

IN THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

Original Application No. 238 of 2021(SZ)
(Earlier O.A.No.181 of 2020 (PB))

Chepuri Ramachandraiah
S/o. Durgaiah,
R/o. Veliminedu Village,
Chityal Mandal,
Nalgonda District, Telangana

... Applicant

Versus

The Principal Secretary of Telangana
Environment Science & Technology,
Telangana and Others

... Respondents

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CHENNAI

DRAWN AND FILED BY
M/S. K.S.VISWANATHAN
& T.HEMALATHA
ADVOCATES

DATE: 15/12/2022



COUNSEL FOR FOURTH RESPONDENT

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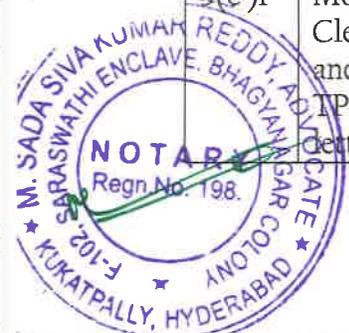
RESPONSE FILED ON BEHALF OF THE 4TH RESPONDENT TO THE
REPORT DATED 13/05/2022 ALONG WITH COMPLIANCE REPORT

The 4th Respondent above named respectfully submits as follows:

1. It is submitted that the Joint Committee appointed by this Hon'ble Tribunal by order dated 18/11/2021 has submitted a report dated 13/05/2022 wherein in para 5 the Committee has dealt with the status of compliance/violation in respect of the conditions of consent/clearance and has also suggested certain measures in para 5 (d) of the report.

2. The following is the response of the 4th Respondent to the report of the Joint Committee dated 13/05/2022 along with the compliance status of the unit.

S.No	Observations	Reply by Respondent No.4
5(c) i	MoEF has accorded Environmental Clearance for expansion of Bulk drugs and intermediate products from 5.25 TPM to 150 TPM on 09.04.2020 vide letter no. IA-J-11011/114/2017-IA II (1)	At the time of joint Committee member's inspection: 1. Industry has been operating the facility under existing consent (CFC) which is



	<p>Present Status: As per the joint committee members report, the expansion activity is in progress and operating under existing consent which is granted by TSPCB. As per joint committee members report, out of the EC conditions, 2 non-compliances and 1 partial compliance was observed and also Half yearly compliance reports are not uploaded in the company website.</p>	<p>granted by TSPCB.</p> <p>2. MOEF & CC has accorded Environmental Clearance to the unit under expansion of Bulk drugs and intermediate products from 5.25 TPM to 150 TPM on 09.04.2020 vide letter no. IA-J-11011/114/2017-IA II (I). We have not yet implemented the accorded Environmental Clearance under expansion.</p> <p>When the project is yet to be implemented report on non-compliance is premature. Half yearly compliance report has been mailed to Southern Region MOEF Office Enclosed as Annexure-I (Project yet to be implemented)</p>
ii	<p>Conditions imposed in Consent under Air Act & Water Act and Authorization under H&OW Rule 2016:</p> <p>(i) No provision made for monitoring of HCL in the process vent as per the consent condition.</p> <p>(ii) LTDS and HTDS ETP found inadequate.</p> <p>(iii) The flow meters installed are not indicating the accountability to ensure ZLD system.</p>	<p>Industry has made provisions in process vent for HCL monitoring, Enclosed Photographs as Annexure-II.</p> <p>Industry has provided adequate treatment facilities (ZLD System: 50 KLD) for the treatment of effluents generated (both HTDS & LTDS). Average HTDS effluent generation: 5 KLD Average LTDS effluent generation :1.5 KLD Total Effluent generation (average):6.5 KLD as against consented 7.14 KLD.</p> <p><u>Storage Facilities:</u></p> <p>a) HTDS Storage Tanks of Capacities (2 X 180 KL RCC Tanks:Above Ground Level)). b) LTDS Storage Tanks of Capacities (1 X 180, 2 x 25 KL RCC Tanks:Above Ground Level)).</p> <p><u>Treatment Systems:</u> Stripper 50 KLD, MEE - 3 effect (50 KLD), ATFD (7.5 KLD), Two Stage Bio ETP - 50 KLD RO plant -50 KLD.</p> <p>These facilities are adequate for the treatment of effluents (HTDS and LTDS) generated from the facility.</p> <p>Industry has provided Electro Magnetic Flow meters at their ZLD system for effluent</p>

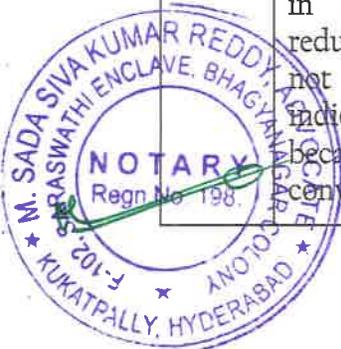


	<p>(iv) Inadequacy of Odour control measures in ETP.</p> <p>(v) Inadequate control measures to process emissions were found partially complying.</p> <p>(vi) Non installations of online TDS meter for HTDS effluent.</p> <p>(vii) Odour control at MEE found not complying.</p>	<p>quantification and treatment.</p> <p>These are being further reinforced by calibrating flowmeters on regular basis for ensuring accountability in ZLD System.</p> <p>Industry has provided the following measures at their ETP system for odour control.</p> <ul style="list-style-type: none"> a) Scrubbers in ATFD operations. b) Avoiding seal leakages at pumps c) Maintaining Good Housekeeping at ETP area. <p>VOC's are being monitored by third party periodically and the monitored values are within the permissible limit. It indicates that scrubbers are working effectively for controlling odour nuisance at ETP. Also provided on-line VOC system to monitor VOC values and the same has been connected to TSPCB server. Hence no chance of odour reflection.</p> <p>Industry has provided 5 nos. of double stage scrubbers at process areas for controlling process emissions.</p> <p>The emissions are being scrubbed with neutralising agents before letting out. In addition to this online VOC meters are provided to monitor VOC's.</p> <p>VOC levels monitored are within the permissible limits. It indicates that scrubbers are working effectively for controlling emissions.</p> <p>On-line TDS meter for HTDS has been installed as per the consent condition of TSPCB.</p> <p>Industry has provided the following measures at their MEE system for odour control.</p> <ul style="list-style-type: none"> a) Scrubbers in ATFD operations. b) Avoiding seal leakages at pumps. c) Maintaining Good Housekeeping at ETP area.
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5 (d) Status of Pollution Control Measures taken to prevent the pollution:
 As per the monitoring carried by the Committee, COD and TDS reduction was observed 35% and 37% respectively in LTDS ETP. As per the COD reduction, the conventional treatment is not adequate, the reduction of TDS indicates the possibilities of dilution because TDS cannot be reduced through conventional treatment. The RO

Parameter	Raw effluent LTDS	RO feed (Bio outlet)	% removal
TDS (mg/l)	2422	1508	37
COD (mg/l)	2840	1840	35
BOD (mg/l)	779	268	66

In the plant, Conventional Wastewater



efficiency was observed only 21.6% which indicates the inadequacy of treatment plant to treat the LTDS effluent.

The unit claims that they are achieving 25% TDS concentration through MEE, from the analysis results the MEE efficiency also observed very poor, the TDS concentration was increased from 2.47% to 9% through MEE and it is inadequate to achieve the desirable limits of 25% TDS concentration to recover the salt.

treatment process is used to treat LTDS effluents for the purpose of BOD and COD reduction not for TDS reduction.

1) Reason for 37% TDS reduction:

Based on the above sample analysis results done by TSPCB on Raw Effluent LTDS sample, the TDS was observed 2422 mg/l and the outlet TDS was 1508 mg/l. TDS cannot be reduced in Bio ETP.

The reason for higher TDS was (2422 mg/lit) due to improper equalising of LTDS effluents (i.e. MEE condensate, ATFD condensate, Boiler blowdown & Cooling tower blowdown) in collection tank at the time of sample collection.

Majority of unit's low TDS effluent is condensate from MEE and ATFD which has a TDS of <500 mg/lit and the equalised LTDS effluent (MEE condensate, ATFD condensate, Boiler blowdown & Cooling tower blowdown) TDS will be on an average 1500 mg/l.

