

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

ORIGINAL APPLICATION No. 97 OF 2021 (SZ)

IN THE MATTER OF:

Ravula Lingaswamy,
Yadadri Bhuvanagiri District and Ors.

....

Applicant(s)

Versus

Union of India,
rep by its Secretary,
MoEF, New Delhi & Ors.

....

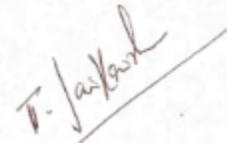
Respondent(s)

REPORT OF THE TELANGANA STATE POLLUTION CONTROL BOARD (R3)

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Place: Hyderabad.
Date: 18-01-2024.


Counsel for Respondent No. 3

**REPORT DATED 17-01-2024 OF TELANGANA STATE POLLUTION CONTROL BOARD
IN OA No.97 OF 2021 FILED BY SRI RAVULA LINGA SWAMY, S/o.YADAAIAH &
OTHERS OF ANTHAMMAGUDEM VILLAGE, POCHAMPALLY MANDAL, YADADRI
BHUVANAGIRI DISTRICT.**

It is to submit that Sri. Ravula Lingaswamy, R/o.Yadadri Bhuvanagiri District & others has filed an OA No. 97 of 2021 before the Hon'ble NGT, Chennai on pollution due to M/s. Hazelo Labs (P) Ltd., Anthammagudem (V), Yadadri District.

Earlier, the Board has filed a report dated latest on 22.11.2023 before the Hon'ble NGT, Chennai submitting the action taken by the Board on Respondent industry. The Hon'ble NGT during the hearing held on 30.11.2023 has taken on record the report filed by the Board.

In response to the directions issued by the Board imposing levy of Environmental Compensation, the industries have made part payment of Environmental Compensation. The details of the EC imposed and payment made by the industries are submitted below:-

S. No	Name and address of the industry	Environmental Compensation (EC) levied (Rs)	Payment details.
1.	M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	77,70,000/-	Paid an amount of Rs.19,45,000/- on 23.12.2023. i.e., 25% of EC levied.
2.	M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd.), Sy. No. 210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	50,40,000/-	Paid an amount of Rs.12,50,000/- vide DD dated: 18.12.2023. i.e, about 25% of EC levied.
3.	M/s. VJ Sai Chem., Sy.No.240/B, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	22,40,000/-	Paid an amount of Rs.5,60,000/- vide DD Dt:16.12.2023. i.e, 25% of EC levied
4.	M/s. SVR Laboratories (P) Ltd., Sy.No. 238 (part), 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	44,80,000/-	Paid an amount of Rs.11,20,000/- vide DD dated:19.12.2023. i.e, 25% of EC levied.
5.	M/s. Chemic Life Sciences (P) Ltd., Sy No. 238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri	44,80,000/-	Paid an amount Rs.4,48,000/- vide DD dated: 01.01.2024.

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S. No	Name and address of the industry	Environmental Compensation (EC) levied (Rs)	Payment details.
	District.		i.e, 10% of EC levied.
6.	M/s. Archimedis Laboratories (P) Ltd., Sy.No. 238, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	51,80,000/-	Paid an amount Rs.12,95,000/- vide DD dated: 16.12.2023. i.e, 25% of EC levied.
7.	M/s. Optimus Drugs (P) Ltd. Sy.No. 238, 239, 240 & 248, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	77,70,000/-	Not paid*
8.	M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhavangiri District.	45,00,000/-	Paid an amount of Rs.11,25,000/- vide DD dated:27.12.2023 i.e, 25% of actual EC levied

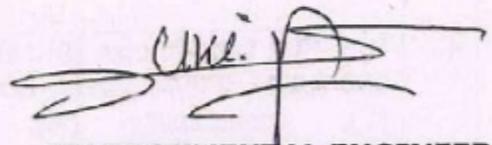
*--M/s. Optimus Drugs Private Limited has filed a W.P. No. 28698 of 2023 before Hon'ble High Court of Telangana challenging orders of the Board issued directing the petitioner industry to deposit an amount of Rs. 77,70,000/- towards Environmental Compensation. The matter is pending before the Hon'ble High Court.

Subsequently, the Board reviewed the above industries in the Task Force Committee meeting held on 03.01.2024. Based on the recommendations of the Task Force Committee, the respondent Board vide orders Dt.03.01.2024 again issued fresh directions to industries (except M/s.Optimus Drugs (P) Ltd) directing to pay the remaining Environmental Compensation (EC) amount within 06 (six) months time. (**Annexure - 1**).

It is to submit that the Respondent Board will regularly monitor the industries for environmental compliance and for payment of balance Environmental Compensation levied against them.

Place: Nalgonda

Date: 17-01-2024


ENVIRONMENTAL ENGINEER

ENVIRONMENTAL ENGINEER
T.S. Pollution Control Board,
Regional Office, Nalgonda.



BY REGD. POST WITH ACK. DUE

Annexure-I

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-44/TSPCB/TF/HO/2024-1159

Date: 03.01.2024

Sub: TSPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **DIRECTIONS - ISSUED** - Reg.

- Ref:
1. CFO&HWA Order dated: 01.09.2022, valid upto 31.03.2027.
 2. Directions Orders issued on 03.02.2022.
 3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 5. Directions Orders issued on 06.12.2022.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 11. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 12. The industry filed a WP No.20623 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 13. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 14. Directions issued on 13.09.2023.
 15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 17. RO Nalgonda report dated 28.12.2023.
 18. Dhotigudem Industrial Association representation dated 03.01.2024.
 19. Hearing held on 03.01.2024

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to your industry on 01.09.2022 for expansion under phase-I with a validity period up to 31.03.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued certain directions to the industry on 03.02.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3rd cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
 - i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.

- ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
6. **WHEREAS**, vide reference 5th cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 31.10.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall comply with the following as per the CPCB directions dt:19.09.2022
 - The unit shall augment MEE and RO, so as to achieve ZLD system.
 - The unit shall segregate High TDS and Low TDS effluent and to install online flow-meters at inlet and outlet.
 - The efficiency of the condensers connected to the reactors shall be improved to reduce the VOCs emissions and total cumulative losses of solvent should not be more than 5% of the solvent on annual basis form storage inventory.
 - The unit shall carry Leak Detection and Repair (LDAR) program to assess the solvent losses and shall take appropriate measures to control to arrest the solvent losses and reduce the VOCs in the premises.
 - To ensure that hazardous wastes shall be disposed within 90 days from the date of generation and shall maintain proper records
 - iv. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - v. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

7. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
 - i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
 - ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
 - iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
 - v. The Industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
8. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
9. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
10. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions vide reference 9th cited.
11. **WHEREAS**, the industry have filed a Writ Petition No.20623 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same
12. **WHEREAS**, vide reference 10th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

⑥

1. Coal dust spillages observed on the road as they are transporting crushed coal from crusher to boiler through belt conveyer.
 2. Odour was observed at MEE, ATFD, biological ETP and R&D lab.
 3. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
 4. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
 5. The industry has not provided charcoal bed and sub cooler condensers to the scrubbers connected to production blocks A (extension), D1 & D2, F and H Blocks & ATFD and Stripper, which causes smell nuisance in the surrounding area.
 6. The industry has not provided online TDS meter to the HTDS effluents.
 7. The industry has not maintaining the records pertaining to quantity of first cut rain water collected and treated.
 8. During inspection, leakages/ spillages of effluents were observed near MEE system.
 9. The industry provided IP camera for boiler stack, at storm water drain, at main gate. However, the same is not connected to the Board server.
 10. During inspection the scrubber is not in operation which was connected to HTDS collection tank and not provided online pH meters.
 11. The industry has provided PIION spray system but, the same was not in operation during inspection.
 12. The industry has not submitted latest LDAR study report.
 13. The industry has provided 1 No of VOC analyser and connected the same to the Board's server. The VOC analyser is placed at warehouse block. As per the online data, the values are found to be zero (period verified is from 01.06.2023 to 01.08.2023).
 14. During inspection on 01.08.2023, the reading in VOC analyser was observed 2.80 PPM (photograph enclosed). However, the online data showing zero value
13. **WHEREAS**, vide reference 11th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
14. **WHEREAS**, vide reference 12th cited, the industry has filed writ petition no. 20623 of 2023 before the Hon'ble High Court regarding environmental compensation levied by the TSPCB vide order dt.08.08.2023 in WP No.20623 of 2023, disposed the case ordering as follows:
- "Therefore, we are not inclined to entertain this writ petition. However, the petitioner is granted the liberty to take recourse to the remedy of statutory appeal available to him. Needless to state that in case the petitioner files an appeal within a period of two weeks, the National Green Tribunal shall entertain the appeal preferred by the petitioner. Writ petition is accordingly disposed of".*
15. **WHEREAS**, the above industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
16. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided Biological ETP. However, the industry has not developed the bio-culture in the aeration tank of the biological ETP. Clarifier is not in operation. This indicates that biological ETP is not operated effectively.

- ii. The industry provided new RO system with higher capacity and same was not in operation (which was not commissioned by the supplier, since they are not meeting the standards of the RO inlet). Hence, the industry is not treating LTDS effluents in Biological ETP followed by RO.
 - iii. Spillages were observed at MEE area and odour was observed. VOC reading at MEE area - 0.762 ppm.
 - iv. The industry has not provided sub cooler condensers to the scrubbers attached 4 Nos. of production blocks and activated charcoal bed to to the scrubbers attached 3 Nos. of production blocks to control process emissions. Thereby causing odour pollution in the surrounding areas.
 - v. The industry has not provided bypass provision for rain water collection tank.
 - vi. They are storing spent acid tanks openly.
 - vii. The odour was observed near production block and MEE area in the premises and VOC readings are 0.196 ppm, 0.214 ppm, 0.355 ppm, 0.411 ppm, 0.407 ppm, 0.419 ppm, 0.334 ppm & 0.207 ppm.
 - viii. The industry is a large scale unit and they are not having dedicated laboratory to measure the parameters of the ETP effluents and not having any environment cell to monitor the operation of the water and air pollution control systems. Most the labours working in the plant are not having PPE's.
 - ix. The committee directed the industry to submit the clarification on the following:
 - x. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
 - xi. The industry has not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023.
17. **WHEREAS**, vide reference 13th cited, the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
18. **WHEREAS**, vide reference 14th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the following directions were issued to your industry vide order dt.13.09.2023:
1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 2. The industry shall comply with all the conditions stipulated in the directions Order dated: 30.05.2023.
 3. The industry shall pay the Environmental Compensation (EC) of Rs.77,70,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.77,70,000/- (Rupees Seventy Seven Lakhs Seventy Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
 4. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 5. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
 6. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

7. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
8. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
9. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

19. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. As per the CFO, the industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel for boilers.
- iii. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
- iv. Odour was observed near ZLD area and the VOC readings were in the range of 0.033 to 0.78 PPM.
- v. The industry has provided scrubbers and not provided sub cooler condensers / charcoal bed connected to the production block-A (extension) D1 & D2, H-Block, PB-F Block, Stripper & Vacuum Tub, ATFD & High TDS collection tank (Single Stage Scrubber only).
- vi. The odour was observed near production block and MEE area in the premises.
- vii. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
- viii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
- ix. The industry has provided odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment & MEE area to control VOCs. But, odour was observed at MEE area.
- x. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same. The Dothigudem Industrial Association vide letter dt.04.10.2023 also requested the Board for exemption to submit the BG and its forfeiture, citing lack of product demand, heavy competition in Global market and financial crises.
- xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 10.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (861 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.
- xii. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
- xiii. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
- xiv. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drain of the industry are very high.

20. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

1. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
2. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
3. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
4. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
5. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
6. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drian of the industry are very high.
7. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
8. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs.

21. **WHEREAS**, vide reference 16th cited, based on the recommendations of committee, the Board issued **SHOWCAUSE NOTICE** to your industry as to why action should not be initiated against your industry under section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) for the following:

1. Violating the Consent conditions & directions of the Board as mentioned above.
2. Non-payment of Environmental Compensation of Rs.77,70,000/- for past violations.
3. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

22. **WHEREAS**, vide reference 17th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.

5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). it is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm³) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm³).
 7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt:22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
 8. Accordingly, the Board Officials Inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
23. **WHEREAS**, vide reference 18th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
24. **WHEREAS**, vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
 4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.
 5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). it is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm³) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm³).
 7. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.

