCB server.	Complied.
5	The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.	The industry has provided first run off rain water collection tank of capacity 60 KL & (for new production block area), 40 KL (for old production block area).
6	The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.	During inspection, no discharges were observed.
7	The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.	Complied.
8	The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.	Complied.
9	The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.	<ul style="list-style-type: none">• Complied.• They provided separate flow meters for HTDS, LTDS & RO permeate and same are connected to TSPCB Server.
10	The industry shall connect the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server.	<ul style="list-style-type: none">• Complied.• Provided digital flow meter and IP camera without PTZ feature to HTDS, LTDS, RO Permeate and connected the same to Board server.
11	The industry shall provide PTZ (pan tilt zoom) cameras to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant.	<ul style="list-style-type: none">• Complied.• The industry has provided PTZ camera ZLD area which will cover boiler stack and ZLD area.
12	The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.	Complied.
13	The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.	<ul style="list-style-type: none">• Complied.• No odour nuisance was observed at cooling towers.• The Board has collected water samples from cooling towers on 27.05.2023 to ensure usage effluents in cooling towers.
14	The industry shall maintain proper housekeeping within the premises.	Complied.
15	The industry shall extend the Bank Guarantee from time to time till further orders from the Board.	Directed to comply

16	The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.	The Board issued Temporary Revocation of closure Order to industry vide order dt. 26.06.2023 and same is valid upto 31.07.2023.
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- The status of compliance of the industry on Board Task Force Additional directions Order dt.20.06.2023 issued Under Air & Water (P&C) Amendment Acts is submitted below:

S. No.	Directions	Compliance
1	The industry shall maintain sufficient free board to avoid overflows in effluent collection tanks and shall dispose the same as per CFO & HWA conditions.	<ul style="list-style-type: none"> Complied. During inspection, No overflows were observed.
2	The industry shall not stock the effluents in the collection tanks and shall treat the effluents in ZLD system / send to the CETP to avoid any over flow in view of the rainy season.	During inspection, ZLD system (MEE system and Bio ETP system) was under operation.

- Compliance of the industry on CFO schedule - B conditions: CFO Order No. 230524255692, dt.13.01.2023.

S. No	Condition	Compliance																																																															
1	The industry shall take steps to reduce water consumption to the extent possible and consumption shall NOT exceed the quantities prescribed below:	As per the records of the industry during the period from Jan 2023 to June 2023 the water consumption is 28.28 KLD as against the consented 59.2 KLD (As per CFO order).																																																															
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4	The industry shall not manufacture any un-consented products and exceeding capacities without obtaining prior Consent for Establishment (CFE) and Consent for Operation (CFO) of the Board.	As per the production records of the industry for the last 9 months period of Jan 2023 to June 2023, the industry has manufactured 7 Consented products with a production of 227.29 Kg/day (avg) as against consented 733.31 Kg/day.																																																															

5	The industry shall comply with emission limits for DG sets upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets more than 800 KW should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	Complied.
6	The industry shall comply with ambient air quality standards of PM10(Particulate Matter size less than 10µm) - 100 µg/ m ³ ; PM2.5(Particulate Matter size less than 2.5 µm) - 60 µg/ m ³ ; SO ₂ - 80 µg/ m ³ ; NO _x - 80 µg/m ³ , NH ₃ - 400 µg/m ³ outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009 Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A).	--
7	The industry has paid CFO fee Rs. Rs.15,00,000/- upto 31.12.2027. The industry has to pay balance CFE differential fee of Rs. 4,50,000/-.	Complied. The industry has paid the balance CFE fee of Rs. 4,50,000/- on 13.01.2023 with UTR no UTIBR52023011300361829.
8	The industry either paying annual fee or total fee for Consented period, shall pay the balance fee as per the revised rates as applicable from time to time.	
9	The industry shall maintain separate water meters for recording water consumption for process, boiler feed, cooling and domestic purposes and also maintain daily records.	Complied.
10	The industry shall segregate effluents into LTDS & HTDS effluents separately.	Complied
11	The industry shall regularly operate the ZLD system to treat the effluent and 100% recycle of treated effluent.	During the inspection, the MEE system was not in operation. But, Biological ETP
12	The industry is permitted to send HTDS effluents to the MEE system of M/s. JETL, Jeedimetla for a period of maximum 15 days in a calendar year i.e. during maintenance / break down of Stripper, MEE & ATFD system and shall maintain records.	--
13	The industry shall maintain digital flow meters with totalisers (RS-485 communication) for recording the quantity of HTDS effluents, LTDS effluent & RO permeate and also maintain daily records. They shall connect the flow totaliser data to TSPCB & CPCB servers as per CPCB protocol.	The industry has provided digital flow meters at effluent collection line, MEE feed, ATFD feed, MEE condensate, RO permeate.
14	The industry shall provide IP camera with PAN, 5x or above focal length with night vision capability at the entrance of the main gate within two months with a backup data for a period of 6 months.	Complied. The industry has provided PTZ IP camera at the main gate and connected it to TSPCB website.
15	The industry shall maintain vent condensers for chemical / solvent storage tanks to control fugitive emissions.	Provided vent condensers for bulk solvent storage tanks.
16	The industry shall operate multi stage scrubber along with online pH monitoring system for control of process emissions. They shall maintain log book for operation of scrubber for monitoring active scrubbing media.	Complied

17	The industry shall monitor VOCs in ambient air with online VOC analyzer & connect the data to TSPCB server.	Complied
18	The industry shall maintain elevated platform with leachate/spillages collection pit to store drums containing chemicals & wastes to control spillages / discharges of chemicals / effluents on ground.	<ul style="list-style-type: none"> Complied. The industry has provided separate shed for storage of drums.
19	The industry shall maintain IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at effluent collection system (HTDS & LTDS) and RO permeate as per CPCB norms. They shall connect the data to CPCB & TSPCB server.	Provided digital flow meter and IP camera without PTZ feature to HTDS, LTDS, RO Permeate and connected the same to Board server.
20	The industry shall install IP cameras to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant.	The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view).
21	The industry maintain the Ambient Air Quality (AAQ) and have adequate control to achieve the ZLD.	During inspection, No nuisance was observed.
22	The industry shall install on line TDS meter for HTDS effluent generation and connect the same to TSPCB server within two months. They shall maintain the records for effluent generation, TDS values, salts generation on daily basis.	Complied
23	The industry shall develop greenbelt as per norms.	Developed greenery in an area of about 1.6 acres.
24	The industry shall operate dry vacuum pump to minimize odour as per the directions of the Board.	Complied
25	The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to R.O., Nalgonda every month along with invoice copies of the starting raw materials.	Directed to comply.
26	The industry shall operate Solvent Recovery Plant within plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The industry shall submit status of efficiency of Solvent Recovery Plant to the concerned Regional Officer. The industry shall not dispose spent solvents / mixed spent solvents to the traders/ recyclers.	The industry has Solvent Recovery Column with 2 columns of capacity 20 KLD.
27	The industry shall carry out Leak Detection and Repair Study (LDAR) to access the solvent losses.	The industry has conducted Leak Detection and Repair Study in the Month of Sept'22.
28	The industry shall provide storm water drains to avoid mixing of effluent/spillages with run-off water during rains.	The industry has provided first run off rain water collection tank of capacity 60 KL & (for new production block area), 40 KL (for old production block area).
29	The industry shall provide arrangement to bypass the rain water collection tank of first run off rain water for subsequent water flow.	Complied
30	The industry shall provide and maintain platform and cover area for detoxification of containers and container liners. The wastewater generated from detoxification facility shall be sent to the effluent storage tank for further treatment and disposal.	Complied