Unit's routine procedure is to collect, mix and equalising Low TDS effluents in LTDS effluent Collection tank to get the desired TDS levels. TDS cannot be reduced in bio ETP and hence the reduction of TDS will be based on equalising of low TDS effluents in low TDS effluent collection tank.

2) 35% COD Reduction:

BOD reduction was 66% and the COD reduction was 35% based on the analysis done by TSPCB for the samples collected at Bio ETP by Committee Members. In the process of Bio ETP, only biodegradable organics (BOD) are removed. COD means both biodegradable and non-biodegradable organics. Non bio degradable organics will not be removed in Bio ETP.

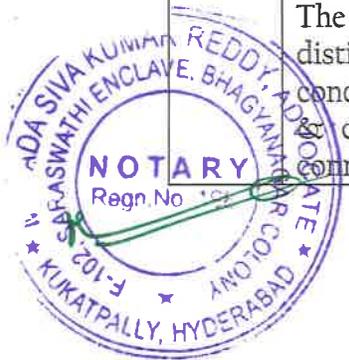
Hence the efficiency of Bio ETP mainly depends on removal of BOD and the removal efficiency of BOD was 66% which indicates that the Bio ETP is working satisfactorily for low TDS effluent treatment.

3) RO Efficiency:

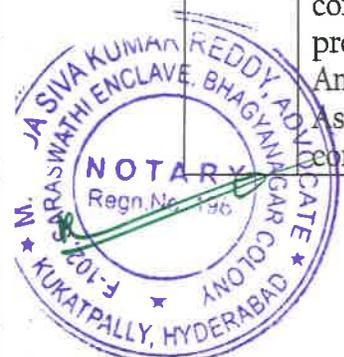
Parameter	RO feed	RO Permeate	% removal
TDS(mg/l)	1508	42	97



		<table border="1"> <tr> <td>COD(mg/l)</td> <td>1840</td> <td>28</td> <td>98</td> </tr> <tr> <td>BOD(mg/l)</td> <td>268</td> <td>BDL</td> <td></td> </tr> </table>	COD(mg/l)	1840	28	98	BOD(mg/l)	268	BDL		<p>Based on the above analysis results, the RO system efficiency was 97% & 98% with respect to TDS and COD removal. But the committee has given the efficiency of RO Plant was 21.6% efficiency which is not correct. The RO system efficiency was 97% & 98% with respect to TDS and COD removal.</p> <p>4) MEE efficiency: TDS concentration was increased from 2.47% to 9% through MEE for the samples collected by Committee Members at MEE Plant. Due to scale formation inside the tubes of Multiple Effect Evaporator (MEE), heat transfers will be less in calendria tubes to evaporate the effluents in MEE operations. The Evaporation rate also falls down thereby the output from MEE (concentrate) was reduced (in terms of TDS load).</p> <p>Whenever evaporation rate reduced, CIP (Cleaning in process) either by Hydro jet or chemical cleaning is required for removing scale deposits inside the tubes of evaporators to improve the performance of MEE output.</p> <p>After CIP, the Evaporation rate will be increased & concentrate TDS levels achieved to a maximum of 25% to recover the salts. MEE efficiency varies with the deposits of scales in the calendria tubes during effluent evaporation.</p>
COD(mg/l)	1840	28	98								
BOD(mg/l)	268	BDL									
<p>ii</p>	<p>Source emission and Process vents: The unit has connected the process vents to the double condenser followed by scrubbing system. As per the consent issued by TSPCB, the process vent is required to monitor for HCL concentration, however no provision is made in the process vent for monitoring HCL. The Unit has not provided online emission monitoring system to the boilers.</p>	<p>As per the consent condition of the TSPCB, we have made provision in the process vent for monitoring of HCL emission. As per the directions issued by CPCB/TSPCB we has connected online effluent monitoring system to TSPCB and CPCB Server. No directions were issued to the industry by TSPCB/CPCB regarding online emission monitoring system to the boilers.</p>									
<p>Iv</p>	<p>Solvents Used & Control measures adopted to control VOCs The unit is claiming that they have distillation column with double condenser and circulation of RT water chilled water, condenser vents are connected to scrubber. The scrubbers</p>	<p>At solvent recovery system, the emissions from the condenser vents are being connected to scrubber and are being scrubbed before letting out. The scrubbing liquid is being maintained with neutralised agents.</p>									



	<p>are maintained with neutralized agents. The loss through condenser vent is reported in the range of 200 to 432 Ltrs/day, these vents are connected to scrubber. During scrubbing, scrubbed solvent may dispersed in the form of VOCs and causing odour nuisance in the surrounding area.</p>	<p>As per the data monitored very low concentrations of VOC's were reported indicates that scrubbers are working effectively for controlling odour nuisance in the surrounding area.</p>
5 (e)	<p>Other observations made during field visit: The applicant reported that, the water pollution since 10 years, hence the committee asked the details of products manufactured, Treatment system provided, details of Hazardous waste storage facilities by earlier unit (i.e., before 2015 year), however no details were made available by the present management before the 2015 data. The committee has taken reconnaissance survey around the unit, no visible discharge was observed.</p> <p>During committee visit, the applicant son Mr. Vishnu submitted reports of water and soil quality obtained from Agricultural department. As per the report dated 17.12.2019, the bore well water sample categorized as C4SI which states that the water is not suitable for cultivation under normal condition. If this water is used for moderate type of lands under necessary situation, the soil turns salt. This water can be used of light sandy soils by providing proper drainage facility. But more water taps are used to dissolve salt in the water and proper drainage facility shall be provided to drain out the salt. Saline resisting crops like ragi, paddy, etc., shall be used.</p>	<p>The present management acquired the existing unit in the year 2015. The details of products manufactured, Treatment system provided, details of Hazardous waste storage facilities of former unit are not available with us. The details may be available with TSPCB.</p> <p>No visible discharge was observed during the committee reconnaissance survey.</p> <p>Report of Department of Agricultural vide letter no. D8/124/Pollution/2022 dated: 15.02.2022, it states that the soil is not affected and can be used for cultivation and recommended that the bore water can be used for irrigation with reclamation measures and soil can be useful for cultivation.</p>
6 (a)	<p>Status of Ambient Air quality and TVOC in the surrounding area of Respondent Unit: The Committee monitored the ambient air quality as well as VOC in 3 locations to assess the impact of operation of respondent unit on 03.04.2022. The result of analysis report, it is observed that PM10, SO2, NO2 and Ammonia concentration were found within the prescribed standards of National Ambient Air Quality Standards. As per the VOC monitoring very less concentrations were reported in all</p>	<p>Based on the results of analysis report, it is observed that PM₁₀, SO₂, NO₂ and Ammonia concentration were found within the prescribed standards of National Ambient Air Quality Standards.</p> <p>As per the VOC monitoring very low concentrations were reported in all three locations.</p> <p>Hence the industry has not contributed any</p>



