

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL SOUTHERN ZONE  
BENCH AT CHENNAI  
APPEAL NO 68 OF 2021**

**IN THE MATTER OF:**

M/s. Sri Mahalakshmi Hatcheries  
& Ors

..Appellants

Versus

State Environment Impact Assessment  
Authority & Ors

..Respondents

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Dated at Chennai on this the 11<sup>th</sup> Day of November 2021.



**COUNSEL FOR RESPONDENT NO.3**

# **Pre-Feasibility Report**

**for**

**Proposed**

**Bulk Drugs & Intermediates manufacturing unit  
at Krishnapatnam Industrial Area, Kothapatnam (V),  
Kota (M), SPSR Nellore (D), Andhra Pradesh**

**Submitted to**

**Ministry of Environment, Forests & Climate Change,  
GOI, New Delhi**

**Submitted by**

**M/s Divi's Laboratories Limited,  
1-72/23(P)/Divis/303, Cyber hills, Gachibowli, Hyderabad –  
500032, Telanagana**

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(NABET/EIA/1619/RA 0046)**

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## Pre - Feasibility Report

### 1.0 Executive Summary

The Divi's Laboratories Limited was established in the year 1990, with Research & Development as its prime fundamental. Divi's Laboratories focused on developing new processes for the production of Active Pharmaceutical Ingredients (APIs) & Intermediates. The company in a matter of short time expanded its breadth of operations to provide complete turnkey solutions to the domestic Indian pharmaceutical industry. With five years of experience, expertise and a proven track-record of helping many companies with its turn-key and consulting strengths, Divi's Laboratories established its first manufacturing facility in 1995, built on a 500 acres site at Hyderabad (Unit-I). The plant comprises of 13 multi-purpose production blocks and has space for further growth and expansion. Divi's Laboratories had set up its second manufacturing facility at Visakhapatnam (Unit-II) in the year 2002 in a 350 acres site. The site has 14 multipurpose production blocks. Divi's Laboratories is planning to establish a few more units in Andhra Pradesh. As a part of this, one unit has been planned at Ontimamidi Village, East Godavari District in Andhra Pradesh for which necessary permission was obtained and for the other unit planned at Kothapatnam Village, SPSR Nellore District, appropriate lands have been identified and process of obtaining necessary clearance from statutory authorities is in progress.

The proposed Divi's Laboratories Limited Unit in Krishnapatnam Industrial area is a commercial facility for manufacturing APIs & intermediates with a firm commitment towards environmental care. This proposed manufacturing facility would be established in Krishnapatnam Industrial area with an area of 81.74 Ha (202 Acres) identified for establishing multipurpose production blocks in Kothapatnam village, Kota mandal, SPSR Nellore District of Andhra Pradesh.

**Table 1 - Site Features**

Name of the Project	Divi's Laboratories Limited, Krishnapatnam Industrial area
Land Area	81.74 Ha (202 Acres)
Survey Numbers	397, 401, 402, 403, 446, 676, 681, 682, 683, 700 to 709
Land Coordinates	1. 14°10'05.82"N, 80° 05'55.00"E 2. 14° 9'43.56"N, 80° 05'51.80"E 3. 14° 9'43.74"N, 80° 06'24.21"E 4. 14°10'13.64"N, 80° 06'29.57"E 5. 14°10'16.20"N, 80° 06'16.88"E 6. 14°10'05.53"N, 80° 06'14.13"E
Nearest village	Yamadhinnepalem, Kothapatnam SE (adjacent)
Nearest Railway Station	Venkatachalam 26 km NW
Nearest City	Nellore (District Head Quarters) 33 km NW

Nearest Airport	Sri Venkateswara Airport, Renigunta 84 km SW
Nearest Highway	NH 16 (NH5) 25 km SW
Water Supply	Nearby Surface Water/Bore wells
Manpower Required	2200 (1000 supervisory and 1200 non-supervisory)
Working Hours	On shift basis, industries to run 24 Hours
Estimated Cost	Rs. 150 Crores

## 2.0 Introduction of the Project / Background Information

### 2.1 Identification of the Project and Project Proponent

As per EIA Notification S.O. No. 1533 issued on 14<sup>th</sup> September, 2006 and its subsequent amendments, the proposed project falls under Project/Activity 5(f) i.e. Synthetic Organic Chemicals Industry. This project/activity falls under Category 'A', as the project is proposed to be located outside the Notified Industrial Area/Estate and requires Environmental Clearance from Expert Appraisal Committee (EAC), Ministry of Environment, Forest and Climate Change (MoEF&CC), New Delhi.

Mr. Rao Divi, the Project Proponent is the Director (Projects) of Divi's Laboratories Limited. He is a post-graduate in Structural Engineering from Mysore University. He started his career as a Senior Engineer with M/s Howe India and had executed several off-shore and on-shore construction projects such as Vizag Outer Harbour Project. He looks after environment management, project implementation, production planning and regulatory affairs. He is responsible for implementing the new projects under capital expenditure plans of the company, plant upgradation to comply with Food and Drug Administration (FDA) requirements, environment management and overseeing logistics at plant.

### 2.2 Brief description of nature of the project

M/s Divis Laboratories Limited has identified and purchased around 81.74 Ha (202 Acres) of land from Krishnapatnam infratech limited for establishing the proposed APIs and intermediates manufacturing facility at Krishnapatnam Industrial Area, Kothapatnam (V), Kota (M), SPSR Nellore (D), Andhra Pradesh. The site is in close proximity (aerially about 120 km) from Chennai, Sri Venkateswara Airport in Renigunta (at about 84 km SW) and Venkatachalam Railway station (at about 26 km NW). The nearest major town from the site is Nellore (located around 33 km NW) which is also the district headquarters.

The production and manufacturing of APIs and intermediates involves the use of various raw materials. In addition, chemical reactions like precipitation, substitution, addition reactions and physical processes like centrifugation, purifications, solvent recovery etc., are also involved.

The project site photographs are shown as **Figure 1**.

**Figure 1 – Site Photographs****East Side of the Site****North Side of the site****South side of the site****South side road to Yamainnepalem**

### **2.3 Need for the Project and Its Importance to the Country and Region**

Increase in population, continuous change in lifestyle and physical environment has resulted in the increased demand for drugs and medicines to address the well-being of mankind. The sustainable development of an Indian pharmaceutical industry is important in order to make India one of the largest global providers of quality medicines at reasonable prices. With huge experience, expertise and a proven track-record of helping many companies with its turnkey and consulting strengths, the establishment of new manufacturing units will enable easy availability, accessibility and affordability of drugs to all groups of people.

### **2.4 Demand-Supply Gap**

Divi's Laboratories Limited has intended to develop and manufacture intermediates for many MNC customers by undertaking contract research work for them. The project is envisaged to meet the demand-supply gap in both domestic market and export market, as API demand is increasing day by day.

## **2.5 Imports vs. Indigenous production**

The project shall reduce imports of some intermediate products and also enhance the foreign exchange reserves in view of the proposed exports of a few products.

## **2.6 Export Possibility**

Divi's have vast experience in the field of bulk drugs manufacturing and with all these capabilities, they are proposing to supply the products within India and abroad by establishing this bulk drug manufacturing unit.

## **2.7 Domestic / Export Markets**

The bulk drugs manufactured in the proposed unit are expected to meet the demand-supply gap in both domestic and export markets.

## **2.8 Employment Generation (Direct and indirect) due to the project**

The proposed project for manufacturing of synthetic organic chemicals – bulk drugs & intermediates requires substantial handling of raw materials, goods in process and finished goods. The proposed project is expected to generate direct and indirect employment to around 2200 persons under various categories (skilled, unskilled, managerial staff, etc.)

- Supervisory 1000
- Non-supervisory 1200

## **3.0 Project Description**

### **3.1 Location of the Project and Project Boundary**

The site for the proposed project is located at Krishnapatnam Industrial Area, Kothapatnam village, Kota mandal, SPSR Nellore District of Andhra Pradesh. The site is surrounded by KPIL land (towards Sea) in the East, road in the West, KPIL land & Reserved Forest in the North and village road in the South.

The location map of the project site is given as **Figure 2**. The 10 km radius google map of project site is given as **Figure 3**.

