

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI
APPLICATION NO. 34 OF 2019

Rajasekar Shambu

... Applicant

Versus

Karnataka State Pollution Control Board and Ors.

... Respondents

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CHENNAI

DRAWN AND FILED BY

DATE: 04.01.2022.



ADVOCATE FOR RESPONDENT NO.5

BEFORE THE NATIONAL GREEN TRIBUNAL

SOUTHERN ZONE, CHENNAI

APPLICATION NO. 34 OF 2019

Rajasekar Shambu

... Applicant

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... Respondents

**RESPONSE/OBJECTIONS FILED BY THE RESPONDENT NO.5
TO THE ADDITIONAL REPORT FILED BY THE JOINT
COMMITTEE**

The Fifth Respondent respectfully submits as follows:-

1. At the outset, it is submitted that the Respondent No.5 has already filed a detailed Reply Statement in the above Original Application along with Annexures in order to establish the fact that the industry has been running in full compliance of the directions issued by the Pollution Control Board from time to time.

2. Pursuant to the order dated 09/07/2020 passed by this Hon'ble Tribunal, the Joint Committee had submitted a further report wherein the Committee has calculated the quantum of Environmental Compensation payable by the Respondent Industrial units. In so far as Respondent No.5 is concerned, the Committee in para 7.1 has noted that there was non - compliance between 03/11/2017 and 13/12/2017 and there was letting out of chemical fumes into the atmosphere between 03/04/2019 and 08/08/2019. On this score, the number of days of violation has been calculated as 60 days and Environmental Compensation amount of Rs.18,00,000/- has been recommended by the Committee. In this regard, the following dates and events are relevant



For Corvine Chemicals & Pharmaceuticals Ltd.

Ramkrishna Reddy
Director



in order to appreciate the nature of violation said to have been committed by the Respondent No.5.

Dates	Events	Remarks
03/11/2017	Inspection of our factory Corvine Chemicals & Pharmaceuticals Ltd, (CCPL), Bidar, by Senior Environmental Officer (SEO) KSPCB, Zonal Office, Kalaburagi.	
25/11/2017	Notice is issued by SEO, KSPCB, Kalaburagi, after his inspection on 03/11/2017 Lr: No. KSPCB/ ZO-KLB/ IND/2016-17/150 dated 25/11/2017. ANNEXURE -I	The minor observations were about house- keeping, spillage, white patches on the floor etc, Regarding fumes, his observation was "fumes were observed near production area of Sodium Azide section".
05/12/2017	Reply submitted by Fifth Respondent stating that they have taken measures for effective ventilation and scrubbing system, "We have made ventilation system more effective to suck the fumes from shop floor. The collected fumes are sent to scrubbing system". We have given reply to other observations also. ANNEXURE-II	
13/12/2017	In continuation of our letter dated 05/12/2017, we have submitted our reply on 13/12/2017, stating that the proper	



For Corvine Chemicals & Pharmaceuticals Ltd.

S. Venanth Reddy
Director



	measures, and modifications were taken to correct the other observations, like replacement of damaged tiles, better housekeeping, along with photographs.	
	ANNEXURE -III	
03/04/2019	Notice, Lr. No. KSPCB/RO/(BDR)/2019-20/ 4 dated 03/04/2019, sent by Environmental Officer (EO) KSPCB/RO/ Bidar stating that there was a complaint by Kolhar Industrial Area, Bidar, that there were chemical fumes in the atmosphere letting out by our industry	
	ANNEXURE -IV	
05/04/2019	We have immediately replied to RO, KSPCB, Bidar dated 05/04/2019.	We gave the details regarding the various equipment of HCl scrubbing system. The total system is in operation from the inception of TTC chemical production and giving desired results. On the said date 03/04/2019, there was power failure at about 6.00 pm for a very brief period. Due to power failure, the circulation pumps of dilute acid, which pump to scrubber, are stopped. Very small quantity of unabsorbed HCL gas escaped into the atmosphere through vent. We took immediate action not



For Corvine Chemicals & Pharmaceuticals Ltd.

M. Renuk Reddy
Director



	ANNEXURE -V	<p>to recur as following</p> <ol style="list-style-type: none"> i. Constant supervision of the scrubbing system. ii. Immediate stoppage of key raw material addition. iii. Closing of the vent valve of the scrubber. <p>A very small quantity of HCl fumes emitted into atmosphere will be absorbed into the moisture in air and forms white fog and looks like a large quantity of emission.</p>
20/07/2019	<p>Notice Lr. No. KSPCB/RO /(BDR) / IR /2019 -20/507 dated 20/07/2019 was issued to CCPL.</p> <p style="text-align: center;">ANNEXURE -VI</p>	The RO, KSPCB inspected our factory on 19/07/2019 and observed some fumes in the factory.
06/08/2019	<p>We submitted our reply dated 06/08/2019.</p> <p style="text-align: center;">ANNEXURE -VII</p>	<p>After having done small modification at centrifuging section. The 30L capacity open tubs were replaced with closed tubs, by which we could control emission effectively. As previously mentioned the HCl gas of very insignificant quantity also forms fog with the moisture in the air. However, we took utmost care and implemented the measures to prevent gaseous emission into atmosphere.</p> <p>*The gaseous emissions were there only on two days 03/04/2019 and 19/07/2019.</p> <p>*There were no fumes as indicated in Joint Committee Report NGT, from 03/04/2019 to 08/08/2019 for about 4 months.</p>



For Corvine Chemicals & Pharmaceuticals Ltd.

