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TELANGANA STATE POLLUTION CONTROL BOARD
REGIONAL OFFICE, HYDERABAD

4th floor, Collectorate Complex, Nampally Station Road, Hyderabad-500 001.
Phone: 23205367, e-mail: ee-hyd-tspcb@telangana.gov.in

Lr. No.2/ NGT-Chennai/O.A No: 43 of 2019/TSPCB//RO-HYD/2021- 205 Date:12.07.2021

To
✓ The Senior Environmental Engineers,
Legal Cell, T.S. Pollution Control Board,
Board Office, Sanathnagar,
Hyderabad.

Sir,

Sub: TSPCB – RO - Hyderabad – The petition filed O. No. 43/2019 in case of P. Madhusudan Reddy Vs State of Telangana & Ors against against de-linting units located at Gadwal & Ieeza surroundings area- Replied to the Objections – Submitted – Reg.

Ref: Mail received legal cell on 30.06.2021, 02.07.2021& 07.07.2021.

With reference cited above, It is to submit that petition filed O. No. 43/2019 in case of P. Madhusudan Reddy Vs State of Telangana & Ors against de-linting units located at Gadwal & Ieeza surroundings area. The objections filed by the applicant are received. The responded objections are not received. The Board office has directed to submit reply to objections filed by applicant. The following are the reply to the Objections are as below:

SNo	Observations of the Committee	Objections of the petitioner	Reply of the Board
1.	--	That the Status report dated 3.3.2021 submitted by the Joint Committee is in conclusive and only partial compliance was done even after 15 months of submitting its first report dated 4.1.2020. That the Committee has left several recommendations made in the first report and fixed very nominal Environment Compensation to few industries.	Based on the first recommendations of the joint committee dt: 02.01.2020, the Task Force Committee of the Board comprising of Expert External members representing Indian Institute of Chemical Technology (IICT) and National Institute of Pharmaceutical Education & Research (NIPER) reviewed status of 23 industries. Out of these 23 industries, 15 industries were carrying out cotton delinting activity and the remaining are carrying out the ginning operations where no water is used in the process and no effluents are generated. Based on the recommendation of the Committee, 21 units have been issued with the directions and remaining 2 units which are already

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			<p>closed by the Board were continued with the same.</p> <p>Presently, 14 number of industries provided own ETPs and treated water is being used for on land application. Remaining 1 unit has given a undertaking letter that the unit will not be operated till the construction of ETP. During the season (2020 -2021) from November to February 3 units were operated and the Board official collected samples. The Board officials effluent samples were collected from inlet and outlet of ETP & also soil samples. The analysis reports indicate concentrations within the standards. During the inspections, no discharges are observed outside the premises. (Annexure- I)</p> <p>As per the directions of the Hon'ble NGT, based on the recommendations of the Task Force Committee, the Board has levied Environmental Compensation on 17 units including 2 ginning units which earlier carried out cotton delinting activity. The Environmental Compensation was calculated from season (2018 to 2020) November to February.</p> <p>Out of 17 units, 12 Nos of units have partially paid Environmental compensations, 1 unit has paid total and remaining 4 units are yet to pay.</p> <p>As these units are seasonally operated, presently, all the units are not in operation. Before the start of ensuring season i.e., November, 2021 the Board will again carryout inspection of all the units and only those units which are complying and have</p>
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			paid Environmental Compensation will be permitted to operate.
2.		<p>That the industries have been causing pollution right from 1997-98. Some of the units have started between 2007-15. But the Joint Committee has imposed Environment Compensation based on the inspection conducted on 6.1.2020. The State PCB is having complete record about the functioning of the Units. It has issued Show cause notices, directions and even closer orders to the units several times from 2012-18. Even in the TSPCB orders annexed with the first Joint Committee report refers about the earlier directions issued on 21.3.2018. That that is considered, the Environment compensation has to multiplied 3 times to the present EC.</p>	<p>As per the directions of the Hon'ble NGT, based on the recommendations of the Task Force Committee, the Board has levied Environmental Compensation on 17 units including 2 ginning units which earlier carried out cotton delinting activity.</p> <p>The Environmental Compensation was calculated from season (2018 to 2020) November to February.</p> <p>Out of 17 units, 12 Nos of units have partially paid Environmental compensations, 1 unit has paid total and remaining 4 units are yet to pay.</p> <p>As these units are seasonally operated, presently, all the units are not in operation. Before the start of ensuring season i.e., November, 2021 the Board will again carryout inspection of all the units and only those units which are complying and have paid Environmental Compensation will be permitted to operate.</p>
3.	That the comparative chart showing the non implementation of the recommendations of the Joint Committee and lenient view taken at the time of imposing Environment compensation are placed as under:		
	Observations of the committee report dt: 04.01.2020	Objections raised by the Applicant	Reply by the Board
i)	All the 23 cotton ginning and cotton seed processing industries were inspected by the committee members. During inspection, the industries were operating only ginning and cotton seed processing de-linting was not operational.	During the inspection done by the Joint Committee, violations found in 23 units. But Environment Compensation imposed only on 15 units restricting the compensation to delinting. Illegal extraction of ground water, damage caused to soil, affect on the workers, air pollution, noise nuisance etc are not considered in the Status Report.	The Board has reviewed status of 23 industries. Out of these 23 industries, 15 industries were carrying out cotton delinting activity and the remaining are carrying out the ginning operations where no water is used in the process and no effluents are generated.