31	The industry shall provide dyke walls for storage tanks / areas to control spillages.	Complied
32	The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption.	The industry has provided separate energy meter for ZLD system and scrubbing system.
33	The evaporation losses in solvents shall be controlled by taking all preventive measures such as circulation of Chilled brine, transfer of solvents by using pumps instead of manual handling, closed centrifuges, providing primary & secondary condensers to all the reactor vents and all the solvent storage tanks and keeping solvent storage in ground storage tanks with closed pipeline to Reactors. The industry shall operate Solvent Recovery Plant within plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The industry shall submit status of efficiency of Solvent Recovery Plant to the concerned Regional Officer. The industry shall not dispose spent solvents / mixed spent solvents to the traders/ recyclers.	Provided vent condensers for bulk solvent storage tanks.
34	The industry should not discharge any wastewater within or outside the factory premises.	During the inspection, no discharges of effluent were observed.
35	(a) The industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection. i. Daily production details and Central Excise Returns. ii. Quantity of Effluents generated (HTDS & LTDS) and disposed. iii. Log Books for pollution control systems. iv. Daily solid waste generated and disposed (b) The industry shall submit consolidated statement of the above on monthly basis to the Concerned Regional Office.	Maintained
36	As per G.O.Rt.No.286, the industry shall transport the industrial effluents and plying on the roads is allowed between 6 A.M. to 6 P.M. only.	--
37	The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular movement.	Complied
38	The industry shall comply with Task Force directions issued by the Board from time to time.	Submitted above
39	The applicant shall submit Environment statement in Form V to the Regional office before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof.	Submitting
40	The conditions stipulated in this order are without any prejudice to rights and contentions of this Board in any Hon'ble court of Law.	--

Remarks:

1. M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhavanagiri District and engaged in manufacturing of Bulk Drugs & Intermediates.
2. The industry has obtained CFO & HWA (phase-I expansion) renewal from the Board vide order dt: 13.01.2023 valid up to 31.12.2027.
3. The industry provided new ZLD system (125 KLD) consisting of Collection Cum Neutralization → Holding tank → Flash mixer-I → Coagulation → Clarifier → Press filter → Stripper Holding tank → Stripper (125 KLD) → MEE (4 calendrias having total capacity of 125 KLD) → ATFD (20 KLD) → MEE & ATFD Condensate to ETP (Biological Treatment-125 KLD) → Concentrate to ATFD, salts to TSDF.

4. The industry has provided vent condenser followed by activated charcoal bed to the scrubber of ATFD.
5. The Biological ETP system consisting of Collection Cum Equalization → ETP (Biological Treatment) along with MEE condensate.
ETP (Biological Treatment) along with the domestic wastewater (septic tank overflow) → Aeration tank -I (650 KL), secondary Clarifier-I (25 KL), Aeration tank -II (100 KL), Secondary clarifier -II (15 KL), Storage tank (10 KL), Sand filter & carbon filters and RO plant (125 KL) → RO Permeate to Cooling Tower / Boiler
6. During inspection, the MEE system was not in operation due to lack of effluent load and Biological ETP was under operation.
7. The industry has provided the IP camera without PTZ features along with digital flow meters at HTDS and LTDS effluents collection line, RO permeate and connected to the Board server.
8. The industry is having coal fired boiler of capacity 5 TPH provided with Bag filter as APCE and 2 TPH boiler provided with cyclone dust collector as APCE followed by separate chimneys of height 30 mtrs. The industry is having DG sets of capacity 250 KVA & 125 KVA and provided acoustic enclosures.
9. The industry has provided double stage scrubber followed by Activated charcoal bed for production block A and 3 Nos of single stage scrubbers at vent of HCL tank, vents of centrifuges at production block-A, vents of centrifuges at production block-B. The industry has provided double stage scrubber followed by activated charcoal bed at Production block-D (new block). The industry has provided single stage scrubber to vent of ATFD (new ZLD).
10. The industry has provided online VOC analyzer for monitoring of VOCs and connected to TSPCB server.
11. As per the production records of the industry for the last 6 months period of Jan 2023 to June 2023, the industry has manufactured 7 Consented products with a production of 227.29 Kg/day (avg) as against consented 733.31 Kg/day.
12. As per the records of the industry during the period from Jan 2023 to June 2023 the water consumption is 28.28 KLD as against the consented 59.2 KLD (As per CFO order).
13. As per the records of the industry during the period from Jan 2023 to June 2023 the waste water generation is 9.96 KLD as against the consented 28.5 KLD.
14. As per the records of the industry during the period from Jan 2023 to June 2023 the MEE salts disposal to M/s. TSDF is 584 kgs/day to TSDF (M/s Ramky) and disposal of Organic waste is 648 kgs/day to Cement industries (i.e., Sri Envirotech).
15. The board has collected samples from cooling towers on 27.05.2023 to ensure usage of untreated effluent in cooling towers. The values of the analysis reports are as given below:

Parameter	Cooling tower - chilling plant	Cooling tower - Production Block A	Cooling tower - Production Block B
pH	7.78	7.10	7.59
TSS	42	38	24
TDS	980	604	880
COD	104	96	88

Note: All values are in mg/L, except pH.

12. **WHEREAS**, vide reference 9th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 07.08.2023. The industry representative and RO-Nalgonda have attended the meeting. After detailed discussions, the Committee recommended to inspect the industries by Task Force Committee Members.
13. **WHEREAS**, vide reference 10th cited, the Task Force Committee inspected the industries on 10th & 11th of August, 2023 and the following observations were made:
 1. During the inspection, the industry is in operation.