S. Ramesh Reddy
Director



3. From the foregoing submissions, it is clear that the Joint Committee has not taken into account the exact nature of violation and the number of days the industry is liable for compensation. In respect of violation noticed for the period 03/11/2017 to 13.12.2017, the industry had rectified the minor defects immediately. In respect of gaseous emissions, the same were observed only on two days, viz., 03/04/2019 & 19/07/2019 and not a period of four months as observed in the report. The Joint Committee has also failed to take into account the strict compliance of Pollution Control Standards adopted by the Respondent No.5 which is reflected in Annexures 1 to 17 filed along with the main Reply Statement of Respondent No.5 in July 2020 itself.

4. Under the circumstances, the Environmental Compensation of Rs.18,00,000/- levied on the Respondent is arbitrary and unreasonable and totally disproportionate to the nature of violation alleged.

5. It is submitted that the Respondent No.5 is also filing the compliance report in respect of Specific Remedial Measures suggested in para 8.1 of the report in respect of M/s. Corvine Chemicals & Pharmaceuticals Ltd. along with annexures.

6. It is therefore prayed that this Hon'ble Tribunal may be pleased to consider this objections and reduce the compensation amount to such reasonable amount as may be found necessary considering strict compliance of Pollution Control Standards by Respondent No.5 for a long period of time.



For Corvine Chemicals & Pharmaceuticals Ltd.

Director



VERIFICATION

I, Revanth Reddy, S/o. M.Mahipal Reddy aged about 31 Years, Executive Director, M/s. Corvine Chemicals & Pharmaceuticals Limited, the 5th Respondent herein do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at *Hyderabad* on this the *4* day of January 2022

For Corvine Chemicals & Pharmaceuticals Ltd.

Revanth Reddy

Director

Respondent No.5



ATTESTED

S. LAXMI NARAYANA
B.Com, LL.B

NOTARY

Flat No: 204, Lumbini Towers
6-3-666/A/204, Panjagutta, Hyd-82
(Appointed by Govt. of India)



4 JAN 2022



ವಲಯ ಕಛೇರಿ, ಕರ್ನಾಟಕ ರಾಜ್ಯ ಮಾಲಿನ್ಯ ನಿಯಂತ್ರಣ ಮಂಡಳಿ

ZONAL OFFICE, KARNATAKA STATE POLLUTION CONTROL BOARD

ಪ್ಲಾಟ್ ನಂ. ೩-101, ಗ್ರೀನ್ ಪಾರ್ಕ್, ಗೃಹಮಂಡಲ ಐಡಾವಳಿ, ರಿಂಗ್ ರೋಡ್, ಶೇಕ್ ರೋಜಾ, ಕಲಬುರಗಿ

Flat No. G-101, Green Park, Housing Board Colony, Ring Road, Shaik Roza, Kalaburagi

E-mail: seoklb@kspcb.gov.in

website: <http://kspcb.kar.nic.in>

Phone : 08472-699888

No. KSPCB/ZO-KLB/IND/2016-17/150

Date 25-11-2017

//BY- RPAD//

To
The Occupier,
M/s Corvine Chemicals & Pharmaceuticals Ltd.,
Plot No.135 E. Kolhar Industrial Area,
Bidar

Sir,

Sub : Non- Compliance under the provisions of Water (P & C of P) Act , 1974 and Air Act (P & C of P) Act , 1981 -reg.

Ref : 1. Inspection of your industry by Senior Environmental Officer, KSPCB, Zonal Office, Kalaburagi along with EO, Regional Office, Bidar on 03-11-2017.

The unit is operating in the name and style of M/s. Corvine Chemicals & Pharmaceuticals Ltd., located at Plot No. 135E, Kolhar Industrial Area, Bidar. The unit has obtained Consent from the Board for the period from 1/7/2016 to 30/06/2021 for the manufacturing of above said bulk drug and intermediates.

The above said industry was inspected as per Water (Prevention & Control of Pollution) Act, 1974 and Air (Prevention & Control of Pollution) Act, 1981. During inspection the following observations were made.

- Industry was operating at the time of inspection.
- Spillage near sodium azide manufacturing area was observed.
- Floor washing is done in crude manner.
- Acid proof tiles in production area has been damaged.
- Fumes were observed near production area of sodium azide section.
- MEE of 30 KL capacity with ATFD has been provided. Online monitoring system has been installed and working.
- White patches on concrete flooring in front of production block was observed. Clearly indicates odd hour discharge and rainy days.

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- Lot of flooring has been damaged due to chemical spillage throughout the area within the premises.
- Lot of acid mist smell was observed from the scrubbing area.
- Drainage lines connected from production block to MEE in crude carriage and is not scientific. Reported as manually carried and transferred.
- There are lots of spillages from various activities, which is not accessed and quantified, which is causing problem for working.
- The effluent drains are not provided with acid proof lining, which is quite likely to effect the ground water.
- Coal of 4 to 5 tons per day is consumed by three 2 ton boilers. Boilers are installed in 2002. This needs to be controlled by using the agro fuel instead of coal to avoid fugitive emission within the premises.
- Most of the reactors/containers are corroded. Clearly indicating the problems within the premises
- Neutralization of effluent is not done properly.
- Reverse osmosis(RO) plant provided is very old and appears to be not working properly as some spillages were found in the area. It is desirable to provide the new RO system.