	three locations, However, the team felt strong VOC odour near to ETP area as well as in the area of solvent recovery system.	VOC odour near to ETP area as well as in the area of solvent recovery system.
6 (b)	<p>Status of Ground water quality in the surrounding area of respondent Unit: The Committee collected the water samples in 8 locations to assess the impact of operation respondent unit. As per the result of Bore well water in the applicant land was reported the smell of solvent, presence of COD and BOD indicates the contamination of bore wells. Total dissolved solids, total alkalinity & hardness and magnesium found exceeding the drinking water standards in the applicant bore wells. Chloride and calcium found high in one well.</p>	<p>The industry is located in Nalgonda District, Telangana State.</p> <p>Generally, in Nalgonda District bore well water parameters cannot be matched with drinking water standards and it is consisting of high Salt content and low sodium content even though this water is suitable for many types of soils and crops in normal conditions. Further, we have to inform you that the committee collected 8 bore well samples in 8 locations to assess the impact of water quality.</p> <p>As per analysis report 7 bore wells do not contribute any smell of solvent and not exceed the COD & BOD levels.</p> <p>No visible discharge was observed during the committee reconnaissance survey. It is not known as to how it is possible to conclude that applicant bore well was contaminated without finding any visible discharges from the unit</p>
(c)	<p>Result of Finger Printing Analysis of the Bore well water samples: The committee has taken sample for signature analysis to confirm the compounds present in the effluents of respondent unit and bore well water samples of applicant. As per fingerprint analysis no water samples taken were reported any signature compounds present in the effluent. However, the samples taken from the applicant land and Sri Sami Anji Reddy S/o Gopi Reddy Sy.no.293 were noticed Odour resembles the VOCs.</p>	<p>The committee has taken sample for signature analysis to confirm the compounds present in the effluents of respondent unit and bore well water samples of applicant.</p> <p>As per fingerprint analysis no water samples taken reported any signature compounds present in the effluent. It clearly shows that the unit has not contributed to any water pollution.</p>
(d)	<p>Assessment of Ground Water Quality in the Applicant land by Agricultural Department: The water samples (7 nos.) taken from agricultural lands of applicant and other neighbour lands were analysed at the Laboratory of Agricultural Department, Miryalaguda to verify the suitability of quality of water w.r.t. agricultural requirement.</p>	<p>As per the analysis report, the bore well water samples are categorized C3S1, which is High Salt content and Low sodium content i.e., this water is suitable for many types of soils and crops in normal conditions. If this water is used for heavy soils, it shall be cultivated within a short period of time to obtain crops and while giving water moisture shall provide proper drainage facility. Abundant quantity of water is necessary to improve physical condition of the soil and for high production. So that the applicant land ground water is not affected.</p>



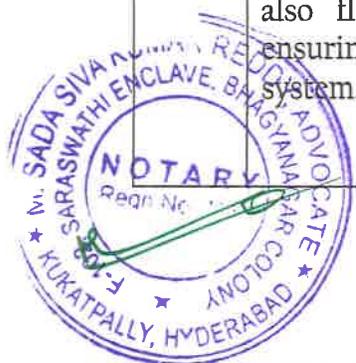
	<p>As per the analysis report, the bore well water samples are categorized C3S1, which is High Salt content and Low sodium content i.e., this water is suitable for many types of soils and crops in normal conditions. If this water is used for heavy soils, shall be cultivated within a short period of time to obtain crops and while giving water moisture shall provide proper drainage facility. Abundant quantity water is necessary to improve physical condition of the soil and for high production.</p> <p>The Agriculture Department has opined the following on EC, SAR, RSC and Boron content in the bore well water: Electrical Conductivity (EC) result: C3: 0.76 – 2.25, The said water can be used for irrigation purpose in general conditions (duly lifting from Bore wells). Abundant quantity water is necessary to improve physical condition of the soil and for high production. Changeability of EC level in Ground Water cannot be attributed to the industrial pollution, in case of hard rocks where abstraction is high, the water levels will go deep since the movement of water is very low and water rock interactions are more hence changeability in EC values. And geography of Nalgonda is having high level of rocks area.</p> <p>Assessment of Soil Quality in the Applicant land by Agricultural Department: During committee visit, Agricultural Department, Miryalguda taken 6 soil samples @ 2 samples/acres were taken from the applicant land to verify the suitability of soil w.r.t agricultural requirement and the samples were analysed at the Laboratory of Agricultural Department, Miryalguda. As per the report of Department of Agricultural vide letter no. D8/124/Pollution/2022 dated: 15.02.2022, it states that the soil is not affected and can be used for cultivation, hence it is recommended that the bore water can be used for irrigation with reclamation measures and soil can be useful for cultivation.</p>	<p>As per the Agriculture Department Bore well water analysis report changeability of EC levels in Ground Water cannot be attributed to the industrial pollution and in case of hard rock where abstraction is high, the water levels will go deep since the movement of water is very low and water rock interactions are more hence changeability in EC values. Geography of Nalgonda is having high level of rocky area.</p> <p>As per the report of Department of agricultural, vide letter no. D8/124/Pollution/2022 dated: 15.02.2022, it states that the soil is not affected and can be used for cultivation, hence it is recommended that the bore water can be used for irrigation with reclamation measures and soil can be useful for cultivation.</p>
7	Conclusion of the Committee based on Field observations and monitoring results:	After detailed monitoring, field observations and analysis reports of samples taken, the committee concluding as follows:
7 a(i)	The respondent unit M/s.Hindys Laboratory Ltd. was taken over in the	As per the applicant information, the contamination water was reported since 10



	<p>year 2015 from M/s. Hychem Laboratories and started production from the same year. As per the applicant information, the contamination water was reported since 10 years i.e before starting operation of unit by existing management.</p>	<p>years i.e., before starting operation of unit by existing management.</p> <p>The present management has acquired the unit in the year 2015 and have installed all pollution control measures.</p>
(ii)	<p>The unit is having all requisite permissions/clearances from Boiler inspection department, Petroleum & Explosives Safety Organisation, MOEF&CC, Factories Department, Panchayath Raj Department and Telangana Pollution control board. The list of permissions obtained is tabulated in Table No.1.</p>	<p>The industry is operating with all Statutory License Approvals.</p>
(iii)	<p>The unit has valid integrated consent under Water & Air Acts and Authorisation under H&OW Rule 2016. However, 35 out 44 conditions imposed were found complying and remaining 9 conditions were found partially/non-compliance. The major non-compliance observed are online monitoring systems installed in the ETP, non-installation of online TDS meter, non- installation of online monitoring system in Boiler stack and inadequate control system provided in the process vents and solvent recovery system which is causing odour nuisance in the surrounding area.</p>	<ol style="list-style-type: none"> 1) Unit has installed online effluent monitoring system and is being connected to TSPCB/CPCB servers. No directions were issued by TSPCB/CPCB with respect to online emission(boiler stack) monitoring system 2) Online TDS meter for HTDS has been installed as per the consent condition. 3) At solvent recovery system, the emissions from the condenser vents are connected to scrubber and are being scrubbed with neutralizing agent before letting out. 4) As per the VOC monitoring in the site, very low concentrations of VOC's were reported and are within the permissible limits. It indicates that scrubbers are working effectively for controlling odour.
(iv)	<p>Ministry of Environment, Forest and Climate Change, has accorded Environmental Clearance to M/s. Hindys Lab Pvt. Ltd., for expansion of Bulk drug and intermediates manufacturing unit from 5.25 TPM TO 150 TPM at Sy.Nos. 289-292, Village Veliminedu Mandal Chityal, District Nalgonda, Telangana vide letter no. IA-J-11011/114/2017-IA II(I) dated 09.04.2020. Products are manufactured as per earlier Consent granted by TSPCB. No Product mentioned in the EC are manufactured by PA, at present. They are in the process of the implementation of the activities proposed in the expansion of their project.</p>	<p>MOEF & CC has accorded Environmental Clearance to the unit under expansion of Bulk drugs and intermediate products from 5.25 TPM to 150 TPM on 09.04.2020 vide letter no. IA-J-11011/114/2017-IA II (I). Unit has not yet implemented the accorded Environmental Clearance under expansion.</p> <p>At present, the operational activity is with existing permitted consent capacities only as prescribed by the TSPCB.</p>