Figure 2 - Project location

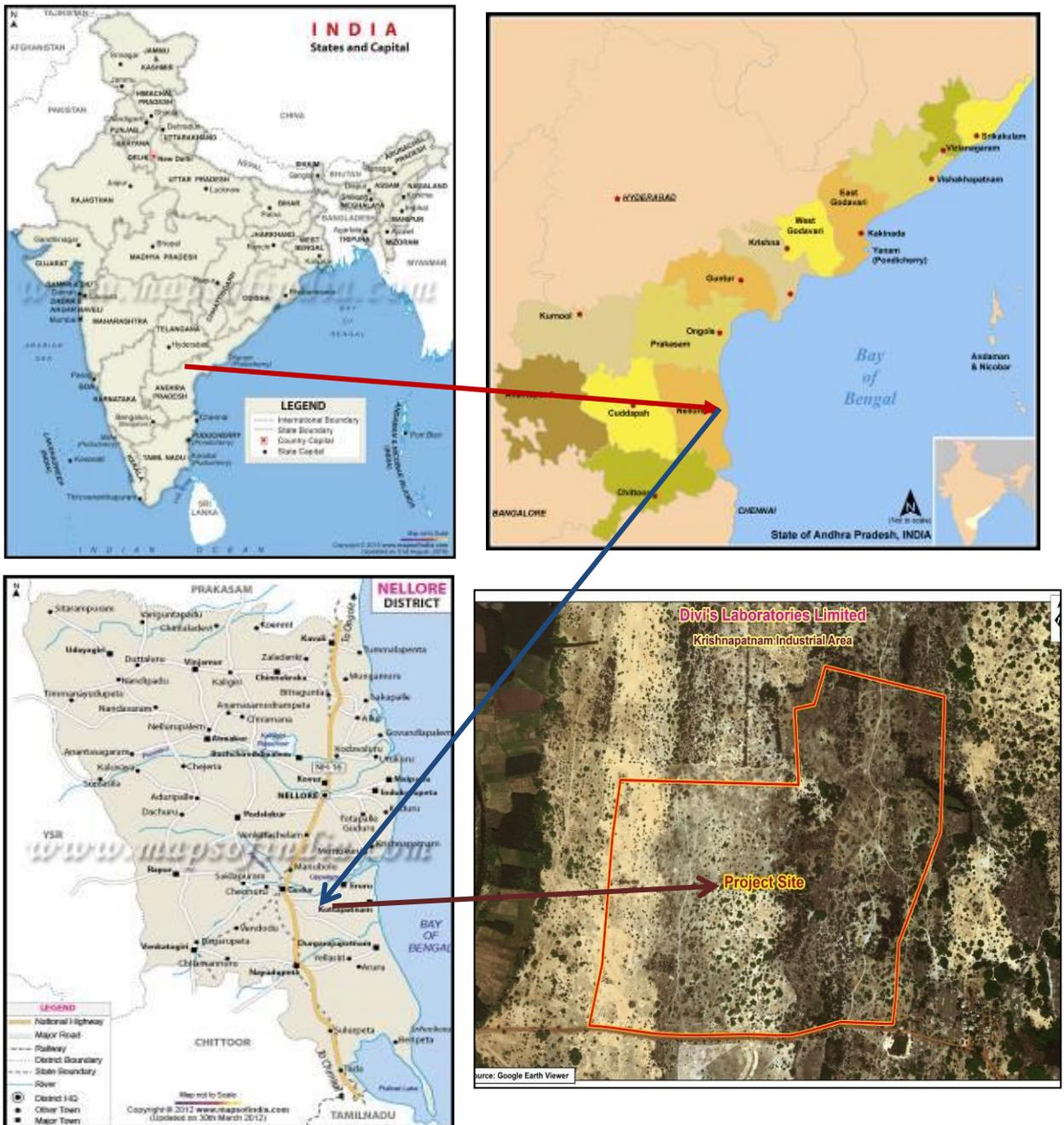
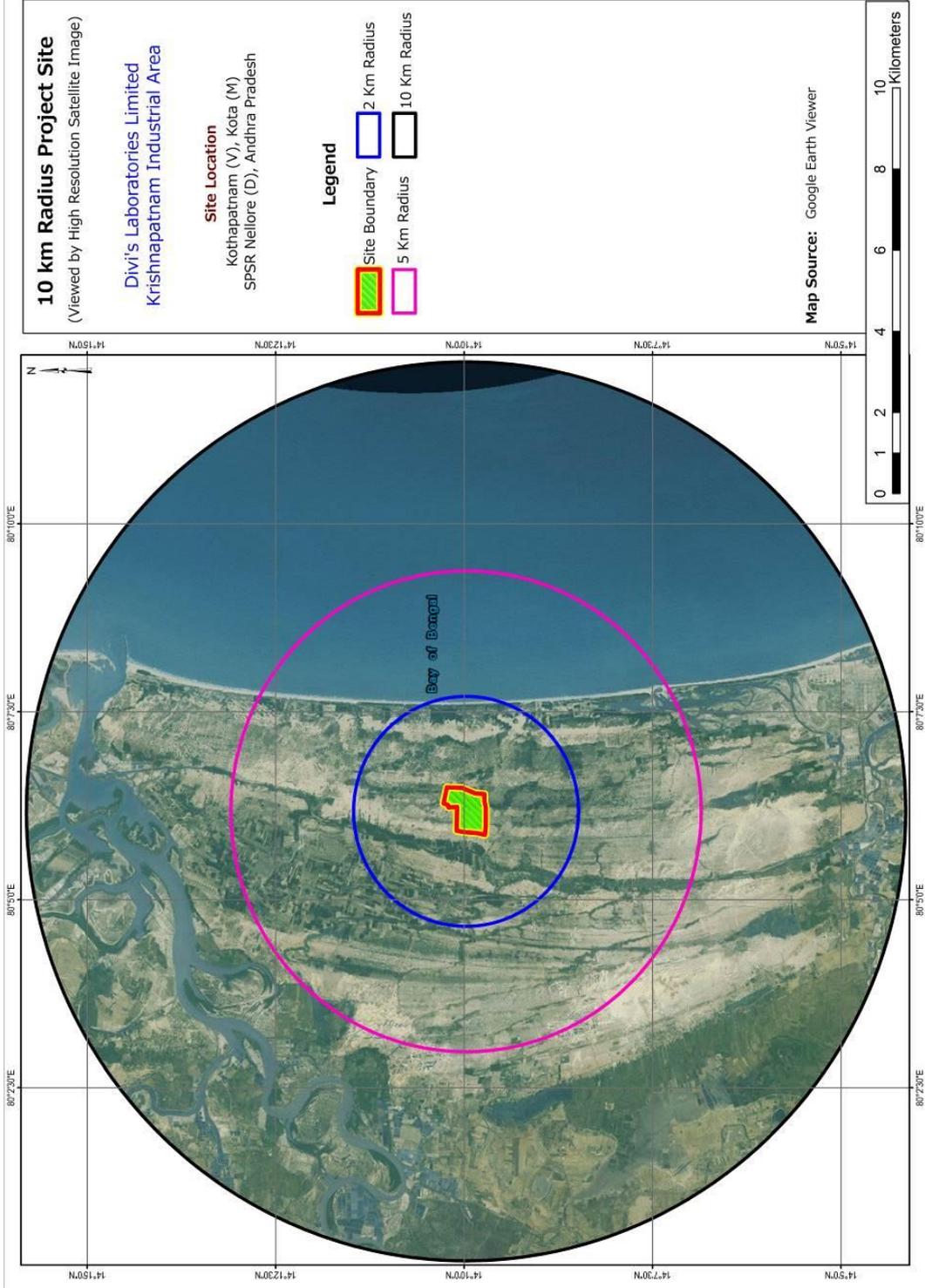


Figure 3 - Google map of the project site – 10 km radius



### 3.3 Details of Alternate Sites Considered and the Basis of Selecting the Proposed Site

For the proposed bulk drugs manufacturing unit, three sites have been identified at various places of Andhra Pradesh. After a detailed assessment of various environmental and financial implications, Kothapatnam village, Kota mandal, SPSR Nellore District of Andhra Pradesh has been identified as the most suitable site for the proposed project. The proposed site in Kothapatnam village is selected in view of environmental and economic perspectives.

**Table 2 - Comparison of alternate sites for the proposed project**

Details	Sitting Guidelines	Alternative Site - 1	Alternative Site - 2	Alternative Site - 3
<b>Land Coordinates (Latitude &amp; Longitude)</b>		1. 14°10'05.82"N, 80° 05'55.00"E 2. 14° 9'43.56"N, 80° 05'51.80"E 3. 14° 9'43.74"N, 80° 06'24.21"E 4. 14°10'13.64"N, 80° 06'29.57"E 5. 14°10'16.20"N, 80° 06'16.88"E 6. 14°10'05.53"N, 80° 06'14.13"E	17°07'55.97"N 82°23'35.90"E	17°14'19.70"N 82°30'56.20"E
<b>Location</b>	-	Kothapatnam (V), Kota (M), SPSR Nellore District , Andhra Pradesh	Kona papaya peta (V), Kottapalli (M), East Godavari District, Andhra Pradesh	Vamavaram (V), Thondangi (M), East Godavari District, Andhra Pradesh
<b>Ecological Sensitive Areas</b>	At least 25 km	None in the study area.	None in the study area	None in the study area
<b>Coastal Areas</b>	½ km from high tide line	Bay of Bengal 2.1 km, East	Bay of Bengal. <0.5 km, East and South East	Bay of Bengal. <1 km, East, South East and East
<b>Flood plain of Riverine system</b>	½ km from flood plain	There is no Riverine system in < 0.5 km. Buckingham Canal – 0.4 km West	There is no Riverine system in < 0.5 km.	There is no Riverine system in < 0.5 km.
<b>Transport &amp; Communication</b>	½ km from highway & railway	NH 16 (earlier NH-5) 25 km, South West Mannegunta-	NH-214; 10.6 km; North West Kakinada – Tuni Beach road ,	NH 16 (earlier NH-5) 10 km, North West Kakinada – Tuni

Details	Sitting Guidelines	Alternative Site - 1	Alternative Site - 2	Alternative Site - 3
		Kothapatnam Road, adjacent to site in South Railway station: Venkatachalam- 26 km, North West	adjacent, South-South East - East , NH 16 (earlier NH-5) 14.0 km, North West	Beach road, <0.1 km, North West and North.
<b>Major settlements (3 Lakhs population)</b>	At least 25 km	Kota Mandal Headquarters, 15 km South West	Kona papaya peta adjacent to the site, East	Vemavaram village, <0.2 km, North East
<b>Rehabilitation &amp; Resettlement (R &amp; R) issues</b>		Not required	Requires R & R	Requires R & R
<b>Type of land</b>	Avoid Prime Agri Land	Private land belonging to Krishnapatnam Infratech Limited falling in Krishnapatnam Industrial area	There are nearby hatcheries and villages	Low laying area, water stagnation during floods
<b>Remarks</b>	Apart from the above mentioned suitable criteria, <b>site 1</b> was selected for the establishment of proposed project as the site is part of proposed Industrial corridor of Visakhapatnam -Chennai- Bangalore at Krishnapatnam Node approved by Government of India. The site is also under the proposed Coastal Economic Zone.			

### 3.4 Size or Magnitude of Operation

The total area required for setting up of proposed project is **81.74 Ha (202 Acres)** and the proposed manufactured products are given below.

**Table 3 - List of products and manufacturing capacity**

S. No	Product Chemical name	Production Capacity (MTPA)
1	1-(6-methoxy-2-naphthyl)ethanone	5000
2	2-(S) - Acetoxy propionylchloride	72
3	ATIPA DICHLORIDE	300
4	3- Hydroxy acetophenone	320
5	p-methoxy phenyl acetic acid	780
6	2-(1-cyclohexenyl)ethylamine	540
7	Octamandalate	780

S. No	Product Chemical name	Production Capacity (MTPA)
8	Dextromethorphan HBr	420
9	4-(4-chlorophenyl)cyclohexanecarboxylic acid	50
10	Benzyladrinone HCl	500
11	2(n-butyl)-4-chloro-5-formyl imidazole	300
12	Z-L Valine	180
13	C10-Dialdehyde	150
14	1,2,3-Tri-O-Acetyl-5-deoxy-n-ribofuranose	50
15	N-Hydroxysuccinimide	60
16	Dimethylacetylene di carboxylate	60
17	DL-2,2-dimethylcyclopropane carboxylic acid	10
18	ACETONIDE	132
19	I-Pentanol	84
20	Astaxanthin	60
21	B-Carotene	150
22	Beta-iolidine ethyl triphenyl phosphene bromide	380
23	Lycopene	25
24	Canthaxanthin	5
25	APO Carotenol	25
26	Lutein	50
<b>Total</b>		<b>10483</b>

### 3.5 Project description with process details (a schematic diagram/ flow chart showing the project layout, components of the project etc. should be given)

The project is proposed for manufacturing of bulk drugs and intermediates. The project consists of production blocks, facilities for the storage of raw materials, solvents and finished product, water storage tanks, waste material yards, cooling tower, service blocks, admin building, parking, canteen, ETP, STP, Coal storage yard, hostels etc. The layout also consists of greenbelt all along the boundary, roads for movement of vehicles and firefighting system. The site will have two entry and exit points. The detailed project layout is given in **Figure 4**.

