

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

Original Application No.154 of 2023 (SZ)

IN THE MATTER OF

T.R. Dhamodara Perumal
S/o. T. Radha
Chennai – 600 060.

...Applicant(s)

Versus

M/s. BAFNA Pharmaceuticals Limited
No.13, Sri Vinayakar Koil Street,
Madhavaram,
Chennai and Ors.

...Respondent(s)

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**Advocate for Respondent: TNPCB
Thiru. S. Sai Sathya Jith
Advocate, Chennai**

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, (SZ),
CHENNAI

O.A No: 154 of 2023

T.R.Dhamodara Perumal,
S/o.T.Radha,
No.97, Bharathiyar Street,
Madhavaram,
Chennai-600 060.

...Applicant

-VS-

1. M/s.BAFNA Pharmaceuticals Ltd.,
No.13, Sri Vinayakar Koil Street,
Madhavaram,
Chennai-600 060.
2. Tamil Nadu Pollution Control Board,
Rep by its Member Secretary
76, Mount Salai, Guindy,
Chennai-600 032.
3. The District Collector,
O/o.Chennai Collectorate,
SingaravelarMaaligai, 4thFloor,
Rajaji Salai, Chennai - 600 001.
4. The Commissioner of Chennai Corporation,
O/o. Corporation of Chennai,
Ribbon buildings,
Chennai-600 003.
5. The Thasildar,
O/o. The Thasildar,
Urban Tax Plan, Puzhal,

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20/5/24
JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

Madhavaram, Chennai - 600 066.

6. The Zonal Officer,
O/o.The Zonal Officer, Zone - III,
No.1, Thattankulam Road,
Madhavaram, Chennai - 600 060.
7. The Village Administrative Officer,
Bazaar Street, Madhavaram,
Chennai - 600 060.

.....Respondents

**REPLY AFFIDAVIT FILED ON BEHALF OF THE SECOND
RESPONDENT - TAMIL NADU POLLUTION CONTROL
BOARD.**

I, R. Sarasavani, Daughter of Thiru. J. Raghavan, Hindu, aged about 59 years, having my office at 76, Mount Salai, Guindy, Chennai-600032, do hereby solemnly affirm and sincerely state as follows:-

1. I am the Joint Chief Environmental Engineer, Tamil Nadu Pollution Control Board (TNPCB), Chennai -600 032, and I am authorized to file this reply affidavit on behalf of the Second Respondent -Tamil Nadu Pollution Control Board duly approved by the Chairperson. I am well acquainted with the facts of the case from the records available in our office.
2. I submit that I deny all the averments contained in the O.A filed by the appellant except those that are specifically admitted herein. None of the allegations contained in the said O.A shall be deemed to be admitted merely for want of a specific denial/traverse.
3. It is respectfully submitted that the application has been filed by the applicant with the prayer to close the first respondent unit, M/s. Bafna


 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMIL NADU POLLUTION CONTROL BOARD
 No.76, MOUNT SALAI, GUINDY,
 CHENNAI-600 032.

Pharmaceuticals Ltd. (currently named as Navron Pharmaceuticals Pvt Ltd.), located at No.13, Sri Vinayakar Koil Street, Madhavaram, Chennai – 600 060 and not to function in the residential area and requesting the respondents 2nd to 7th to take proper action against the unit for not having trade license and not to permit for trade licence to operate in residential area.

4. It is respectfully submitted that before responding to the averments contained in the application, the answering respondent submits the brief facts of the case for appreciation of this Tribunal.
5. It is respectfully submitted that the unit, M/s. Bafna Pharmaceuticals Ltd. (currently named as Navron Pharmaceuticals Pvt Ltd.), located at No.13, Sri Vinayakar Koil Street, Madhavaram, Chennai – 600 060 has obtained its first consent to operate vide Proc dated 24.09.1999.
6. It is respectfully submitted that the unit has obtained continuous renewal of consent of the Board (Consent orders is enclosed as ANNEXURE - 1) and the latest renewal of consent of the Board under the Water and Air Acts was issued to the unit vide proceeding dated 11.07.2023 valid up to 31.03.2026 for the following:

Product Details:

- TABLETS - 900 LAKHS/MONTH
- CAPSULES – 75 LAKHS/MONTH
- SYRUPS – 15000 LTRS/M

7. It is respectfully submitted that based on the complaint regarding noise & Air Pollution received from the applicant on 30.06.2022, the unit was inspected on 01.09.2022 and it was found that the unit is in operation with valid consent of the Board under Air and Water Acts. The unit was instructed


 JOINT CHIEF ENVIRONMENTAL ENGINEER
 TAMIL NADU POLLUTION CONTROL BOARD
 No.76, MOUNT SALAI, GUINDY,
 CHENNAI-600 032.

to operate the Effluent Treatment plant and Air pollution Control measures continuously and efficiently to meet the standards prescribed by the Board. Action taken on the complaint was sent to the applicant vide letter dated 30.09.2022 informing about the Water Pollution and Air Pollution control measures installed in the unit. It is also informed that the unit was being continuously monitored by the TNPCB.