2. The industry provided ZLD system consisting of Stripper, MEE, ATFD & Biological ETP followed by RO plant. During inspection, the MEE system was not in operation for less effluent load due to low production. Photograph of MEE System:
3. The industry provided Biological ETP to treat LTDS effluent and MEE condensate. During inspection, the Biological ETP was under operation.
4. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings
5. The industry has provided double stage scrubber followed by Activated charcoal bed for production block A and 3 Nos of single stage scrubbers at vent of HCL tank, vents of centrifuges at production block-A, vents of centrifuges at production block-B. The industry has provided double stage scrubber followed by activated charcoal bed at Production block-D (new block).
6. The industry has provided condenser followed by single stage scrubber followed by activated charcoal bed to the ATFD.
7. The industry is having coal fired boiler of capacity 5 TPH provided with Bag filter as APCE and 2 TPH boiler provided with cyclone dust collector as APCE followed by separate chimneys of height 30 mtrs. The industry is having DG sets of capacity 250 KVA & 125 KVA and provided acoustic enclosures.
8. The industry has stored hazardous waste, and there was lot of odour.
9. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.
 - The compliance status of the industry on the Non-Compliances mentioned in TF agenda dated:07.08.2023:

S. No	Direction	Compliance
1	The industry has to improve housekeeping at HTDS circulation tank.	Improved.
2	Odour was observed within the industry premises it may lead to surrounding areas during the wind flow.	Odour was observed at MEE & ETP area.
3	The industry has not submitted latest LDAR status report.	Submitted to RO

14. **WHEREAS**, vide reference 11th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 28.08.2023. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. After detailed discussions, the Committee recommended to issue Extension of Temporary Revocation of Closure Orders for a period upto 31.10.2023 and also recommended to forfeit the Bank Guarantee of Rs.24.0 Lakhs with certain directions.

15. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period upto 31.10.2023 with the following directions to comply with:**

1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
2. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
3. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.45,00,000/- (Rupees Forty Five Lakhs Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
4. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.

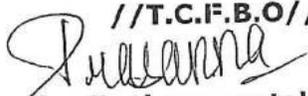
5. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 6. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 7. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 8. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 9. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs towards compliance of the above directions in favour of the Member Secretary, TSPCB, Hyderabad for a period of one year at concerned Regional office within in a week.
 10. The industry shall recoup the Bank Guarantee of Rs.24.0 Lakhs towards Bank Guarantee forfeited to the Board from time to time before its expiry, till further orders of the Board.
 11. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
16. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period up to 31.10.2023.
17. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).
18. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To
M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.

Copy to:

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action. The RO is directed coordinate with the Task Force Committee Members to inspect the industry after four weeks to verify the compliances status of the industry.
3. Concerned file.

//T.C.F.B.O//

Senior Environmental Engineer
(Task Force - UH-IV)

This Order has the Digital Approval by the Member Secretary.



BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-54/TSPCB/TF/HO/2023-768

Date: 13.09.2023

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Revocation of Closure Order for a period up to 31.10.2023 - Orders Issued** - Reg.

- Ref :**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 5. The Board issued additional directions on 21.06.2023 for Levying of Environmental Compensation.
 6. Extension of Temporary Revocation of Closure Order issued on 26.06.2023 for a period up to 31.07.2023.
 7. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding colored water stagnation in the Dothigudem area and also same complaint forwarded by the District Collector, Yadadri Bhuvanagiri District.
 8. The RO-Nalgonda Officials report dated 01.08.2023.
 9. Hearing held on 07.08.2023.
 10. Hon'ble High Court orders in WP.No.19039 of 2023 dt.08.08.2023 regarding Environmental Compensation Levied by the TSPCB.
 11. The Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023.
 12. Hearing held on 28.08.2023.

* * * * *

1. **WHEREAS**, you are operating the industry located at Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District and engaged in Bulk drugs & Intermediates manufacturing unit.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period upto 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 directed the TSPCB to furnish the compliance report on water & soil analysis.
6. **WERHEAS**, vide reference 5th cited, the Board issued additional directions to the Industry on 21.06.2023 for Levying of Environmental Compensation (EC).
7. **WERHEAS**, vide reference 6th cited, the Board issued Extension of Temporary Revocation of Closure Order to the industry on 26.06.2023 for a period up to 31.07.2023.

DESPATCH NO:
DATE: 14 SEP 2023

8. **WERHEAS**, vide reference 7th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding colored water stagnation in the Dothigudem area and also same complaint forwarded by the District Collector, Yadadri Bhuvanagiri District.

9. **WHEREAS**, the industry have filed a Writ Petitions before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.

10. **WHEREAS**, the Hon'ble High Court passed an orders dt.08.08.2023 in the WP No.19039 of 2023, the composite order dated:21.06.2023 issued to the industry by the Board is quashed and set aside and the operative portion of the order reads as under.

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter".

11. **WHEREAS**, vide reference 8th cited, the RO-Nalgonda officials inspected the industry and submitted report to the Board office on 01.08.2023 and the following observations were made:

1. The industry is in operation during inspection.

- The compliance status of the industry on the Non-Compliances stipulated in the Extension of Temporary Revocation of Closure Order dt: 26.06.2023 is as follows:

Air Act:

S. No	Direction	Compliance
1	The industry shall take all odour control measures and operate the same regularly to avoid nuisance to the surrounding environment.	Complied.
2	The industry shall provide & maintain dome with suction hood followed by double stage scrubber with online pH meter to the HTDS effluent storage tanks to control the odour nuisance.	<ul style="list-style-type: none"> • Complied. • The industry has provided double stage scrubber followed by activated carbon bed with online pH meter.
3	The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.	<ul style="list-style-type: none"> • Complied. • The industry has provided double stage scrubber with sub cooler condenser followed by activated carbon bed with online pH meter for HTDS collection tanks.
4	The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.	<ul style="list-style-type: none"> • Complied. • The industry has provided single stage scrubber with sub cooler condenser followed by activated carbon bed with online pH meter for ATFD.
5	The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.	<ul style="list-style-type: none"> • Complied. • During inspection, No odour nuisance was observed

6	The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server.	The industry has installed online VOC analyzer near security gate and same was connected to TSPCB website.
7	The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to contain VOCs.	Complied.
8	The industry shall provide & maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.	Complied.
9	The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.	The industry has conducted Leak Detection and Repair Study in the Month of Sept'22.
10	The industry shall not cause any air pollution to the surrounding area.	<ul style="list-style-type: none"> During inspection, no nuisance was observed.