### 3.6 Raw material required along with estimated quantity likely source, marketing area of final product/s, mode of transport of raw material and finished product

All the raw materials required for manufacturing are mostly available in India. There are no banned chemicals/products proposed to be used in the project. It is proposed to enter into long term arrangements with some of the raw material suppliers both in India and overseas to avoid shortages at any time. The major mode of transportation of raw materials will be through road/rail; however, Krishnapatnam port which is 10 km towards north of the site will be used, if required.

### **3.7 Resource Optimization/ Recycle and Reuse**

New and creative approach will be adopted to enable less waste intensive production by regular up-gradation of process technology. The byproducts, spent acids, fly ash etc., will be given to authorized recyclers/reusers.



### 3.8 Availability of water its source, energy/power requirement and source should be given

#### Water

The total water requirement for the proposed project is 3200 KLD, which will be drawn from the bore wells and nearest surface water bodies. The detailed water balance is presented in **Table 4**. The schematic diagram of effluent treatment plant is given as **Figure 5**.

**Table 4 - Water requirement and wastewater generation**

Description	Water Requirement			Loss	Waste Water Generation
	Fresh	Treated	Total		
Process	810	--	810	--	1002
Reactor, Floor Washing etc	200	--	200	20	180
RO / DM Plant	200	--	200	--	200
Boiler	500	--	500	75	425
Cooling Tower	200	500	700	280	420
Domestic Needs	100	--	100	10	90
Hostels	170	--	170	17	153
Greenbelt	320	200	520	--	--
<b>Total</b>	<b>2500</b>	<b>700</b>	<b>3200</b>	<b>402</b>	<b>2470</b>

#### Source of Water

- Water required for the proposed project can be drawn from both surface and ground water sources
  - Ground water is available at the depth of 15-18 ft.
  - It is proposed to have three bore wells within the premises to meet the preliminary/ initial requirement.
  - Govt of AP accorded in principle approval to allocate 5-6 TMC of water from Kandaleru reservoir (dead storage) to the proposed industrial activities at Krishnapatnam.
  - Industrial water supply shall be requested from Govt of AP at the door step of the Unit as per the Industrial Development Policy of Govt of AP.
  - Alternative sources to meet the water requirement are
    - Supply from Kandaleru Reservoir through a combination of open channel/pipeline
- OR
- Supply from Somasila Reservoir through a pipeline along the riverbed through Sangam and Nellore Anicuts and further conveyance through Sarvepalli Channel

- Divis shall requisite the permission from the state government in this regard which will be taken in due course.
- Desalination of seawater is another alternative to ensure continuous and assured water supply to unit.

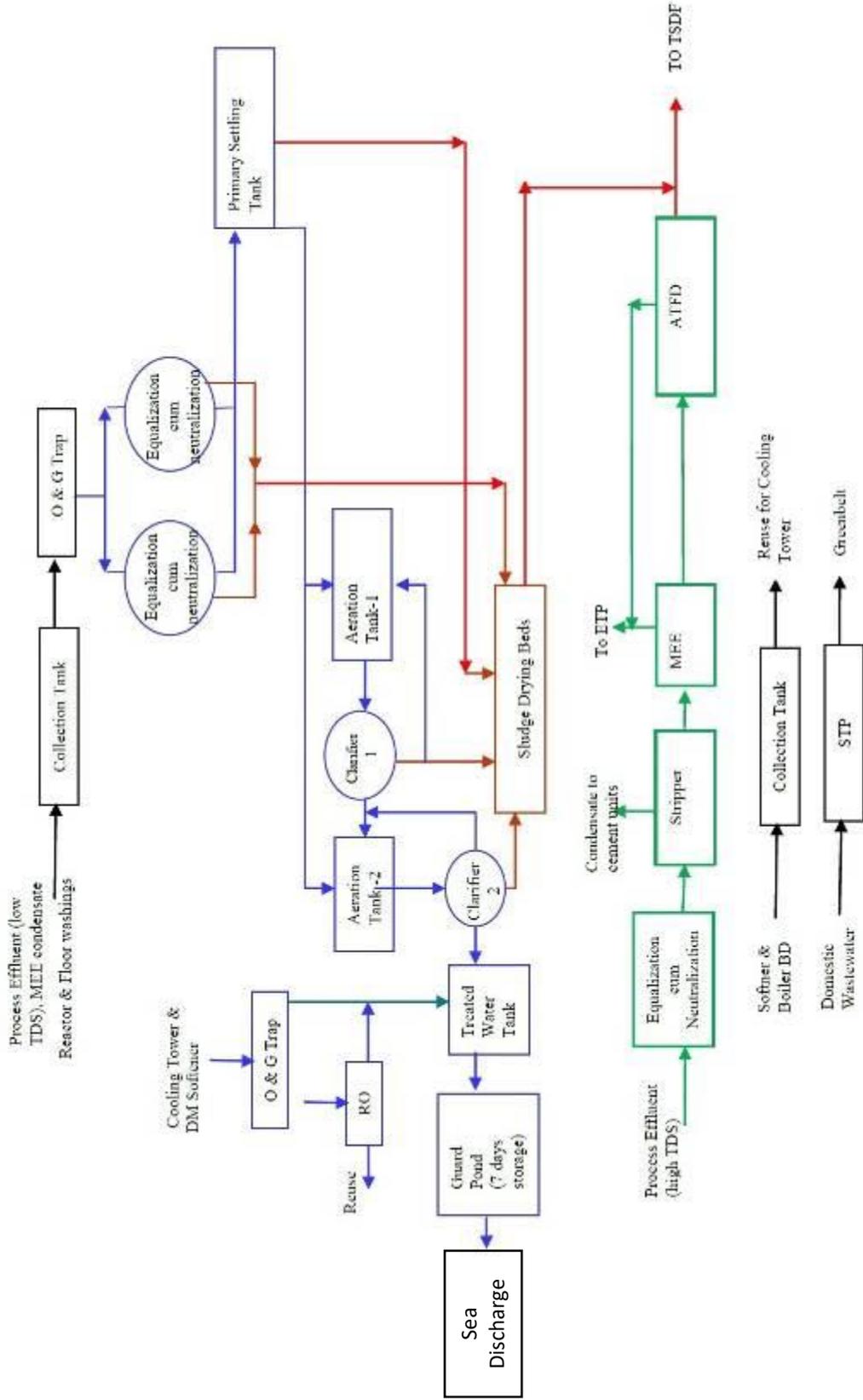
### Electricity

The electricity requirement will be fulfilled by the nearby APTRANSCO substation. Further requirement and power back up will be supported by proposed DG sets. The details of power requirement are given in **Table 5**.

**Table 5 - Power and fuel requirement**

S. No	Details	Capacity/Units	Remarks
1	Power	35 MW	APTRANSCO
2	DG Sets	5x1500 kVA 4x1250 kVA 1x1000 kVA 1x320 kVA	For emergency during power failure
3	Boiler	24 TPH	Coal consumption 120 TPD
4	Incinerator	9 TPD	For hazardous waste incineration

Figure 5 – Schematic diagram of ETP



**3.9 Quantity of wastes to be generated and Scheme for their Management/disposal**

The details of solid waste and hazardous waste generated from production blocks and ancillary facilities are given below in **Table 6**.

**Table 6 - Details of solid waste/ hazardous waste and disposal**

S. No	Type of Waste	Quantity	Method of Disposal
1	Process residue	11739 kg/day	Shall be sent to the authorized cement plants for co-processing (or) for incineration at onsite / TSDF
2	Process Salts	1152 kg/day	To TSDF/ Authorized Vendors
3	ETP Sludge	200 kg/ day	To TSDF for secured land filling.
4	Multiple effect evaporation or forced evaporation salts	13658 kg/ day	To TSDF / Authorized Vendors
5	Incinerated ash	75 kg/ day	To TSDF
6	Containers & Container liners of Hazardous chemicals & hazardous Wastes.	Container 2000 no's/month and Liners 5000 no's/ month	After detoxification, it shall be disposed to the outside agencies.
7	Spent Carbon	134 kg/ day	Shall be sent to the authorized cement plants for co-processing (or) for incineration at onsite / TSDF.
8	Used oil/Waste lubricant oil.	100 Ltrs/ month	Shall be sent to authorized re processors /recyclers
9	Spent Solvents	200 kl/day	Shall be recovered within the premises / to authorized re processors or recyclers
10	Mixed spent Solvent	40 kl / day	Shall be sent to authorized agencies / for Co-incineration in cement industries.
11	Spent acids	187 kl/day	Shall be sent to authorized agencies
12	Spent Catalysts	200 kg/day	Shall be sent to authorized re processors/ recyclers.
13	Ash (fly and bottom)	30 Tons/day	Shall be given to Brick/Tile/Cement manufacturers

### 3.10 Schematic Representation of the Feasibility Drawing for EIA Purpose

For development of proposed project in Kothapatnam (V), site screening, pre-feasibility report, environmental impact assessment (EIA), environmental management plan (EMP) studies, etc. for obtaining environmental clearance and consent for establishment from statutory authorities are the main processes involved. The following procedures are involved in the schematic approach for obtaining environmental clearance.

- Zoning plan indicating type of industries which can be established considering the site location and market potential
- Submission of Form-1, prefeasibility report, draft ToR for appraisal to concerned authority (MoEF&CC)
- Obtaining official Terms of Reference from MoEF&CC
- Baseline data collection for one season, Draft EIA report preparation compliance with ToR
- Draft EIA report submission to SPCB for organizing public hearing
- Submission of final EIA report including public hearing minutes and action plan to MoEF&CC
- Obtaining EC from MoEF&CC
- Submission of CFE application to SPCB
- Obtaining CFE from SPCB

## 4.0 Site Analysis

### 4.1 Connectivity

The site is in close proximity (aerially 120 km) to Chennai and is about 84 km from the nearest airport, Sri Venkateswara airport at Renigunta. It is at a distance of about 26 km from Venkatachalam railway station in Nellore. Entry to the site is through an access road of about 10 km which can be the point of access that connects back towards Krishnapatnam Port.