8. It is respectfully submitted that based on another complaint received from the applicant, the unit was inspected on 01.07.2023 and it was observed that the unit was under operation with valid consent of the Board and was under renovation.
9. It is respectfully submitted that the unit is involved in granulation, blending, compression, coating, packing of tablets, capsules and syrup. Sewage – 2 KLD and Trade Effluent from vessel washing operation 0.5 KLD is discharged into combined ETP for treatment and the treated effluent is discharged to onland for gardening. The Report of Analysis of the treated effluent samples collected from the ETP outlet on 08.01.2024 reveals that the parameters are within standards prescribed by the TNPCB. The Ground water sample was collected on 19.01.2024 from the bore well located within the unit's premises and the RoA of the samples reveals that the parameters are within the permissible limit in the absence of alternate source as Per IS 10500: 2012 Drinking water specification. The unit has provided diesel fired Thermax boiler of capacity 400 Kg/hr with a stack of height 12m above Ground Level (GL) for generation of steam which is utilised in the process and DG Set 40 KVA with Acoustic enclosures and stack of height 3.5m above GL.

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JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI 600 032.

10. It is respectfully submitted that all the processes are carried out in closed vessels; hence there is no other source of process emissions from the industry except Thermax boiler of capacity 400 Kg/hr and DG set. The Thermax boiler is used to prepare the coating liquid for coating the tablets and sugar syrup only. The unit generates Hazardous Waste (HW) category No.28.5. - Date expired products, 35.3- Chemical sludge from waste water treatment from the ETP for which the unit has executed agreement with the Hazardous Waste (HW) preprocessor M/s. Sandhiya Enviro Care, Villupuram for disposal of the same and also executed agreement with the authorised recycler M/s. DVR refineries, Villupuram for the disposal of HW category 5.1 – Used/spent Oil & 5.2 - Wastes or residues containing oil from DG set and other machinery services & cleaning. The unit has applied for Hazardous Waste Authorization on 14.05.2024 which is under process.
11. It is respectfully submitted that, during inspection on 08.01.2024, it was found that there was no water stagnation within the unit's premises. The unit has provided a total of 0.1 hectare for green belt development. The unit generates 2 KLD of sewage and 0.5 KLD of trade effluent accounting to 2.5 KLD for gardening an area of 0.1 hectare.
12. It is respectfully submitted that the unit has stored the Hazardous Waste – Date Expired Products in an ear marked space inside a closed shed. Photos of Hazardous waste storage area, log book of HW Stored and display board are attached in the annexure.
13. It is respectfully submitted that the unit has provided paved surface for surface runoff and the unit has rainwater harvesting well to collect the runoff. The gardening waste and packaging wastes including carton and

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TAMIL NADU POLLUTION CONTROL BOARD
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CHENNAI-600 032.

primary packaging generated is disposed through the Greater Chennai Corporation on daily basis.

14. It is respectfully submitted that the unit was inspected by the TNPCB official on 08.01.2024 and the observations are as follows:

- a. The unit was under operation with valid consent of the Board.
- b. The unit draws water from the bore well around 4.5 KLD and utilises the bore well water for domestic use and manufacturing of tablets and Syrup.
- c. The unit generates 2 KLD of sewage and 0.5 KLD of process waste water from vessel washing operation which is treated in the combined ETP consisting of effluent collection sump, sewage collection sump, flocculation chamber, Primary settling tank, aeration tank, secondary settling tank, pressure sand filter, activated carbon filter, treated water sump, sludge drying beds and the treated water is utilised on land for gardening.
- d. The unit has provided diesel fired Thermax boiler of capacity 400 Kg/hr with a stack of height 12m above Ground Level (GL) for generation of steam which is utilised in the process and DG Set 40 KVA with Acoustic enclosures and stack of height 3.5m above GL.

15. It is respectfully submitted that the unit M/s. Bafna Pharmaceuticals Ltd. (Currently named as Navron Pharmaceuticals Pvt Ltd) is in operation in compliance of the conditions stipulated under Water Act, 1974 as amended in 1988 and Air Act, 1981 as amended in 1987.