- The status of compliance of the industry on Board Task Force Additional directions Order dt.20.06.2023 issued Under Air & Water (P&C) Amendment Acts is submitted below:

S. No.	Directions	Compliance
1	The industry shall maintain sufficient free board to avoid overflows in effluent collection tanks and shall dispose the same as per CFO & HWA conditions.	<ul style="list-style-type: none"> Complied. During inspection, No overflows were observed.
2	The industry shall not stock the effluents in the collection tanks and shall treat the effluents in ZLD system / send to the CETP to avoid any over flow in view of the rainy season.	During inspection, ZLD system (MEE system and Bio ETP system) was under operation.

- Compliance of the industry on CFO schedule - B conditions: CFO Order No. 230524255692, dt.13.01.2023.

S. No.	Condition	Compliance																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
1	<p>The industry shall take steps to reduce water consumption to the extent possible and consumption shall NOT exceed the quantities prescribed below:</p> <table border="1"> <thead> <tr> <th>S</th> <th>Purpose</th> <th>Quantity in KLD</th> </tr> </thead> <tbody> <tr><td>1</td><td>Process</td><td>11.0</td></tr> <tr><td>2</td><td>Washing (metric soapstone, floor, etc)</td><td>1.0</td></tr> <tr><td>3</td><td>Spent Wash (50% water)</td><td>18</td></tr> <tr><td>4</td><td>Spent Wash (100% water)</td><td>7</td></tr> <tr><td>5</td><td>Drainage</td><td>1</td></tr> <tr><td>6</td><td>Drainage</td><td>1</td></tr> <tr><td>7</td><td>Drainage</td><td>1</td></tr> <tr><td>8</td><td>Drainage</td><td>1</td></tr> <tr><td>9</td><td>Drainage</td><td>1</td></tr> <tr><td>10</td><td>Drainage</td><td>1</td></tr> <tr><td>11</td><td>Drainage</td><td>1</td></tr> <tr><td>12</td><td>Drainage</td><td>1</td></tr> <tr><td>13</td><td>Drainage</td><td>1</td></tr> <tr><td>14</td><td>Drainage</td><td>1</td></tr> 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water)	7	5	Drainage	1	6	Drainage	1	7	Drainage	1	8	Drainage	1	9	Drainage	1	10	Drainage	1	11	Drainage	1	12	Drainage	1	13	Drainage	1	14	Drainage	1	15	Drainage	1	16	Drainage	1	17	Drainage	1	18	Drainage	1	19	Drainage	1	20	Drainage	1	21	Drainage	1	22	Drainage	1	23	Drainage	1	24	Drainage	1	25	Drainage	1	26	Drainage	1	27	Drainage	1	28	Drainage	1	29	Drainage	1	30	Drainage	1	31	Drainage	1	32	Drainage	1	33	Drainage	1	34	Drainage	1	35	Drainage	1	36	Drainage	1	37	Drainage	1	38	Drainage	1	39	Drainage	1	40	Drainage	1	41	Drainage	1	42	Drainage	1	43	Drainage	1	44	Drainage	1	45	Drainage	1	46	Drainage	1	47	Drainage	1	48	Drainage	1	49	Drainage	1	50	Drainage	1	51	Drainage	1	52	Drainage	1	53	Drainage	1	54	Drainage	1	55	Drainage	1	56	Drainage	1	57	Drainage	1	58	Drainage	1	59	Drainage	1	60	Drainage	1	61	Drainage	1	62	Drainage	1	63	Drainage	1	64	Drainage	1	65	Drainage	1	66	Drainage	1	67	Drainage	1	68	Drainage	1	69	Drainage	1	70	Drainage	1	71	Drainage	1	72	Drainage	1	73	Drainage	1	74	Drainage	1	75	Drainage	1	76	Drainage	1	77	Drainage	1	78	Drainage	1	79	Drainage	1	80	Drainage	1	81	Drainage	1	82	Drainage	1	83	Drainage	1	84	Drainage	1	85	Drainage	1	86	Drainage	1	87	Drainage	1	88	Drainage	1	89	Drainage	1	90	Drainage	1	91	Drainage	1	92	Drainage	1	93	Drainage	1	94	Drainage	1	95	Drainage	1	96	Drainage	1	97	Drainage	1	98	Drainage	1	99	Drainage	1	100	Drainage	1	101	Drainage	1	102	Drainage	1	103	Drainage	1	104	Drainage	1	105	Drainage	1	106	Drainage	1	107	Drainage	1	108	Drainage	1	109	Drainage	1	110	Drainage	1	111	Drainage	1	112	Drainage	1	113	Drainage	1	114	Drainage	1	115	Drainage	1	116	Drainage	1	117	Drainage	1	118	Drainage	1	119	Drainage	1	120	Drainage	1	121	Drainage	1	122	Drainage	1	123	Drainage	1	124	Drainage	1	125	Drainage	1	126	Drainage	1	127	Drainage	1	128	Drainage	1	129	Drainage	1	130	Drainage	1	131	Drainage	1	132	Drainage	1	133	Drainage	1	134	Drainage	1	135	Drainage	1	136	Drainage	1	137	Drainage	1	138	Drainage	1	139	Drainage	1	140	Drainage	1	141	Drainage	1	142	Drainage	1	143	Drainage	1	144	Drainage	1	145	Drainage	1	146	Drainage	1	147	Drainage	1	148	Drainage	1	149	Drainage	1	150	Drainage	1	151	Drainage	1	152	Drainage	1	153	Drainage	1	154	Drainage	1	155	Drainage	1	156	Drainage	1	157	Drainage	1	158	Drainage	1	159	Drainage	1	160	Drainage	1	161	Drainage	1	162	Drainage	1	163	Drainage	1	164	Drainage	1	165	Drainage	1	166	Drainage	1	167	Drainage	1	168	Drainage	1	169	Drainage	1	170	Drainage	1	171	Drainage	1	172	Drainage	1	173	Drainage	1	174	Drainage	1	175	Drainage	1	176	Drainage	1	177	Drainage	1	178	Drainage	1	179	Drainage	1	180	Drainage	1	181	Drainage	1	182	Drainage	1	183	Drainage	1	184	Drainage	1	185	Drainage	1	186	Drainage	1	187	Drainage	1	188	Drainage	1	189	Drainage	1	190	Drainage	1	191	Drainage	1	192	Drainage	1	193	Drainage	1	194	Drainage	1	195	Drainage	1	196	Drainage	1	197	Drainage	1	198	Drainage	1	199	Drainage	1	200	Drainage	1	201	Drainage	1	202	Drainage	1	203	Drainage	1	204	Drainage	1	205	Drainage	1	206	Drainage	1	207	Drainage	1	208	Drainage	