In view of the above background, it is evident that your unit has not shown interest in compliance to the standards and directions issued by the Board, wherefore causing environmental and health hazards which cannot be compensated by money.

Wherefore, you are hereby directed to Show-Cause within 15 days why this office shall not initiate further action which includes Notice of Proposed Direction and closure of your unit. Failure to reply/comply this notice within the stipulated period indicates, you have nothing to say in the matter and hence this office would initiate action indicated above without further hearing from you in this regard.

Please acknowledge receipt of the letter and note that operating unit without compliance attracts penal provision, which includes criminal proceedings as per law.

Yours faithfully,


Senior Environmental Officer
Zonal Office, Kalaburagi.

CORVINE CHEMICALS & PHARMACEUTICALS LTD.**Admn. Office :**

Plot No. 735, Venkateswara Hills,
Road No. 3, Banjara Hills,
Hyderabad - 500 034. T.S. Indla.
Phone : 91-40-23354928
Fax : 91-40-23354929
E-mail : hyd1_mahipal@sancharnet.in
Website : www.corvinechemicals.com

Regd. Office :

Plot No. 135E,
Kolhar Industrial Area,
BIDAR, Karnataka.
Phones : 08482-232204
: 08482-232297

To,

Date : 05/12/2017

The Senior Environmental Officer,
KSPCB, Zonal Office,
Kalaburagi.



Sir,

Sub:- Non-Compliance under the provisions of water (P & C of P) Act, 1974 and Air Act (P & C of P) Act, 1981 – reg.

Ref :- Your Letter No. KSPCB/ZO-KLB/IND/2016-17/150., dated : 25/11/2017.

With reference to your letter, we submit the point wise compliance.

1. Spillage at Sodium Azide section was cleaned. The plant was stopped a fortnight back before inspection.
2. The other areas of flooring were cleaned well.
3. The damaged tiles were replaced and the area was thoroughly cleaned.
4. We have made ventilation system more effective to suck the fumes from shop-floor. The collected fumes are sent to scrubbing system.
5. MEE and ATFD are under operation effectively by online monitoring round the clock.
6. A light white precipitate patches were being observed on the rough surface of the flooring, due to the fall of droplets of cooling tower water. The total flooring surface was made smooth and now the patches are not observed.
7. The damaged tiles were replaced in the last two weeks.
8. As the waste solid powder was being discharged at the bottom of ATFD, slight smell is being observed only in near vicinity as the powder is in very hot condition.
9. No liquid effluent is carried manually from production area to MEE.

The existing scheme, which is in operation, is as follows.

The effluent from various points is collected in PPFRP, Underground tank (UGT). It is pumped from UGT to Acid proof tile lined, Over Head tank (OHT) over the terrace above MEE. The effluent is charged into PPFRP Reactor from OHT. It is neutralized in PPFRP Reactor and then pumped to MEE via PP Plate & Frame Filter press through rotameter.

10. The house keeping staff is strictly being instructed to clean the whole plant premises thoroughly.
11. The effluent lines are of HDPE pipes, RCC cleaning chambers, as suggested, were lined with PPFRP to last long.
12. We are enquiring about the agrobased fuel briquettes to replace the coal for boilers.
13. Despite of painting periodically, due to fugitive emissions and humidity of air a light layer of rust is formed within a short span. We will increase the frequency of painting to keep them clean and rust free.
14. Effluents are always neutralized to pH =7 in PPFRP Reactor.
15. RO unit was installed 2 years back only and it is functioning very well. The TDS of input and output of MEE condensate to RO unit are 1000 to 1500 ppm and 100 - 200 ppm respectively. This water is being used as boiler feed water.

We are operating our industry as per the norms of KSPCB only and not causing any environmental and health hazards. We have strengthened the House keeping section and instructed our operating staff to maintain the plant clean and tide.

The slight deviation at some points are rectified in the last three weeks as suggested by respected Senior Environmental Officer, during inspection of our organization.

We assure you Sir, that we will take every action for compliance of PCB norms.

Thanking you,

U. 
K. RAJI REDDY
DIRECTOR

CORVINE CHEMICALS & PHARMACEUTICALS LTD.

Admn. Office :

Plot No. 735, Venkateswara Hills,
Road No. 3, Banjara Hills,
Hyderabad - 500 034, T.S. India
Phone : 91-40-23354928
Fax : 91-40-23354929
E-mail : hyd1_mahipal@sancharnet.in
Website : www.corvinechemicals.com

Regd. Office :

Plot No. 135E,
Kolhar Industrial Area,
BIDAR, Karnataka.
Phones : 08482-232204
: 08482-232297

O/C

13th December 2017

To
The Senior Environmental Officer
KSPCB Zonal Office
Kalaburgi

Sir

Sub: Non Compliance under the provisions of Water (P & C of P) Act, 1974 and
Air act (P & C of P) Act, 1981-reg
Ref: your office letter No. KSPCB/ZO-KLB/IND/2016-17/150 dated 25-11-2017
Our letter dated 05-12-2017

With reference to above cited subject we are herewith submitting photographs of the complied
Areas.