The site is approachable from NH16 (earlier NH5) which is at about 25 km from site expanded into a four lane road as part of the Golden Quadrilateral scheme. Further, NHAI has the proposal to develop NH16 as six lane road (from Ichapuram to Tada) considering the present and projected traffic from the upcoming industrial activities in the coastal region of Andhra Pradesh.

The Krishnapatnam port, built and owned, all weather, deep water port is about 10 km from the proposed project site. The proposed connectivity with the port will ensure quick movement of goods and personnel. The impact on the existing traffic in the region is also minimum as there is an existing rail cum road corridor from Venkatachalam, connecting NH16 and the Chennai-Howrah trunk line to the port which can be used to assess the proposed project site. A four lane expressway is developed on NH16 to Krishnapatnam port from Venkatachalam. The area is well connected by the road network.

Buckingham Canal, which runs close to the project site is declared as the National Waterway (NW) and is used for transportation between Chennai in the South and Krishna river delta in the North. This waterway (NW4) is currently under redevelopment by the Inland Waterways Authority of India (IWAI).

#### **4.2 Land Form, land Use and Land Ownership**

The land measuring 81.74 Ha (202 acres) has been bought by Divi's laboratories Limited for establishing the manufacturing unit of bulk drugs and intermediates.

Land of 202 acres is spread around several survey numbers and abetting on west side of site with an access to local road from the frontage and on South side is the proposed road. Abetting our site on East side is Yamadinnepalem village with a Reserved Forest on North side boundary. The site is part of proposed Industrial corridor of Visakhapatnam-Chennai-Bangalore at Krishnapatnam Node by Government of India. The site is also under the proposed Coastal Economic Zone.

#### **4.3 Topography (along with map)**

The Topographical map of study area has been prepared using Survey of India Topo Sheets (1:50,000 scale). The Topo sheet numbers are D44H15, D44H16, D44I3 and D44I4. The Topographical map of 10 km study area is given in **Figure 6**.

#### **4.4 Existing land use pattern**

The proposed site is located in Krishnapatnam Industrial Area, which is not a notified industrial area. The proposed land doesn't include any forest area and/or water bodies etc. Bay of Bengal is at a distance of 2.1 km in East direction from the site. The eco-sensitive map of the study area showing nearest eco-sensitive areas is shown as **Figure 7**.

#### **4.5 Existing Infrastructure**

There is no existing infrastructure in the proposed project site. However, required infrastructure such as roads, storm water drains, compound wall etc., will be developed after obtaining necessary permissions from statutory authorities.

#### **4.6 Soil classification**

The proposed site is located in Nellore District. Geomorphologically, the district can be broadly divided into 3 distinct units, viz., western hills, central pediplains and eastern deltaic & coastal plains. The proposed area falls under eastern deltaic and coastal plains. The master slope of the area is from west to east towards Bay of Bengal. The sandy coastal plain extends up to a distance of 5 - 6 km from sea coast. The predominant soils in the study area are lateritic sandy and alluvial soils.

Figure 6 – Topographical map of study area – 10 km radius

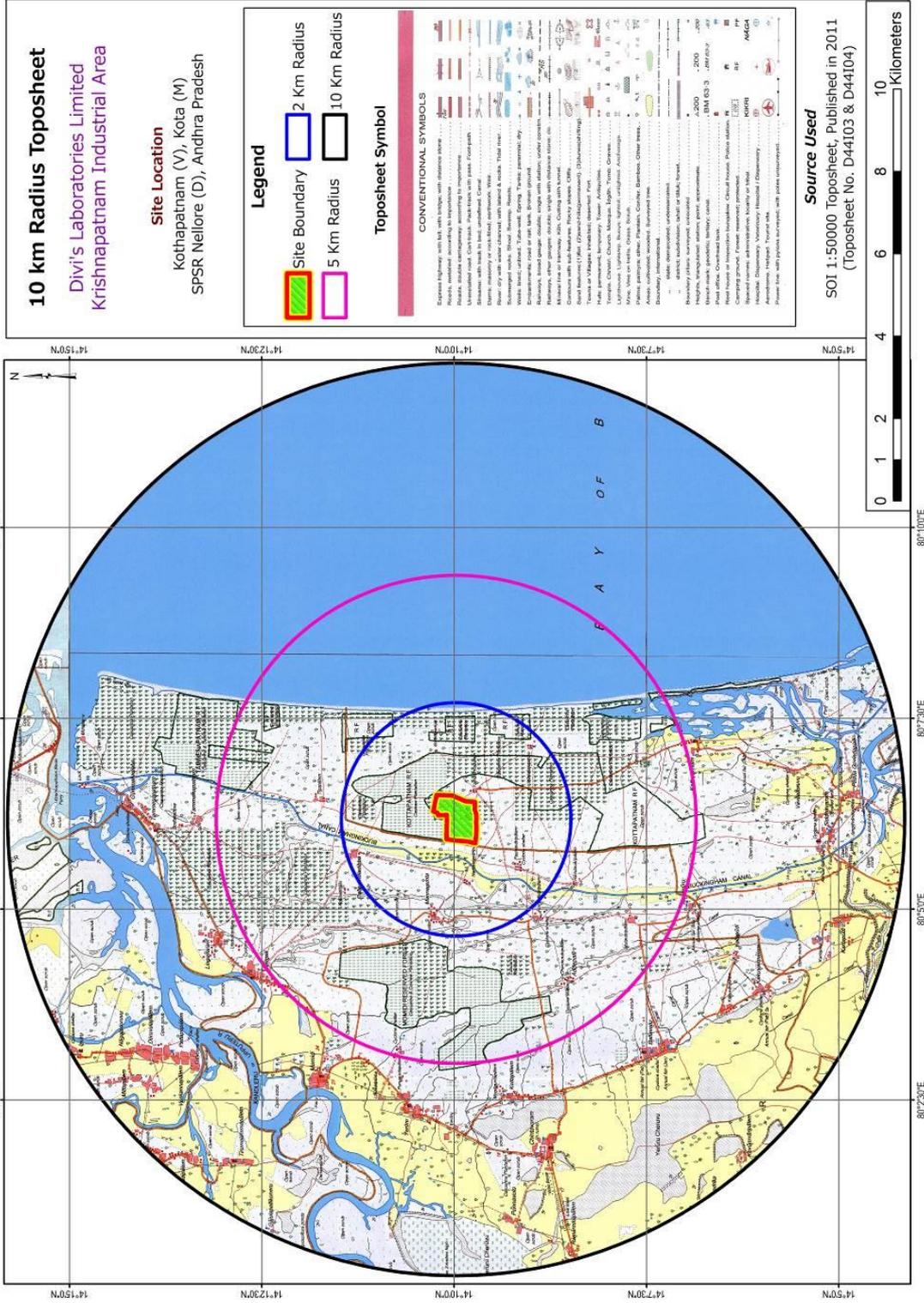
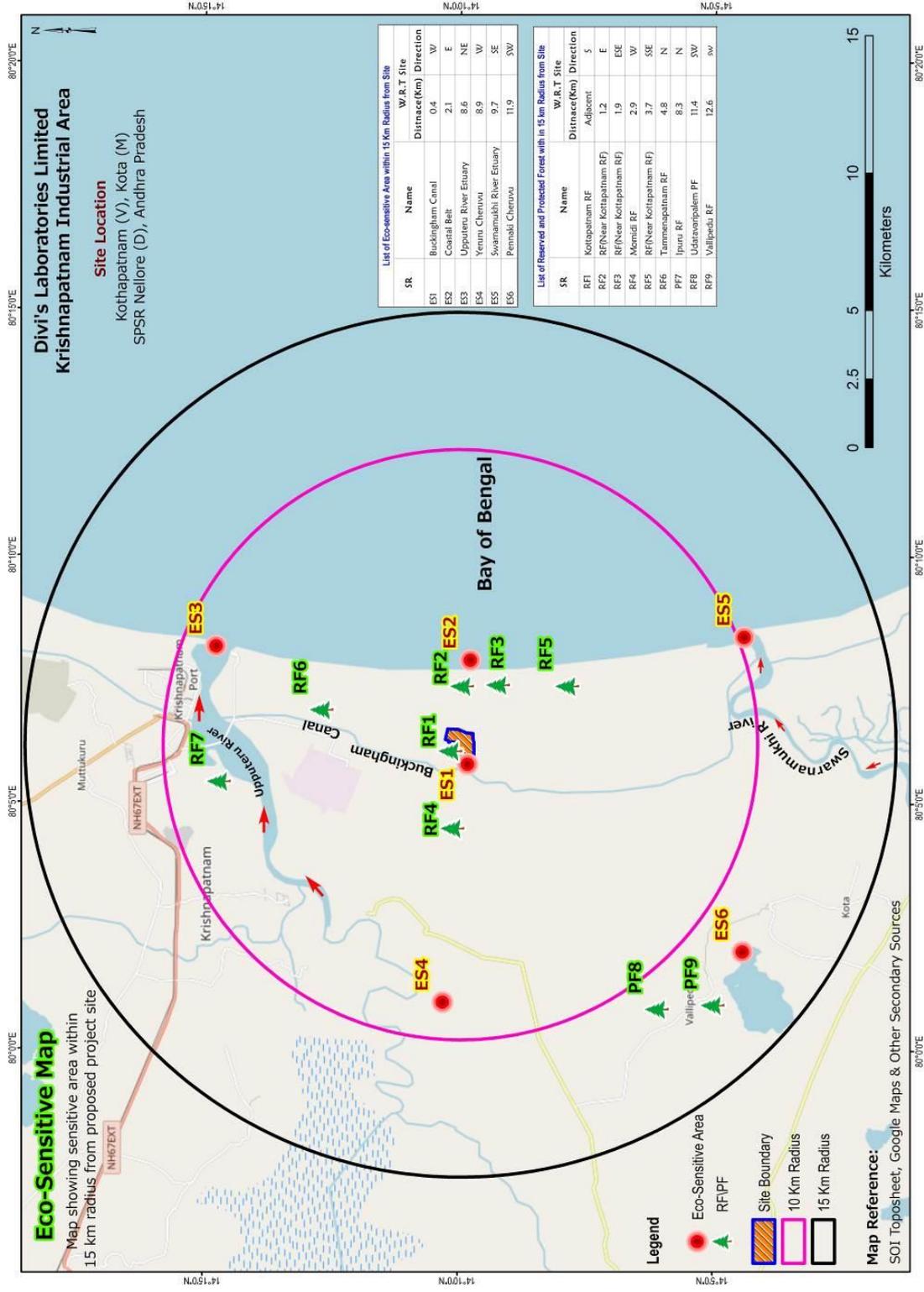


Figure 7 – Eco sensitive map



#### 4.7 Climate Data from Secondary Source

The climate of the district is moderate and is characterized by sub-tropical climate. The period from December to middle of February is generally the season of fine weather. Summer season extends from March to May which is followed by monsoon from June to September, then post monsoon from October to December and finally winter season from January to February. The annual normal rainfall of the district is 1084 mm. The peculiarity of monsoon in this district is that contribution of SW monsoon is far less than that of NE monsoon rainfall. About 70% of the annual rainfall is contributed by the NE monsoon. The mean daily maximum temperature in the district is about 39.9°C in May and the mean daily minimum temperature is about 20.7°C in January. Temperature in the district begins to rise from the middle of February till May. The relative humidity ranges from 63 to 86% in the mornings, whereas it varies from about 51 to 74% in the evenings. The climatological data of three decades obtained from the IMD station located in Nellore from 1981-2010 is given in **Table 7**.