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JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

Under above circumstances, it is humbly prayed that this Hon'ble National Green Tribunal (Southern Zone) may be pleased to pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the facts and circumstances of this case and thus render justice.

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JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

VERIFICATION

I, R. Sarasavani, Daughter of Thiru. J. Raghavan, Hindu, aged about 59 years, having my office at 76, Mount Salai, Guindy, Chennai-600032, do hereby verify that the contents of above reply affidavit are true to the best of my knowledge through records.

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20/5/24

JOINT CHIEF ENVIRONMENTAL ENGINEER
TAMIL NADU POLLUTION CONTROL BOARD
No.76, MOUNT SALAI, GUINDY,
CHENNAI-600 032.

Solemnly affirmed at Chennai
On this the day 20th of May 2024
and signed his name in my presence.

ADVOCATE: CHENNAI

Category of the Industry :

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CONSENT ORDER NO. 2305135903423 DATED: 11/07/2023.

PROCEEDINGS NO.F.1396AMB/OL/DEE/TNPCB/AMB/W/2023 DATED: 11/07/2023

SUB: Tamil Nadu Pollution Control Board –CONSENT TO OPERATE – DIRECT -M/s. NAVRON PHARMACEUTICALS PVT LTD , S.F.No. 950/2, MADHAVARAM village Madhavaram Taluk and Chennai District - Consent for the operation of the plant and discharge of sewage and/or trade effluent under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act 6 of 1974) – Issued- Reg.

Ref: 1. Pro. No. F.1396AMB/OL/DEE/TNPCB/AMB/A&W/2021 dated 20.11.2021.
2. The unit application No: 35903423 dated 15.12.2020.
3. IR.No : F.1396AMB/OL/AEE/AMB/2023 dated 05/07/2023.

CONSENT TO OPERATE is hereby granted under Section 25 of the Water (Prevention and Control of Pollution) Act, 1974 as amended in 1988 (Central Act, 6 of 1974) (hereinafter referred to as "The Act") and the rules and orders made there under to

Power of Attorney
M/s . NAVRON PHARMACEUTICALS PVT LTD
S.F No. 950/2
MADHAVARAM Village
Madhavaram Taluk
Chennai District.

Authorising the occupier to make discharge of sewage and /or trade effluent.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated under the Special and General conditions stipulated in the Consent Order issued earlier and subject to the special conditions annexed.

This CONSENT is valid for the period ending **March 31, 2026**

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Date: 2023.07.11
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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
AMBATTUR

To
Power of Attorney,
M/s.NAVRON PHARMACEUTICALS PVT LTD,
No. 375, Bharathiar Street, Madhavaram, Chennai
Pin: 600060

Copy to:

1. The Commissioner, CHENNAI CORPORATION-Corporation, Madhavaram Taluk, Chennai District .
2. Copy submitted to the Member Secretary, Tamil Nadu Pollution Control Board, Chennai for favour of kind information.
3. The District Environmental Engineer, Tamil Nadu Pollution Control Board, AMBATTUR for favour of kind information.
4. File

SPECIAL CONDITIONS

1. This consent to operate is valid for operating the facility for the manufacture of products (Col. 2) at the rate (Col. 3) mentioned below. Any change in the products and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Sl. No.	Description	Quantity	Unit
Product Details			
1.	TABLETS	900	LAKHS/MONTH
2.	CAPSULES	75	LAKHS/MONTH
3.	SYRUPS	15000	LTRS/M

2. This consent to operate is valid for operating the facility with the below mentioned permitted outlets for the discharge of sewage/trade effluent. Any change in the outlets and the quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Outlet No.	Description of Outlet	Maximum daily discharge in KLD	Point of disposal
Effluent Type : Sewage			
1.	Sewage	2.0	In to combined ETP for further treatment and disposed on land for gardening
Effluent Type : Trade Effluent			
1.	Trade Effluent	0.5	On land for gardening