- III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special conditions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions Issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.
4. The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

26. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

27. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), directing closure of the industry in the interest of Public Health and Environment without any further notice.

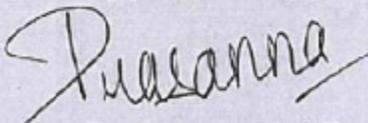
Sd/-
MEMBER SECRETARY

To,
**M/s. Hazelo Lab Private Limited,
(Formerly M/s. Venlar Labs (P) Ltd),
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvangiri District.**

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//


**Senior Environmental Engineer
(Task Force - UH-IV)**



12

Letter No.RCP-106/TSPCB/TF/HO/2024-1458

Date:03.01.2024

Sub : TSPCB - M/s. Selmar Lab Pvt. Ltd, Unit-II, (Formerly M/s KRR Drugs & Chemicals Pvt. Ltd.), Sy.No.180/1 to 15, IDA Khazipally, Jinnaram Mandal, Sangareddy District - Non-compliance of the Consent conditions and directions issued by the Board - **Forfeiture of Bank Guarantee of Rs.12.0 Lakhs**- Reg.

Ref : 1. Task Force Committee meeting held on 28.08.2023.
2. Letter No.RCP-106/TSPCB/TF/HO/2023- Date:13.09.2023.
3. Task Force Committee meeting held on 03.01.2024.
4. T.O. Lr.No.RCP-106/TSPCB/TF/HO/2024- Dated.03.01.2024.

* * * * *

The Compliance status of the Board Directions and CFO&HWA conditions issued to **M/s. Selmar Lab Pvt. Ltd, Unit-II, (Formerly M/s KRR Drugs & Chemicals Pvt. Ltd.), Sy.No.180/1 to 15, IDA Khazipally, Jinnaram Mandal, Sangareddy District** was reviewed in the Task Force Committee meeting held on 28.08.2023. After detailed discussions, the Committee recommended to impose the Bank Guarantee of Rs.12.0 lakhs and forfeit the same.

Vide reference 2nd cited, the EE, RO, RC Puram was directed to obtain a fresh B.G. of Rs.12.0 Lakhs and address a letter to the Bank authorities to forfeit Bank Guarantee amount of Rs.12.0 Lakhs for non-compliance of the directions and obtain the forfeited amount by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" and submit to Board office.

Vide reference 3rd cited, the industry was again reviewed in the Task Force Committee meeting held on 03.01.2024. After detailed discussions, the Committee recommended to forfeit the Bank Guarantee of Rs.12.0 lakhs.

In view of the above, the EE, RO, RC Puram is hereby directed once again to obtain a fresh B.G. of Rs.12.0 Lakhs and address a letter to the Bank authorities to forfeit Bank Guarantee amount of Rs.12.0 Lakhs within one month for non-compliance of the directions and obtain the forfeited amount by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" and submit to Board office.

Sd/-
MEMBER SECRETARY

To
The Environmental Engineer,
T.S.Pollution Control Board,
Regional Office,
RC Puram.

//T.C.F.B.O//
Puram
Senior Environmental Engineer
(Task Force - UH-IV)



13
BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-44/TSPCB/TF/HO/2024- 1460

Date: 03.01.2024

Sub: TSPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **DIRECTIONS - ISSUED - Reg.**

can
DESPATCH NO:

DATE: 05 JAN 2024

- Ref:**
1. CFO&HWA Order dated: 01.09.2022, valid upto 31.03.2027.
 2. Directions Orders issued on 03.02.2022.
 3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 5. Directions Orders Issued on 06.12.2022.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions Issued on 21.06.2023 for Levying of Environmental Compensation.
 10. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials Inspected the industry on 28.07.2023.
 11. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 12. The industry filed a WP No.20623 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 13. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 14. Directions issued on 13.09.2023.
 15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 17. RO Nalgonda report dated 28.12.2023.
 18. Dhotigudem Industrial Association representation dated 03.01.2024.
 19. Hearing held on 03.01.2024

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to your industry on 01.09.2022 for expansion under phase-I with a validity period up to 31.03.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board Issued certain directions to the industry on 03.02.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3rd cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
 - i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.

- ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these Industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
6. **WHEREAS**, vide reference 5th cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 31.10.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall comply with the following as per the CPCB directions dt:19.09.2022
 - The unit shall augment MEE and RO, so as to achieve ZLD system.
 - The unit shall segregate High TDS and Low TDS effluent and to install online flow-meters at inlet and outlet.
 - The efficiency of the condensers connected to the reactors shall be improved to reduce the VOCs emissions and total cumulative losses of solvent should not be more than 5% of the solvent on annual basis from storage inventory.
 - The unit shall carry Leak Detection and Repair (LDAR) program to assess the solvent losses and shall take appropriate measures to control to arrest the solvent losses and reduce the VOCs in the premises.
 - To ensure that hazardous wastes shall be disposed within 90 days from the date of generation and shall maintain proper records
 - iv. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - v. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

7. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
 - ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
 - iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
 - v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with Invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
8. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
9. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
10. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions vide reference 9th cited.
11. **WHEREAS**, the industry have filed a Writ Petition No.20623 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
12. **WHEREAS**, vide reference 10th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

1. Coal dust spillages observed on the road as they are transporting crushed coal from crusher to boiler through belt conveyer.
 2. Odour was observed at MEE, ATFD, biological ETP and R&D lab.
 3. As per the consolidated statement submitted by the industry and generated about 56.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
 4. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
 5. The industry has not provided charcoal bed and sub cooler condensers to the scrubbers connected to production blocks A (extension), D1 & D2, F and H Blocks & ATFD and Stripper, which causes smell nuisance in the surrounding area.
 6. The industry has not provided online TDS meter to the HTDS effluents.
 7. The industry has not maintaining the records pertaining to quantity of first cut rain water collected and treated.
 8. During inspection, leakages/ spillages of effluents were observed near MEE system.
 9. The industry provided IP camera for boiler stack, at storm water drain, at main gate. However, the same is not connected to the Board server.
 10. During inspection the scrubber is not in operation which was connected to HTDS collection tank and not provided online pH meters.
 11. The industry has provided PIION spray system but, the same was not in operation during inspection.
 12. The industry has not submitted latest LDAR study report.
 13. The industry has provided 1 No of VOC analyser and connected the same to the Board's server. The VOC analyser is placed at warehouse block. As per the online data, the values are found to be zero (period verified is from 01.06.2023 to 01.08.2023).
 14. During inspection on 01.08.2023, the reading in VOC analyser was observed 2.80 PPM (photograph enclosed). However, the online data showing zero value
13. **WHEREAS**, vide reference 11th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
14. **WHEREAS**, vide reference 12th cited, the industry has filed writ petition no. 20623 of 2023 before the Hon'ble High Court regarding environmental compensation levied by the TSPCB vide order dt.08.08.2023 in WP No.20623 of 2023, disposed the case ordering as follows:
- "Therefore, we are not inclined to entertain this writ petition. However, the petitioner is granted the liberty to take recourse to the remedy of statutory appeal available to him. Needless to state that in case the petitioner files an appeal within a period of two weeks, the National Green Tribunal shall entertain the appeal preferred by the petitioner. Writ petition is accordingly disposed of".*
15. **WHEREAS**, the above industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
16. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided Biological ETP. However, the industry has not developed the bio-culture in the aeration tank of the biological ETP. Clarifier is not in operation. This indicates that biological ETP is not operated effectively.

- ii. The industry provided new RO system with higher capacity and same was not in operation (which was not commissioned by the supplier, since they are not meeting the standards of the RO inlet). Hence, the industry is not treating LTDS effluents in Biological ETP followed by RO.
 - iii. Spillages were observed at MEE area and odour was observed. VOC reading at MEE area - 0.762 ppm.
 - iv. The industry has not provided sub cooler condensers to the scrubbers attached 4 Nos. of production blocks and activated charcoal bed to the scrubbers attached 3 Nos. of production blocks to control process emissions. Thereby causing odour pollution in the surrounding areas.
 - v. The industry has not provided bypass provision for rain water collection tank.
 - vi. They are storing spent acid tanks openly.
 - vii. The odour was observed near production block and MEE area in the premises and VOC readings are 0.196 ppm, 0.214 ppm, 0.355 ppm, 0.411 ppm, 0.407 ppm, 0.419 ppm, 0.334 ppm & 0.207 ppm.
 - viii. The industry is a large scale unit and they are not having dedicated laboratory to measure the parameters of the ETP effluents and not having any environment cell to monitor the operation of the water and air pollution control systems. Most the labours working in the plant are not having PPE's.
 - ix. The committee directed the industry to submit the clarification on the following:
 - x. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
 - xi. The industry has not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023.
17. **WHEREAS**, vide reference 13th cited, the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
18. **WHEREAS**, vide reference 14th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the following directions were issued to your industry vide order dt.13.09.2023:
- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the directions Order dated: 30.05.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.77,70,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.77,70,000/- (Rupees Seventy Seven Lakhs Seventy Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.

(18)

- vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

19. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. As per the CFO, the Industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel for boilers.
- iii. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
- iv. Odour was observed near ZLD area and the VOC readings were In the range of 0.033 to 0.78 PPM.
- v. The industry has provided scrubbers and not provided sub cooler condensers / charcoal bed connected to the production block-A (extension) D1 & D2, H-Block, PB-F Block, Stripper & Vacuum Tub, ATFD & Hight TDS collection tank (Single Stage Scrubber only).
- vi. The odour was observed near production block and MEE area in the premises.
- vii. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
- viii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
- ix. The industry has provided odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment & MEE area to control VOCs. But, odour was observed at MEE area.
- x. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same. The Dothigudem Industrial Association vide letter dt.04.10.2023 also requested the Board for exemption to submit the BG and its forfeiture, citing lack of product demand, heavy competition in Global market and financial crises.
- xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 10.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (861 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.
- xii. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.

- xiii. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
- xiv. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drain of the industry are very high.

20. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
- ii. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
- iii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
- iv. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
- v. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
- vi. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drian of the industry are very high.
- vii. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs.

21. **WHEREAS**, vide reference 16th cited, based on the recommendations of committee, the Board issued **SHOWCAUSE NOTICE** to your industry as to why action should not be initiated against your industry under section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) for the following:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.77,70,000/- for past violations.
- iii. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

22. **WHEREAS**, vide reference 17th cited, the RO, Nalgonda submitted the report and following observations were made:

- 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
- 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.

- 3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
- 4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.
- 5. The Board Officials collected samples from the Borewell at Northwest direction within the Industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). It is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
- 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm3) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm3).
- 7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
- 8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

23. **WHEREAS,** vide reference 18th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.

24. **WHEREAS,** vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

- I. The Committee noted the following non-compliances:
 - 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
 - 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 - 3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
 - 4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.
 - 5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). It is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
 - 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm3) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm3).

7. Dothigudem Industrial Association ⁽²⁾ has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
- III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special conditions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.

26. These orders are Issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).

27. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) directing closure of the industry in the interest of Public Health and Environment without any further notice.

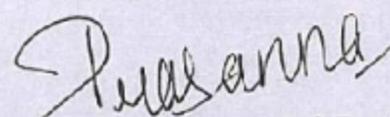
Sd/-
MEMBER SECRETARY

To,
**M/s. Hazelo Lab Private Limited,
(Formerly M/s. Venlar Labs (P) Ltd),
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvangiri District.**

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//


**Senior Environmental Engineer
(Task Force - UH-IV)**

BY REGD. POST WITH ACK. DUE

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-14/TSPCB/TF/HO/2024- (126)

Date: 03.01.2024

Sub: TSPCB - M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd., M/s. Anvija Pharmaceuticals (P) Ltd.), Sy.No.210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued** - Reg.

- Ref :**
1. CFO&HWA order dt.28.05.2022 valid up to 31.03.2026.
 2. Closure Order No. NLG-14/TSPCB/TF/HO/2016-2150, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No. NLG-14/TSPCB/TF/HO/2016, Dt: 30.03.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-1/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the Industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No. NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 12. The Board received a complaint on twitter by Sri Panduchoppari @ panduchoppari on 31.07.2023.
 13. The industry filed a WP No. 18057 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Extension of Temporary Revocation of Closure Order No. NLG-47/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 16. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 17. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 18. RO Nalgonda report dated 28.12.2023.
 19. Dothigudem Industrial Association representation dated 03.01.2024.
 20. Hearing held on 03.01.2024.