(v)	<p>As per the monitoring results of ETPs indicates that the ETP installed to treat Low TDS effluent was found not adequate, only 35% efficiency was observed w.r.t. COD reduction through conventional treatment. The RO efficiency (21.6%) also found very poor.</p>	<p>BOD reduction was 66% and COD reduction was 35% based on the analysis done by TSPCB for the LTDS samples collected at Bio ETP by Committee Members.</p> <p>In the process of Bio ETP, only biodegradable organics (BOD) are removed. COD means both biodegradable and non-biodegradable organics. Non bio degradable organics will not be removed in Bio ETP. Hence the efficiency of Bio ETP mainly depends on removal of BOD and the removal efficiency of BOD was 66% which indicates that Bio ETP is working satisfactorily for low TDS effluent treatment.</p> <p>The efficiency of RO Plant with respect to TDS and COD were 97 and 98% respectively as per the analysis done by TSPCB for the LTDS samples collected by Committee members but the committee concluded that the RO efficiency was 21.6% which is s not correct. Our RO efficiency was 97% & 98% with respect to TDS & COD removal.</p>
(vi)	<p>As per the analysis results of treatment system provided for treating High TDS, the efficiency of MEE was found very poor. The TDS concentration was increased from 2.7% to 9.0% through MEE and it is inadequate to achieve the desirable limit of 25% TDS Concentration to recover the salt.</p>	<p>During HTDS effluent treatment by MEE, initially the evaporation is more as the scaling is low in the tubes of evaporator. Unit will achieve 25% TDS concentration from MEE output to recover the salt. Over a period of treatment, the scales are formed in tubes of evaporators and the efficiency of output through MEE is reduced.</p> <p>CIP (Cleaning in process by Hydro jet or chemical cleaning) is required for removing scales in evaporators to improve the performance of output through MEE.</p> <p>When the output through MEE is reduced, Unit will go for CIP for improving MEE output to achieve maximum TDS (25%) output through MEE. This is a cycle of treatment in MEE operations for wastewater treatment.</p>
(vii)	<p>The flow meter installed as a part of online monitoring to ensure ZLD also found not proper and not ensuring the accountability of effluent generated, treated through RO, RO permeate & RO reject, similarly in MEE section also flow meters installed are not ensuring the achievability of ZLD system.</p>	<p>Unit has provided Electro Magnetic Flow meters at their ZLD system for effluent quantification and treatment.</p> <p>These are being further reinforced by calibrating flow meters on regular basis for ensuring accountability in ZLD System.</p>



viii.	The unit has not provided the online monitoring system to stack attached to 6 TPH & 8 TPH Coal fired boiler. As per the Consent issued by TSPCB, the process vent is required to be monitored for HCL concentration, however no provision is made in the process vent for monitoring of HCL.	No directions were issued to the industry by TSPCB/CPCB regarding online emission monitoring system to the boilers. As per the consent condition of the TSPCB provision has been made in the process vent for monitoring of HCL emission.
ix	As per the Authorisation issued by the TSPCB, Authorised quantity of sludge and ATFD salt is 467.2 kg/day (170.52 MT/Annum). During the period from Jan'2021 to Dec'2021, the industry has Hazardous waste generation (ATFD salt) of 144.85 MT/annum.	Complied As per the Authorisation issued by TSPCB, unit is disposing the generated Hazardous waste to Cement industry/TSDf, Dundigal.
x.	The solvent loss through condenser vent is reported in the range of 200 to 432 Ltrs/day, these vents are connected to scrubber. During scrubbing, scrubbed solvent may dispersed in the form of VOC's and causing odour nuisance in the surrounding area.	At solvent recovery system, the emissions from the condenser vents are connected to scrubber and are being scrubbed with neutralizing agent before letting out. As per the VOC monitoring in the site very low concentrations of VOC's were reported and are within the permissible limits. It indicates that scrubbers are working effectively.

The observation regarding Environmental damage as mentioned in para 7(b) of the report has already been dealt with in the unit's response to para 6 a, b, c & d. In so far as the compensation calculation in para 7(b) (iii) is concerned, it is submitted that the 4th Respondent has not been put on notice about the calculation of compensation and the manner at which it has been arrived at. The TSPCB independently has not issued any notice calling upon the 4th Respondent to show cause as to why compensation cannot be levied on the 4th Respondent. On the other hand, the Joint Committee has calculated the total days of non-compliance as 336 days and has applied the formula without any basis and has arrived at a compensation of Rs.1,42,43,000/-. The objections to the report are being filed only now. However, the 4th Respondent has already issued a notice dated 13/12/2022 whereby the 4th Respondent has been called upon to deposit environmental compensation to the tune of Rs.1,19,70,000/- without any determination in accordance with law. The Joint Committee report is yet to be acted upon the tribunal and therefore the demand for environmental compensation made by notice dated 13/12/2022 is prima facie, illegal and baseless.



It is submitted that the Joint Committee may be directed to respond to the aforesaid submissions made by the Respondent No.4 in order to arrive at a conclusion as to whether the observations made in the report are fully justified.

It is therefore prayed that this Hon'ble Tribunal may be pleased to take this response on file and pass suitable orders in the above Application based on the compliance report being filed in the above matter as above and thus render justice.



RESPONDENT NO.4

HYDERABAD:

DATE: 15/12/2022

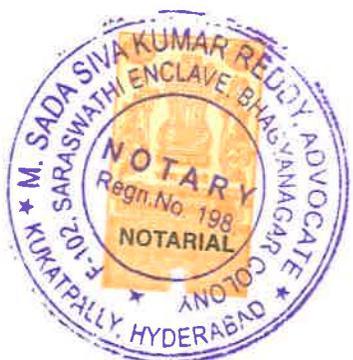
VERIFICATION

I, V.Jagadeeswara Rao, S/o. Late Ranga Rao, Age : 51 Years, Authorized Signatory of the Fourth Respondent herein residing at 7-2-A2, I.E Sanathnagar, Hyderabad – 500 018, Telangana State, do hereby verify and declare that what is stated are true to my personal knowledge and believed to be true on legal advice and that I have not suppressed any material fact.

Verified on this day of 15th December 2022 at Hyderabad



RESPONDENT NO.4



ATTESTED

M. SADA SIVA KUMAR REDDY, B.Com., B.L.,
ADVOCATE & NOTARY
Appointed by Govt., India
G.O.Ms.No.198, Rev (Regn-II), dt. 11.04.2000
102, Saraswathi Enclave, Bhagyanagar Colony,
Kukatpally, Hyderabad, TS, India (Ph:98480 44395)

15-12-2022

Hindys lab

Hindys Lab Private Limited

Reg. Off. & Factory : Sy No: 290 & 291,
Veliminedu Village, Chityal (Mandal),
Nalgonda (Dist.) Telangana State, India-508114.
E-mail:info@hindyslab.com Phone : 9989749336
GSTIN : 36AABCH9256P1ZW
CIN : U24100TG2007PTC055636

Date: 29.06.2022

To,
The Member secretary,
Telangana State Pollution Control Board,
A-3, Paryavaran Bhavan,
Sanathnagar, Hyderabad- 5000018.
Telangana.

Sir,

Sub: -Submission of Half yearly Compliance Report of Environmental Clearance for the period of Jan- 2022 to Jun-2022 –Reg..

Ref: Environmental Clearance F No: IA- J-11011/114/2017-IA.II (I), dated 09th April, 2020

With reference to the above subject, herewith submitting the compliance and latest implementations of the Plant Environmental Clearance of our unit i.e., M/S. HINDYS LAB PRIVATE LIMITED Sy.no, 289,290,291 & 292 (Formerly M/s Hychem Laboratories) Veliminedu (V), Chityala (M) Nalgonda Dist., Telangana for your kind information.

Thanking you sir,

Yours faithfully,

For HINDYS LAB PVT LTD



AUTHORISED SIGNATORY

Encl: As above

CC To: 01. The Director (Monitoring Cell), IA Division, Indira Paryavaran Bhavan, Ministry of Environment, Forests and Climate Change, Jorbagh Road, Aliganj, New Delhi-110003

02. The Monitoring Cell, Ministry of Environment and Forests, Government of India, Ministry of Environment, Forests and Climate Change (MoEF&CC) Regional Office – South Eastern Zone Nungambakkam, Chennai, Tamilnadu – 600034.