**Table 7 - Climatological data – IMD station (Nellore)**

Month	Mean Temperature (°C)		Rainfall (mm)		Relative Humidity (%)		Mean wind speed (km/h)	Predominant wind directions (From)
	Daily Max.	Daily Min.	Total	No. of days	08:30	17:30		
Jan	29.9	20.7	26	1.2	86	64	4.5	E
Feb	32.4	22.0	1.7	0.2	82	61	5.4	SE
Mar	35.1	23.9	3.5	0.2	78	61	6.4	SE
Apr	37.8	26.2	8.7	0.4	71	62	7.5	SE
May	39.9	28.4	43.1	1.6	63	55	7.9	SE
Jun	38.2	28.5	28.9	3.0	64	51	8.6	W
Jul	36.0	27.2	85.9	6.1	69	56	8.2	W
Aug	35.1	26.7	96	6.4	71	56	8.2	W
Sep	35.1	26.4	97.2	5.4	74	62	6.5	W
Oct	32.8	25.2	287.1	8.7	82	71	4.9	NE
Nov	30.1	23.2	290.9	9.1	85	74	5.0	NE
Dec	29.0	21.5	100.4	3.7	86	71	5.2	NE

**Note – Source: IMD Climatological Tables (1981 – 2010)**

#### 4.8 Social Infrastructure available

All infrastructure facilities such as education, health and other social facilities are adequate at the district headquarters Nellore. Major surrounding villages are having basic requirements such as post offices, PHC's, banks etc.,

## 5.0 Planning Brief

### 5.1 Planning Concept (type of Industries, Facilities and Transportation)

The need for the environmental administration of India to become active in the field of environmental planning is founded in the Environment (Protection) Act, 1986, which authorizes the Central and State Government to have the power to take all such measures as it deems necessary or expedient for the purpose of protecting and improving the quality of the environment and preventing, controlling and abating environmental pollution. Since the carrying capacity of the environment is not unlimited and some areas or ecosystems are more susceptible to adverse environmental impacts than others, the unplanned and haphazard location of industries might substantially increase the risk to the environment. Environmental planning is a proven tool for reducing the impacts from such risks. However, this tool has seldom been used in this country. Proper siting of newly planned industries and industrial estates is a strong pollution preventive instrument that ensures environmental soundness of the industrial development.

### 5.2 Population Projection

In 2011, SPSR Nellore had a population of around 29,63,557 of which, male and female constituted 14,92,974 and 14,70,583 respectively. The sex ratio of the district is 1000:985.

In 2017, SPSR Nellore had a population of around 31,59,152 (considering decadal growth of 11%)

### 5.3 Land Use Planning (break up along with Greenbelt)

The 81.74 Ha (202 Acres) land area for the proposed project is located in Krishnapatnam Industrial Area. The detailed land breakup for the proposed project is given in **Table 8**.

**Table 8 - Land breakup details**

Description	Area in Acres	Percentages
Built up area	42	20.8
Greenbelt Development	70	34.6
Road Network	20	9.9
Common Facilities Area	30	14.9
Future expansion	40	19.8
<b>Total Area</b>	<b>202</b>	<b>100</b>

### 5.4 Assessment of Infrastructure Demand (Physical & Social)

The project site is adjacent to Mannegunta- Kothapatnam road and is connected to NH 16 (earlier NH 5) which is around 25 km SW. The nearest railway station, Venkatachalam railway station is around 26 km NW, which falls under South Central railways of Vijayawada-Chennai section of Howrah-Chennai main line.

### **5.5 Amenities/Facilities**

The proposed project will develop all amenities required for safe handling of raw materials, finished products, treatment systems for wastewater, hazardous waste, gaseous pollutants etc.,

### **6.0 Proposed Infrastructure**

#### **6.1 Industrial Area (Processing Area)**

The proposed project is designed based on the market value potential and demand assessment study for sector of industries to be established in the proposed site. As per the categorization of industries by state pollution control board, the proposed project is placed under Red Category.

The processing area consists of production blocks, storage sheds, solvent storage yards, service blocks, coal storage, ETP etc.,

#### **6.2 Residential Area (Non processing area)**

In the proposed project hostel facilities will be provided to 800 workers including accommodation, kitchen, recreation and dining hall.

#### **6.3 Greenbelt**

Development of green belt as per MoEF&CC guidelines is conceived at the beginning of the project. The distance between two plants will be kept minimum for thick green belt. Regular maintenance of green belt will be done, dead plants will be replaced with new ones as and when necessary.

#### **6.4 Social Infrastructure**

The proposed project shall be made available with all infrastructures that are required for industrial purpose and also for the locals where they can be benefitted from the infrastructure of the proposed project. The infrastructure for the proposed project involves an establishment of centralized canteen, administration building, emergency medical centre, guest Rooms etc.

#### **6.5 Connectivity**

The Project Site is adjacent to Mannegunta- Kothapatnam road and is connected to NH 16 (earlier NH 5) which is around 25 km SW. Venkatachalam railway station, around 26 km NW, is the nearest railway station to the project site which belongs to the South Central railways of Vijayawada-Chennai section of Howrah-Chennai main line.

#### **6.6 Drinking Water Management Source and Supply of Water**

Water is considered as one of the major resources in industrial and domestic activities. It is used directly in production and also for other utilities like floor and equipment

washings, cooling, domestic purposes, green belt development etc. Provision of assured water supply is vital for achieving sustainability in any development.

### **6.7 Sewerage System**

Sewerage system is designed in proposed project according to the elevation and contour profile. Sewage water generated from common facilities are transferred through pipe line system and diverted to Sewage Treatment Plant. The treated water will be reused for green belt.

### **6.8 Industrial Wastewater Management**

The industrial wastewater will be segregated and treated in Effluent Treatment Plant consisting of Primary, Secondary and Tertiary treatment units, based on TDS and COD. Part of treated water will be reused for cooling tower, greenbelt etc., and the excess treated wastewater after meeting sea discharge standards will be disposed into sea through a dedicated marine outfall.

### **6.9 Solid Waste Management**

Industrial waste is classified as hazardous and non-hazardous. The Hazardous wastes will be treated as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Electronic waste will be processed as per E-waste Management and Handling Rules 2016 and the Batteries (Management and Handling) Rules, 2010 and its subsequent amendments.

### **6.10 Power Requirement and Supply/Source**

Total Power requirement for the entire plant will be acquired from APTRANSCO. In case of power failure, DG sets will be made available for respective units of proposed project.

### **7.0 Rehabilitation and Resettlement Plan (R&R)**

The proposed project does not envisage any disturbance of local community or the village since the land is purchased from Krishnapatnam infratech limited and fully owned by the Divi's laboratories Limited. The proposed project will not affect the home oustees, land oustees and landless laborers.

### **8.0 Project Schedule and Cost Estimates**

#### **8.1 Likely date of start of construction and date of completion (Time schedule for the project to be given).**

The factors which are responsible for timely implementation of the project are:

- Arrangement of proper finance for the project.
- Finalization of layout of the proposed plant.
- Design of utilities and services.
- Placement of orders for plant and machinery.
- Arrangements for Govt. sanctions and supply of power.

- Recruitment of personnel.

As per an initial estimate, around eight (8) months will be needed for implementation of the project from the starting date i.e. from the date of receiving all the statutory clearances for starting the project.

## 8.2 Estimated Project Cost along with analysis in terms of Economic Viability of the project

As per initial estimate, the cost of the project works out to be around Rs. 150 Crores. After examining the environmental feasibility, commercial and financial feasibility, it may be inferred that the project will have a positive impact. The detailed cost breakup of the project is given in **Table 9**.

**Table 9 - Project cost breakup details**

S. No	Details	In Rs. Crores	Remarks
1	Plant & Machinery	9.5	Cost towards production and ancillary units excluding land
2	Total Civil buildings	30.0	
3	Production Blocks	30.0	
4	Pipe lines & insulation	6.0	
5	Electricals & instrumentation	25.0	
6	Reservoir & cooling towers	2.0	
7	Services and roads	10.0	
8	Safety	3.0	
9	ETP, RO, MEE, Greenbelt, etc.,	20.0	Cost towards EMP
10	ETP drains, solar, Rain water harvesting etc.,	10.0	
11	Online Monitoring, AAQ Monitoring etc.,	0.5	
12	Corporate Social Responsibility and ESR	4.0	Cost towards CSR and ESR
<b>Total</b>		<b>150.0</b>	

## 9.0 Analysis of Proposal

### 9.1 Financial and Social Benefits with emphasis on the benefit to the local people including tribal population if any, in the area.

The proposed project is expected to bring significant socio-economic and environmental benefits to the study area as listed below:

#### Activities under CSR

- Social awareness programs on issues such as sanitation and hygiene, HIV Prevention Program etc., will be implemented
- Adult education and female education programmes are planned to the illiterate adults and backward females of the villages in the project surrounding area.