This is in continuance of the letter submitted to your office by us letter dated 5th December 2017

Thanking you

Yours Sincerely

For CORVINE CHEMICALS & PHARMACEUTICALS LIMITED

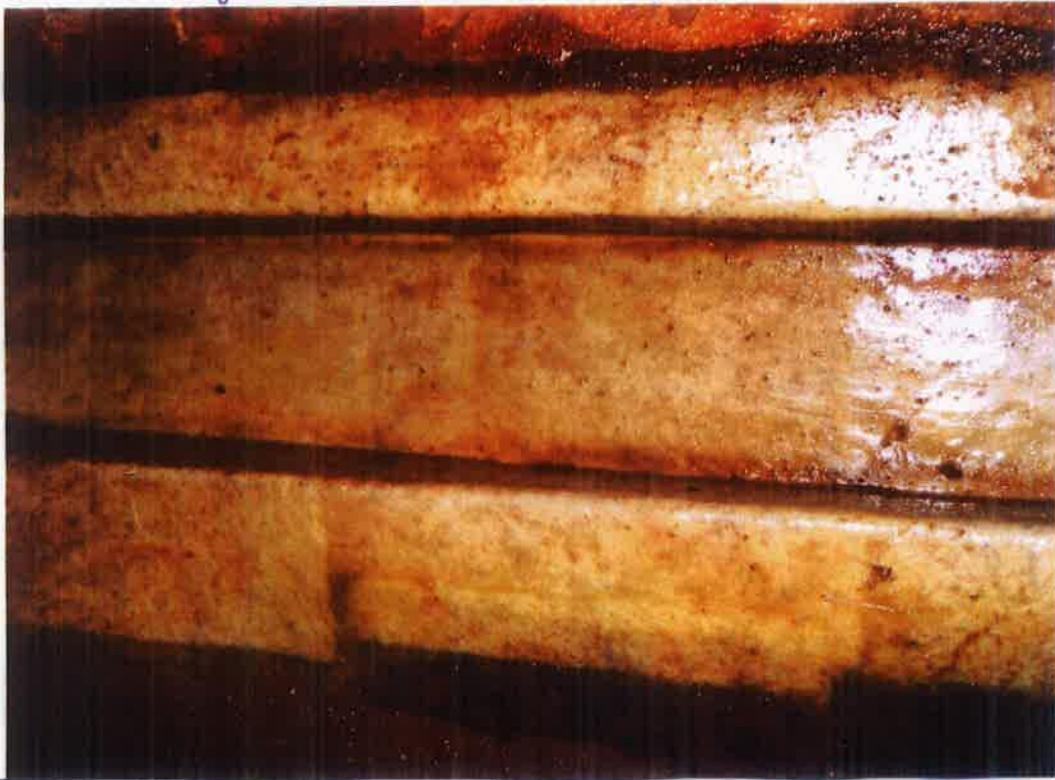
Govind
GOVIND BHATT
MANAGER

Copy to: Regional Office, Bidar
SEO, HO Bengaluru

Encl: Photos of the completed works



Drainage line with PFRP coating



Rice cleaning chamber with PFRP Coating



**CORVINE CHEMICALS &
PHARMACEUTICALS LTD.**
Plot No. 135-E, Kolhat Industrial Area,
BIDAR - 585 402. (Karnataka)

B

Total flooring surface was made smooth



The damaged tiles were replaced



CORVINE CHEMICALS &
PHARMACEUTICALS LTD.
Plot No. 106-E, Kolhar Industrial Area,
Dist. Jharsuguda, 751 002 (Orissaloka)

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Patched on the floors. Covered

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ಪ್ರಾದೇಶಿಕ ಕಛೇರಿ
ಕರ್ನಾಟಕ ರಾಜ್ಯ ಮಾಲಿನ್ಯ ನಿಯಂತ್ರಣ ಮಂಡಳಿ
ಪ್ಲಾಟ್ ನಂ.42 (ಬಿ2) ನೌಬಾದ ಕೈಗಾರಿಕ ಪ್ರದೇಶ,
ಬೀದರ - 585403.
Phone no 08482-232322
Web Site: <http://kspcb.kar.nlc.in>



REGIONAL OFFICE: BIDAR
Karnataka State Pollution Control Board
Plot No.42 (B2)Naubad Indl Area,
Bidar -585403.
Phone No 08482-232322.
E-mail: bidar@kspcb.gov.in

NO:KSPCB/RO(BDR)/2019-20/4

DATE:03.04.2019

TO,

"Show Cause Notice"

The Director
M/s.Corvine Chemicals & Pharmaceutical Ltd.
Plot No.135-E, Kolhar Indl Area, Bidar-01.

Sir,

Sub: Letting out of chemical fumes to atmosphere from your industry premises on
3.4.2019.

Ref: Telephone call received from public on 3.4.2019.