**Hindys Lab Private Limited,
(Formerly M/s Hychem Laboratories)
Sy.289,290, 291&292, Veliminedu (V), Chityala (M)
Nalgonda District, Telangana state -508114 India.**

Compliance status Report

ENVIRONMENTAL CLEARANCE

F No: IA- J-11011/114/2017-IA.II (I)

Period: Jan -2022 to Jun- 2022

S. No	Condition	Status
1	Necessary permission has mandated under the water (Prevention and control of pollution) Act, 1974 and the Air (Prevention and control of pollution) Act, 1981, as applicable from time to time, shall be obtained from the state pollution control board.	At present, the industry has not implemented Expansion project and it is under progress. Industry is obtained CFO from TSPCB for existing unit which is valid up to 31 st July 2025 under Water act 1974 and Air act 1981.
2	As already committed by the project proponent, Zero Liquid discharge shall be ensured and no waste/treated water shall be discharged outside the premises. All the waste water to be collected and reused after treatment.	At present, the industry has not implemented Expansion project and it is under progress. Industry is operating the pollution control equipment's i.e. Stripper, MEE, ATFD, and Bio ETP & RO Plant to treat the wastewater. After treatment the treated water (RO permeate) is recycled/reuse in cooling tower make up.
3	Necessary authorization required under the Hazardous and other wastes (Management and trans-boundary Movement) Rules 2016, Solid waste management rules 2016, shall be obtained and the provisions contained in the rules shall be strictly adhered to.	At present, the industry has not implemented Expansion project and it is under progress Obtained necessary authorization required under the Hazardous and other wastes (Management and trans-boundary Movement) Rules 2016 for existing operations.
4	National Emission Standards for Organic Chemical manufacturing industry issued by the ministry vide G.S.R.608(E) Dated 21 st July 2010 and amended from to time shall be followed.	At present, the industry has not implemented Expansion project and it is under progress. Industry is following the National Emission Standards issued by the ministry vide G.S.R.608(E) Dated 21 st July 2010 for existing permissions.
5	Volatile organic compounds (VOCs) Fugitive emission shall be controlled at 99.95% With effective chillers/modern technology.	At present, the industry has not implemented Expansion project and it is under progress. Industry is monitoring VOC values in our plant with portable VOC meter. And also installed the online VOC monitoring system at middle of the plant and same has been connected to TSPCB server to control the Fugitive emissions from process.
6	No raw material/solvent prohibited by the concerned regulatory authorities from time to time, shall be used.	At present, the industry has not implemented Expansion project and it is under progress. Industry is not using any raw

		materials/solvents prohibited by the concerned regulatory authorities in existing process.
7	As proposed, storage of raw material shall be restricted to 3 days.	At present, the industry has not implemented Expansion project and it is under progress. The industry is Maintaining the minimum inventory for storage of Raw materials in existing operations.
8	To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and /or the NAAQS. The gaseous emission shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.	At present, the industry has not implemented Expansion project and it is under progress. Industry is maintaining the required stack height and also installed pollution control devices like Bag filter and cyclone separators to control fugitive emissions as per CPCB/SPCB guidelines in our existing operations.
9	Solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) The condensers shall be provided with sufficient HTS and residence time so as to achieve more than 95% recovery. (d) Solvents shall be stored in a separate space specified with all safety measures. (e) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (f) Entire plant shall be flameproof. The solvent storage tanks shall be provided with breather valve to prevent losses. (g) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	At present, the industry has not implemented Expansion project and it is under progress. The industry is maintaining the following safety measures in the existing operations: 1. All the reactors are connected to chilled brine condenser. 2. Provided mechanical seals to all the solvent handling pumps. 3. Solvents are stored in a separate space with N2 blanketing and provided fire hydrant sprinkler system. 4. Proper earthing system for all the equipment's & double earthing to solvent storage tanks. 5. Solvent storage tanks are provided with breather valve & Nitrogen blanketing system.
10	Total fresh water requirement shall not exceed 163.3 cum/day, proposed to be met from mission Bhagiratha (Industrial supply) .Prior permission in this regard shall be obtained from the concerned regulatory authority.	At present, the industry has not implemented Expansion project and it is under progress. The consumption of fresh water is within the prescribed limits as mentioned in the existing CFO.
11	Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system. All the vent pipes should be above the roof level.	The industry is maintaining separate collection system for Process effluent and storm water.

12	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arrestors shall be provided on tank farm, and solvent transfer through pumps. Raw material and products should be stored in leak proof containers. Spent acid to be stored over the ground tank and to be sent to TSDF.	At present, the industry has not implemented Expansion project and it is under progress. The industry is storing Hazardous chemicals in storage tanks, tank farms, drums, carboys etc. with Flame arrestors and all the solvents are transfer through closed system. Raw material and products are stored in leak proof containers.
13	Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.	The industry is sending the generated Hazardous waste in existing process to TSDF/Cement industries periodically for further treatment and disposal as prescribed by H.W management rules and regulations.
14	The company shall strictly comply with the rules and guidelines under Manufacture, storage and import of Hazardous chemicals (MSIHC) Rules 1989 as amended time to time. All transportation of Hazardous chemicals shall be as per the Motor Vehicle Act (MVA), 1989.	At present, the industry has not implemented Expansion project and it is under progress. And complying with the rules and guidelines under Manufacture, storage and import of Hazardous chemicals (MSIHC) Rules 1989 as amended time to time. Also complying transportation of Hazardous chemicals as per the Motor Vehicle Act (MVA), 1989.
15	Fly ash should be stored separately as per CPCB guidelines so that it may not adversely affect the air quality. Direct exposure of workers to fly ash and dust should be avoided.	The generated fly ash in existing operations are stored in a closed system.
16	The company shall undertake waste minimization measures as below: (a) Metering and control of quantities of active ingredients to minimize waste. (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapour recovery system. (f) Use of high pressure hoses for equipment clearing to reduce waste water generation.	At present, the industry has not implemented Expansion project and it is under progress. In existing operations Our R&D team is working in plant to minimise the waste and maintain cleaner production practices. 2. We are using auto pumping and closed feeding system to control the spillages. 3. We are using high pressure hoses for equipment cleaning.
17	The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the periphery, in downward wind direction, and along road side etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.	At present, the industry has not implemented Expansion project and it is under progress. The industry is maintain 33% green belt in total area of existing area..
18	As proposed Rs.2.25 crores shall be allocated towards	At present, the industry has not

	Corporate Environment Responsibility (CER) As proposed, the CER allocation shall be spent mainly for addressing the issues (Social, health employment, infrastructure, drinking water facility, skill development, plantation etc) raised during public consultation/hearing	implemented Expansion project and it is under progress. And comply with this condition in expansion project.
19	Preference shall be given to local villagers for employment in the unit.	Noted and we will implement this condition after expansion of project.
20	For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Industry is provided required stack height and monitoring facility (Port Hole, Platform, ladder etc...) as per emission regulations and the CPCB guideline's. Regular monitoring carried out by MOEF authorised vendor once in a month. Industry is provided Acoustic enclosure to DG set for controlling the noise pollution in existing operations.
21	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling .Fire- fighting system shall be as per the norms.	In existing operational activity, industry is maintaining good fire protection systems like fire hydrant system, Sprinkler system, Fire alarm system and Fire extinguishers with auto modular type.
22	Occupational health surveillance including dental check-up of the workers shall be done on a regular basis and records maintained as per the factories Act.	In existing operational activity, industry is providing health check-up for workers in plant on periodical basis as per the factories Act.
23	Continuous online (24*7) monitoring system for stack emission shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For ZLD, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.	Noted and we will implement this condition after expansion of project. In existing operational activity, The industry is installed and operating IP camera with PAN, TILT Zoom, 5x or above focal length with night vision capability. Along with flow meter & totalizers with RS -485 communication facilities to HTDS, LTDS & RO permeate with connection of the data server of CPCB & TSPCB.
11.1	The grant of environmental clearance is further subject to compliance of other general conditions under:	
1	The project proponent shall obtain all other statutory/necessary permissions/recommendations/NOCs prior to start of construction/operation of the project, which inter alia include, permission/approvals under the Forest(Conservation) Act,1980;wild life (Protection)	Noted & followed