3. The effluent discharge shall not contain constituents in excess of the tolerance Limits as laid down hereunder.

Sl. No.	Parameters	Unit	TOLERANCE LIMITS - OUTLETS -Nos				
			Sewage		Trade Effluent		
			1		1		
1.	pH		5.5 to 9		5.5 to 9		
2.	Temperature	oC	-		shall not exceed 5°C above the receiving water temperature		
3.	Particle size of Suspended solids	-	-		shall pass 850 micron IS sieve		
4.	Total Suspended Solids	mg/l	30		100		
5.	Total Dissolved solids (inorganic)	mg/l	-		2100		
6.	Oil & Grease	mg/l	-		10		
7.	Biochemical Oxygen Demand (3 days at 27oC)	mg/l	20		30		
8.	Chemical Oxygen Demand	mg/l	-		250		
9.	Chloride (as Cl)	mg/l	-		1000		
10.	Sulphates (as SO4)	mg/l	-		1000		
11.	Total Residual Chlorine	mg/l	-		1		
12.	Ammonical Nitrogen (as N)	mg/l	-		50		
13.	Total Kjeldahl Nitrogen (as N)	mg/l	-		100		
14.	Free Ammonia (as NH3)	mg/l	-		5		
15.	Arsenic (as As)	mg/l	-		0.2		
16.	Mercury (as Hg)	mg/l	-		0.01		
17.	Lead (as Pb)	mg/l	-		0.1		
18.	Cadmium(as Cd)	mg/l	-		2		
19.	Hexavalent Chromium (as Cr+6)	mg/l	-		0.1		
20.	Total Chromium (as Cr)	mg/l	-		2		
21.	Copper (as Cu)	mg/l	-		3		
22.	Zinc (as Zn)	mg/l	-		1		
23.	Selenium (as Se)	mg/l	-		0.05		
24.	Nickel (as Ni)	mg/l	-		3		
25.	Boron (as B)	mg/l	-		2		
26.	Percent Sodium	%	-		-		
27.	Residual Sodium Carbonate	mg/l	-		-		
28.	Cyanide (as CN)	mg/l	-		0.2		
29.	Fluoride (as F)	mg/l	-		2		
30.	Dissolved Phosphates(as P)	mg/l	-		5		
31.	Sulphide (as S)	mg/l	-		2		
32.	Pesticides	mg/l	-				
33.	Phenolic Compounds (as C6H5OH)	mg/l	-		1		
34.	Radioactive materials a) Alpha emitters	micro curie/ml	-		10-7		
35.	Radioactive materials b). Beta emitters	micro curie/ml	-		10-6		

36.	Fecal Coliform	MPN/100ml	-	-	-	-
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4. All units of the sewage and Trade effluent treatment plants shall be operated efficiently and continuously so as to achieve the standards prescribed in Sl No.3 above or to achieve the zero liquid discharge of effluent as applicable.
5. The occupier shall maintain the Electro Magnetic Flow Meters/water Meters installed at the inlet of the water supply connection for each of the purposes mentioned below for assessing the quantity of water used and ensuring that such meters are easily accessible for inspection and maintenance and for other purposes of the Act.
 - a. Industrial Cooling, Spraying in mine pits or boiler feed.
 - b. Domestic purpose.
 - c. Process.
6. The occupier shall maintain the Electro Magnetic Flow Meters with computer recording arrangement for measuring the quantity of effluent generated and treated for the monitoring purposes of the Act.
7. Log book for each of the unit operations of ETP have to be maintained to reflect the working condition of ETP along with the readings of the Electro Magnetic Flow Meters installed to assess effluent quantity and the same shall be furnished for verification of the Board officials during inspection.
8. The occupier shall at his own cost get the samples of effluent/surface water/ground water collected in and around the unit by Board officials and analyzed by the TNPC Board Laboratory periodically.
9. Any upset condition in any of the plants of the factory which is, likely to result in increased effluent discharge and result in violation of the standards mentioned in Sl. No.3 above shall be reported to the Member Secretary / Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
10. The occupier shall always comply and carryout the order/directions issued by the Board in this Consent Order and from time to time without any negligence. The occupier shall be liable for action as per provisions of the Act in case of non compliance of any order/directions issued.
11. The occupier shall develop adequate width of green belt at the rate of 400 numbers of trees per Hectare.
12. The occupier shall provide and maintain rain water harvesting facilities.
13. The occupier shall ensure that there shall not be any discharge of effluent either treated or untreated into storm water drain at any point of time.
14. In the case of zero liquid discharge of effluent units, the occupier shall adhere the following conditions as laid under.
 - i). The occupier shall ensure zero liquid discharge of effluent, thereby no discharge of untreated / treated effluent on land or into any water bodies either inside or outside the premises at any point of time.
 - ii) The occupier shall operate and maintain the Zero liquid discharge treatment components comprising of Primary, Secondary and tertiary treatment systems at all times and ensure that the RO permeate/Evaporator condensate shall be recycled in the process and the final RO reject shall be disposed off with the reject management system ensuring zero liquid discharge of effluents in the premises.
 - iii) The occupier shall operate and maintain the reject management system effectively and recover the salt from the system which shall be reused in the process if reusable or shall be disposed off as ETP sludge.
 - iv) In case of failure to achieve zero discharge of effluents for any reason, the occupier shall stop its production and operations forthwith and shall be reported to the Member Secretary/Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
 - v) The occupier shall restart the production only after ascertaining that the Zero discharge treatment system can perform effectively for achieving zero discharge of effluents.