- Fishermen area development and fund for the development of infrastructure such as roads, lighting, drinking water etc., will be allocated

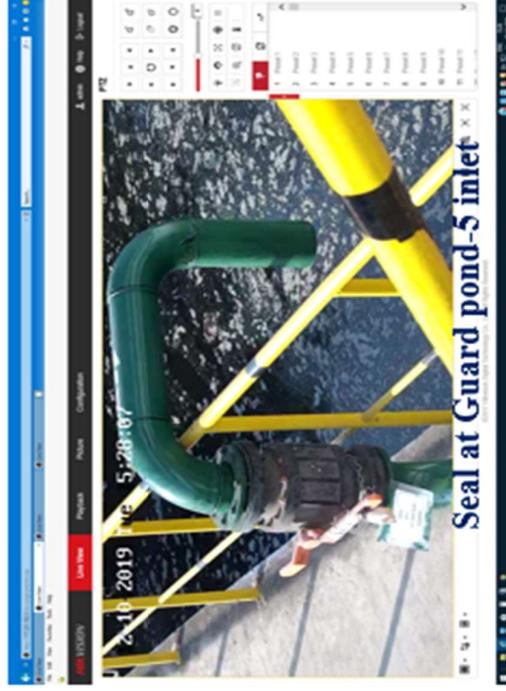
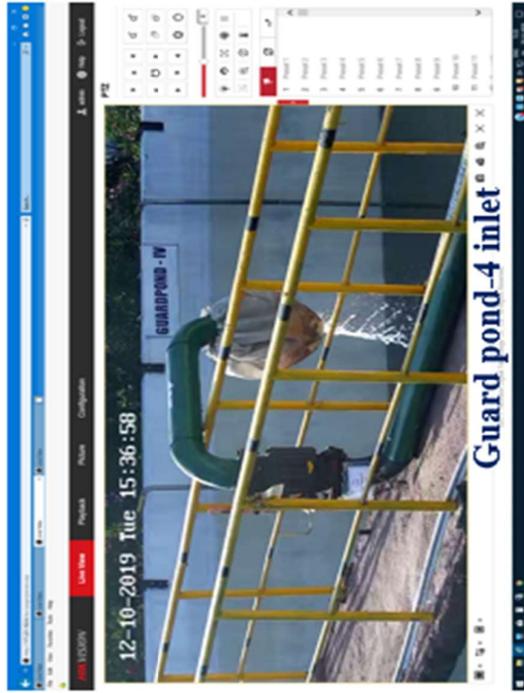
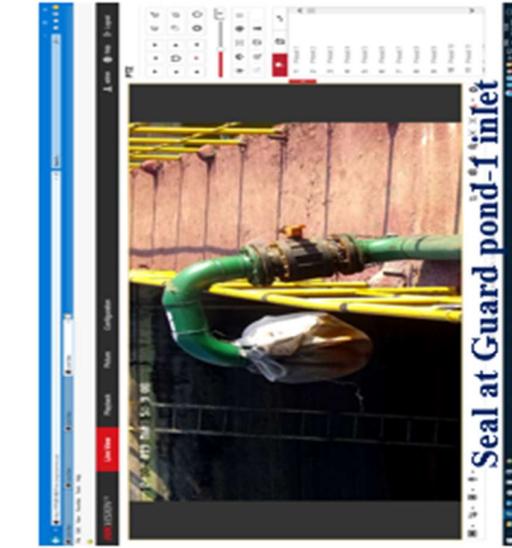
**Employment Potential**

The project is going to create employment. During this project activity, people in the project area will be recruited as skilled and semi-skilled workers by the company as per its policy. Therefore, employment and income are likely to be generated for the local people. So, the project will contribute in a positive manner towards direct employment in the project area.

Thus, the proposed project shall usher in the social and economic upliftment of the persons living in the vicinity of the project i.e. of society at large.

Divis Laboratories Limited, Unit-2  
Chippada

VISIBILITY OF GUARD POND INLET SEALS THROUGH PTZ CAMERA FROM THE WEBSITE



# LOCK & SEAL BY APPCB



Divis Laboratories Limited, Unit-2  
Chippada

# PROVISION FOR PTZ CAMERAS TO COVER THE GUARD PONDS



Divis Laboratories limited, Unit-2  
Chippada  
Bio-Assay test Facility



Bioassay testing facility for treated effluent



Zebra Fish (Danio rerio) for Bio assay test



Divis Laboratories limited, Unit-2  
Chippada  
Bio-Assay test Facility



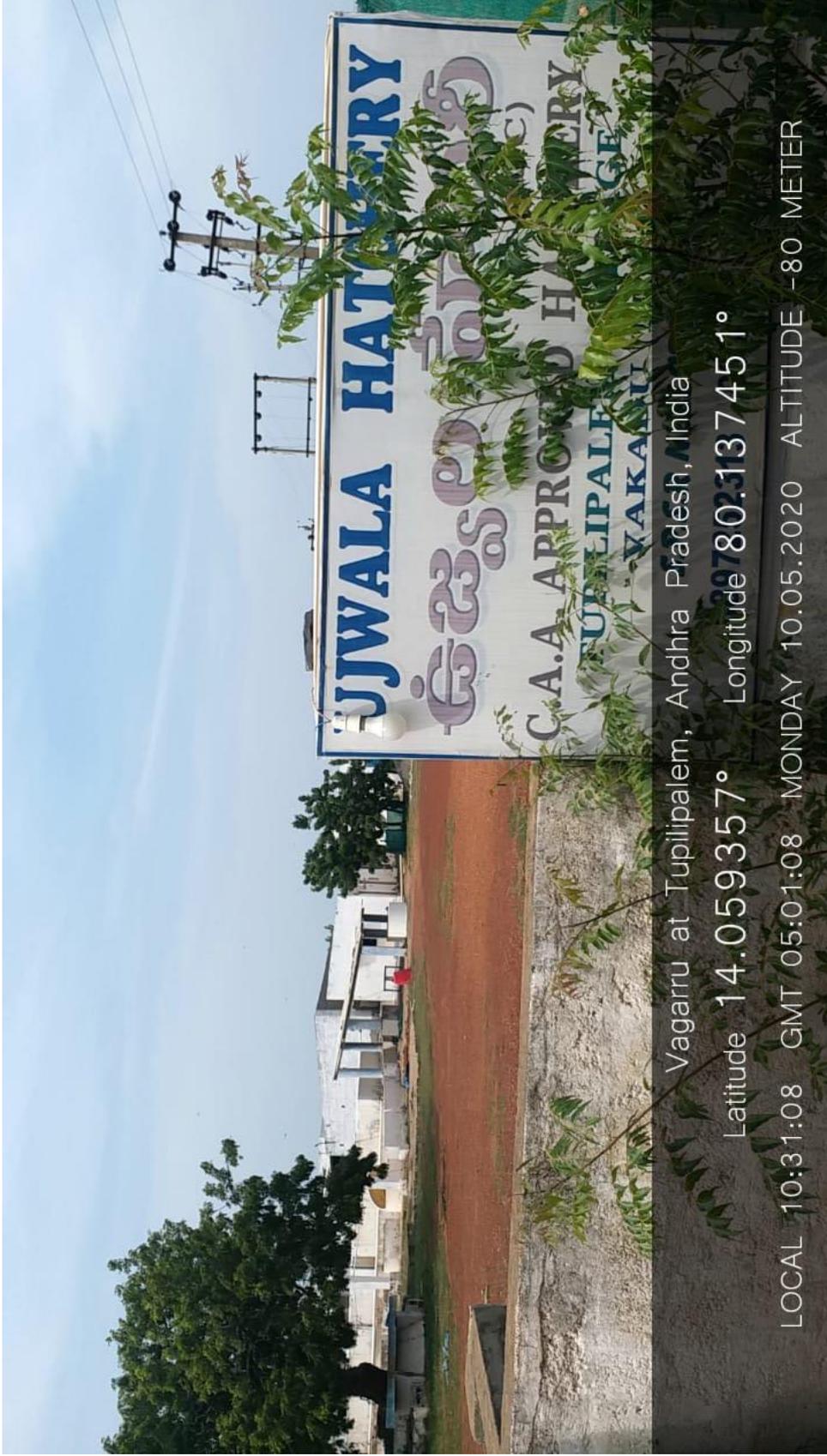
Bioassay testing facility for treated effluent