	Act.1972; the Coastal Regulation Zone Notification.2019,as amended from time to time, and other office Memoranda/circular issued by the ministry of Environment, Forest and Climate Change from time to time .as applicable to the project.	
2	The project proponent shall ensure compliance of 'National Emission Standards' as applicable to the project, issued by the Ministry from time to time. The project proponent shall also abide by the rules /regulations issued by the CPCB/SPCB for control/abatement of pollution.	Comply with this condition of National Emission Standards rules and regulations issued by the CPCB/SPCB for control/abatement of pollution in expansion project.
3	The project authorities shall adhere to the stipulations made by the State pollution Control Board/Committee, Central pollution Control Board, State Government and any other statutory authority.	Industry obey stipulations made by the State pollution Control Board/Committee, Central pollution Control Board, State Government and any other statutory authority in expansion project.
4	The project proponent shall prepare a site specific conservation plan and wild life management plan in case of the presence of Schedule-1 species in the study area, as applicable to the project, and submit to Chief Wild life Warden for approval .The recommendations shall be implemented in consultation with the State Forest/Wildlife Department in a time bound manner.	Noted and comply with this condition in new project implementation.
5	No further expansion or modifications in the plant, other than mentioned in the EIA Notification ,2006 and its amendments, shall be carried out without prior approval of Ministry of Environment, Forest and Climate change. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any	Noted and followed
6	The energy source for lighting purpose shall be preferably LED based, or advance having preference in energy conservation and environment betterment.	The industry is using LED based lighting in existing operational activity and same has to be implemented in expansion project.
7	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that atleast one station each is installed in the upwind and down wind direction as well as where maximum ground level concentration s are anticipated.	Noted and comply with this condition in expansion project implementation.
8	The National Ambient Air quality Emission Standards issued by the Ministry vide G.S.R. NO.826(E)dated 16 th November ,2009 shall be followed.	Noted and follow this condition.
9	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measure including acoustic hoods, silencers, enclosures etc. On all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment(Protection) Act, 1986 Rules, 1989 viz. 75 dBA	Noted and follow this condition.

	(day time) and 70 dBA (night time).	
10	The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and to utilize the same for process requirements.	Noted and follow this condition.
11	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	1. Industry is providing regular trainings to all employees on safety and health aspects of chemicals handling. 2. Pre-employment and routine periodical medical examinations for all the employees in existing operational activity and will be implement in expansion new project.
12	The company shall also comply with all environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.	The industry is implementing all the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the expansion project.
13	The company shall undertake all relevant measures for improving the socioeconomic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented.	Noted and comply with this condition after implementation of expansion project.
14	The company shall undertake eco-development measures including community welfare measures in the project area for the overall improvement of the environment.	Noted and comply with this condition
15	A Separate environmental management cell (having qualified person with Environmental science/ Environmental Engineering /Specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental management and monitoring functions.	Will be followed and implement this condition after implementation of expansion project.
16	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the ministry of environment, Forest and Climate change as the state Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management / pollution control measures shall not be diverted for any other purpose.	Noted and followed this condition.
17	A Copy of the clearance letter shall be sent by the project proponent to concerned panchayat, Zilla parishad/Municipal corporation, urban local body and the local NGO, if any, from whom suggestions /representations, if any, were received while processing the proposal.	Complied with this condition.

18	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated environmental clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.	Noted and comply with this condition.
19	The environmental statement for each financial year ending 31 st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the environmental (protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall be sent to the respective regional offices of MoEF&CC by e-mail.	At present, the industry is submitting Form-V statement for existing operational activity and will submit the environmental statement (Form-V) for each financial year ending 31 st March after implementation of expansion project.
20	The project proponent shall inform the public that the project has been accorded environmental clearance by the ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at website of the Ministry and at https://parivesh.nic.in/ . This shall be advertised within the seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned regional Office of the Ministry.	Complied with this condition.
21	The project authorities shall inform the regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Noted and comply with this condition.
22	This environmental clearance is granted subject to final outcome of Honble supreme court of india, Honble NGT and any other court of Law, if any, as may be applicable to this project.	Noted and Agreed.
12	The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.	Noted and Agreed.
13	Concealing factual data or submission of false/ fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the environmental (protection) Act 1986.	Noted and Agreed.

14	Any appeal against this environmental clearance shall lie with the national green Tribunal, if preferred, within a period of 30 days as prescribed under section 16 of the National Green Tribunal Act. 2010.	Noted and Agreed.
15	The above conditions shall be enforced, inter-alia under the provisions of the Water(Prevention & control of pollution) Act,1974, the Air (Prevention & control of pollution)Act,1981, the environmental(protection) Act,1986,Hazardous and other Wastes (Management and trans boundary Movement)Rules,2016 and the public Liability insurance Act,1991 along with their amendments and Rules and any other orders passed by the Honble Supreme court of india / High Courts and any other Court of Law relating to the subject matter.	Noted and Agreed.
16	This issues with approval of the competent authority.	