Special Additional Conditions:

The unit shall obtain No Objection Certificate (NOC) from the Tamil Nadu Bio Diversity Board /National Bio Diversity Authority if the unit is using any Biological resources or knowledge associated thereto as per the provisions of Biological Diversity Act 2002.

The industries shall take all efforts to use and popularize "Mission LiFE" logo and mascot which is available in TNPCB & MoEFCC website. They shall also request their employees to adopt "Mission LiFE" action points and document the same and furnish half yearly report to Board.

Additional Conditions:

1. The unit shall ensure that the overflow from the septic tank is connected to combined ETP for further treatment.
2. The unit shall operate and maintained the combined effluent treatment plant efficiently and continuously so as to bring the quality of treated trade effluent shall meet the standards prescribed by the Board.
3. The unit shall utilize the treated effluent for gardening purpose within the premises of the unit as reported.
4. The unit shall apply for authorization under Hazardous Waste Management Rules, 2016 for the disposal of discarded medicine within a month's time.
5. The unit's activity shall not attract any complaint from nearby area
6. The unit shall continue to develop more green belt within the premises.
7. The unit shall not use "Use and throwaway plastics" such as plastic sheets used for food wrapping, spreading on dining table etc., plastic plates, plastic coated tea cups, plastic tumbler, water pouches and packets, plastic straw, plastic carry bags and plastic flags irrespective of thickness, within the industry premises. Instead, the unit shall encourage use of eco-friendly alternatives such as banana leaf, arecanut palm plate, stainless steel, glass porcelain plates/cups cloth bag, jute bag etc.,
8. The unit shall comply with the E-waste management Rules, 2016. E-waste as listed in schedule -I generated by them shall be channelized through collection centre or dealer of authorised producer or the dismantler or through designated take back service provider of the producer to authorized dismantler or recycler. The unit shall maintain records of E-waste generated by them in form -2 and make such records available for scrutiny by the TNPCB. The unit shall file annual returns in form-3 to the TNPCB on or before the 30th day of June, following the financial year.

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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
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GENERAL CONDITIONS

1. The occupier shall make an application along with the prescribed consent fee for grant of renewal of consent at least 60 days before the date of expiry of this Consent Order along with all the required particulars ensuring that there is no change in Production quantity and change in sewage/Trade effluent.
2. This Consent is issued by the Board in consideration of the particulars given in the application. Any change or alteration or deviation made in actual practice from the particulars furnished in the application will also be ground for review/variation/revocation of the Consent Order under Section 27 of the Act and to make such variation as deemed fit for the purpose of the Act.
3. The consent conditions imposed in this order shall continue in force until revoked under Section 27(2) of the Act.
4. After the issue of this order, all the 'Consent to Operate' orders issued previously under Water (Prevention and Control of Pollution) Act, 1974 as amended stands defunct.
5. The occupier shall maintain an Inspection Register in the factory so that the inspecting officer shall record the details of the observations and instructions issued to the unit at the time of inspection for adherence.
6. The occupier shall provide and maintain an alternate power supply along with separate energy meter for the Effluent Treatment Plant sufficient to ensure continuous operation of all pollution control equipments to maintain compliance.
7. The occupier shall provide all facilities to the Board officials for inspection and collection of samples in and around the factory at any time.
8. The occupier shall display the flow diagram of the sources of effluent generation and pollution control systems provided at the ETP site.
9. The solid waste such as sweepings, wastage, package, empty containers, residues, sludge including that from air pollution control equipments collected within the premises of the industrial plant shall be collected in an earmarked area and shall be disposed off properly.
10. The occupier shall collect, treat the solid wastes like food waste, green waste generated from the canteen and convert into organic compost.
11. The occupier shall segregate the Hazardous waste from other solid wastes and comply in accordance with Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008.
12. The occupier shall maintain good house-keeping within the factory premises.
13. All pipes, valves, sewers and drains shall be leak proof. Floor washings shall be admitted into the trade effluent collection system only and shall not be allowed to find their way in storm drains or open areas.
14. The occupier shall ensure that there shall not be any diversion or by-pass of trade effluent on land or into any water sources.
15. The occupier shall ensure that solar Evaporation pans shall be constructed in such a way that the bottom of the solar pan is at least 1 m above the Ground level (if applicable).
16. The occupier shall furnish the following returns in the prescribed formats to the concerned District office regularly.
 - a) Monthly water consumption returns of each of the purposes with water meter readings in Form-I on or before 5th of every month.
 - b) Yearly return on Hazardous wastes generated and accumulated for the period from 1st April to 31st March in Form-4 before the end of the subsequent 30th June of every year (if applicable).
 - c) Yearly Environmental Statement for the period from 1st April to 31st March in Form -V before the end of the subsequent 30th September of every year(if applicable).
17. If applicable, the occupier has to comply with the provisions of Public Liability Insurance Act, 1991 to provide immediate relief in the event of any hazard to human beings, other living creatures/plants and properties while handling and storage of hazardous substances.
18. The issuance of this consent does not authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any natural watercourse or in Government Poromboke lands.
19. The issuance of this Consent does not convey any property right in either real personal property or any exclusive privileges, nor does it authorize any injury to private property or Government property or any invasion of personal rights nor any infringement of Central, State laws or regulation.