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			<p>The Board has levied Environmental Compensation on 17 units including 2 ginning units which earlier carried out cotton delinting activity.</p> <p>Environmental Compensation was based on the recommendations of the Task Force Committee as per the CPCB guidelines duly considering the non compliance of consent conditions.</p> <p>The list of industries on which Environmental Compensation is levied is enclosed as Annexure -II .</p>
ii)		<p>No action taken on the factual report of the Committee:</p> <p>From the observations of industries, analysis results of the soil samples and the manifest copies of JETL confirms that the industries operating de-tinting /cotton seed processing are illegally discharging untreated acidic effluent into their own agricultural land.</p>	<p>The Joint Committee recommended that the TSPCB may issue amendment to CFO after rectifying the drawbacks identified by the Committee members in the operation of the ETPs.</p> <p>Based on the NGT joint committee recommendation, the industries has modified the ETP i.e.,</p> <ul style="list-style-type: none">• The industries have provided collection cum neutralization tank for pH neutralization instead of mixing in the primary clarifier.• The Industries have interchanged the softener and Dual Media Filter (DMF) positions.• Outlet of the aeration water is sent to softener instead of DMF and the treated water of DMF is used for irrigation. <p>The Board has permitted own ETPs after above modifications as suggested by the Joint Committee.</p> <p>During the season (2020 - 2021) from November to</p>

			<p>February 3 units were operated and the Board official collected samples from inlet and outlet of ETP. The analysis reports indicate concentrations within the standards. During the inspections, no discharges are observed outside the premises.</p> <p>The units are members of TSDF. The industries which are in operation are sending ETP sludge to TSDF.</p>
ii) iv)		<p>No action taken on the Action taken report of the Committee:</p> <p>During inspection of the 23 industries in question, the 15 de-tinting industries informed that the lint after ginning is sent to other States for de-tinting. But the industries failed to produce the transfer certificate which draws suspicion. Even after issuing letter to submit the copy within two days to RO, Hyderabad, the industries failed to respond. Further, the letter was written on December 13, 2019 to District Collectorate of Jogulamba Gadwal District and TS PCB to provide the copy of transfer certificate for confirmation.</p> <p>Based on the inspection & directions of the committee, TS PCB issued closure direction to M/s Sri Venkateswara Cotton Ginning & Processing Unit, Kistareddy Bangla on December 31, 2019 for operating without valid consent</p>	<p>The Sri Venkateswara Cotton Ginning & Processing Unit, Kistareddy Bangla has obtained CFO of the Board vide order dated 05.10.2017 which expired on 31.12.2018 and the Board has issued Closure order on 12.02.2016. Subsequently, temporary revocation was issued upto 31.03.2019. A letter was addressed to TSSPDCL, Gadwal district on 28.12.2019 and The TSSPDCL has disconnected power connection on 31.12.2019 and still the unit is under closure.</p>
v)		<p>Not reflected in the Status Report the Committees recommendations.</p> <p>The units which are stopped delinting were not imposed EC for the past violations. That the Association of the Units them self admitted in their representation made to the TSPCB that they have been operating the units from 2007. Hence the violations are going on from that date. But EC imposed from January, 2020</p>	<p>As per the directions of the Hon'ble NGT, based on the recommendations of the Task Force Committee, the Board has levied Environmental Compensation on 17 units including 2 ginning units which earlier carried out cotton delinting activity. The Environmental Compensation was calculated from season (2018 to 2020) November to February.</p>