1	209	Drainage	1	210	Drainage	1	211	Drainage	1	212	Drainage	1	213	Drainage	1	214	Drainage	1	215	Drainage	1	216	Drainage	1	217	Drainage	1	218	Drainage	1	219	Drainage	1	220	Drainage	1	221	Drainage	1	222	Drainage	1	223	Drainage	1	224	Drainage	1	225	Drainage	1	226	Drainage	1	227	Drainage	1	228	Drainage	1	229	Drainage	1	230	Drainage	1	231	Drainage	1	232	Drainage	1	233	Drainage	1	234	Drainage	1	235	Drainage	1	236	Drainage	1	237	Drainage	1	238	Drainage	1	239	Drainage	1	240	Drainage	1	241	Drainage	1	242	Drainage	1	243	Drainage	1	244	Drainage	1	245	Drainage	1	246	Drainage	1	247	Drainage	1	248	Drainage	1	249	Drainage	1	250	Drainage	1	251	Drainage	1	252	Drainage	1	253	Drainage	1	254	Drainage	1	255	Drainage	1	256	Drainage	1	257	Drainage	1	258	Drainage	1	259	Drainage	1	260	Drainage	1	261	Drainage	1	262	Drainage	1	263	Drainage	1	264	Drainage	1	265	Drainage	1	266	Drainage	1	267	Drainage	1	268	Drainage	1	269	Drainage	1	270	Drainage	1	271	Drainage	1	272	Drainage	1	273	Drainage	1	274	Drainage	1	275	Drainage	1	276	Drainage	1	277	Drainage	1	278	Drainage	1	279	Drainage	1	280	Drainage	1	281	Drainage	1	282	Drainage	1	283	Drainage	1	284	Drainage	1	285	Drainage	1	286	Drainage	1	287	Drainage	1	288	Drainage	1	289	Drainage	1	290	Drainage	1	291	Drainage	1	292	Drainage	1	293	Drainage	1	294	Drainage	1	295	Drainage	1	296	Drainage	1	297	Drainage	1	298	Drainage	1	299	Drainage	1	300	Drainage	1	301	Drainage	1	302	Drainage	1	303	Drainage	1	304	Drainage	1	305	Drainage	1	306	Drainage	1	307	Drainage	1	308	Drainage	1	309	Drainage	1	310	Drainage	1	311	Drainage	1	312	Drainage	1	313	Drainage	1	314	Drainage	1	315	Drainage	1	316	Drainage	1	317	Drainage	1	318	Drainage	1	319	Drainage	1	320	Drainage	1	321	Drainage	1	322	Drainage	1	323	Drainage	1	324	Drainage	1	325	Drainage	1	326	Drainage	1	327	Drainage	1	328	Drainage	1	329	Drainage	1	330	Drainage	1	331	Drainage	1	332	Drainage	1	333	Drainage	1	334	Drainage	1	335	Drainage	1	336	Drainage	1	337	Drainage	1	338	Drainage	1	339	Drainage	1	340	Drainage	1	341	Drainage	1	342	Drainage	1	343	Drainage	1	344	Dr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4	The industry shall not manufacture any un-consented products and exceeding capacities without obtaining prior Consent for Establishment (CFE) and Consent for Operation (CFO) of the Board.	As per the production records of the industry for the last 9 months period of Jan 2023 to June 2023, the industry has manufactured 7 Consented products with a production of 227.29 Kg/day (avg) as against consented 733.31 Kg/day.
5	The industry shall comply with emission limits for DG sets upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets more than 800 KW should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	Complied.
6	The industry shall comply with ambient air quality standards of PM10(Particulate Matter size less than 10µm) - 100 µg/ m ³ ; PM2.5(Particulate Matter size less than 2.5 µm) - 60 µg/ m ³ ; SO ₂ - 80 µg/ m ³ ; NO _x - 80 µg/m ³ , NH ₃ - 400 µg/m ³ outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009 Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A).	--
7	The industry has paid CFO fee Rs. Rs.15,00,000/- upto 31.12.2027. The industry has to pay balance CFE differential fee of Rs. 4,50,000/-.	Complied. The industry has paid the balance CFE fee of Rs. 4,50,000/- on 13.01.2023
8	The industry either paying annual fee or total fee for Consented period, shall pay the balance fee as per the revised rates as applicable from time to time.	with UTR no UTIBR52023011300361829.
9	The industry shall maintain separate water meters for recording water consumption for process, boiler feed, cooling and domestic purposes and also maintain daily records.	Complied.
10	The industry shall segregate effluents into LTDS & HTDS effluents separately.	Complied
11	The industry shall regularly operate the ZLD system to treat the effluent and 100% recycle of treated effluent.	During the inspection, the MEE system was not in operation. But, Biological ETP
12	The industry is permitted to send HTDS effluents to the MEE system of M/s. JETL, Jeedimetla for a period of maximum 15 days in a calendar year i.e. during maintenance / break down of Stripper, MEE & ATFD system and shall maintain records.	--
13	The industry shall maintain digital flow meters with totalisers (RS-485 communication) for recording the quantity of HTDS effluents, LTDS effluent & RO permeate and also maintain daily records. They shall connect the flow totaliser data to TSPCB & CPCB servers as per CPCB protocol.	The industry has provided digital flow meters at effluent collection line, MEE feed, ATFD feed, MEE condensate, RO permeate.
14	The industry shall provide IP camera with PAN, 5x or above focal length with night vision capability at the entrance of the main gate within two months with a backup data for a period of 6 months.	Complied. The industry has provided PTZ IP camera at the main gate and connected it to TSPCB website.