20. The occupier shall forth with keep the Board informed of any accident of unforeseen act or event of any poisonous, noxious or polluting matter or emissions are being discharged into stream or well or air as a result of such discharge, water or air is being polluted.
21. If due to any technological improvements or otherwise the Board is of opinion that all or any of the conditions referred to above requires variation (including the change of any treatment system, either in whole or in part) the Board shall, after giving the applicant an opportunity of being heard, vary all or any of such conditions and thereupon the applicant shall be bound to comply with the conditions as so varied.
22. In case there is any change in the constitution of the management, the occupier of the new management shall file fresh application under Water (Prevention and Control of Pollution) Act, 1974, as amended in Form-II alongwith relevant documents of change of management immediately and get the necessary amendment with renewal of consent order.
23. In case there is any change in the name of the company alone, the occupier shall inform the same with relevant documents immediately and get the necessary amendments for the change of name from the Board.
24. The occupier shall display this consent order granted to him in a prominent place for perusal of the inspecting Officers of this Board.

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Date: 2023.07.11
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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
AMBATTUR

Category of the Industry :

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CONSENT ORDER NO. 2305235903423 DATED: 11/07/2023.

PROCEEDINGS NO.F.1396AMB/OL/DEE/TNPCB/AMB/A/2023 DATED: 11/07/2023

SUB: Tamil Nadu Pollution Control Board –CONSENT TO OPERATE –DIRECT –M/s. NAVRON PHARMACEUTICALS PVT LTD , S.F.No. 950/2, MADHAVARAM village Madhavaram Taluk and Chennai District - Consent for operation of the plant and discharge of emissions under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) –Issued- Reg.

Ref: 1. Pro. No. F.1396AMB/OL/DEE/TNPCB/AMB/A&W/2021 dated 20.11.2021.
2. The unit application No: 35903423 dated 15.12.2020.
3. IR.No : F.1396AMB/OL/AEE/AMB/2023 dated 05/07/2023.

CONSENT TO OPERATE is hereby granted under Section 21 of the Air (Prevention and Control of Pollution) Act, 1981 as amended in 1987 (Central Act 14 of 1981) (hereinafter referred to as "The Act") and the rules and orders made there under to

Power of Attorney
M/s . NAVRON PHARMACEUTICALS PVT LTD
S.F No. 950/2
MADHAVARAM Village
Madhavaram Taluk
Chennai District.

Authorizing the occupier to operate the industrial plant in the Air Pollution Control Area as notified by the Government and to make discharge of emission from the stacks/chimneys.

This is subject to the provisions of the Act, the rules and the orders made there under and the terms and conditions incorporated under the Special and General conditions stipulated in the Consent Order issued earlier and subject to the special conditions annexed.

This CONSENT is valid for the period ending **March 31, 2026**

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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
AMBATTUR

To
Power of Attorney,
M/s.NAVRON PHARMACEUTICALS PVT LTD,
No. 375, Bharathiar Street, Madhavaram, Chennai
Pin: 600060

Copy to:

1. The Commissioner, CHENNAI CORPORATION-Corporation, Madhavaram Taluk, Chennai District .
2. Copy submitted to the Member Secretary, Tamil Nadu Pollution Control Board, Chennai for favour of kind information.
3. The District Environmental Engineer, Tamil Nadu Pollution Control Board, AMBATTUR for favour of kind information.
4. File

SPECIAL CONDITIONS

1. This consent to operate is valid for operating the facility for the manufacture of products (Col. 2) at the rate (Col. 3) mentioned below. Any change in the products and its quantity has to be brought to the notice of the Board and fresh consent has to be obtained.