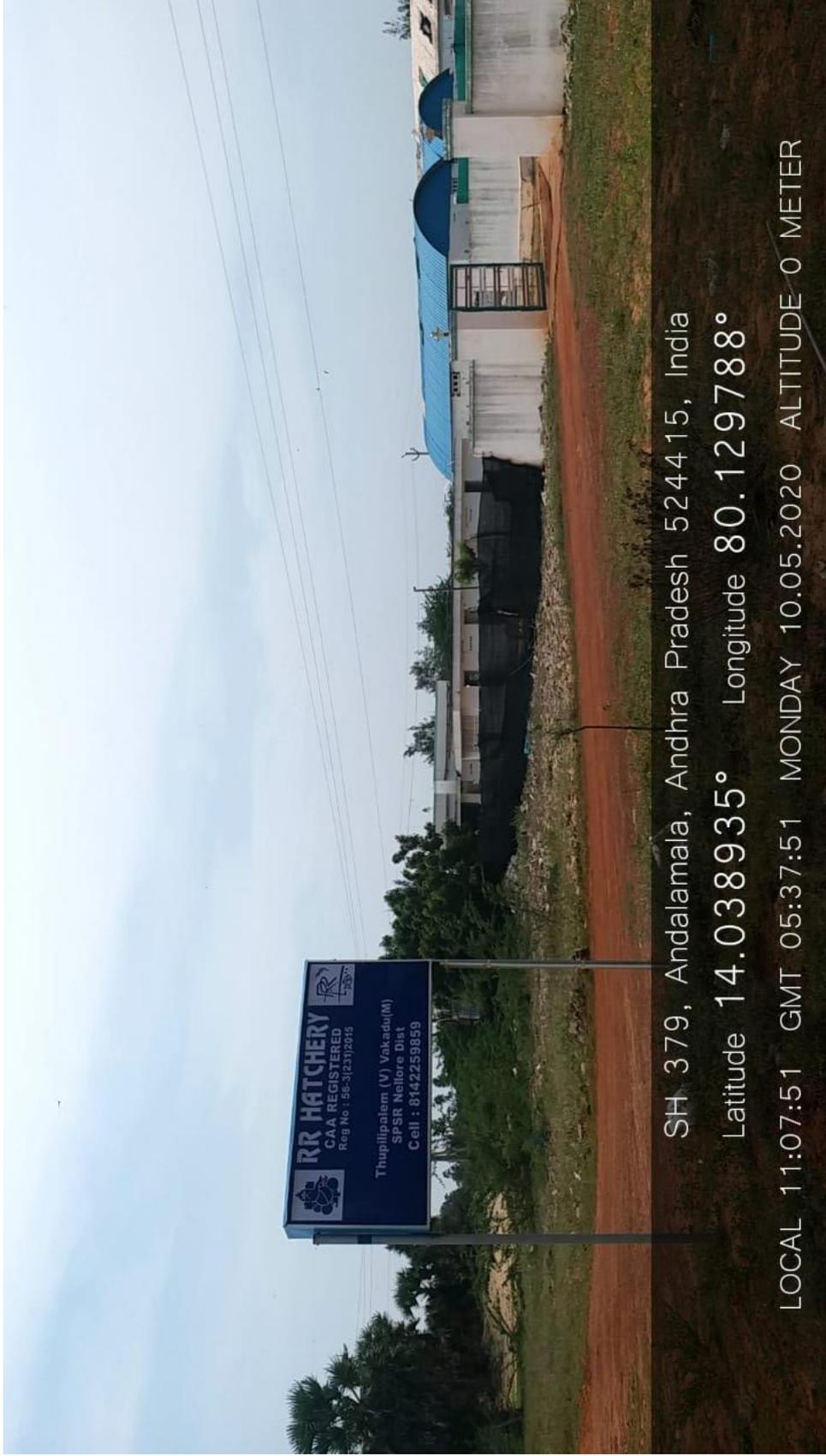




S.No	Name of the Hatchery	Village Name	Mandal	Distance FROM LAND FALL POINT IN KM
1	M/s. Teknomin Aqua Exports (I) Limited	Srinivasa Satram	Kota	2.19
2	M/s.Sri Mahalakshmi Hatcheries	Srinivasa Satram	Kota	2.54
3	M/s.VSF Projects Limited	Srinivasa Satram	Kota	2.65
4	M/s.Ujwala Hatchery	Thupili Palem	Vakadu	12.34
5	M/s.Pradep Hatcheries	Thupili Palem	Vakadu	12.31
6	M S HATCHERY PVT LTD	THUJILIPALEM	Vakadu	12.4
7	M/s. C.P.Aquaculture (INDIA) Private Limited	Thupili Palem	Vakadu	12.76
8	M/s.S.S. Hatcheries	Thupili Palem	Vakadu	12.95
9	M/s. Neeva Aero Solutions( KAUSALYA )	Thupili Palem	Vakadu	13.08
10	COASTAL PRAWN HATCHERY	Thupili Palem	Vakadu	13.59
11	SANTHI HATCHERY	Thupili Palem	Vakadu	13.87
12	M/s. Sri Hari Hara Hatchery	Thupili Palem	Vakadu	14.08
13	M/s.Shrimpex Hatcheries Pvt. Ltd	Thupili Palem	Vakadu	14.19
14	M/s.Sri Balaji Hatchery	Thupili Palem	Vakadu	14.57
15	R R HATCHERY	Thupili Palem	Vakadu	14.56
16	GK HATCHERY	Thupili Palem	Vakadu	14.78
17	M/s.Five Star Marine Exports Private Limited	Thupili palem	Vakadu	14.26

CAA LISTED	GOOGLE MAP LOCATION	PHYSICAL VERIFICATION	APPROX COORDINATES	REMARKS
YES	YES	VERIFIED	14° 9'0.89"N 80° 7'21.14"E	not known
YES	YES	VERIFIED	14° 8'47.22"N 80° 7'27.70"E	OPERATIONAL
YES	YES	VERIFIED	14° 8'43.08"N 80° 7'31.76"E	OPERATIONAL
YES	YES	VERIFIED	14° 3'33.69"N 80° 8'14.82"E	not known
YES	YES	VERIFIED	14° 3'31.95"N 80° 8'26.71"E	not known
NO	YES	VERIFIED	14° 3'30.29"N 80° 8'27.14"E	OPERATIONAL
YES	YES	VERIFIED	14° 3'20.31"N 80° 8'29.07"E	OPERATIONAL
YES	YES	VERIFIED	14° 3'11.14"N 80° 8'30.94"E	OPERATIONAL
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YES	YES	VERIFIED	14° 2'31.87"N 80° 8'40.70"E	OPERATIONAL
YES	YES	VERIFIED	14° 2'19.22"N 80° 8'35.86"E	OPERATIONAL
NO	YES	VERIFIED	14° 2'20.17"N 80° 8'44.04"E	OPERATIONAL
NO	YES	VERIFIED	14° 2'13.25"N 80° 8'47.29"E	OPERATIONAL
YES	YES	VERIFIED	14° 2'24.93"N 80° 7'36.42"E	not known







LAKE ATHABASCA CANADA

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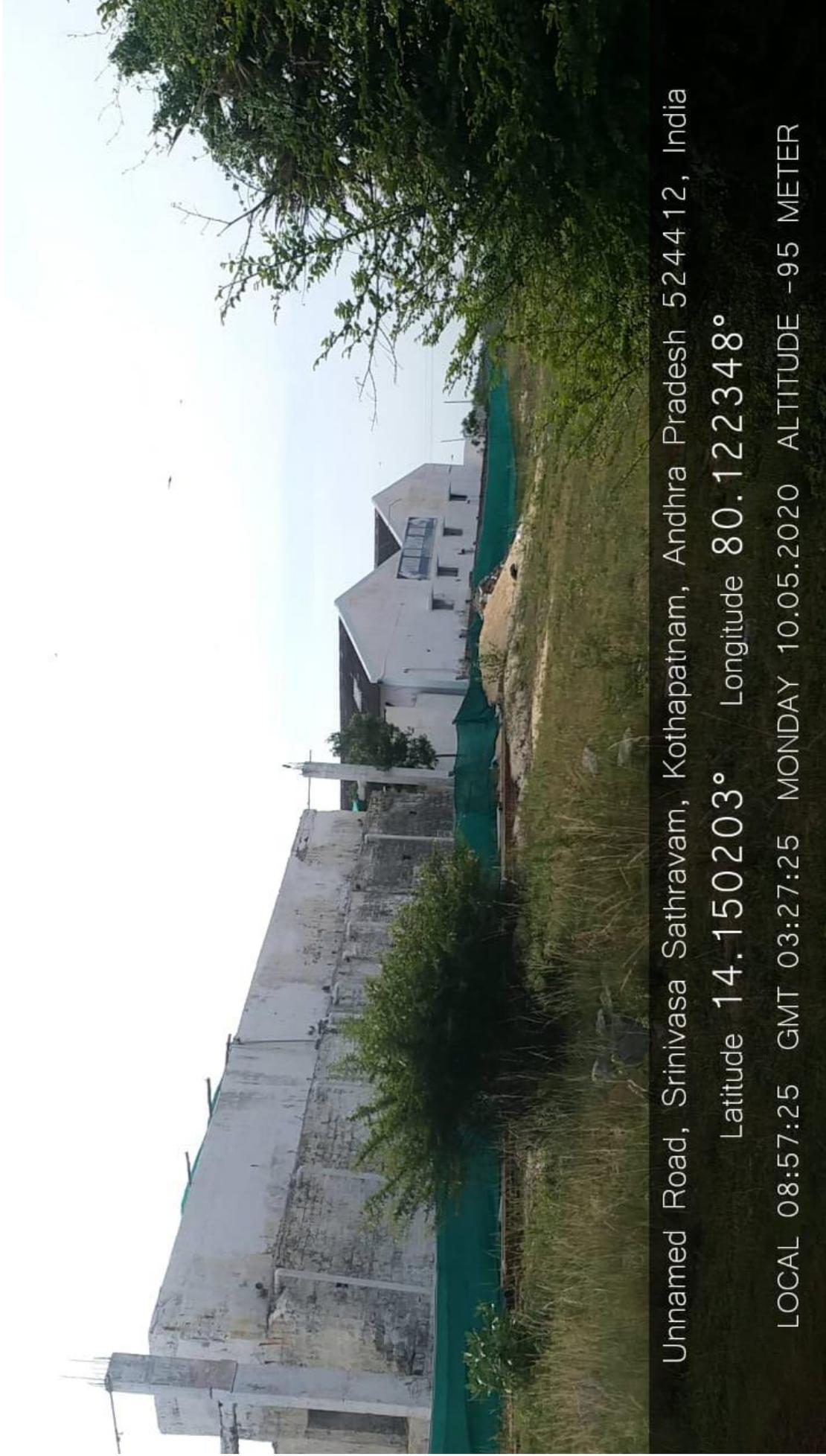












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Kothapatnam, Andhra Pradesh 524412, India  
Latitude Longitude  
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GMT 03:27:16 ALTITUDE -95 METER



LAKE ATHABASCA CANADA

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LOCAL 10:50:34 GMT 05:20:34 MONDAY 10.05.2020 ALTITUDE 0 METER



Srinivasa Sathravam, Kothapatnam, Andhra Pradesh 524412, India

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Ganganapalem, Burlavari Palem, Andhra Pradesh  
524415, India