15	The industry shall maintain vent condensers for chemical / solvent storage tanks to control fugitive emissions.	Provided vent condensers for bulk solvent storage tanks.
16	The industry shall operate multi stage scrubber along with online pH monitoring system for control of process emissions. They shall maintain log book for operation of scrubber for monitoring active scrubbing media.	Complied
17	The industry shall monitor VOCs in ambient air with online VOC analyzer & connect the data to TSPCB server.	Complied
18	The industry shall maintain elevated platform with leachate/spillages collection pit to store drums containing chemicals & wastes to control spillages / discharges of chemicals / effluents on ground.	<ul style="list-style-type: none"> • Complied. • The industry has provided separate shed for storage of drums.
19	The industry shall maintain IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at effluent collection system (HTDS & LTDS) and RO permeate as per CPCB norms. They shall connect the data to CPCB & TSPCB server.	Provided digital flow meter and IP camera without PTZ feature to HTDS, LTDS, RO Permeate and connected the same to Board server.
20	The industry shall install IP cameras to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant.	The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view).
21	The industry maintain the Ambient Air Quality (AAQ) and have adequate control to achieve the ZLD.	During inspection, No nuisance was observed.
22	The industry shall install on line TDS meter for HTDS effluent generation and connect the same to TSPCB server within two months. They shall maintain the records for effluent generation, TDS values, salts generation on daily basis.	Complied
23	The industry shall develop greenbelt as per norms.	Developed greenery in an area of about 1.6 acres.
24	The industry shall operate dry vacuum pump to minimize odour as per the directions of the Board.	Complied
25	The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to R.O., Nalgonda every month along with invoice copies of the starting raw materials.	Directed to comply.
26	The industry shall operate Solvent Recovery Plant within plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The industry shall submit status of efficiency of Solvent Recovery Plant to the concerned Regional Officer. The industry shall not dispose spent solvents / mixed spent solvents to the traders/ recyclers.	The industry has Solvent Recovery Column with 2 columns of capacity 20 KLD.
27	The industry shall carry out Leak Detection and Repair Study (LDAR) to access the solvent losses.	The industry has conducted Leak Detection and Repair Study in the Month of Sept'22.
28	The industry shall provide storm water drains to avoid mixing of effluent/spillages with run-off water during rains.	The industry has provided first run off rain water collection tank of capacity 60 KL & (for new production block area), 40 KL (for old production block area).
29	The industry shall provide arrangement to by-pass the rain water collection tank of first run off rain water for subsequent water flow.	Complied

30	The industry shall provide and maintain platform and cover area for detoxification of containers and container liners. The wastewater generated from detoxification facility shall be sent to the effluent storage tank for further treatment and disposal.	Complied
31	The industry shall provide dyke walls for storage tanks / areas to control spillages.	Complied
32	The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption.	The industry has provided separate energy meter for ZLD system and scrubbing system.
33	The evaporation losses in solvents shall be controlled by taking all preventive measures such as circulation of Chilled brine, transfer of solvents by using pumps instead of manual handling, closed centrifuges, providing primary & secondary condensers to all the reactor vents and all the solvent storage tanks and keeping solvent storage in ground storage tanks with closed pipeline to Reactors. The industry shall operate Solvent Recovery Plant within plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The industry shall submit status of efficiency of Solvent Recovery Plant to the concerned Regional Officer. The industry shall not dispose spent solvents / mixed spent solvents to the traders/ recyclers.	Provided vent condensers for bulk solvent storage tanks.
34	The industry should not discharge any wastewater within or outside the factory premises.	During the inspection, no discharges of effluent were observed.
35	(a) The industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection. i. Daily production details and Central Excise Returns. ii. Quantity of Effluents generated (HTDS & LTDS) and disposed. iii. Log Books for pollution control systems. iv. Daily solid waste generated and disposed (b) The industry shall submit consolidated statement of the above on monthly basis to the Concerned Regional Office.	Maintained
36	As per G.O.Rt.No.286, the industry shall transport the industrial effluents and plying on the roads is allowed between 6 A.M. to 6 P.M. only.	--
37	The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular movement.	Complied
38	The industry shall comply with Task Force directions issued by the Board from time to time.	Submitted above
39	The applicant shall submit Environment statement in Form V to the Regional office before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof.	Submitting
40	The conditions stipulated in this order are without any prejudice to rights and contentions of this Board in any Hon'ble court of Law.	--

Remarks:

1. M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppall (M), Yadadri Bhavanagiri District and engaged in manufacturing of Bulk Drugs & Intermediates.
2. The industry has obtained CFO & HWA (phase-I expansion) renewal from the Board vide order dt: 13.01.2023 valid up to 31.12.2027.
3. The industry provided new ZLD system (125 KLD) consisting of Collection Cum Neutralization → Holding tank → Flash mixer-I → Coagulation → Clarifier → Press filter → Stripper Holding tank → Stripper (125 KLD) → MEE (4 calendrias having total

capacity of 125 KLD) →ATFD (20 KLD) → MEE & ATFD Condensate to ETP (Biological Treatment-125 KLD) → Concentrate to ATFD, salts to TSDF.

4. The industry has provided vent condenser followed by activated charcoal bed to the scrubber of ATFD.
5. The Biological ETP system consisting of Collection Cum Equalization → ETP (Biological Treatment) along with MEE condensate.
6. ETP (Biological Treatment) along with the domestic wastewater (septic tank overflow) → Aeration tank -I (650 KL), secondary Clarifier-I (25 KL), Aeration tank -II (100 KL), Secondary clarifier -II (15 KL), Storage tank (10 KL), Sand filter & carbon filters and RO plant (125 KL) → RO Permeate to Cooling Tower / Boiler
7. During inspection, the MEE system was not in operation due to lack of effluent load and Biological ETP was under operation.
8. The industry has provided the IP camera without PTZ features along with digital flow meters at HTDS and LTDS effluents collection line, RO permeate and connected to the Board server.
9. The industry is having coal fired boiler of capacity 5 TPH provided with Bag filter as APCE and 2 TPH boiler provided with cyclone dust collector as APCE followed by separate chimneys of height 30 mtrs. The industry is having DG sets of capacity 250 KVA & 125 KVA and provided acoustic enclosures.
10. The industry has provided double stage scrubber followed by Activated charcoal bed for production block A and 3 Nos of single stage scrubbers at vent of HCL tank, vents of centrifuges at production block-A, vents of centrifuges at production block-B. The industry has provided double stage scrubber followed by activated charcoal bed at Production block-D (new block). The industry has provided single stage scrubber to vent of ATFD (new ZLD).
11. The industry has provided online VOC analyzer for monitoring of VOCs and connected to TSPCB server.
12. As per the production records of the industry for the last 6 months period of Jan 2023 to June 2023, the industry has manufactured 7 Consented products with a production of 227.29 Kg/day (avg) as against consented 733.31 Kg/day.
13. As per the records of the industry during the period from Jan 2023 to June 2023 the water consumption is 28.28 KLD as against the consented 59.2 KLD (As per CFO order).
14. As per the records of the industry during the period from Jan 2023 to June 2023 the waste water generation is 9.96 KLD as against the consented 28.5 KLD.
15. As per the records of the industry during the period from Jan 2023 to June 2023 the MEE salts disposal to M/s. TSDF is 584 kgs/day to TSDF (M/s Ramky) and disposal of Organic waste is 648 kgs/day to Cement industries (i.e., Sri Envirotech).
16. The board has collected samples from cooling towers on 27.05.2023 to ensure usage of untreated effluent in cooling towers. The values of the analysis reports are as given below:

Parameter	Cooling tower - chilling plant	Cooling tower - Production Block A	Cooling tower - Production Block B
pH	7.78	7.10	7.59
TSS	42	38	24
TDS	980	604	880
COD	104	96	88

Note: All values are in mg/L, except pH.