Sl. No.	Description	Quantity	Unit
Product Details			
1.	TABLETS	900	LAKHS/MONTH
2.	CAPSULES	75	LAKHS/MONTH
3.	SYRUPS	15000	LTRS/M

2. This consent to operate is valid for operating the facility with the below mentioned emission/noise sources along with the control measures and/or stack. Any change in the emission source/control measures/change in stack height has to be brought to the notice of the Board and fresh consent/Amendment has to be obtained.

I Point source emission with stack :				
Stack No.	Point Emission Source	Air pollution Control measures	Stack height from Ground Level in m	Gaseous Discharge in Nm ³ /hr
1	THERMAX BOILER 400 Kg/Hr	Stack	12	
2	DG Set 40 KVA	Acoustic enclosures with stack	3.5	
II Fugitive/Noise emission :				
Sl. No.	Fugitive or Noise Emission sources	Type of emission	Control measures	
1.	DG 40 KVA	Noise	Acoustic Enclosure	

- 3(a). The emission shall not contain constituents in excess of the tolerance limits as laid down hereunder :

Sl.	Parameter	Unit	Tolerance limits	Stacks
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Annexure enclosed if applicable. :-

- 3.(b) The Ambient Air in the industrial plant area shall not contain constituents in excess of the tolerance limits prescribed below.

Sl. No.	Pollutant	Time Weighted Average	Unit	Tolerance Limits	
				Industrial, Residential, Rural and other area	Ecologically Sensitive Area (notified by Central Govt.)
1.	Sulphur Dioxide (SO ₂)	Annual 24 hours	microgram/m ³ microgram/m ³	50 80	20 80
2.	Nitrogen Dioxide (NO ₂)	Annual 24 hours	microgram/m ³ microgram/m ³	40 80	30 80
3.	Particulate Matter (Size Less than 10 micro M) or PM ₁₀	Annual 24 hours	microgram/m ³ microgram/m ³	60 100	60 100
4.	Particulate Matter (Size Less than 2.5 micro M) or PM _{2.5}	Annual 24 hours	microgram/m ³ microgram/m ³	40 60	40 60
5.	Ozone (O ₃)	Annual 24 hours	8 Hours 1 Hour	100 180	100 180
Sl. No.	Pollutant	Time Weighted Average	Unit	Tolerance Limits	
				Industrial, Residential, Rural and other area	Ecologically Sensitive Area (notified by Central Govt.)
6.	Lead (Pb)	Annual 24 hours	microgram/m ³ microgram/m ³	0.5 1.0	0.5 1.0
7.	Carbon Monoxide (CO)	8 Hours 1 Hour	miligram/m ³ miligram/m ³	02 04	02 04
8.	Ammonia (NH ₃)	Annual 24 hours	microgram/m ³ microgram/m ³	100 400	100 400
9.	Benzene (C ₆ H ₆)	Annual	microgram/m ³	5	5
10.	Benzo(O) Pyrene (BaP) -particulate phase only	Annual	nanogram/m ³	01	01
11.	Arsenic (As)	Annual	nanogram/m ³	06	06
12.	Nickel (Ni)	Annual	nanogram/m ³	20	20

3(c) The Ambient Noise Level in the industrial plant area shall not exceed the limits prescribed below:

Limits in L.eq.-dB(A)	Day Time	Night Time
Commercial Area	65	55

- All units of the Air pollution control measures shall be operated efficiently and continuously so as to achieve the standards prescribed in Sl. No.3 above.
- The occupier shall not change or alter quality or quantity or the rate of emission or replace or alter the air pollution control equipment or change the raw material or manufacturing process resulting in change in quality and/or quantity of emissions without the previous written permission of the Board.
- The occupier shall maintain log book regarding the stack monitoring system or operation of the plant or any other particulars for each of the unit operations of air pollution control systems to reflect the working condition which shall be furnished for verification of the Board officials during inspection.
- The occupier shall at his own cost get the samples of emission/air/noise levels collected and analyzed by the TNPC Board Laboratory once in every 6 months/once in a year/periodically for the parameters as prescribed.

8. Any upset condition in any of the plants of the factory which is likely to result in increased emissions and result in violation of the standards mentioned in Sl.No.3 shall be reported to the Member Secretary / Joint Chief Environmental Engineer-Monitoring and the concerned District/Assistant Environmental Engineer of the Board by e-mail immediately and subsequently by Post with full details of such upset condition.
9. The occupier shall always comply and carryout the order/directions issued by the Board in this Consent Order and from time to time without any negligence. The occupier shall be liable for action as per provisions of the Act in case of non compliance of any order/directions issued.

Special Additional Conditions:

The unit shall obtain No Objection Certificate (NOC) from the Tamil Nadu Bio Diversity Board /National Bio Diversity Authority if the unit is using any Biological resources or knowledge associated thereto as per the provisions of Biological Diversity Act 2002.