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the industry has CFO & HWA of the Board vide order dated 28.05.2022 with a validity up to 31.03.2026.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the Industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 30.03.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
 - i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 Issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
 - i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board Issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
 - i. The industry shall comply with the directions issued vide order dated: 09.11.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - iv. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.
8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
 - i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.

- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
 - iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
 - v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 5th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 Industries located in the area.
 10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.50,40,000/-** along with other directions vide reference 9th cited.
 12. **WHEREAS**, the industry have filed a Writ Petition No. 18057 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. Odour was observed within the premises and at MEE, ATFD area.

- ii. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
 - iii. The industry has to improve housekeeping at MEE area.
14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 18057 of 2023, disposed the case ordering as follows:
"For the afore-mentioned reasons, order dated: 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated: 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter."
16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided 3 Nos. double stage scrubbers with vent condenser followed by activated charcoal bed (2 Nos. at two production blocks and one common scrubber for vent of ATFD and vent of HTDS collection tanks). The industry has not provided Online pH meter for scrubber at MEE area.
 - ii. During the inspection, biological ETP was in operation. However, MLSS is not developed in the biological ETP. ETP is not functioning properly as the COD outlet was very high.
 - iii. The industry need to maintain records of COD, TDS every day for biological ETP so as to know the operating condition of the ETP.
 - iv. During inspection it was observed that, the inlet to stripper tank was not a closed tank which is leading to odour nuisance. The VOCs measured at above tank and found to be 7.784 PPM.
 - v. Odour was observed at MEE area. The VOCs measured at above tank and found to be 0.4 PPM.
 - vi. The industry has to improve housekeeping at MEE area.
 - vii. The industry is storing coal openly and lot of coal / ash spillages observed in the area. Proper shed is required to store the coal.
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.

- ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - iv. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - v. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 - vi. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 - vii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 - viii. The industry shall submit a fresh Bank Guarantee of Rs.12.0 Lakhs for a period of one year within in a week.
 - ix. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
 - x. The industry shall pay the Environmental Compensation (EC) of Rs.50,40,000/-.
20. **WHEREAS**, vide reference 15th cited, the industry filed W.P.No.30282 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.50,40,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.
21. **WHEREAS**, the Task Force Committee Members Inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not developed MLSS in the Biological ETP. Sewage odour was observed in the aeration tanks.
 - ii. No biological culture is maintained in the Aeration tanks thereby ETP is not operating effectively. RO plant is not in operating condition and required to change the RO as per effluent characteristics.
 - iii. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
 - iv. Odour was observed near production block A and MEE area.
 - v. The industry is storing coal openly.
 - vi. The industry is storing hazardous waste of about 25 Tons and not disposing regularly.
 - vii. The industry provided "PIION" system with holes for spraying at ETP area, However, the industry has not provided nozzles for effective spray.
 - viii. The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view) & gate camera. However, only gate camera is connected to TSPCB server.

- ix. The Board Officials conducted stack & Ambient Air Quality Monitoring on 13.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (595 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.
- x. As per analysis reports the values of (COD-656 mg/l & 240 mg/l) and (TDS 1850 mg/l & 1745 mg/l) in the aeration tank - I & II are very less, it indicates that the industry is not treating low TDS effluents in bio ETP.
- xi. The industry has not paid Environmental Compensation of Rs.50,40,000/- vide order dated 21.06.2023 & 13.09.2023.
- xii. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs

22. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:

1. The industry has not developed MLSS in the Biological ETP. Sewage odour was observed in the aeration tanks.
2. No biological culture is maintained in the Aeration tanks thereby ETP is not operating effectively. RO plant is not in operating condition and required to change the RO as per effluent characteristics.
3. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
4. The industry is storing hazardous waste of about 25 Tons and not disposing regularly.
5. The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view) & gate camera. However, only gate camera is connected to TSPCB server.
6. As per analysis reports the values of (COD-656 mg/l & 240 mg/l) and (TDS 1850 mg/l & 1745 mg/l) in the aeration tank - I & II are very less, it indicates that the industry is not treating low TDS effluents in bio ETP.
7. The industry has not paid Environmental Compensation of Rs.50,40,000/- vide order dated 21.06.2023 & 13.09.2023.
8. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs.

23. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. 25% of the levied Environmental compensation i.e., an amount of Rs. 12,50,000/- is paid by the industry.
2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
4. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

- 24. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments. And also BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
- 25. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
 - I. The Committee noted the following non-compliances:
 - 1. About 25% of the levied Environmental compensation i.e., an amount of Rs. 12,50,000/- is paid by the industry.
 - 2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 - 3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm3) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm3).
 - 4. Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments. And also BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.

- 26. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**
 - 1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
 - 2. The industry shall operate ZLD system including biological ETP effectively.
 - 3. The industry shall pay the Environmental Compensation amount within 06 months period.
 - 4. The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.
 - 5. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
- 27. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

- 28. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).
- 29. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To
M/s. Ravoos Laboratories Limited
(Formerly M/s. Silicon Drugs & Intermediates (P) Ltd.,
M/s. Anvija Pharmaceuticals (P) Ltd.,),
Sy.No.210, Dothigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

Copy to:

- 1. The JCEE., Z.O., R.C.Puram for information and necessary action.
- 2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action.
- 3. Concerned file.

P. Subanna
//T.C.F.B.O//
Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-14/TSPCB/TF/HO/2024-11162

Date: 03.01.2024

Sub: TSPCB - M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd., M/s. Anvija Pharmaceuticals (P) Ltd.), Sy.No.210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued** - Reg.

C. A. S.
DESPATCH NO:
DATE: 05 JAN 2024

- Ref :**
1. CFO&HWA order dt.28.05.2022 valid up to 31.03.2026.
 2. Closure Order No. NLG-14/TSPCB/TF/HO/2016-2150, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No. NLG-14/TSPCB/TF/HO/2016, Dt: 30.03.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No. NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 12. The Board received a complaint on twitter by Sri Panduchoppari @ panduchoppari on 31.07.2023.
 13. The industry filed a WP No. 18057 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Extension of Temporary Revocation of Closure Order No. NLG-47/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 16. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 17. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 18. RO Nalgonda report dated 28.12.2023.
 19. Dothigudem Industrial Association representation dated 03.01.2024.
 20. Hearing held on 03.01.2024.

* * * * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the industry has CFO & HWA of the Board vide order dated 28.05.2022 with a validity up to 31.03.2026.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 30.03.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical Industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 Issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board Issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dated: 09.11.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - iv. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.
8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.

- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP *shall be revamped for effective performance.*
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
 - iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
 - v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.50,40,000/-** along with other directions vide reference 9th cited.
 12. **WHEREAS**, the industry have filed a Writ Petition No. 18057 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. Odour was observed within the premises and at MEE, ATFD area.
 - ii. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
 - iii. The industry has to improve housekeeping at MEE area.

14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 In WP No. 18057 of 2023, disposed the case ordering as follows:
- "For the afore-mentioned reasons, order dated: 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated: 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter."
16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided 3 Nos. double stage scrubbers with vent condenser followed by activated charcoal bed (2 Nos. at two production blocks and one common scrubber for vent of ATFD and vent of HTDS collection tanks). The industry has not provided Online pH meter for scrubber at MEE area.
 - ii. During the inspection, biological ETP was in operation. However, MLSS is not developed in the biological ETP. ETP is not functioning properly as the COD outlet was very high.
 - iii. The industry need to maintain records of COD, TDS every day for biological ETP so as to know the operating condition of the ETP.
 - iv. During inspection it was observed that, the inlet to stripper tank was not a closed tank which is leading to odour nuisance. The VOCs measured at above tank and found to be 7.784 PPM.
 - v. Odour was observed at MEE area. The VOCs measured at above tank and found to be 0.4 PPM.
 - vi. The industry has to improve housekeeping at MEE area.
 - vii. The industry is storing coal openly and lot of coal / ash spillages observed in the area. Proper shed is required to store the coal.
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.

- iv. **The industry has provided aeration tanks for Biological ETP.** No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - v. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 - vi. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 - vii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 - viii. The industry shall submit a fresh Bank Guarantee of Rs.12.0 Lakhs for a period of one year within in a week.
 - ix. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
 - x. The industry shall pay the Environmental Compensation (EC) of Rs.50,40,000/-.
20. **WHEREAS**, vide reference 15th cited, the industry filed W.P.No.30282 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.50,40,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.
21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not developed MLSS in the Biological ETP. Sewage odour was observed in the aeration tanks.
 - ii. No biological culture is maintained in the Aeration tanks thereby ETP is not operating effectively. RO plant is not in operating condition and required to change the RO as per effluent characteristics.
 - iii. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
 - iv. Odour was observed near production block A and MEE area.
 - v. The industry is storing coal openly.
 - vi. The industry is storing hazardous waste of about 25 Tons and not disposing regularly.
 - vii. The industry provided "PIION" system with holes for spraying at ETP area, However, the industry has not provided nozzles for effective spray.
 - viii. The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view) & gate camera. However, only gate camera is connected to TSPCB server.
 - ix. The Board Officials conducted stack & Ambient Air Quality Monitoring on 13.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (595 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.

- x. As per analysis reports the values of (COD-656 mg/l & 240 mg/l) and (TDS 1850 mg/l & 1745 mg/l) in the aeration tank - I & II are very less, it indicates that the industry is not treating low TDS effluents in bio ETP.
- xi. The industry has not paid Environmental Compensation of Rs.50,40,000/- vide order dated 21.06.2023 & 13.09.2023.
- xii. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs

22. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:

1. The industry has not developed MLSS in the Biological ETP. Sewage odour was observed in the aeration tanks.
2. No biological culture is maintained in the Aeration tanks thereby ETP is not operating effectively. RO plant is not in operating condition and required to change the RO as per effluent characteristics.
3. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
4. The industry is storing hazardous waste of about 25 Tons and not disposing regularly.
5. The industry has provided IP Camera focusing Chimney area, Biological ETP (which can rotate 360 for plant view) & gate camera. However, only gate camera is connected to TSPCB server.
6. As per analysis reports the values of (COD-656 mg/l & 240 mg/l) and (TDS 1850 mg/l & 1745 mg/l) in the aeration tank - I & II are very less, it indicates that the industry is not treating low TDS effluents in bio ETP.
7. The industry has not paid Environmental Compensation of Rs.50,40,000/- vide order dated 21.06.2023 & 13.09.2023.
8. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs.

23. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. 25% of the levied Environmental compensation i.e., an amount of Rs. 12,50,000/- is paid by the industry.
2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
4. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the Industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

24. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments. And also BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
25. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. 25% of the levied Environmental compensation i.e., an amount of Rs. 12,50,000/- is paid by the industry.
 2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
 4. Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments. And also BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.

26. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**
1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
 2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.
 3. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
27. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.
28. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).

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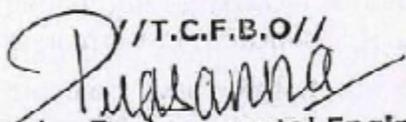
29. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include Imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To
M/s. Ravoos Laboratories Limited
(Formerly M/s. Silicon Drugs & Intermediates (P) Ltd.,
M/s. Anvija Pharmaceuticals (P) Ltd.,),
Sy.No.210, Dothigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action.
3. Concerned file.

//T.C.F.B.O//

Senior Environmental Engineer
(Task Force - UH-IV)



TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tpspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

38

Order No.NLG-14/TSPCB/TF/HO/2024-1463

Date:03.01.2024.

Sub : TSPCB - M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd., M/s. Anvija Pharmaceuticals (P) Ltd.), Sy.No.210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Restoration of Power Supply for a period of Three months - Orders Issued** - Reg.

Ref : 1. Order No.NLG-14/TSPCB/TF/HO/2023-449, Dt: 13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No.NLG-14/TSPCB/TF/HO/2024- , dt:03.01.2024.