#####

With reference to the above, the undersigned has received complaint from the Kolhar industrial area public on 3.4.2019 at 5.56PM and complained about letting out of chemical fumes into the atmosphere from your industry premises. There is video of fumes moving to the atmosphere from your industry premises has been received, same has been immediately communicated to your industry person Sri, Govind Bhat. As per video, it is clear that white fumes are spreading in the area discharged from your industry premises. Hence, you are hereby directed to operate all air and water pollution control equipments during operation of the industry process and cautioned not to discharge any chemical effluents and/or chemical fumes into the land and atmosphere respectively in future. Due to such any accidents in future, you will be solely responsible for all the environmental damages and for the related compensations. Release of such chemical fumes into the atmosphere at any point of time from the chemical industries cannot be tolerated. For the said violation, you are hereby called upon to show cause within 7 days time as to why this office shall not recommend the Board for taking action as per the provisions of Acts and Rules.

Acknowledge the receipt of this notice.

Yours faithfully,

Manjappa 3/4/19
Environmental Officer
KSPCB, Bidar

CORVINE CHEMICALS & PHARMACEUTICALS LTD.**Admn. Office :**

Plot No. 735, Venkateswara Hills,
Road No. 3, Banjara Hills,
Hyderabad - 500 034. T.S. India.
Phones : 91-40-23354928, 23354931
E-mail : hyd1_mahipal@sancharnet.in
Website : www.corvinechemicals.com

Regd. Office :

Plot No. 135E,
Kolhar Industrial Area.
BIDAR, Karnataka.
Phones : 08482-232204
: 08482-232297

To
Environmental Officer
KSPCB Bidar
Bidar

5TH APRIL 2019

Sir

Sub: Letting out of chemical fumes to atmosphere from your Industry premises on 3.4.2019
Ref: your office letter NO: KSPCB/RO(BDR)/2019-20/4 DATED 03.04.2019

With reference to above cited subject we submit the following.

The HCl generated in the reaction of Trityl chloride (TTC) is passed through the scrubbing system, which comprises of

Scrubber 2 nos,
Dil HCl tanks 2 nos,
Recirculation pumps 2 nos,
Glass condensers 2 nos, (to remove the heat of absorption)
Induced draft blower 1 no.

This scheme is in operation from the inception of TTC production and giving desired results On 03.04.2019 due to power failure pumps were stalled and immediately started on the resumption of power as the circulation of dilute acid is stopped to the scrubbers, very small quantity of unabsorbed HCl gas escaped into the atmosphere through vent.

We have taken immediate action not recur as following

- i) constant supervision of the performance of the scrubbing system not only for power but mechanical failures also.
- ii) immediate stoppage of key raw material addition.
- iii) closing of the vent valve of the scrubbing system.

Yours sincerely

For CORVINE CHEMICALS AND PHARMACEUTICALS LIMITED



M REVANTH REDDY
DIRECTOR



ANNEXURE - VI

5/8/19 17
Time- 17:45 P.M

ಪ್ರಾದೇಶಿಕ ಕಛೇರಿ:

ಕರ್ನಾಟಕ ರಾಜ್ಯ ಮಾಲಿನ್ಯ ನಿಯಂತ್ರಣ

ಮಂಡಳಿ, ಪ್ಲಾಟ್ ನಂ. 42 (ಬಿ2)

ನೌಬಾದ ಕೈಗಾರಿಕ ಪ್ರದೇಶ ಬೀದರ್- 585402

ದೂರವಾಣಿ ಸಂಖ್ಯೆ: 08482-232322



Regional Office:

Karnataka State Pollution Control

Board, Plot No. 42 (B2) Naubad Ind

Area, Bidar- 585402.

Phone No. 08482-232322

NO: KSPCB/RO (BDR) /IR/2019-20/ 507

Date: 20-7-19

To,

The Director

M/s. Corvine Chemicals & Pharmaceutical Ltd

Plot No.135-F Kolhar Indl Area.

Bidar District-585402.

Sir,

Sub: Letting out of chemical fumes to atmosphere from your industry premises on
19.07.2019.

Ref: Inspection on dated: 19.07.2019

With reference to the above, the undersigned has inspected your industry on 19.07.2019 at 9.30 pm and it is observed that you are letting out of chemical fumes from your production blocks of the industry into the atmosphere. Visible fumes are observed during inspection and these fumes are spreading in the area discharged from your industry premises. Hence, you are hereby directed to operate all air and water pollution control equipments during operation of the industry process and cautioned not to discharged any chemical effluents and/or chemical fumes into the land and atmosphere respectively in future. For any accidents in future, you will be solely responsible for all the environmental damages and for the related consequences/compensations. Release of such chemical fumes into the atmosphere at any point of time from the chemical industries cannot be tolerated. For the said violations, you are hereby called upon to show cause within 7 days time as to why this office shall not recommend the Board for taking action as per provisions of Acts and Rules.

Acknowledge the receipt of this notice.

Yours faithfully,

Manjappa
Environmental Officer

KSPCB, Bidar,

20/7/19

CORVINE CHEMICALS & PHARMACEUTICALS LTD.**Admn. Office :**

Plot No. 735, Venkateswara Hills,
Road No. 3, Banjara Hills,
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Website : www.corvinechemicals.com

Regd. Office :

Plot No. 135E,
Kolhar Industrial Area,
BIDAR, Karnataka.
Phones : 08482-232204
: 08482-232297

To,
The Environmental Officer,
KSPCB,
Bidar, Karnataka.
Respected Sir,

Date : 06/08/2019

Sub :- Letting out of chemical fumes to atmosphere from our industry premises on 19/07/2019.