12. **WHEREAS**, vide reference 9th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 07.08.2023. The industry representative and RO-Nalgonda have attended the meeting. After detailed discussions, the Committee recommended to inspect the industries by Task Force Committee Members.
13. **WHEREAS**, vide reference 10th cited, the Task Force Committee inspected the industries on 10th & 11th of August,2023. The details of the inspection are as follows:

1. During the inspection, the industry is in operation.

2. The industry provided ZLD system consisting of Stripper, MEE, ATFD & Biological ETP followed by RO plant. During inspection, the MEE system was not in operation for less effluent load due to low production. Photograph of MEE System:
3. The industry provided Biological ETP to treat LTDS effluent and MEE condensate. During inspection, the Biological ETP was under operation. Photograph of biological ETP:
4. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings
5. The industry has provided double stage scrubber followed by Activated charcoal bed for production block A and 3 Nos of single stage scrubbers at vent of HCL tank, vents of centrifuges at production block-A, vents of centrifuges at production block-B. The industry has provided double stage scrubber followed by activated charcoal bed at Production block-D (new block).
6. The industry has provided condenser followed by single stage scrubber followed by activated charcoal bed to the ATFD.
7. The industry is having coal fired boiler of capacity 5 TPH provided with Bag filter as APCE and 2 TPH boiler provided with cyclone dust collector as APCE followed by separate chimneys of height 30 mtrs. The industry is having DG sets of capacity 250 KVA & 125 KVA and provided acoustic enclosures.
8. The industry has stored hazardous waste, and there was lot of odour.
9. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.

The compliance status of the industry on the Non-Compliances mentioned in TF agenda dated:07.08.2023:

S. No	Direction	Compliance
1	The industry has to improve housekeeping at HTDS circulation tank.	Improved.
2	Odour was observed within the industry premises it may lead to surrounding areas during the wind flow.	Odour was observed at MEE & ETP area.
3	The industry has not submitted latest LDAR status report.	Submitted to RO

14. **WHEREAS**, vide reference 11th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 28.08.2023. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. After detailed discussions, the Committee recommended to issue Extension of Temporary Revocation of Closure Orders for a period upto 31.10.2023 and also recommended to forfeit the Bank Guarantee of Rs.24.0 Lakhs with certain directions.

15. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period up to 31.10.2023 with the following directions to comply with:**

1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
2. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
3. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.45,00,000/- (Rupees Forty Five Lakhs Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
4. The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to control VOCs within one month.

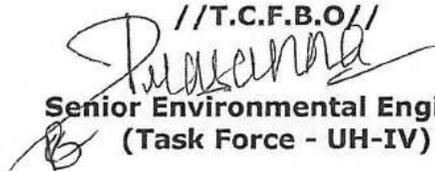
5. The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.
16. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period upto 31.10.2023.
17. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).
18. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To
**M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.**

Copy to:

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action. The RO is directed coordinate with the Task Force Committee Members to inspect the industry after four weeks to verify the compliances status of the industry.
3. Concerned file.

//T.C.F.B.O//

**Senior Environmental Engineer
(Task Force - UH-IV)**

This Order has the Digital Approval by the Member Secretary.

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ANNEXURE - IV



BRUNDAVAN LABORATORIES PVT. LTD.

(GMP & ISO Certified Company)

305, 3rd Floor, Tirumala Shah Residency, Yellareddyguda, Ameerpet, Hyderabad - 500 073. INDIA
☎: +91 040-23735395, ✉: contact@brundavanlabs.com. CIN : U24231TG2002PTC040136

The Member Secretary,
Telangana State Pollution Control Board,
ParyavaranBhavan,
Sanathnagar, Hyderabad



27.12.2023

Dear Sir,

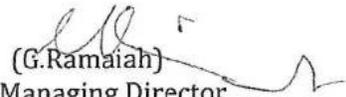
Sub: Environmental compensation demand

Please find attached demand draft no. 467455 dated 27/12/2023 for Rs 11,25,000 drawn on Axis Bank, payable at Hyderabad towards part payment of Environmental Compensation.

Kindly acknowledge the receipt.

Thanking you.

Yours sincerely,
For Brundavan Laboratories Pvt Ltd


(G. Ramaiah)
Managing Director

EE/AEE
for nbg
27/12/2023

31



AXIS BANK LTD

ISSUING BRANCH

IFS CODE - UTIB0001634

A/C PAYEE ONLY

CBB HYDERABAD

VALID FOR THREE MONTHS FROM THE DATE OF ISSUE

DATE
दिनांक

D	D	M	M	Y	Y	0	2	Y	3

1634

or order / या उनके आदेश पर

Cn Demand Pay

मांगे जाने पर

MEMBER SECRETARY, T.S POLLUTION CONTROL BOARD

Rupees

रुपये

Eleven Lakh Twenty Five Thousand only

अदा करें

₹

*****11,25,000.00

FOR VALUE RECEIVED

DD.
Sr.No.

467455

Purchaser: BRUNDAVAN LABORATORIES PR

IVATE LIMITED

1634012100105

Payable at Par (B2K)

Sarva Udaya Bhanu
Arvika

DRAWEE BANK AND BRANCH
अदा करता बैंक और शाखा

CODE NO.

AUTHORISED SIGNATORY

AUTHORISED SIGNATORY

Sarva Udaya Bhanu
Sr. Manager & Ops. Head
Emp.No.1165, SS No.2459
Axis Bank Ltd. CBB, Hyd.

ATEURI AMBIC, .
SS No. 16514
Axis Bank Ltd., CBB, Hyd.