M/s. HINDYS LAB PRIVATE LIMITED
V) VELIMINEDU M) CHITYAL DIST) NALGONDA

Hindys Lab Private Limited

Annexure-II



Vent for monitoring of HCL emission

Hindys Lab Private Limited

Annexure-III



LTDS EQUALIZATION TANK



AERATION TANKS



ETP RO

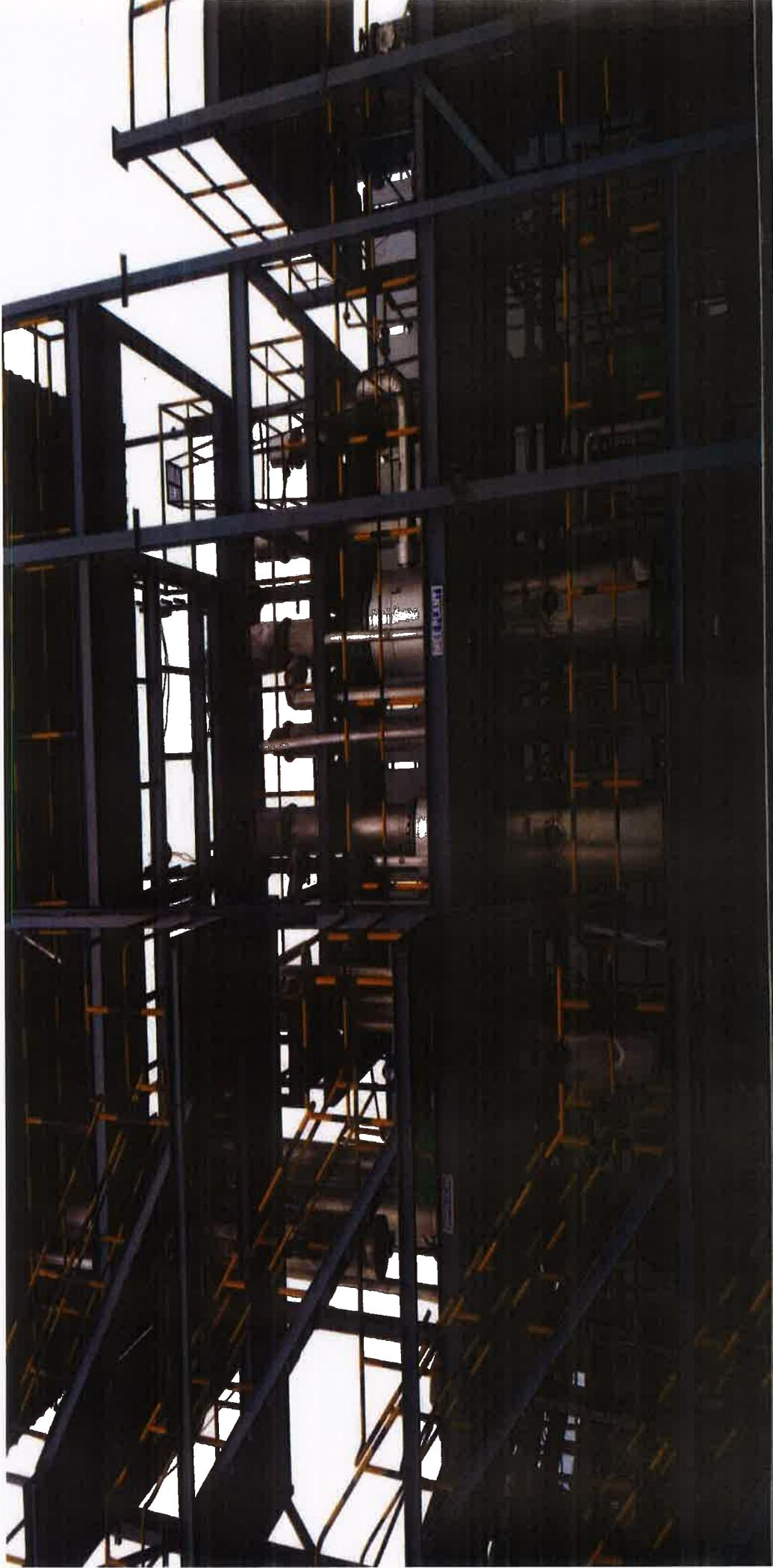


ETP RO

ZLD Infrastructure

3

Hindys Lab Private Limited



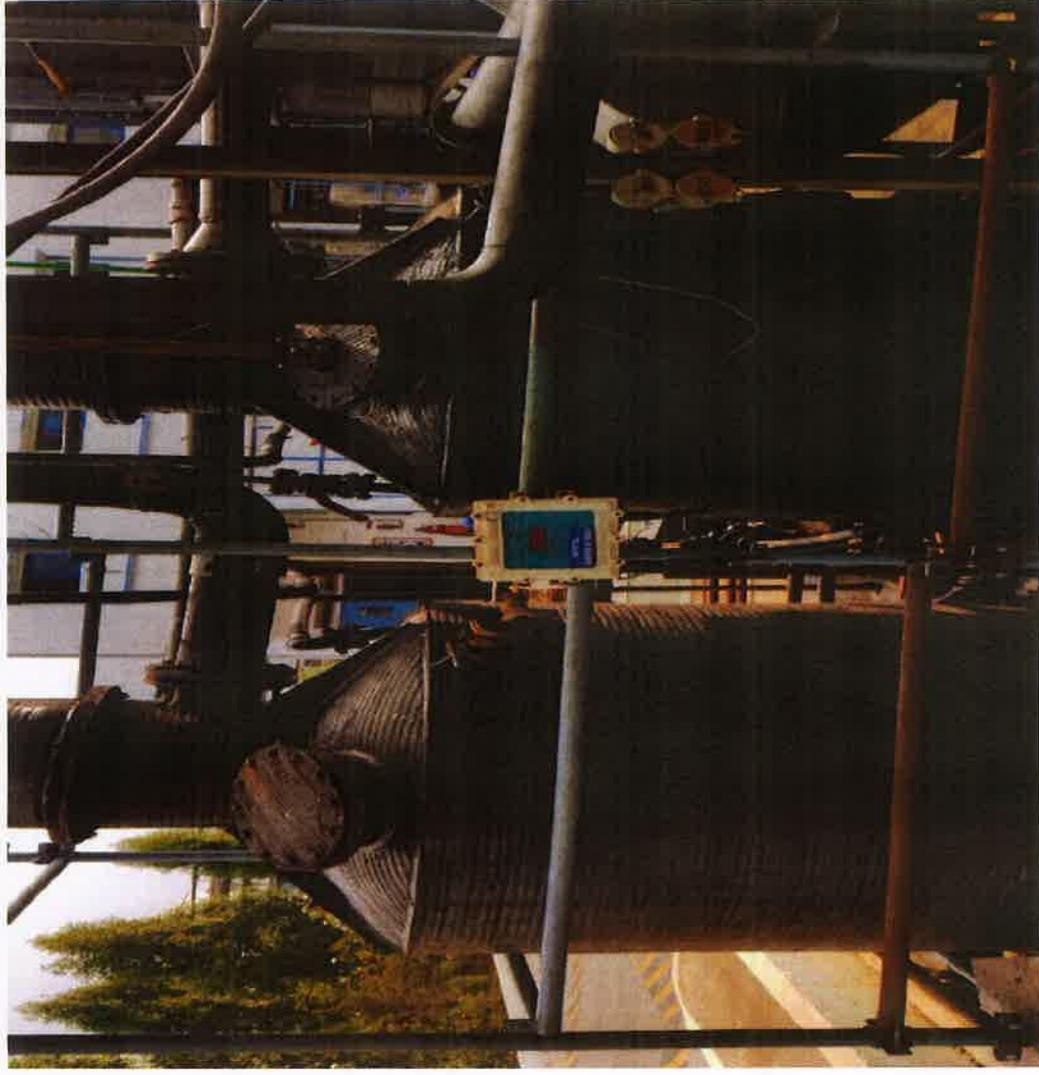
STRIPPER, MEE & ATFD