Ref :- your letter No. KSPCB/RO (BDR)/IR/2019-20/507 dated 20/07/2019. Received on 05/08/2019.

With reference to the above, we submit the following for your perusal.

The HCl gas produced in the reaction of Trityl Chloride (TTC) process, is subjected to the twin scrubber, scrubbing system and 20 - 25% HCl acid is produced. Part of it is used for captive consumption and the rest of the quantity is dispatched as a by-product.

The crystallized TTC reaction mass is centrifuged and MLs are collected in 30Lts open tubs.

Slight fumes were observed over the tubs specially in monsoon season.

Fortnight back, we have installed two nos PFFRP, 400 L cap. closed tanks for collection of MLs and washings separately to avoid gaseous fumes, in place of 30L open tubs.

The inlet and outlet nozzles of ML tanks are connected to Centrifuges and Scrubbing system respectively.

The water, which is circulated in the scrubbing system is analysed for HCl content.

HCl content is 4% and 7% after processing of 19 and 28 batches respectively. The results of modification are encouraging in reducing the emissions.

Generally, the HCl fumes dissolved in water vapour of moist air of atmosphere in monsoon season appears as white fog eventhough HCl gas quantitatively is insignificant.

However, we take utmost care and implement the remedial measures to prevent the gaseous emissions into atmosphere.

Thanking you

Corvine Chemicals & Pharmaceuticals Ltd.,

Authorized Signatory.



8.0 Specific Remedial Measures suggested in para 8.1 of the report.

M/s Corvine Chemicals & Pharmaceuticals Ltd.

Sl.No.	Non-compliance noticed	Remedial measures	Remedial measures taken & Photographs & records	Remarks
1.	NOC from KGWA for usage of Groundwater	To obtained NOC from KGWA	NOC obtained from KGWA Attached.	Annexure-1
2.	Manual handling of some of solvents	To ensure/ implement closed loop handling system for solvents.	Closed loop system following, The quantity of solvent used in the manufacturing process is very less, so barrels are handled manually. We have applied for necessary approval to KSPCB. Please find enclosed application for the same.	Annexure-2
3.	Spillage collection system	To provide secured spillage collection system in process area.	We have some spillage collection pits in the process area. On 27/11/2019 when joint committee visited our plant, they noticed one unused section of process area with damaged spillage pit, which was repaired. Please find enclosed photo of spillage collection pit.	Annexure-3

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4.	Designated area for storage of by-products	To construct secured storage area for by-product Sodium Sulphate salt, etc.	We have constructed designated stores for the storage of by-product Sodium Sulphate. Please find enclosed photo of sodium sulphate storage area.	Annexure -4.
5.	Dyke for scrubber	To construct dyke/ spillage collection for Alkaline scrubber to avoid soil contamination.	Dyke wall and collection pits were provided at scrubber area. Please find enclosed photos of dyke wall & collection pit.	Annexure-5.
6.	Open storage of used solvents drums	To shift the designated place after washing for disposal of re-cycler.	Used solvents drums are washed in a designated washing area, and then stored under closed condition in the Hazardous Waste storage area. Please find enclosed picture of HW storage area & designated washing area. Washing's are collected into effluent collection tank.	Annexure-6.
7.	Fugitive dust emission.	To control fugitive emission from ash handling, have proper storage area with three side cover.	Boiler ash lumps & fine ash stored in bags. Please find enclosed photos of Boiler ash bags.	Annexure-7.
8.	Scrubber system for HCl storage	To arrest HCl fumes, the storage vents shall be provided with scrubber.	Scrubber system was provided to HCl storage tanks. Please find enclosed photo of Scrubber.	Annexure-8.

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9.	Storage tank for surface runoff	To increase the capacity of surface runoff collection tank and also to remove the collection tank outlet to avoid any outside discharge.	Surface runoff collection tank's outlet was closed. Please find enclosed photo of closed outlet.	Annexure-9
10.	Management of domestic sewage	To install phytoid treatment or any other treatment for domestic sewage in place of septic tank.	We have installed domestic sewage treatment plant. Please find enclosed photo of domestic sewage treatment plant.	Annexure-10
11.	Proper operation of MEE to meet condensate water quality.	To operate MEE efficiently meet the condensate water quality for re-cycling.	We have installed Biological treatment plant and RO plant from which the condensate of good quality, is obtained and being recycled.	Annexure-11

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ANNEXURE- I



GOVERNMENT OF KARNATAKA

No:KGWA/GW/NOC/06/2021-22/2071

Karnataka Groundwater Authority,
No.1/1, KSFC Bhavan,
Thimmaiah Road, Bangalore.
Dated: 15.12.2021
E-mail: gwdkar@gmail.com
Ph No. 080-22268732

**Form 3A
(Rule-6)**

**Permission for digging/drilling a well/ Bore well/ Extraction of Groundwater for
Industrial/ Commercial/ Entertainment or other use**

M/s. Corvine Chemicals & Pharmaceuticals Pvt Ltd., Plot No. 135, Kolhara Industrial area, Bidar taluk & District Karnataka, is permitted for extraction of groundwater at Plot No. 135, Kolhara Industrial area, Bidar taluk & District Karnataka from one (01) bore well for Drinking and Industrial use.