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		which is completely erroneous.	
4.		<p>That causing pollution, non-implementation of environment norms by the Respondent units has become money earning tool for the officials and self-interested persons. That several complaints were made to PCB on the pollution of the Respondent Units and cases also filed before this Hon'ble Tribunal and Hon'ble High Court for the State of Telangana and Andhra Pradesh way back in 2015 vide Application No. 196 of 2015 (SZ) and PIL No. 26 of 2015. But the complaints/cases are not taken to logical end due to unknown reasons and the officials also not taken stringent action though they are aware of the violations.</p>	<p>As per the directions of the Hon'ble NGT, the Board has implemented the recommendations of the Joint Committee by ensuring the modification of ETPs by the industries and levying the environmental compensations for non compliance.</p> <p>During the season (2020 - 2021) from November to February 3 units were operated and the Board official collected samples from inlet and outlet of ETP. The analysis reports indicate concentrations within the standards. During the inspections, no discharges are observed outside the premises.</p> <p>As these units are seasonally operated, presently, all the units are not in operation. Before the start of ensuring season i.e., November, 2021 the Board will again carryout inspection of all the units and only those units which are complying and have paid Environmental Compensation will be permitted to operate.</p>

This is submitted for kind information

Encl:as above,

Yours faithfully,



ENVIRONMENTAL ENGINEER



Analysis Report

Reg. No.SR/05/TSPCB/HO/R00/LAB/2021/2324
Collected on: 15/02/2021
Test method: USEPA, SW846 & APHA 23rd Edition
Issue date: 24/02/2021

Collected by: R.O. Hyderabad.
Received on: 16/02/2021
Quantity of the sample: 500 gr.
Page No.: 1 of 1

Source: M/s. Sree Ramya Industries, Sy.No. 244/KA, KA (PAIKI), KHA, Mellacheruvu (V), Gadwal (M),
Jogulamba Gadwal District-509125.

Sample code : Sample details / collection point

2324 : Soil sample collected from onland discharge of ETP treated water.

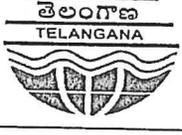
Parameter (s)	Results (2324)	Standards as per CRIT and TCLP Standards as per Schedule – II of HWM Rules 2016
Colour	Brown	-
State	Solid	-
pH	3.56	≤2 (Hazardous) ≥12.5 (Hazardous)
Electrical Conductivity in µs/cm	5320	-
Loss on Ignition at 550 ⁰ C (%w/w)	6.0	-
Flash point (degrees centigrade)	No flash < 60 ⁰ C	T-flash < 60 ⁰ C is hazardous
TCLP- Copper mg/l	<0.1	25
TCLP -Zinc mg/l	0.24	250
TCLP -Cadmium mg/l	<0.1	1.0
TCLP -Nickel mg/l	0.87	20
TCLP -Lead mg/l	ND	5.0
TCLP-Chromium mg/l	<0.1	5.0

Note: Results related to sample as received.

ND: Not Detected.

JOINT CHIEF ENVIRONMENTAL SCIENTIST (FAC)

.....End of Report.....

	TELANGANA STATE POLLUTION CONTROL BOARD ZONAL LABORATORY: HYDERABAD ZONE H.No : 1-8-269, Balasamudram, Warangal – 506001
	ISO-9001 & OHSAS-18001 Certified Laboratory Certificate's No:- Q-180211 & 180204-S

Form IV
Report by the State Board Analyst
(See rule 14)

Annexure - I

Sample Codes. ZLWGL21-013750 to 013754
Dated the 20th January, 2021

I hereby certify that I, Smt. R. Parvathi, State Board Analyst, Zonal Laboratory duly appointed under sub-section (3) of section 53 of the Water (Prevention and Control of Pollution) Act, 1974 (6 of 1974) received the day of 15.01.2021 from the Zonal laboratory, Warangal, effluent sample of M/s. Sree Ramya Industries, Sy.No. 244/KA, KA (PAIKI), KHA, Mellacheruvu (V), gadwal (M), Jogulamba Gadwal District collected on 11.01.2021. The sample was in a condition fit for analysis reported below:

Sample code	Sample source
ZLWGL21-013750	Collection tank (Inlet of ETP)
ZLWGL21-013751	Outlet of Newtralisation tank
ZLWGL21-013752	Outlet of settling tank
ZLWGL21-013753	Outlet of aeration tank
ZLWGL21-013754	Outlet of ETP

I further certify that I have analyzed the aforementioned samples from 15.01.2021 to 20.01.2021 and declare the result of the analysis to be as follows: -