Hindys Lab Private Limited



Online VOC Meter

Hindys Lab Private Limited

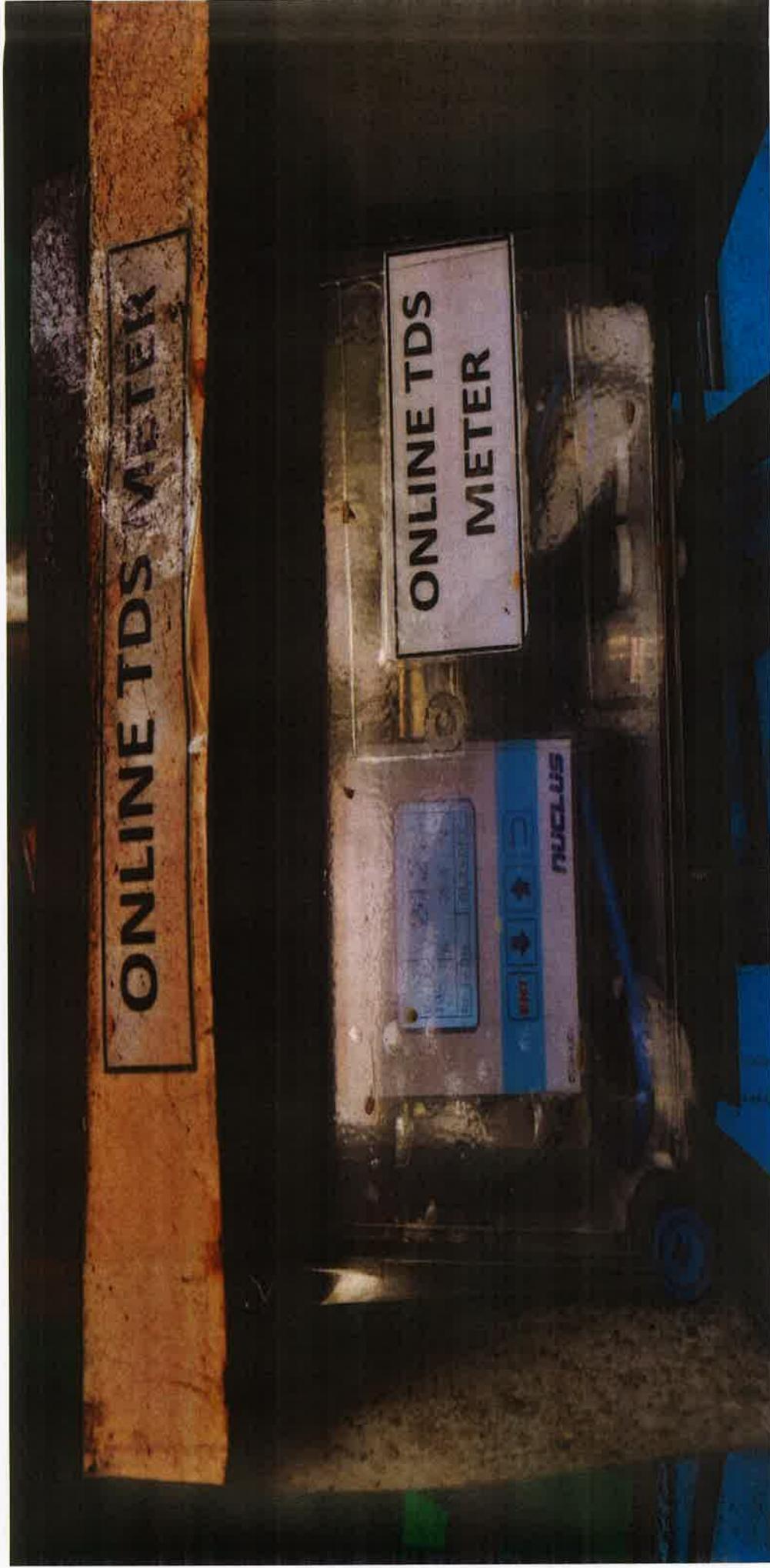


Scrubber with online pH meter



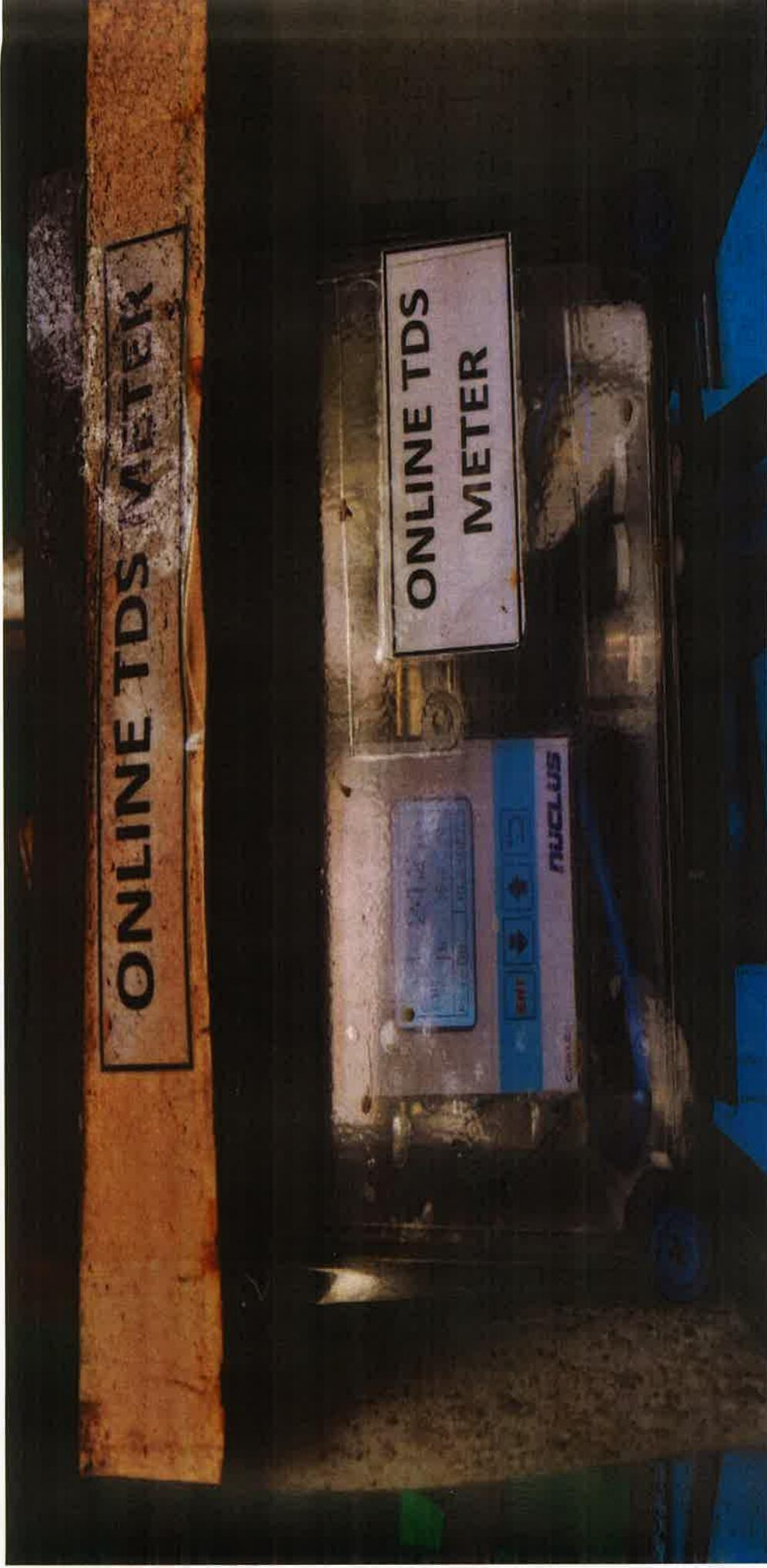
Double stage scrubber

Hindys Lab Private Limited



Online TDS Meter for HTDS

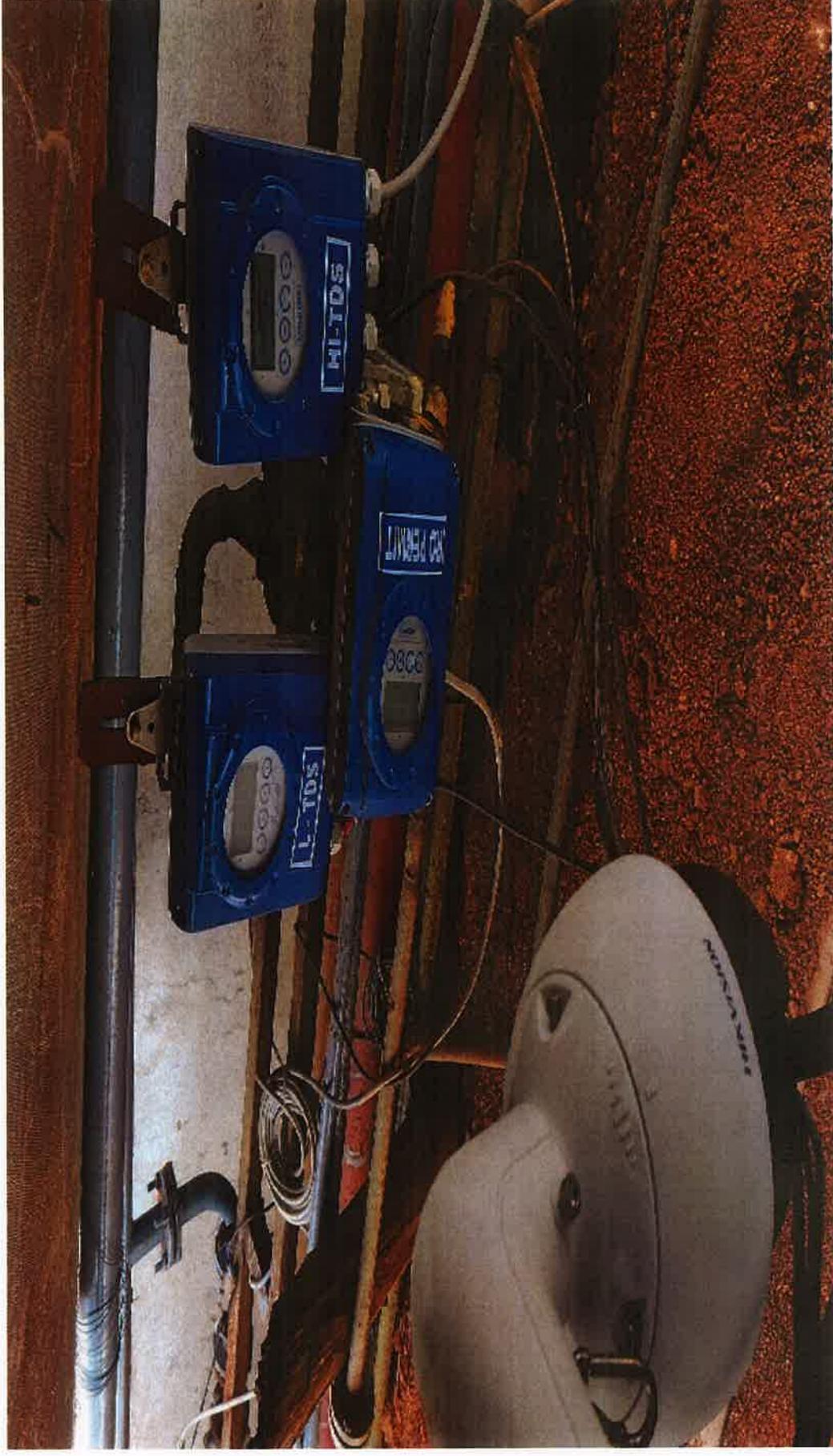
Hindys Lab Private Limited



Online TDS Meter for HTDS

Hindys Lab Private Limited

Annexure-VIII



Electro Magnetic Flow meters