* * * * *

In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period up to 31.10.2023 to **M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd., M/s. Anvija Pharmaceuticals (P) Ltd.), Sy.No.210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.**

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to **M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd., M/s. Anvija Pharmaceuticals (P) Ltd.), Sy.No.210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District for a period of Three Months from date of This Order** for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

Sd/-
MEMBER SECRETARY

To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//

Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

39

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-85/TSPCB/UH-II/2024- 1164

Date: 03.01.2024

Sub: TSPCB - M/s. V.J.Sai Chem, Sy.No.240/B, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

Ref:

1. CFO&HWA Order dt: 14.10.2021 with a validity up to 30.04.2026.
2. Closure Order No.NLG-50/TSPCB/TF/HO/2017-, dt.02.03.2022.
3. Temporary Revocation of Closure Order No.NLG-50/TSPCB/TF/HO/2017, Dt: 27.04.2022.
4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
7. EPTRI, Hyderabad Study report dt.24.04.2023.
8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
12. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
13. The Industry filed a WP No. 18088 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30301 of 2023.
16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
17. RO Nalgonda report dated 28.12.2023.
18. Dhothigudem Industrial Association representation dated 03.01.2024.
19. Hearing held on 03.01.2024.

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy Sy.No.238 & 239, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 14.10.2021 with a validity up to 30.04.2026.
3. **WHEREAS**, vide reference 2nd cited, the Board Issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.

C. J. R.
DESPATCH NO:
DATE: 05 JAN 2024

5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadalah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.
 - v. The industry shall upgrade the existing ETP to treat the LTDS effluents so as to have full-fledged Biological ETP.

- vi. The industry shall improve the operational performance of MEE system (Stripper, MEE & ATFD) as suggested by the ZLD performance study. (41)
- vii. The industry shall install online TDS meter for HTDS effluent generation and connect the same to TSPCB server within 15 days.
- viii. The industry shall connect the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server within 15 days.
- ix. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- x. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- xi. The industry shall store drums containing raw material / in process goods / MLs / spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xii. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xiii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
- xiv. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xvi. The industry shall not use effluent or any waste water for cooling tower purpose and shall check the quality of the cooling circulation water regularly.
- xvii. The industry shall maintain proper housekeeping within the premises.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate,

HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.22,40,000/-** along with other directions vide reference 9th cited.
 12. **WHEREAS**, the industry have filed a Writ Petition No. 18088 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has provided scrubber to the ATFD vent and causing smell nuisance at ATFD area. However odour was observed at the ATFD area.
 - ii. The overall housekeeping of the industry shall improve.
 - iii. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However, soil details have not submitted.
 - iv. The industry has installed online TDS meter but not connected to TSPCB website.
 - v. During the inspection spillages were observed at ATFD & MEE.
 - vi. As per the RO report, the following are the non - compliances:
 - vii. During the inspection it was observed that, acid proof tiles work is under progress in the Biological ETP.
 - viii. The industry has not connected LTDS effluents digital flow meter to Board server.
 - ix. The industry has not provided fixed pipelines from solvent storage yard to production block. The industry using drums for transfer of solvent, this will cause odour nuisance in the surrounding area.

x. The industry has not provided PIION spray system.

xi. The industry is having odour in the premises.

xii. The industry has not submitted latest LDAR study report.

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14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
15. **WHEREAS**, vide reference 13th cited, the industry has filed writ petition against the Environmental compensation imposed by the Board. the Hon'ble High Court vide order dt.08.08.2023 in WP No. 18088 of 2023, disposed the case ordering as follows:
"For the afore-mentioned reasons, order dated:21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated:02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter."
16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
1. The committee recommended to provide separate scrubber for HTDS collection tank dome instead of common scrubber for ATFD and HTDS collection tank.
 2. Bio culture development is under progress in the Biological ETP. The biological ETP is not functioning properly, just they are doing aeration.
 3. The industry has stored drums openly. Photograph submitted below:
 4. The compliance status of the industry on the Non-Compliances reported in the TF meeting dt.07.08.2023 agenda is as follows:
 5. During the inspection, odour is observed in the industry premises.
 6. During the inspection, it was observed that tiles work in the aeration tank was completed and they are developing Bio culture in the aeration tank as part of the Biological ETP. Presently they are operating pre aeration tank as aeration to treat the LTDS effluent. They have just started the Biological ETP system till date they have not addressed the effluents. The culture they are developing is also not active.
 7. The industry has not connected LTDS effluents digital flow meter to Board server
 8. The industry has not provided PIION spray system.
 9. During the inspection, odour was observed in the industry premises
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:

1. The industry shall pay the Environmental Compensation (EC) of Rs.22,40,000/-.
 2. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 3. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
 4. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 5. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 6. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 7. The industry shall extend the Bank Guarantee from time to time till further orders from the Board.
 8. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
20. **WHEREAS**, vide reference 15th cited, the industry filed W.P.no.30301 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.22,40,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.
21. **WHEREAS**, the Task Force Committee Members inspected the Industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
1. The industry has not paid Environmental Compensation of Rs.22,40,000/ vide order dated 21.06.2023 & 13.09.2023.
 2. Lot of hose pipes were observed in the industry premises.
 3. The industry has stored hazardous waste drums openly causing odour nuisance.
 4. Solvent odour is observed near bio ETP due to pre-aeration tanks present before the biological ETP. The industry may be directed to provide dome to the pre aeration tanks or may develop culture in the tanks for effective reduction of COD.
 5. Provided "PIION" system with holes for spraying, However, the industry has not provided nozzles for effective spray.
 6. As per analysis reports the value of TDS is 28,405 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately.
 7. The Board Officials conducted stack & Ambient Air Quality Monitoring on 13.11.2023. As per the analysis reports, the value of Particulate Matter (PM10) (105 µg/m³ against 100 µg/m³) & Suspended Particulate Matter (SPM) (406 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.
 8. As per the analysis reports the values of TDS & COD are very high (4,879 mg/l & 6,519 mg/l) in production block-I and the values of TDS & COD are very high (3,920 mg/l & 1,148 mg/l) in production block-IV.
22. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:
1. Lot of hose pipes were observed in the industry premises.

2. The industry has stored hazardous waste drums openly causing odour nuisance.
3. As per analysis reports the value of TDS is 28,405 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately.
4. As per the analysis reports the values of TDS & COD are very high (4,879 mg/l & 6,519 mg/l) in production block-I and the values of TDS & COD are very high (3,920 mg/l & 1,148 mg/l) in production block-IV.
5. The industry has not paid Environmental Compensation of Rs.22,40,000/ vide order dated 21.06.2023 & 13.09.2023.

23. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 5,60,000/-.
2. The Board Officials collected the sample from MEE feed (HTDS). As per the analysis reports, the value of COD is very high i.e 1,27,296 mg/L.
3. The Board Officials collected the sample from RO permeate. As per the analysis reports, the value of TDS is high i.e 2,050 mg/L.
4. The Board Officials collected the samples from Cooling tower of production block I & II. As per the analysis reports, the value of COD -3,231 mg/L and TDS - 4,182 mg/L.
5. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM₁₀ value (135 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).
6. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.
7. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

24. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that they will pay the remaining Environmental Compensation amount.

25. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & Industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 5,60,000/-.
2. The Board Officials collected the sample from MEE feed (HTDS). As per the analysis reports, the value of COD is very high i.e 1,27,296 mg/L.
3. The Board Officials collected the sample from RO permeate. As per the analysis reports, the value of TDS is high i.e 2,050 mg/L.
4. The Board Officials collected the samples from Cooling tower of production block I & II. As per the analysis reports, the value of COD -3,231 mg/L and TDS - 4,182 mg/L.
5. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM₁₀ value (135 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).

- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dhothigudem area.
- III. The industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments.

After detailed discussions, the committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

26. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.
4. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

27. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

28. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

29. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

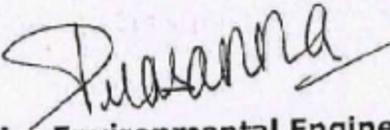
Sd/-
MEMBER SECRETARY

To,
M/s. V.J.Sai Chem,
Sy.No.240/B, Dhothigudem (V),
Pochampally (M), Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

47

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-85/TSPCB/TF/HO/2024- 1465

Date: 03.01.2024

Sub: TSPCB - M/s. V.J.Sai Chem, Sy.No.240/B, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:
1. CFO&HWA Order dt: 14.10.2021 with a validity up to 30.04.2026.
 2. Closure Order No.NLG-50/TSPCB/TF/HO/2017-, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-50/TSPCB/TF/HO/2017, Dt: 27.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 12. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 13. The industry filed a WP No. 18088 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30301 of 2023.
 16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 17. RO Nalgonda report dated 28.12.2023.
 18. Dhothigudem Industrial Association representation dated 03.01.2024.
 19. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238 & 239, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 14.10.2021 with a validity up to 30.04.2026.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah

and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 Issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall take all odour control measures and operate the same regularly to avoid odour nuisance to the surrounding environment.
 - iii. The industry shall provide & maintain dome with suction hood followed by double stage scrubber with online pH meter to the HTDS effluent storage tanks to control the odour nuisance.
 - iv. The industry shall install sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.
 - v. The industry shall maintain sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.
 - vi. The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.
 - vii. The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server.
 - viii. The industry shall provide odour suppressent mist spray / sprinkle "PIION" liquid at effluent treatment area to contain VOCs.
 - ix. The industry shall provide & maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.

- x. The industry shall maintain the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.
- xi. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.
- xii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xiii. The industry shall not cause any air pollution to the surrounding area.

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8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding Industries and effluent flow as per standard norms.
 - ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
 - iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
 - v. The Industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued

directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs.22,40,000/- along with other directions vide reference 9th cited.

12. **WHEREAS**, the industry have filed a Writ Petition No. 18088 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.

13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

- i. The industry has provided scrubber to the ATFD vent and causing smell nuisance at ATFD area. However odour was observed at the ATFD area.
- ii. The overall housekeeping of the industry shall improve.
- iii. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However, soil details have not submitted.
- iv. The industry has installed online TDS meter but not connected to TSPCB website.
- v. During the inspection spillages were observed at ATFD & MEE.
- vi. As per the RO report, the following are the non - compliances:
- vii. During the inspection it was observed that, acid proof tiles work is under progress in the Biological ETP.
- viii. The industry has not connected LTDS effluents digital flow meter to Board server.
- ix. The industry has not provided fixed pipelines from solvent storage yard to production block. The industry using drums for transfer of solvent, this will cause odour nuisance in the surrounding area.
- x. The industry has not provided PIION spray system.
- xi. The industry is having odour in the premises.
- xii. The industry has not submitted latest LDAR study report.

14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.

15. **WHEREAS**, vide reference 13th cited, the industry has filed writ petition against the Environmental compensation imposed by the Board. the Hon'ble High Court vide order dt.08.08.2023 in WP No. 18088 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated:2106.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanati0oni dated:02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall affortd and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.20232 . It is made clear that this court has not expressed any opinion on merits of the matter."

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.

17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:

- i. The committee recommended to provide separate scrubber for HTDS collection tank dome instead of common scrubber for ATFD and HTDS collection tank.
- ii. Bio culture development is under progress in the Biological ETP. The biological ETP is not functioning properly, just they are doing aeration.
- iii. The industry has stored drums openly. Photograph submitted below:
- iv. The compliance status of the industry on the Non-Compliances reported in the TF meeting dt.07.08.2023 agenda is as follows:
- v. During the inspection, odour is observed in the industry premises.
- vi. During the inspection, it was observed that tiles work in the aeration tank was completed and they are developing Bio culture in the aeration tank as part of the Biological ETP. Presently they are operating pre aeration tank as aeration to treat the LTDS effluent. They have just started the Biological ETP system till date they have not addressed the effluents. The culture they are developing is also not active.
- vii. The industry has not connected LTDS effluents digital flow meter to Board server
- viii. The industry has not provided PIION spray system.
- ix. During the inspection, odour was observed in the industry premises

18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.

19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:

- i. The industry shall comply with all conditions stipulated in the CFO & HWA order issued by the Board scrupulously.
- ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
- iii. The industry shall pay the Environmental Compensation (EC) of Rs.22,40,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.22,40,000/- (Rupees Twenty Two Lakhs Forty Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
- iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
- v. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
- vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall extend the Bank Guarantee from time to time till further orders from the Board.