⑈ 467455⑈ 500211046⑈

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TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 040-23887500
Fax: 040-23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

ANNEXURE - V

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No.NLG-54/TSPCB/TF/HO/2024- 1175

Date:03.01.2024

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhuangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 06.12.2022.
 7. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 8. EPTRI, Hyderabad Study report dt.24.04.2023.
 9. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 10. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 11. The industry filed a WP No. 19039 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Hon'ble NGT, (SZ), Chennai Orders dated 03.11.2023 in O.A.No.15 of 2022.
 16. Extension of Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 19. RO Nalgonda report dated 28.12.2023.
 20. Dhotigudem Industrial Association representation dated 03.01.2024.
 21. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period up to 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
 - i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
 - i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, vide reference 6th cited, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
 - i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS.
 - v. The industry shall regularly operate the New ZLD system for treatment of effluents. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.

- vi. The industry shall install & maintain online TDS meter for HTDS effluent generation and connect the same to TSPCB server.
- vii. The industry shall connect & maintain the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server.
- viii. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- x. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xi. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
- xiii. The industry shall provide & maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
- xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xv. The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.
- xvi. The industry shall maintain proper housekeeping within the premises.
- xvii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the

water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 8th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 9th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs.45,00,000/- along with other directions vide reference 10th cited.
 12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19039 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has to improve housekeeping at HTDS circulation tank.
 - ii. Odour was observed within the industry premises it may lead to surrounding areas during the wind flow.
 - iii. The industry has not submitted latest LDAR status report.
 14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
 15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19039 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on

08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter".

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings.
 - ii. The industry has stored hazardous waste, and there was lot of odour.
 - iii. Odour was observed at MEE & ETP area.
 - iv. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, vide reference 15th cited, O.A No.15 of 2023 was filed by Sri Gummi Narender Reddy against pollution being caused by the industry before Hon'ble NGT Chennai. The Hon'ble NGT vide order dated:03.10.2023 has taken on record that the TSPCB has imposed Environmental Compensation of Rs.45,00,000/- against the industry. Further, it was also stated that even before recovery of the same, the power supply to the respondent industry was restored.
20. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
 - i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/-.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- iii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iv. The industry has not provided shed for storage of Coal ash.
- v. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- vi. The industry has to shift the gate camera of internal gate to main gate.
- vii. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

22. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- ii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iii. The industry has not provided shed for storage of Coal ash.
- iv. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- v. The industry has to shift the gate camera of internal gate to main gate.
- vi. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- vii. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

23. **WHEREAS**, vide reference 18th cited, based on the recommendations of the committee, the Board issued **SHOW CAUSE** for the following reasons:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.45,00,000/- for violations.

- iii. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

24. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³). The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
 5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
25. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
26. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

27. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.
4. The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.
5. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

28. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

29. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

30. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To,
M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.

Copy to:

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action.
3. Concerned file.

//T.C.F.B.O//

Pusanna

Senior Environmental Engineer
(Task Force - UH-IV)



TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 040-23887500
 Fax: 040-23815631
 Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No.NLG-54/TSPCB/TF/HO/2024- 1476

Date:03.01.2024

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 06.12.2022.
 7. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 8. EPTRI, Hyderabad Study report dt.24.04.2023.
 9. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 10. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 11. The industry filed a WP No. 19039 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Hon'ble NGT, (SZ), Chennai Orders dated 03.11.2023 in O.A.No.15 of 2022.
 16. Extension of Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 19. RO Nalgonda report dated 28.12.2023.
 20. Dhotigudem Industrial Association representation dated 03.01.2024.
 21. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period up to 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
 - i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
 - i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, vide reference 6th cited, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
 - i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS.
 - v. The industry shall regularly operate the New ZLD system for treatment of effluents. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.

- vi. The industry shall install & maintain online TDS meter for HTDS effluent generation and connect the same to TSPCB server.
- vii. The industry shall connect & maintain the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server.
- viii. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- x. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xi. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
- xiii. The industry shall provide & maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
- xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xv. The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.
- xvi. The industry shall maintain proper housekeeping within the premises.
- xvii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the

- water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 8th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 9th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs.45,00,000/- along with other directions vide reference 10th cited.
 12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19039 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has to improve housekeeping at HTDS circulation tank.
 - ii. Odour was observed within the industry premises it may lead to surrounding areas during the wind flow.
 - iii. The industry has not submitted latest LDAR status report.
 14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
 15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19039 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on

08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter”.

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings.
 - ii. The industry has stored hazardous waste, and there was lot of odour.
 - iii. Odour was observed at MEE & ETP area.
 - iv. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, vide reference 15th cited, O.A No.15 of 2023 was filed by Sri Gummi Narendra Reddy against pollution being caused by the industry before Hon'ble NGT Chennai. The Hon'ble NGT vide order dated:03.10.2023 has taken on record that the TSPCB has imposed Environmental Compensation of Rs.45,00,000/- against the industry. Further, it was also stated that even before recovery of the same, the power supply to the respondent Industry was restored.
20. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
 - i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/-.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- iii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iv. The industry has not provided shed for storage of Coal ash.
- v. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- vi. The industry has to shift the gate camera of internal gate to main gate.
- vii. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

22. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- ii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iii. The industry has not provided shed for storage of Coal ash.
- iv. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- v. The industry has to shift the gate camera of internal gate to main gate.
- vi. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- vii. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

23. **WHEREAS**, vide reference 18th cited, based on the recommendations of the committee, the Board issued **SHOW CAUSE** for the following reasons:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.45,00,000/- for violations.

- iii. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

24. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³). The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - iii. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - iv. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
 5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
25. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
26. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

(47)

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
 - The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.
27. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply within one month period:**
1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
 2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.
 3. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
28. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.
29. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).
30. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

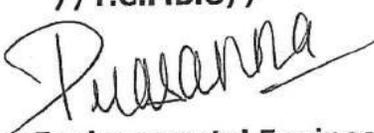
Sd/-
MEMBER SECRETARY

To,
M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.

Copy to:

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action.
3. Concerned file.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



(48)

TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

Order No.NLG-54/TSPCB/TF/HO/2024- 1477

Date:03.01.2024

Sub : TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppall (M), Yadadri Bhuangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Restoration of Power Supply for a period of Three months - Orders Issued** - Reg.

Ref : 1. Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No.NLG-54/TSPCB/TF/HO/2024- , dt:03.01.2024.

* * * * *

In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period up to 31.10.2023 to **M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppall (M), Yadadri Bhuangiri District.**

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to **M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppall (M), Yadadri Bhuangiri District for a period of Three Months from date of This Order** for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

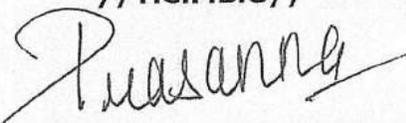
**Sd/-
MEMBER SECRETARY**

**To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuangiri District.**

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//


**Senior Environmental Engineer
(Task Force - UH-IV)**