Latitude

14.030299°

Longitude

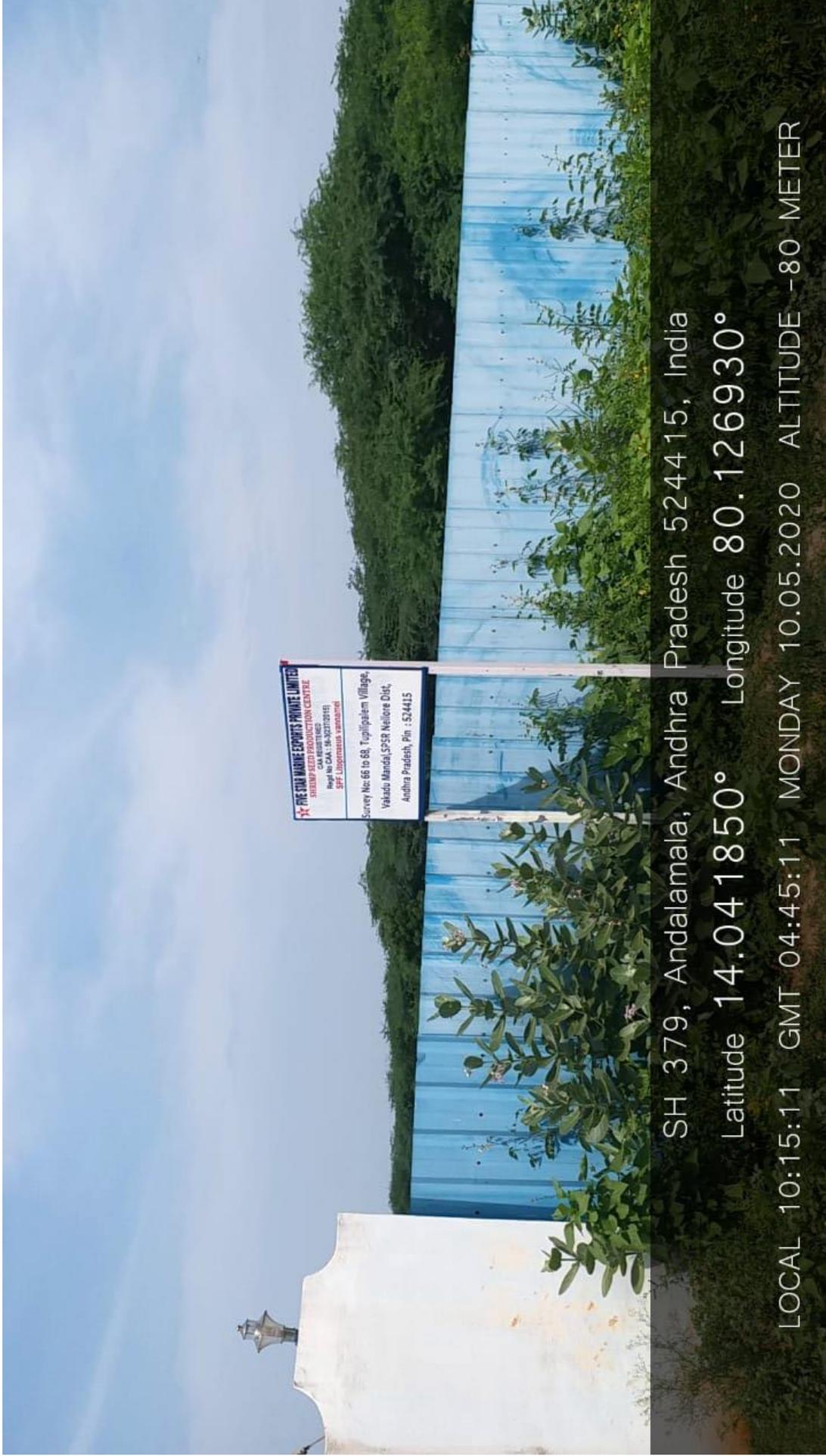
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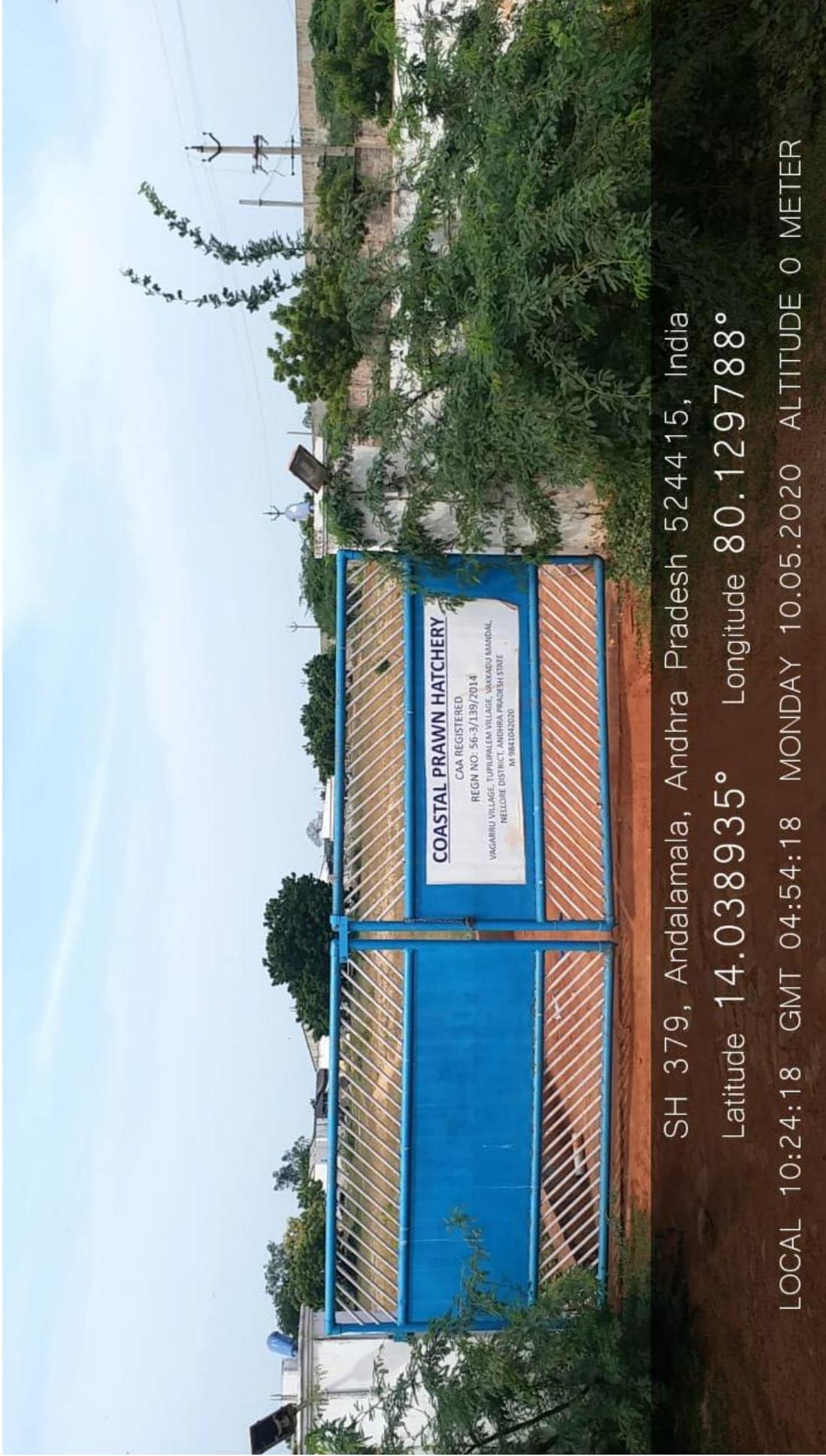
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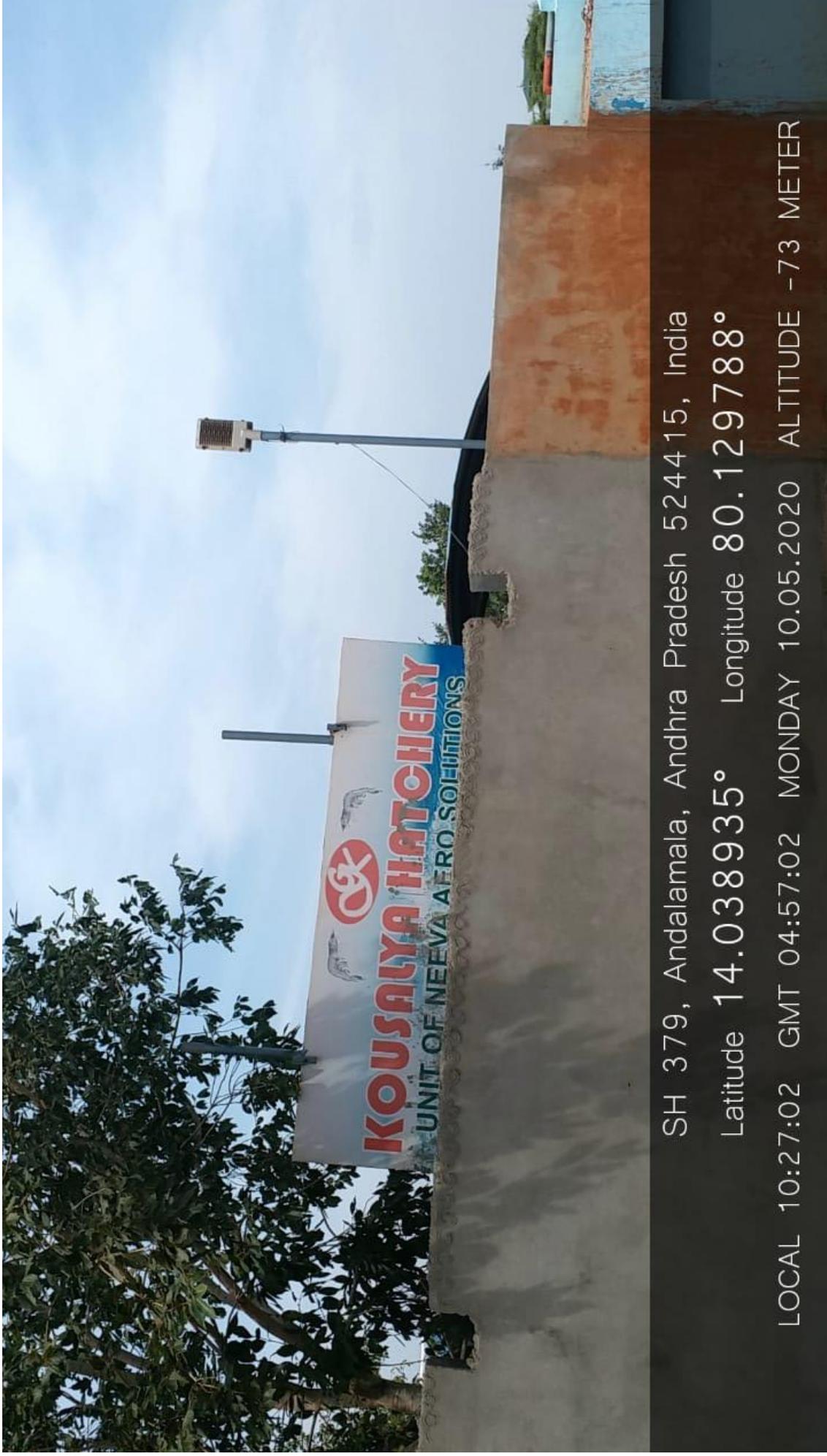
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MONDAY 10.05.2020

ALTITUDE -78 METER







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**UJWALA HANDBLINDERY**  
 అంబాలా హ్యాండ్ బ్లైండ్ రిజిస్టర్డ్  
 C.A.A. APPROVED HANDBLINDERY  
 T. P. LIPALE  
 VAKA  
 S.P.S.R MARLON  
 897252313

SH 379, Andalamala, Andhra Pradesh 524415, India

Latitude 14.038935° Longitude 80.129788°

LOCAL 10:31:03 GMT 05:01:03 MONDAY 10.05.2020 ALTITUDE 0 METER

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

**AppIn/Appeal No. 68/2021  
(SZ)**

M/s. Sri Mahalakshmi Hatcheries  
& Others

..Applicants/Appellants

AND

State Environment Impact  
Assessment Authority (SEIAA)  
& Others

..Respondents

**VOLUME 4  
TYPED SET OF DOCUMENTS FILED  
ON BEHALF OF THE 3<sup>RD</sup>  
RESPONDENT**

**M/s. R. Parthasarathy,  
Rahul Balaji,  
Madhan Babu,  
Vishnu Mohan  
Rangasaran Mohan**

**COUNSEL FOR RESPONDENT NO.3**