- 1) **M/s. Corvine Chemicals & Pharmaceuticals Pvt Ltd.** is permitted to abstract **90m³/day** (not exceeding **28170m³/year**) of groundwater through **one (01) bore well** only. No additional groundwater abstraction structures to be constructed for this purpose without prior approval of the KGWA.
- 2) This NOC is valid for **three years** from **15.12.2021** to **14.12.2024**.
- 3) As per the categorization of taluks, Bidar taluk in Bidar district fall under safe taluk category. Hence, the **Groundwater Abstraction Charges** to be paid is **Rs. 90 per day**.
- 4) The Firm at its own cost shall install one piezometer, at suitable locations and execute groundwater regime monitoring programme in and around the project area on regular basis in consultation with the Senior Geologist, District Groundwater Office, Groundwater Directorate, Bidar District.

No.of Piezometers	Monitoring Mechanism		
	Manual	DWLR	DWLR with Telemetry
1	0	1	0

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Validity of this NOC shall be subject to compliance of the following conditions:

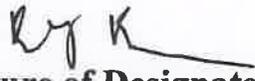
- 5) The well should not be used for drawing water for any other use other than applied for.
- 6) The withdrawal of water should be better managed to avoid wastage of water
- 7) The utilized water should be recycled and reused after necessary treatment
- 8) The construction of rain water harvesting structures in the vicinity of the well/ bore well shall be as per the technical opinion of Senior Geologist, District Groundwater Office, Groundwater Directorate, Bidar District.
- 9) The utilization of water will be subject to the regulation from time to time based on the extraction of water from the well/bore well
- 10) The pollution of groundwater resources should be avoided
- 11) Water meter with telemetry system has to be installed and data on groundwater draft is to be maintained and submitted every month to the Authority concerned. The groundwater quality to be monitored twice in a year during pre-monsoon and post monsoon periods.
- 12) **M/s. Corvine Chemicals & Pharmaceuticals Pvt Ltd**, shall, in consultation with the Senior Geologist, District Groundwater Office, Groundwater Directorate, Bidar District, implement groundwater recharge measures for augmenting the groundwater resources of the area.
- 13) The photographs of the recharge structures after completion of the same are to be furnished immediately to the Senior Geologist, District Groundwater Office, Groundwater Directorate, Bidar District, for verification.
- 14) The abstraction charges should be paid effective from 15th July 2021 and it should be deposited to the Karnataka Groundwater Authority account in the form of DD / Cash. Bank account details are given below:
 - Bank: Canara Bank.
 - Account Holder: Chairman, KGWA
 - Account No:0788201052332
 - IFSC code: CNRB0000788
 - Account type: Current account
- 15) The groundwater monitoring data in respect of Sl.No.4&11 to be submitted to Senior Geologist, District Groundwater Office, Groundwater Directorate, Bidar District on regular basis through telemetry.
- 16) The permission is liable to be cancelled in case of non-compliance of any of the conditions as mentioned in Sl.No. 1 to 14 and the applicant shall be liable to pay the penalties as per the provisions of act and guidelines.
- 17) The Karnataka Groundwater (Regulation for Protection of Sources of Drinking Water) Act, 1999 should be followed scrupulously.
- 18) This NOC is subject to prevailing Central/State Government rules /laws or Court orders related to construction of bore well/ groundwater withdrawal /construction of recharge or conservation structures /discharge of effluents or any such matter as applicable.
- 19) This NOC does not absolve the applicant / proponent of his obligation / requirement to obtain other statutory and administrative clearances from other statutory and administrative authorities.

- 20) It is also informed that during the renewal of the NOC, depending upon the hydrogeological condition the category of the area and the site conditions, the quantity will vary from permitted quantity. The company should make alternate arrangements for the reducing quantity for sustaining their industrial activity by means of availing water through local bodies or using the urban waste water after proper treatment. 24
- 21) The firm is bound to obey the directions of NGT/ court orders that are existing and that may be laid down in future in matters related to Groundwater withdrawal.

This NOC has been issued as per the proceedings drawn from the meetings held under the Chairmanship of Deputy Commissioner, District Groundwater Committee, Bidar District on 01.06.2021, the proceedings drawn from Technical sub-committee meeting of KGA held on 15.07.2021.

Place: Bengaluru

Date: 15.12.2021


Signature of Designated Officer
Karnataka Groundwater Authority


To,
M/s. Corvine Chemicals & Pharmaceuticals Pvt Ltd.
Plot No. 135, Kolhara Industrial area,
Bidar taluk & District
Karnataka

ANNEXURE 2

CORVINE CHEMICALS & PHARMACEUTICALS LTD.

Admn. Office :

Plot No. 735, Venkateswara Hills,
Road No. 3, Banjara Hills,
Hyderabad - 500 034, T.S. India.
Phones : 91-40-23354928, 23354931
E-mail : hyd1_mahipal@sancharnet.in
Website : www.corvinechemicals.com

Regd. Office :

Plot No. 135E,
Kolhar Industrial Area,
BIDAR - 585 402, Karnataka.
Phones : 08482-232204
: 08482-232297

o/c

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To,
The Environmental Officer,
KSPCB,
Bidar,
Karnataka.