- x. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
20. **WHEREAS**, vide reference 16th cited, the industry filed W.P.no.30301 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.22,40,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.
21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not paid Environmental Compensation of Rs.22,40,000/ vide order dated 21.06.2023 & 13.09.2023.
 - ii. Lot of hose pipes were observed in the industry premises.
 - iii. The industry has stored hazardous waste drums openly causing odour nuisance.
 - iv. Solvent odour is observed near bio ETP due to pre-aeration tanks present before the biological ETP. The industry may be directed to provide dome to the pre aeration tanks or may develop culture in the tanks for effective reduction of COD.
 - v. Provided "PIION" system with holes for spraying, However, the industry has not provided nozzles for effective spray.
 - vi. As per analysis reports the value of TDS is 28,405 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately.
 - vii. The Board Officials conducted stack & Ambient Air Quality Monitoring on 13.11.2023. As per the analysis reports, the value of Particulate Matter (PM10) (105 µg/m³ agaisnt 100 µg/m³) & Suspended Particulate Matter (SPM) (406 mg/Nm³ agaisnt 115 mg/Nm³) is exceeding the Board standard.
 - viii. As per the analysis reports the values of TDS & COD are very high (4,879 mg/l & 6,519 mg/l) in production block-I and the values of TDS & COD are very high (3,920 mg/l & 1,148 mg/l) in production block-IV.
30. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:
1. The industry has not paid Environmental Compensation of Rs.22,40,000/ vide order dated 21.06.2023 & 13.09.2023.
 2. Lot of hose pipes were observed in the industry premises.
 3. The industry has stored hazardous waste drums openly causing odour nuisance.
 4. Solvent odour is observed near bio ETP due to pre-aeration tanks present before the biological ETP. The industry may be directed to provide dome to the pre aeration tanks or may develop culture in the tanks for effective reduction of COD.
 5. Provided "PIION" system with holes for spraying, However, the industry has not provided nozzles for effective spray.
 6. As per analysis reports the value of TDS is 28,405 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately.
 7. The Board Officials conducted stack & Ambient Air Quality Monitoring on 13.11.2023. As per the analysis reports, the value of Particulate Matter (PM10) (105 µg/m³ agaisnt 100 µg/m³) & Suspended Particulate Matter (SPM) (406 mg/Nm³ agaisnt 115 mg/Nm³) is exceeding the Board standard.

8. As per the analysis reports the values of TDS & COD are very high (4,879 mg/l & 6,519 mg/l) in production block-I and the values of TDS & COD are very high (3,920 mg/l & 1,148 mg/l) in production block-IV.

31. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 5,60,000/-.
2. The Board Officials collected the sample from MEE feed (HTDS). As per the analysis reports, the value of COD is very high i.e 1,27,296 mg/L.
3. The Board Officials collected the sample from RO permeate. As per the analysis reports, the value of TDS is high i.e 2,050 mg/L.
4. The Board Officials collected the samples from Cooling tower of production block I & II. As per the analysis reports, the value of COD -3,231 mg/L and TDS - 4,182 mg/L.
5. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM₁₀ value (135 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).
6. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area.
7. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.
8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

32. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that they will pay the remaining Environmental Compensation amount.

33. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 5,60,000/-.
2. The Board Officials collected the sample from MEE feed (HTDS). As per the analysis reports, the value of COD is very high i.e 1,27,296 mg/L.
3. The Board Officials collected the sample from RO permeate. As per the analysis reports, the value of TDS is high i.e 2,050 mg/L.
4. The Board Officials collected the samples from Cooling tower of production block I & II. As per the analysis reports, the value of COD -3,231 mg/L and TDS - 4,182 mg/L.
5. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM₁₀ value (135 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).

II. During the meeting, the complainants informed that, smell nuisance and water pollution from the Industries located in Dothigudem area.

III. The industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments.

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After detailed discussions, the committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

34. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.
3. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

35. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

36. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).

37. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

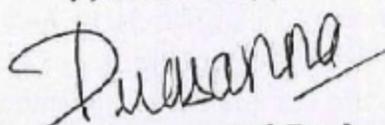
Sd/-
MEMBER SECRETARY

To,
M/s. V.J.Sai Chem,
Sy.No.240/B, Dhothigudem (V),
Pochampally (M), Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
- ✓ 3. Concerned File.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



(55)

TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

Order No.NLG-50/TSPCB/TF/HO/2023-1466

Date:03.01.2024

Sub : TSPCB - M/s. V.J.Sai Chem, Sy.No.240/B, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Restoration of Power Supply for a period of Three Months - Orders Issued** - Reg.

Ref : 1. Order No.NLG-50/TSPCB/ TF/HO/2023-, dt:13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No.NLG-50/TSPCB/ TF/HO/2024- , dt:03.01.2024.

In the 1st reference mentioned above, under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period upto 31.10.2023 to **M/s. V.J.Sai Chem, Sy.No.240/B, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.**

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry for a period of Three months. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to **M/s. V.J.Sai Chem, Sy.No.240/B, Dhothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District** for a period of three months from the date of this order for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

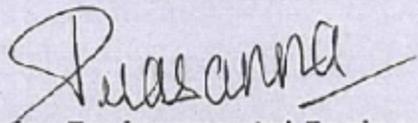
Sd/-
MEMBER SECRETARY

To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

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ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-85/TSPCB/TF/HO/2024-~~11768~~

Date: 03.01.2024

Sub: TSPCB - M/s. SVR Laboratories (P) Ltd., Sy.No. 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:
1. CFO Order dt. 09.11.2021 and valid up to 31.10.2025.
 2. Closure Order No.NLG-96/TSPCB/TF/HO/2016-, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-96/TSPCB/TF/HO/2016, Dt: 27.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/05/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 12. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 13. The industry filed a WP.No. 18108 of 2023 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 16. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30309 of 2023.
 17. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 18. RO Nalgonda report dated 28.12.2023.
 19. Dothigudem Industrial Association representation dated 03.01.2024.
 20. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 09.11.2021 with a validity up to 31.10.2025.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.

5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.
 - v. The industry shall operate the Biological ETP continuously to treat the LTDS effluents.
 - vi. The industry shall improve the operational performance of MEE system (Stripper, MEE & ATFD) as suggested by the ZLD performance study.
 - vii. The industry shall install online TDS meter for HTDS effluent generation and connect the same to TSPCB server within one month.

- viii. The industry shall provide first run off rain water & seepage collection pit with *proper bypass arrangement for free flow* of subsequent rain water (24 KL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- x. The industry shall store drums containing raw material / In process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xi. The industry shall collect & store the hazardous waste in closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xii. The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure for continuous data transmission to the TSPCB server.
- xiii. The industry shall provide/maintain operate IP cameras at main gate entrance and ensure for continuous data transmission to the TSPCB server.
- xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xv. The industry shall not use effluent or any waste water for cooling tower purpose and shall check the quality of the cooling circulation water regularly.
- xvi. The industry shall maintain proper housekeeping within the premises.
- xvii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase-I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further

action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.

vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.44,80,000/-** along with other directions vide reference 9th cited.
12. **WHEREAS**, the industry have filed a Writ Petition No. 18108 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has not provided separate detoxification area for cleaning of drums.
 - ii. The industry has not submitted latest LDAR study report.
 - iii. The housekeeping of the industry is very poor. Lot of spillages were observed at the MEE area, ATFD area and hazardous waste storage area.
 - iv. Fumes were observed during inspection and causing odour nuisance in the surrounding area.
 - v. Installation work of condenser to stripper was under progress.
 - vi. During inspection, inorganic salts of about 40 Tons & Organic residue of about 2 Tons was present in the industry premises.
 - vii. During the inspection, odour of solvent toluene was observed in the premises.
 - viii. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.
14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 18108 of 2023, disposed the case ordering as follows:

"for the afore-mentioned reasons, order dated:2106.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated:02.06.2023. Needless to state that the Board

shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter."

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.

17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:

- i. During the inspection, the industry representative informed that the outlet COD of biological ETP is 1000. The industry has developed less quantity of MLSS in the Biological ETP (which is leading to inadequate for reduction of COD in bio-ETP). The committee recommended that, the industry has to increase the MLSS in the biological ETP.
- ii. During the inspection, it was observed that, the insulation to calandria of MEE was not proper.
- iii. The industry has provided drums storage yard, however empty drums are stored openly on ground.
- iv. The compliance status of the industry on the Non-Compliance mentioned in TF meeting agenda dated:07.08.2023:
 - v. Housekeeping needs improvement.
 - vi. The bio-culture is not available, they are just aerating it. Need to establish bio-culture.
 - vii. During inspection, Inorganic salts of about 40 Tons & Organic residue of about 2 Tons was present in the industry premises. Photograph enclosed as below. The committee recommended to dispose the waste immediately.
 - viii. The committee recommended for double stage scrubber for vents of HTDS collection tank in place of single stage scrubber.

18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.

19. **WHEREAS**, vide reference 15th cited, the industry filed W.P.no.30309 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.44,80,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.

20. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:

- i. The industry shall pay the Environmental Compensation (EC) of Rs.44,80,000/-.
- ii. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
- iii. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
- iv. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

- v. The Industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 - vi. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 - vii. The industry shall extend the Bank Guarantee from time to time till further orders from the Board.
 - viii. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.
21. **WHEREAS**, the industry filed W.P.No.30309 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.44,80,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.
22. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not paid Environmental Compensation of Rs.44,80,000/ vide order dated 21.06.2023 & 13.09.2023.
 - ii. During inspection, it was observed that aeration tank was filled with cow dung and sending the effluent in small quantity which indicates they are not operating Biological ETP effectively. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
 - iii. The RO Plant was not in operation and the industry was asked to keep in operation, then lot of leakages from the pipe joints were observed. RO plant is not in operating condition and hence required to change the RO plant as per effluent characteristics.
 - iv. The industry has sheds for drums storage yard. However, drums (20 nos) were stored openly in west side of the industry.
 - v. The industry representative informed that they sent hazardous waste of about 20 Tonnes. However, about 30 tons of salts were still in the storage shed which is causing odour nuisance.
 - vi. Process sludge of about 4 tons was stored beside production block-II causing odour nuisance.
 - vii. The industry has not provided double stage scrubber for vents of HTDS collection tank in place of single stage scrubber as per the recommendation of the TF Committee.
 - viii. Insulation waste stored on open ground. The industry has not provided PIION spray system at ZLD area.
 - ix. The Board Officials conducted stack & Ambient Air Quality Monitoring on 05.10.2023. As per the analysis reports, the value of Particulate Matter (PM₁₀) (161 µg/m³ against 100 µg/m³) is exceeding the Board standard.
 - x. As per the analysis reports the values of TDS & COD are very high (3,380 mg/l & 1,248 mg/l) in Cooling Tower of Production Block-I and the values of TDS & COD are very high (3,050 mg/l & 1,008 mg/l) in Cooling Tower of Production Block-II.
 - xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 05.10.2023. As per the analysis reports, the value of Particulate Matter (PM₁₀) (161 µg/m³ against 100 µg/m³) is exceeding the Board standard.

23. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. During inspection, it was observed that aeration tank was filled with cow dung and sending the effluent in small quantity which indicates they are not operating Biological ETP effectively. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
- ii. The RO Plant was not in operation and the industry was asked to keep in operation, then lot of leakages from the pipe joints were observed. RO plant is not in operating condition and hence required to change the RO plant as per effluent characteristics.
- iii. The industry has sheds for drums storage yard. However, drums (20 nos) were stored openly in west side of the industry.
- iv. The industry has not provided double stage scrubber for vents of HTDS collection tank in place of single stage scrubber as per the recommendation of the TF Committee.
- v. As per the analysis reports the values of TDS & COD are very high (3,380 mg/l & 1,248 mg/l) in Cooling Tower of Production Block-I and the values of TDS & COD are very high (3,050 mg/l & 1,008 mg/l) in Cooling Tower of Production Block-II.
- vi. The industry has not paid Environmental Compensation of Rs.44,80,000/ vide order dated 21.06.2023 & 13.09.2023.

24. **WHEREAS**, vide reference 17th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:

- i. During inspection, it was observed that aeration tank was filled with cow dung and sending the effluent in small quantity which indicates they are not operating Biological ETP effectively. The committee observed that the industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.
- ii. The RO Plant was not in operation and the industry was asked to keep in operation, then lot of leakages from the pipe joints were observed. RO plant is not in operating condition and hence required to change the RO plant as per effluent characteristics.
- iii. The industry has sheds for drums storage yard. However, drums (20 nos) were stored openly in west side of the industry.
- iv. The industry has not provided double stage scrubber for vents of HTDS collection tank in place of single stage scrubber as per the recommendation of the TF Committee.
- v. As per the analysis reports the values of TDS & COD are very high (3,380 mg/l & 1,248 mg/l) in Cooling Tower of Production Block-I and the values of TDS & COD are very high (3,050 mg/l & 1,008 mg/l) in Cooling Tower of Production Block-II.
- vi. The industry has not paid Environmental Compensation of Rs.44,80,000/ vide order dated 21.06.2023 & 13.09.2023.

25. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

- 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,20,000/-
- 2. The Board Officials collected the samples from Inlet of Biological ETP. As per the analysis reports, Inlet sample is having less TSS, TDS and COD values than RO Feed i.e., Biological ETP Inlet (TSS - 72 mg/l, TDS - 1,850 mg/l and COD - 41 mg/l) and RO Feed (TSS - 246 mg/l, TDS - 3,211 mg/l and COD - 424 mg/l)

3. RO Rejects sample is having less TDS value than RO Feed
RO Rejects - (TDS - 2,248 mg/l) RO Feed - (TDS - 3211 mg/l).
4. There is marginal decrease in COD values of RO Rejects compared to RO Feed i.e., RO Rejects (COD - 408 mg/l) RO Feed (COD - 424 mg/l).
5. As per the analysis reports, it indicates that the RO plant is not working effectively.
6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM10 value (114 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).
7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as-given below:

- i. The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".

- ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.

8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

26. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that, they will pay the remaining Environmental Compensation amount in three installments.

27. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,20,000/-
2. The Board Officials collected the samples from Inlet of Biological ETP. As per the analysis reports, Inlet sample is having less TSS, TDS and COD values than RO Feed i.e., Biological ETP Inlet (TSS - 72 mg/l, TDS - 1,850 mg/l and COD - 41 mg/l) and RO Feed (TSS - 246 mg/l, TDS - 3,211 mg/l and COD - 424 mg/l)
3. RO Rejects sample is having less TDS value than RO Feed
RO Rejects - (TDS - 2,248 mg/l) RO Feed - (TDS - 3211 mg/l).
4. There is marginal decrease in COD values of RO Rejects compared to RO Feed i.e., RO Rejects (COD - 408 mg/l) RO Feed (COD - 424 mg/l).
5. As per the analysis reports, it indicates that the RO plant is not working effectively.
6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM10 value (114 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).

II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.

III. The industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments.

After detailed discussions, the committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

28. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall pay the remaining Environmental Compensation amount within 06 months period.
3. The industry shall operate ZLD system including biological ETP effectively.
4. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

29. **WHEREAS**, the TSSPDCL, Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

30. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

31. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

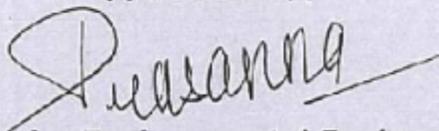
Sd/-
MEMBER SECRETARY

To,
M/s. SVR Laboratories (P) Ltd.,
Sy.No. 239/A, 239/E,
Dothigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//


**Senior Environmental Engineer
(Task Force - UH-IV)**



BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Notice No. NLG-85/TSPCB/UH-II/2024-1468

Date: 03.01.2024

Sub: TSPCB – M/s. SVR Laboratories (P) Ltd., Sy.No. 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District – Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) – Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) – Extension of Temporary Revocation of Closure Order for a period of Three Months – Orders Issued – Reg.

- Ref:**
1. CFO Order dt. 09.11.2021 and valid up to 31.10.2025.
 2. Closure Order No.NLG-96/TSPCB/TF/HO/2016-, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-96/TSPCB/TF/HO/2016, Dt: 27.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 12. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 13. The industry filed a WP.No. 18108 of 2023 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 16. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30309 of 2023.
 17. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 18. RO Nalgonda report dated 28.12.2023.
 19. Dothigudem Industrial Association representation dated 03.01.2024.
 20. Hearing held on 03.01.2024.

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 09.11.2021 with a validity up to 31.10.2025.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.

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DATE : 05 JAN 2024

5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
- ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
- iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.

6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-

- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
- ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
- iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these Industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.

7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.

- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
- ii. The industry shall provide & maintain dome with suction hood followed by double stage scrubber with online pH meter to the HTDS effluent storage tanks to control the odour nuisance.
- iii. The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.
- iv. The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.
- v. The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.
- vi. The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server.
- vii. The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to contain VOCs.

- viii. The industry shall provide & maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.
- ix. The industry shall maintain the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.
- x. The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.
- xi. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xii. The Industry shall not cause any air pollution in the surrounding area.

8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
- vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.

10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.

11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.44,80,000/-** along with other directions vide reference 9th cited.
12. **WHEREAS**, the industry have filed a Writ Petition No. 18108 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
13. **WHEREAS**, vide reference 11th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
- i. The industry has not provided separate detoxification area for cleaning of drums.
 - ii. The industry has not submitted latest LDAR study report.
 - iii. The housekeeping of the industry is very poor. Lot of spillages were observed at the MEE area, ATFD area and hazardous waste storage area.
 - iv. Fumes were observed during inspection and causing odour nuisance in the surrounding area.
 - v. Installation work of condenser to stripper was under progress.
 - vi. During inspection, inorganic salts of about 40 Tons & Organic residue of about 2 Tons was present in the industry premises.
 - vii. During the inspection, odour of solvent toluene was observed in the premises.
 - viii. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.
14. **WHEREAS**, vide reference 12th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 18108 of 2023, disposed the case ordering as follows:
- "for the afore-mentioned reasons, order dated:2106.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated:02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show cause notice dated; 22.05.20232 . It is made clear that this court has not expressed any opinion on merits of the matter."
16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. During the inspection, the industry representative informed that the outlet COD of biological ETP is 1000. The Industry has developed less quantity of MLSS in the Biological ETP (which is leading to inadequate for reduction of COD in bio-ETP). The committee recommended that, the industry has to increase the MLSS in the biological ETP.

- ii. During the inspection, it was observed that, the insulation to calandria of MEE was not proper.
- iii. The industry has provided drums storage yard, however empty drums are stored openly on ground.
- iv. The compliance status of the industry on the Non-Compliance mentioned in TF meeting agenda dated:07.08.2023:
- v. Housekeeping needs improvement.
- vi. The bio-culture is not available, they are just aerating it. Need to establish bio-culture.
- vii. During inspection, inorganic salts of about 40 Tons & Organic residue of about 2 Tons was present in the industry premises. Photograph enclosed as below. The committee recommended to dispose the waste immediately.
- viii. The committee recommended for double stage scrubber for vents of HTDS collection tank in place of single stage scrubber.

18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.

32. **WHEREAS**, vide reference 16th cited, the industry filed W.P.No.30309 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.44,80,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.

19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:

- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
- ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
- iii. The industry shall pay the Environmental Compensation (EC) of Rs.44,80,000/- as per the Hon'ble NGT Orders, you are hereby directed to deposit an amount of Rs.44,80,000/- (Rupees Forty Four Lakhs Eighty Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
- iv. The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to control VOCs within one month.
- v. The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.

20. **WHEREAS**, the industry filed W.P.no.30309 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.44,80,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.

21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.44,80,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. During inspection, it was observed that aeration tank was filled with cow dung and sending the effluent in small quantity which indicates they are not operating Biological ETP effectively. The committee observed that the

industry has not improved the Biological effluent treatment systems as observed in earlier inspection also.

- iii. The RO Plant was not in operation and the industry was asked to keep in operation, then lot of leakages from the pipe joints were observed. RO plant is not in operating condition and hence required to change the RO plant as per effluent characteristics.
- iv. The industry has sheds for drums storage yard. However, drums (20 nos) were stored openly in west side of the industry.
- v. The industry representative informed that they sent hazardous waste of about 20 Tonnes. However, about 30 tons of salts were still in the storage shed which is causing odour nuisance.
- vi. Process sludge of about 4 tons was stored beside production block-II causing odour nuisance.
- vii. The industry has not provided double stage scrubber for vents of HTDS collection tank in place of single stage scrubber as per the recommendation of the TF Committee.
- viii. Insulation waste stored on naked ground. The industry has not provided PIION spray system at ZLD area.
- ix. The Board Officials conducted stack & Ambient Air Quality Monitoring on 05.10.2023. As per the analysis reports, the value of Particulate Matter (PM₁₀) (161 µg/m³ against 100 µg/m³) is exceeding the Board standard.
- x. As per the analysis reports the values of TDS & COD are very high (3,380 mg/l & 1,248 mg/l) in Cooling Tower of Production Block-I and the values of TDS & COD are very high (3,050 mg/l & 1,008 mg/l) in Cooling Tower of Production Block-II.
- xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 05.10.2023. As per the analysis reports, the value of Particulate Matter (PM₁₀) (161 µg/m³ against 100 µg/m³) is exceeding the Board standard.

22. **WHEREAS**, vide reference 17th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023.

- i. The industry representative informed that they sent hazardous waste of about 20 Tonnes. However, about 30 tons of salts were still in the storage shed which is causing odour nuisance.
- ii. Process sludge of about 4 tons was stored beside production block-II causing odour nuisance.
- iii. The industry has not provided double stage scrubber for vents of HTDS collection tank in place of single stage scrubber as per the recommendation of the TF Committee.
- iv. Insulation waste stored on naked ground. The industry has not provided PIION spray system at ZLD area.
- v. The Board Officials conducted stack & Ambient Air Quality Monitoring on 05.10.2023. As per the analysis reports, the value of Particulate Matter (PM₁₀) (161 µg/m³ against 100 µg/m³) is exceeding the Board standard.

23. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,20,000/-
2. The Board Officials collected the samples from Inlet of Biological ETP. As per the analysis reports, Inlet sample is having less TSS, TDS and COD values than RO Feed i.e., Biological ETP Inlet (TSS - 72 mg/l, TDS - 1,850 mg/l and COD - 41 mg/l) and RO Feed (TSS - 246 mg/l, TDS - 3,211 mg/l and COD - 424 mg/l)

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3. RO Rejects sample is having less TDS value than RO Feed
RO Rejects - (TDS - 2,248 mg/l) RO Feed - (TDS - 3211 mg/l).
 4. There is marginal decrease in COD values of RO Rejects compared to RO Feed i.e., RO Rejects (COD - 408 mg/l) RO Feed (COD - 424 mg/l).
 5. As per the analysis reports, it indicates that the RO plant is not working effectively.
 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM10 value (114 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).
 7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.
 8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
33. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that they will pay the remaining Environmental Compensation amount.
34. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,20,000/-
 2. The Board Officials collected the samples from Inlet of Biological ETP. As per the analysis reports, Inlet sample is having less TSS, TDS and COD values than RO Feed i.e., Biological ETP Inlet (TSS - 72 mg/l, TDS - 1,850 mg/l and COD - 41 mg/l) and RO Feed (TSS - 246 mg/l, TDS - 3,211 mg/l and COD - 424 mg/l)
 3. RO Rejects sample is having less TDS value than RO Feed
RO Rejects - (TDS - 2,248 mg/l) RO Feed - (TDS - 3211 mg/l).
 4. There is marginal decrease in COD values of RO Rejects compared to RO Feed i.e., RO Rejects (COD - 408 mg/l) RO Feed (COD - 424 mg/l).
 5. As per the analysis reports, it indicates that the RO plant is not working effectively.
 6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the PM10 value (114 µg/Nm³) in AAQ is exceeding as per the CFO standard (i.e., 100 µg/Nm³).
- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
- III. The industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments.

After detailed discussions, the committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

35. **WHEREAS**, after careful consideration of the material facts of the case, the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.
3. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

36. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

37. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).

38. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To,
M/s. SVR Laboratories (P) Ltd.,
Sy.No. 239/A, 239/E,
Dothigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//

Prasanna
Senior Environmental Engineer
(Task Force - UH-IV)



TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

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Order No. NLG-85/TSPCB/UH-II/2024-1469

Date: 03.01.2024

Sub : TSPCB - M/s. SVR Laboratories (P) Ltd., Sy.No. 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Restoration of Power Supply for a period of Three months - Orders Issued** - Reg.

Ref : 1. Order No. NLG-85/TSPCB/TF/HO/2023-, Dt: 13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No. NLG-85/TSPCB/TF/HO/2024- , dt: 03.01.2024.