The industries shall take all efforts to use and popularize "Mission LiFE" logo and mascot which is available in TNPCB & MoEFCC website. They shall also request their employees to adopt "Mission LiFE" action points and document the same and furnish half yearly report to Board.

Additional Conditions:

1. The unit shall maintain the stack attached to the thermax boiler and to the DG set efficiently and continuously so as to bring the quality of emission let out shall satisfy the AAQ/emission standards prescribed by the Board.
2. The unit shall adhere to the Ambient Noise Level standards prescribed by the Board.
3. The unit shall develop green belt within the premises

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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
AMBATTUR

GENERAL CONDITIONS

1. The occupier shall make an application along with the prescribed consent fee for grant of renewal of consent at least 60 days before the date of expiry of this Consent Order along with all the required particulars ensuring that there is no change in production quantity and emission.
2. This Consent is given by the Board in consideration of the particulars given in the application. Any change or alteration or deviation made in actual practice from the particulars furnished, in the application will also be ground for review/variation/revocation of the Consent Order under Section 21 of the Act.
3. The conditions imposed shall continue in force until revoked under Section 21 of the Act.
4. After the issue of this order, all the 'Consent to Operate' orders issued previously under Air (Prevention and Control of Pollution) Act, 1981 as amended stands defunct.
5. The occupier shall maintain an Inspection Register in the factory so that the inspecting officer shall record the details of the observations and instructions issued to the unit at the time of inspection for adherence.
6. The occupier shall provide and maintain an alternate power supply along with separate energy meter for the Air Pollution Control measures sufficient to ensure continuous operation of all pollution control equipments to ensure compliance.
7. The occupier shall provide all facilities to the Board officials for collection of samples in and around the factory at any time.
8. The applicant shall display the flow diagram of the sources of emission and pollution control systems provided at the site.
9. The liquid effluent arising out of the operation of the air pollution control equipment shall also be treated in a manner and to the satisfaction of standards prescribed by the Board in accordance with the provisions of Water (Prevention and Control of Pollution) Act, 1974 as amended.
10. The air pollution control equipments, location of inspection chambers and sampling port holes shall be made easily accessible at all time.
11. In case of any episodal discharge of emission, the industry shall take immediate action to bring down the emission within the limits prescribed by the Board.
12. If applicable, the occupier has to comply with the provisions of Public Liability Insurance Act, 1991 to provide immediate relief in the event of any hazard to human beings, other living creatures/plants and properties while handling and storage of hazardous substances.
13. The issuance of this consent does not authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any natural watercourse or in Government Poromboke lands.
14. The issuance of this Consent does not convey any property right in either real personal property or any exclusive privileges, nor does it authorize any injury to private property or Government property or any invasion of personal rights nor any infringement of Central, State laws or regulation.
15. The occupier shall forth with keep the Board informed of any accident of unforeseen act or event of any poisonous, noxious or polluting matter or emissions are being discharged into stream or well or air as a result of such discharge, water or air is being polluted.
16. If due to any technological improvements or otherwise the Board is of opinion that all or any of the conditions referred to above requires variation (including the change of any treatment system, either in whole or in part) the Board shall, after giving the applicant an opportunity of being heard, vary all or any of such conditions and thereupon the applicant shall be bound to comply with the conditions as so varied.
17. In case there is any change in the constitution of the management, the occupier of the new management shall file fresh application under Air (Prevention and Control of Pollution) Act, 1981, as amended in Form-I alongwith relevant documents of change of management immediately and get the necessary amendment with renewal of consent order.
18. In case there is any change in the name of the company alone, the occupier shall inform the same with relevant documents immediately and get the necessary amendments for the change of name from the Board.

19. The occupier shall display this consent order granted to him in a prominent place for perusal of the inspecting Officers of this Board.

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District Environmental Engineer,
Tamil Nadu Pollution Control Board,
AMBATTUR

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

Original Application No.154 of 2023 (SZ)

T.R. Dhamodara Perumal
S/o. T. Radha
Chennai – 600 060.

...Applicant(s)

Versus

M/s. BAFNA Pharmaceuticals Limited
No.13, Sri Vinayakar Koil Street,
Madhavaram,
Chennai and Ors.

...Respondent(s)

Report filed on behalf of the 2nd Respondent
– Tamil Nadu Pollution Control Board

**Advocate for Respondent: TNPCB
Thiru. S. Sai Sathya Jith
Advocate, Chennai**

Dated : 20.05.2024

Date of hearing on: 21.05.2024