S. No.	Parameter	Method (*)	Unit	Sample Code					CFO Standards
				013750	013751	013752	013753	013754	
				Values					
1	pH at 25°C	4500-B	-	1.74	10.80	5.88	8.36	8.17	5.5-9.0
2	Total Suspended Solids at 105°C	2540-D	mg/l	1062	211	416	408	192	200
3	Total Dissolved Solids (TDS)	2540-C	mg/l	8270	4135	2236	2012	1200	-
4	Chemical Oxygen Demand	5220-B	mg/l	7595	3600	2088	604	190	-
5	BOD ₃ at 27 ^o C	IS-3025 (1993)	mg/l	-	-	-	-	26	30
6	Oil & grease	5520 A	mg/l	-	-	-	-	NIL	10

The condition of the seals, fastening and containers on receipt was intact.

Signed this on 20th January, 2021

Units: • All values are expressed in mg/l, except pH.

Note: • *Standard methods of APHA, 23rd Edition.
• Results related to sample as received.

Address:
Smt. R. Parvathi,
Senior Environmental Scientist (FAC),
T.S. Pollution control Board
Zonal Laboratory, Warangal.

R.P.
Board Analyst
BOARD ANALYST
T.S. Pollution Control Board
Zonal Laboratory Hyderabad Zone
Warangal-506 001.

Annexure -II The list of industries on which Environmental Compensation is levied

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SNO	Name of the industry
1	Nageswar Reddy and others cotton Seed Ginning Mill, Ieeja Town (Sai Laxmi Venkateshwara Processing Unit, Sy.No.894/B,Medikonda Road, Ieeja (V&M), JogulambaGadwalDist)
2	Sri Sai Ram Ginning and Processing Unit.,Sy.no.891/A, 891/B, Ieeza (V & M), Jogulamba District
3	Sree Ramya Industries, Sy.No. 244/KA, KA(PAIKI), KHA, Mellacheruvu (V), Gadwal (M), Jogulamba District
4	Image Crop Sciences Pvt. Ltd., Sy.No.412/A/2, Vemula (V), Itikyal (M), Mahaboobnagar Dist.
5	Sri Sai Hybrid Cotton Seeds Processing Industries, Sy No: 186/jna2, 186/jna1/1, paramala (Gp), Paramala (V), Gadwal (M), Gadwal District
6	YSR Seed Processing Plant, Sy No. 221/KA, Ieeja Road, Gadwal (V &M), Jogulamba District
7	Sri Laxmi Venkateshwara Seed Processing Unit,Sy.no.184 & 185, Paramala (V), Gadwal (M), Jogulamba District
8	Sree Laxmi Srinivasa Ginning Mill, Sy.No. 132 & 149, Paramala (GP), Paramala (V), Gadwal (M), Jogulamba District
9	Sree Manikanta Seed Processing Industries, Sy No: 184/KHA, Meelacheruvu, Jogulamba District
10	Sri Lakshmi Venkataramana Ginning & Processing Unit, Sy.No: 170/k, Ieeja Road at Gadwal , Jogulamba District:
11	N.A.K.R. Processing Unit, S.No.174/KA, 175/5, Parumala (V), Ieeja Road, Gadwal (M),Jogulamba District
12	Sri Venkateshwara Ginning and Seed Processing Plant, Sy.No. 840, D.No.7-7-971/B, Ieeja Road, Gadwal (V&M), Jogulamba District
13	Sri Ayyappa Swamy Cotton Ginning Mill, Sy.No:858/Aa, Near Milk Coling Center, Gadwal, Jogulamba Gadwal Dist,509125
14	Aparna Cotton Traders , sy-no: 192/ka/2, 192/ka/5, 192/ka/6 , Paramala (GP), Paramala (V), Gadwal (M), Jogulamba Gadwal District
15	Sri Venkateswara Cotton Ginning & Processing Unit,Kistareddy Bangla, Godowns Bearing No.3-1-1, Kista Reddy Bangla, Gadwal (M), Jogulamba Gadwal District,509125
15	Sree Balaji Ginning Mill,Sy No: 888/b2, Ieeja(V & M), Jogulamba Gadwal Dist,509127
17	Vigneshwara agritech (formely Sri Laxmiprasanna Ginning Mill,) Sy.No 911, Near Bharath Petrol Bunk Ieeja Chowrastha,Ieeja (V & M), Jogulamba Gadwal Dist,509127