Date: 01.07.2020.

Respected Sir,

Subject: Application for issue the approval for manually handling of solvent.

With reference to the above subject, we have underground storage tanks for the storage of Solvent like Benzene, Methanol and n-Hexane and we have closed loop system for handling of Benzene and Methanol. We are using solvent n-Hexane is very less quantity for the process and handling manually. We enclosed herewith MSDS of n-Hexane, Safe handling & operation procedure, Solvent spillage handling and Safety measures.

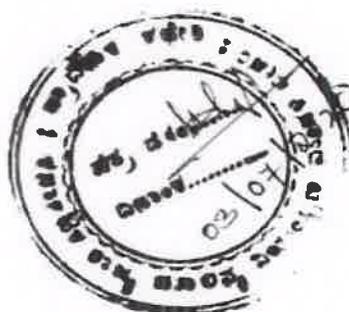
So please give necessary approval for the same.

Please acknowledge the receipt.

Thanking you,

For Corvine Chemicals & Pharmaceuticals Ltd.

Authorized Signatory,



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -3

Photos of Spillage Collection Pits at Process Area



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -4

Photo of By-Product Sodium Sulphate Storage Area.



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CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -5

Photo of Dyke wall and Collection Pit



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -6

Photo of Used Containers Storage Area



Containers are stored in designated storage area.



ANNEXURE -6

Photo of designated washing area.



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -7

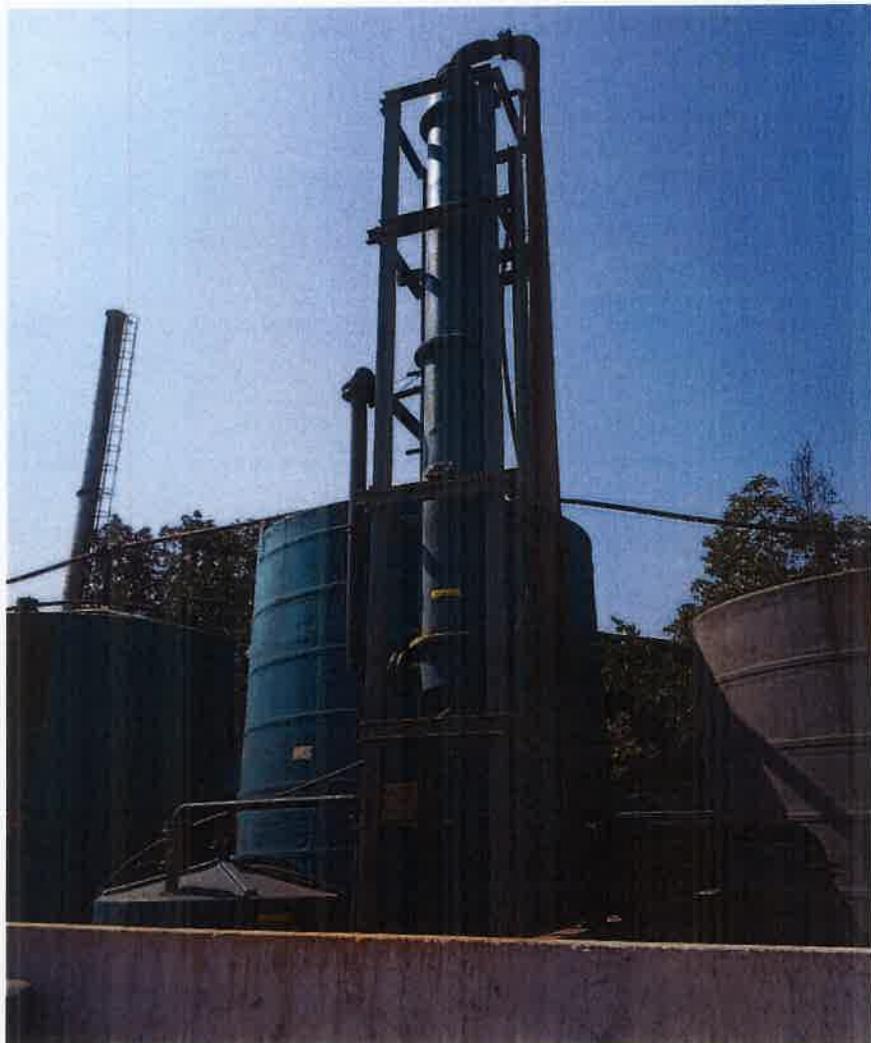
Photo of Boiler ash limps & fine ash



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -8

Photo of HCl Storage tank scrubber system



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ISO 9001:2015 & ISO 14001:2015

ANNEXURE -9

Photo of Surface runoff outlet closed



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ISO 9001:2015 & ISO 14001:2015

ANNEXURE -10

Photo of domestic sewage treatment plant.



CORVINE CHEMICALS & PHARMACEUTICALS LTD.
ISO 9001:2015 & ISO 14001:2015

ANNEXURE -11

Photo of Biological Treatment Plant



Photo of RO Plant