In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period up to 31.10.2023 to M/s. SVR Laboratories (P) Ltd., Sy.No. 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to M/s. SVR Laboratories (P) Ltd., Sy.No. 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District for a period of Three Months from date of This Order for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

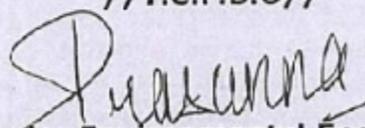
Sd/-
MEMBER SECRETARY

To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

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ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-85/TSPCB/UH-II/2024-1170

Date: 03.01.2024

Sub: TSPCB - M/s. Chemic Life Sciences Pvt. Ltd., Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

CO. P. R. S.
DESPATCH NO:
DATE: 05 JAN 2024

- Ref:**
1. CFO & HWA Order dt.02.05.2023, valid up to 30.04.2028.
 2. Closure Order No.NLG-50/TSPCB/TF/HO/2017-, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 27.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The Industry filed a WP No. 19239 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 16. RO Nalgonda report dated 28.12.2023.
 17. Dhotigudem Industrial Association representation dated 03.01.2024.
 18. Hearing held on 03.01.2024.
- * * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 02.05.2023 with a validity up to 30.04.2028.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical Industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 05.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.
 - v. The industry shall complete the construction of Biological ETP within 15 days and shall regularly operate the same.
 - vi. The industry shall install online TDS meter for HTDS effluent generation and connect the same to TSPCB server within one month.
 - vii. The industry shall connect the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server within 15 days.
 - viii. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.

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- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
 - x. The industry shall store drums containing raw material / in process goods / MLs / spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
 - xi. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
 - xii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
 - xiii. The industry shall provide & maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
 - xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
 - xv. The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.
 - xvi. The industry shall maintain proper housekeeping within the premises.
 - xvii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.

vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.44,80,000/-** along with other directions vide reference 9th cited.
12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19239 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry representative has informed that the association has lifted the contaminated waste water which was stagnated in open place to PETL. However soil details are not submitted.
 - ii. The house keeping of the industry at ATFD has to be improved.
 - iii. The odour was observed within the industry premises and it may carry outside the premises during the wind flow.
 - iv. During inspection observed that the colour of effluent in the aeration tanks is white. Hence, the Biological ETP is not operating properly. No continuous fixed pipe line is existing between Bio ETP and RO system. The industry representative has informed that they are carrying centrifuge operations after aeration and then the remaining effluent is sending for filtration before RO system. But, no fixed pipe line system is existing for centrifuge at ZLD area.
 - v. The industry has provided Separate tanks for collection of HTDS and LTDS. But, During inspection observed that, they are collecting washings (HTDS) into MEE & ATFD condensate (LTDS) collection tank. This may decrease the efficiency of Biological ETP.
 - vi. Spillages were observed near production block-II. During inspection, some renovation works are under progress. They not maintained good housekeeping near production block - II & in the dismantling block.
 - vii. The industry has not provided odour suppressant mist spray / PIION system.
 - viii. The industry has not submitted the latest LDAR study report.
 - ix. The industry has provided 1 PTZ IP camera inside the ZLD shed. But, this may not cover whole ZLD system.
 - x. The industry has not provided online TDS meter for HTDS effluent generation.
 - xi. The industry has not maintaining the records pertaining to production, quantity of effluent generation & re-used, log books for pollution control systems and hazardous waste generation and disposal.

14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.

15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19239 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter."

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.

17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. During inspection observed that the colour of effluent in the aeration tanks is white colour which indicates no biological culture / bacteria is developed in aeration tank. Hence, the Biological ETP is not functioning. No continuous fixed pipe line is existing between Bio ETP and RO system. The RO system is not functioning.
 - ii. The industry has provided Separate tanks for collection of HTDS and LTDS. But, during inspection observed that, they are collecting washings (HTDS) into MEE & ATFD condensate (LTDS) collection tank. This may decrease the efficiency of Biological ETP.
 - iii. During the inspection, it was observed that, the RO is not in operational condition.
 - iv. Odour was observed near MEE area.
 - v. During the inspection it was observed that, Batch Production Records (BPR's) are not available at production block-I which indicates they are not maintaining any records for raw materials and products.
 - vi. The industry has provided drums storage yard, however drums were observed on naked ground near the production block-II.
 - vii. The industry has to carry energy audit in the premises as no proper insulation for steam carrying pipes.
 - viii. The industry has not provided leachate collection pit at the effluent collection tanks area.
 - ix. The industry is not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023

18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.

19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:

- i. The industry shall pay the Environmental Compensation (EC) of Rs.44,80,000/- vide order dated:21.06.2023.
 - ii. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - iii. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
 - iv. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 - v. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
 - vi. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
 - vii. The industry shall submit a fresh Bank Guarantee of Rs.12.0 Lakhs towards compliance of the above directions in favour of the Member Secretary, TSPCB, Hyderabad for a period of one year at concerned Regional office within in a week.
 - viii. The industry shall recoup the Bank Guarantee of Rs.12.0 Lakhs towards Bank Guarantee forfeited to the Board from time to time before its expiry, till further orders of the Board
 - ix. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the Industry.
20. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has stored ATFD salts beside Production block -I in drums which is causing odour nuisance.
 - ii. Leakages were observed from scrubbing system at PB-II.
 - iii. Flexible pipelines were observed for rain water storage area.
 - iv. As per instructions from the Board, the RO, Nalgonda has issued notices to the industry for installation of additional cameras. Accordingly, the industry has installed additional camera at main gate and plant area and connected the same the TSPCB server. However, the industry has not provided for boiler stack view.
 - v. During the inspection, ZLD system was not in operation as the effluent quantity is less. They are storing the effluents in the HDPE storage tanks. They are carrying modification works for aeration tank. Fixation of aerators in the biological ETP was under progress.
 - vi. The industry has drums storage yard. However, lot of drums were stored openly.
 - vii. The industry has not provided digital flow meter to the first cut rain water sump / collection tank.
 - viii. The industry has not paid Environmental Compensation of Rs.44,80,000/- as per order dated 21.06.2023 & 13.09.2023.
 - ix. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs.
21. **WHEREAS**, vide reference 15th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:

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- i. The industry has stored ATFD salts beside Production block -I in drums which is causing odour nuisance.
 - ii. Leakages were observed from scrubbing system at PB-II.
 - iii. Flexible pipelines were observed for rain water storage area.
 - iv. As per instructions from the Board, the RO, Nalgonda has issued notices to the industry for installation of additional cameras. Accordingly, the industry has installed additional camera at main gate and plant area and connected the same to the TSPCB server. However, the industry has not provided for boiler stack view.
 - v. During the inspection, ZLD system was not in operation as the effluent quantity is less. They are storing the effluents in the HDPE storage tanks. They are carrying modification works for aeration tank. Fixation of aerators in the biological ETP was under progress.
 - vi. The industry has drums storage yard. However, lot of drums were stored openly.
 - vii. The industry has not provided digital flow meter to the first cut rain water sump / collection tank.
 - viii. The industry has not paid Environmental Compensation of Rs.44,80,000/ as per order dated 21.05.2023 & 13.09.2023.
 - ix. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs.

22. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 10% of actual Environmental compensation levied i.e., an amount of Rs. 4,48,000/-.
2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
4. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.
5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

23. **WHEREAS**, vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

1. Part payment towards 10% of actual Environmental compensation levied i.e., an amount of Rs. 4,48,000/-.
2. Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).

- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dhotigudem area.
- III. The representative of the industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.

24. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.
4. The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.
5. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

25. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

26. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

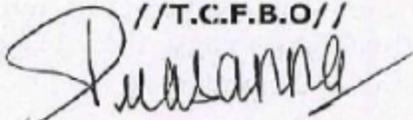
27. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To,
M/s. Chemic Life Sciences Pvt. Ltd.,
Sy.No.238 & 239, Dhotigudem (V),
Pochampally (M),
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//

Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-85/TSPCB/TF/HO/2024- 1171

Date: .01.2024

Sub: TSPCB - - M/s. Chemic Life Sciences Pvt. Ltd., Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg..

- Ref:**
1. CFO & HWA Order dt.02.05.2023, valid up to 30.04.2028.
 2. Closure Order No.NLG-50/TSPCB/TF/HO/2017-, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 27.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 10. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 26.06.2023.
 11. The industry filed a WP No. 19239 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 In O.A.No.97 of 2021.
 15. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 16. RO Nalgonda report dated 28.12.2023.
 17. Dhotigudem Industrial Association representation dated 03.01.2024.
 18. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 02.05.2023 with a validity up to 30.04.2028.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.
4. **WERHEAS**, vide reference 3rd cited, the Board Issued Temporary Revocation of Closure Order to industry on 27.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadalah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical Industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall provide & maintain dome with suction hood followed by double stage scrubber with online pH meter to the HTDS effluent storage tanks to control the odour nuisance.
 - iii. The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system connected to HTDS collection tank so as to arrest the VOCs.
 - iv. The industry shall provide & maintain sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.
 - v. The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.
 - vi. The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server.
 - vii. The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to contain VOCs.
 - viii. The industry shall provide & maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.
 - ix. The industry shall maintain the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.

- x. The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.
- xi. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xii. The industry shall not cause any air pollution in the surrounding area

8. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
- vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

9. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.

10. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.

11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of **Rs.44,80,000/-** along with other directions vide reference 10th cited.

12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19239 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.

13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

- i. The industry representative has informed that the association has lifted the contaminated waste water which was stagnated in open place to PETL. However soil details are not submitted.
- ii. The house keeping of the industry at ATFD has to be improved.
- iii. The odour was observed within the industry premises and it may carry outside the premises during the wind flow.
- iv. During inspection observed that the colour of effluent in the aeration tanks is white. Hence, the Biological ETP is not operating properly. No continuous fixed pipe line is existing between Bio ETP and RO system. The industry representative has informed that they are carrying centrifuge operations after aeration and then the remaining effluent is sending for filtration before RO system. But, no fixed pipe line system is existing for centrifuge at ZLD area.
- v. The industry has provided Separate tanks for collection of HTDS and LTDS. But, During inspection observed that, they are collecting washings (HTDS) into MEE & ATFD condensate (LTDS) collection tank. This may decrease the efficiency of Biological ETP.
- vi. Spillages were observed near production block-II. During inspection, some renovation works are under progress. They not maintained good housekeeping near production block - II & in the dismantling block.
- vii. The industry has not provided odour suppressant mist spray / PIION system.
- viii. The industry has not submitted the latest LDAR study report.
- ix. The industry has provided 1 PTZ IP camera inside the ZLD shed. But, this may not cover whole ZLD system.
- x. The industry has not provided online TDS meter for HTDS effluent generation.
- xi. The industry has not maintaining the records pertaining to production, quantity of effluent generation & re-used, log books for pollution control systems and hazardous waste generation and disposal.

14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.

15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19239 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter."

- 16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
- 17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. During inspection observed that the colour of effluent in the aeration tanks is white colour which indicates no biological culture / bacteria is developed in aeration tank. Hence, the Biological ETP is not functioning. No continuous fixed pipe line is existing between Bio ETP and RO system. The RO system is not functioning.
 - ii. The industry has provided Separate tanks for collection of HTDS and LTDS. But, during inspection observed that, they are collecting washings (HTDS) into MEE & ATFD condensate (LTDS) collection tank. This may decrease the efficiency of Biological ETP.
 - iii. During the inspection, it was observed that, the RO is not in operational condition.
 - iv. Odour was observed near MEE area.
 - v. During the inspection it was observed that, Batch Production Records (BPR's) are not available at production block-I which indicates they are not maintaining any records for raw materials and products.
 - vi. The industry has provided drums storage yard, however drums were observed on naked ground near the production block-II.
 - vii. The industry has to carry energy audit in the premises as no proper insulation for steam carrying pipes.
 - viii. The industry has not provided leachate collection pit at the effluent collection tanks area.
 - ix. The industry is not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023
- 18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
- 19. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
 - i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.44,80,000/- as per the Hon'ble NGT Orders, you are hereby directed to deposit an amount of Rs.44,80,000/- (Rupees Forty Four Lakhs Eighty Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
 - iv. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - v. The industry shall provide odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment area to control VOCs within one month.
 - vi. The industry shall conduct the LDAR study once in six months. The industry shall take necessary measures as per the latest Leak Detection and Repair (LDAR) Study to arrest the solvent losses and reduce VOCs in the premises.

20. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has stored ATFD salts beside Production block -I in drums which is causing odour nuisance.
- ii. Scrubber attached to Production block-II has not provided with vent condenser and pH meter provided to the scrubber was not working.
- iii. Severe odour was observed from HCL scrubber (leakages of scrubber) present near production block
- iv. Leakages were observed from scrubbing system at PB-II.
- v. Flexible pipelines were observed for rain water storage area.
- vi. As per instructions from the Board, the RO, Nalgonda has issued notices to the industry for installation of additional cameras. Accordingly, the industry has installed additional camera at main gate and plant area and connected the same the TSPCB server. However, the industry has not provided for boiler stack view.
- vii. During the inspection, ZLD system was not in operation as the effluent quantity is less. They are storing the effluents in the HDPE storage tanks. They are carrying modification works for aeration tank. Fixation of aerators in the biological ETP was under progress.
- viii. The industry has drums storage yard. However, lot of drums were stored openly.
- ix. The industry has not provided digital flow meter to the first cut rain water sump / collection tank.
- x. The industry has not paid Environmental Compensation of Rs.44,80,000/- as per order dated 21.06.2023 & 13.09.2023.
- xi. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs.

21. **WHEREAS**, vide reference 15th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, issued show cause notice with the following reasons to your industry vide order dt.05.12.2023:

- i. The industry has stored ATFD salts beside Production block -I in drums which is causing odour nuisance.
- ii. Scrubber attached to Production block-II has not provided with vent condenser and pH meter provided to the scrubber was not working.
- iii. Severe odour was observed from HCL scrubber (leakages of scrubber) present near production block
- iv. Leakages were observed from scrubbing system at PB-II.
- v. As per instructions from the Board, the RO, Nalgonda has issued notices to the industry for installation of additional cameras. Accordingly, the industry has installed additional camera at main gate and plant area and connected the same the TSPCB server. However, the industry has not provided for boiler stack view.
- vi. The industry has drums storage yard. However, lot of drums were stored openly.

22. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:

- 1) Part payment towards 10% of actual Environmental compensation levied i.e., an amount of Rs. 4,48,000/-.
- 2) Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.

- 3) The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
- 4) The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i) The complainant challenged the report dt.22.11.2023 submitted by the Board to Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii) The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness ect.,.
- 5) Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

28. **WHEREAS**, vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

- 1) Part payment towards 10% of actual Environmental compensation levied i.e., an amount of Rs. 4,48,000/-.
 - 2) Not submitted the Bank Guarantee of Rs. 12 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 - 3) The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³).
- IV. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
- V. The representative of the industry informed that, they paid the part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.12.0 Lakhs within 2 months.

29. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply with:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.



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TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 23887500
Fax: 040 - 23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

Order No. NLG-85/TSPCB/UH-II/2024-1472

Date: 03.01.2024

Sub : TSPCB - M/s. Chemic Life Sciences Pvt. Ltd., Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **Extension of Temporary Restoration of Power Supply for a period of Three months - Orders Issued** - Reg.

Ref : 1. Order No.NLG-14/TSPCB/TF/HO/2023-449, Dt: 13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No.NLG-14/TSPCB/TF/HO/2024- , dt:03.01.2024.

In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period up to 31.10.2023 to M/s. Chemic Life Sciences Pvt. Ltd., Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to M/s. Chemic Life Sciences Pvt. Ltd., Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District for a period of Three Months from date of This Order for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

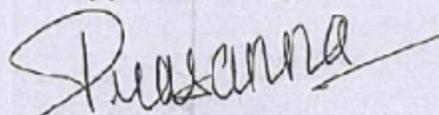
Sd/-
MEMBER SECRETARY

To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

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ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-40/TSPCB/TF/HO/2024-1473

Date: 03.01.2024

Sub: TSPCB - M/s. Archimedis Laboratories (P) Ltd., Dothigudem (V), Pochampally (M), Yadadri-Buvanagiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **DIRECTIONS - ISSUED** - Reg.

- Ref:**
1. CFO&HWA order dt.15.01.2021 valid up to 30.11.2025.
 2. Directions Order dated: 02.03.2022 & 14.07.2022.
 3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 5. Additional Directions Order dated: 06.12.2022.
 6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 7. EPTRI, Hyderabad Study report dt.24.04.2023.
 8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 9. Hearing held on 13.06.2023.
 10. Directions issued on 21.05.2023 for Levying of Environmental Compensation.
 11. The industry filed a WP No.18213 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30285 of 2023.
 16. Directions issued on 13.09.2023.
 17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 19. RO Nalgonda report dated 28.12.2023.
 20. Dothigudem Industrial Association representation dated 03.01.2024.
 21. Hearing held on 03.01.2024

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 15.01.2021 with a validity up to 30.11.2025.
3. **WHEREAS**, vide reference 2nd cited, the Board issued certain directions to the industry on 02.03.2022, 14.07.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3rd cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
6. **WHEREAS**, vide reference 5th cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 14.07.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - iv. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.
7. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
 - ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.

- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
- vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

- 8. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
- 9. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
- 10. **WHEREAS**, vide reference 9th cited, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **51,80,000/-** along with other directions vide reference 10th cited.
- 11. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No.18213 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
- 12. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - 1. The housekeeping is poor at the hazardous waste storage area, where the process organics are stabilized. The fumes and odour was observed at the area.
 - 2. The industry has stored acid in the drums and kept on RCC ground, acid fumes were observed.
 - 3. The industry is not segregating High TDS & Low TDS Effluents.
 - 4. The industry has not provided TDS meter for HTDS effluent generation.
- 13. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.

14. **WHEREAS**, the industry has filed writ petition no. 18213 of 2023 before the Hon'ble High Court regarding environmental compensation levied by the TSPCB vide order dt.08.08.2023 in WP No.18213 of 2023, disposed the case ordering as follows:

"for the afore-mentioned reasons, order dated:21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated: 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show-cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter.

15. **WHEREAS**, the above industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
16. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - ii. RO Plant was not functioning properly.
 - iii. Heavy fumes (HCL fumes) were observed from the production block-II scrubber (pH was maintained as 13) thereby causing air pollution in the surroundings. The industry has to upgrade the double stage scrubbers to triple stage scrubbers for effective control of process emissions.
17. **WHEREAS**, vide reference 14th cited, the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
18. **WHEREAS**, vide reference 16th cited you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the following directions were issued to your industry vide order dt.13.09.2023:
- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the directions Order dated: 30.05.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.51,80,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.51,80,000/- (Rupees Fifty One Lakhs Eighty Thousand Only) towards Environmental Compensation.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
 - vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
 - vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be

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pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal. '

- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.12.0 Lakhs towards compliance of the above directions for a period of one year with in a week.
- x. The industry shall recoup the Bank Guarantee of Rs.12.0 Lakhs towards Bank Guarantee forfeited to the Board.

19. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.51,80,000/ as per order dated 21.06.2023 & 13.09.2023.
- ii. The RO system is not effective/adequate.
- iii. The industry has provided shed for storage of drums. However, lot of drums were stored openly.
- iv. Spent solvent of about 400 drums were observed in the industry premises.
- v. Severe odour was observed near drums storage yard.
- vi. The industry has not provided cover to the lye solution storage tank, which is causing odour nuisance.
- vii. HW organic residue drums were stored openly.
- viii. During the inspection, Ammonia compressor repair work is under progress which is causing odour nuisance and burning of eyes.
- ix. The industry is not having shed for storage of Ash.
- x. The industry has not submitted Bank Guarantee of Rs.12.0 Lakhs to forfeit the same.
- xi. As per the analysis reports the values of TDS & COD are very high (3,216 mg/l & 8,692 mg/l) in RO permeate and the values of TDS & COD are very high (4,100 mg/l & 2,952 mg/l) in Cooling Tower of Reactor Jackets.
- xii. The Board Officials conducted stack & Ambient Air Quality Monitoring on 14.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (228 mg/Nm³ against 115 mg/Nm³) is exceeding the Board standard.

20. **WHEREAS**, vide reference 15th cited, the industry filed W.P.no.30285 of 2023 challenging the order dt.13.09.2023 issued by the Board directing to deposit environmental compensation of Rs.51,80,000/-. The Hon'ble High Court vide order dt.01.11.2023 disposed the writ petition stating that the petitioner has an alternative efficacious remedy of filing an appeal to the Hon'ble NGT.

21. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the Board issued Show Cause Notice on 05.12.2023 for following reasons:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.51,80,000/- for violations.
- iii. Non-submission of Bank guarantee of Rs.12 lakhs towards non-compliance of Board conditions / directions.

22. **WHEREAS**, vide reference 17th cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 12,95,000/-.
2. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
3. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

23. **WHEREAS**, vide reference 18th cited, Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 Installments.

24. **WHEREAS**, vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 12,95,000/-.
 2. Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments.
- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the Industries located in Dothigudem area.
- III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special condition:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.

(97)

26. These orders are issued under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).
27. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), directing closure of the industry in the interest of Public Health and Environment without any further notice.

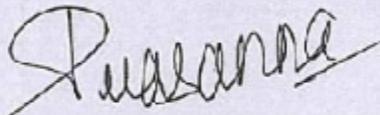
Sd/-
MEMBER SECRETARY

To,
M/s. Archimedis Laboratories (P) Ltd.,
Dothigudem (V), Pochampally (M),
Yadadri-Buvanagiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE 98

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-40/TSPCB/TF/HO/2024- 1474

Date: 03.01.2024

Sub: TSPCB - M/s. Archimedis Laboratories (P) Ltd., Dothigudem (V), Pochampally (M), Yadadri-Buvanagiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **DIRECTIONS - ISSUED** - Reg.

Ref:

1. CFO&HWA order dt.15.01.2021 valid up to 30.11.2025.
2. Directions Order dated: 02.03.2022 & 14.07.2022.
3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
5. Additional Directions Order dated: 06.12.2022.
6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
7. EPTRI, Hyderabad Study report dt.24.04.2023.
8. The Board Issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
9. Hearing held on 13.06.2023.
10. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
11. The industry filed a WP No.18213 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No.30285 of 2023.
16. Directions issued on 13.09.2023.
17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
19. RO Nalgonda report dated 28.12.2023.
20. Dothigudem Industrial Association representation dated 03.01.2024.
21. Hearing held on 03.01.2024

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA to the industry on 15.01.2021 with a validity up to 30.11.2025.
3. **WHEREAS**, vide reference 2nd cited, the Board issued certain directions to the industry on 02.03.2022, 14.07.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3rd cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action

plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.

- ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
5. **WHEREAS**, vide reference 4th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical Industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
6. **WHEREAS**, vide reference 5th cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 14.07.2022.
 - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - iii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
 - iv. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.
7. **WHEREAS**, vide reference 6th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-
- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
 - ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
 - iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - 1.

- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.
- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
- vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
- vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

- 8. **WHEREAS**, vide reference 7th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
- 9. **WHEREAS**, vide reference 8th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
- 10. **WHEREAS**, vide reference 9th cited, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **51,80,000/-** along with other directions vide reference 10th cited.
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- "for the afore-mentioned reasons, order dated:21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated: 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on 08.02.2023 as well as the fact that the petitioner was not a party to the order dated: 17.01.2023 passed by National Green Tribunal in OA.No.97 of 2021. The Board shall afford and opportunity of hearing to the petitioner and shall by speaking order conclude the proceeding initiated in pursuance to show-cause notice dated; 22.05.2023. It is made clear that this court has not expressed any opinion on merits of the matter.
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- i. The industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
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3. Accordingly, the Board Officials Inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.

23. **WHEREAS**, vide reference 18th cited, Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments.

24. **WHEREAS**, vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.

I. The Committee noted the following non-compliances:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 12,95,000/-.
2. Dothigudem Industrial Association has submitted representation stating that the Association Industries have paid the 1/4th EC amount to the Board and remaining EC will be paid in 3 installments.

II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.

III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special condition:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.

- 26. These orders are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).
- 27. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) directing closure of the industry in the interest of Public Health and Environment without any further notice.

**Sd/-
MEMBER SECRETARY**

**To,
M/s. Archimedis Laboratories (P) Ltd.,
Dothigudem (V), Pochampally (M),
Yadadri-Buvanagiri District.**

Copy to:

- 1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
- 2. The EE, TSPCB, RO, Nalgonda for information and necessary action
- 3. Concerned File.

//T.C.F.B.O//

D. S. S. S. S.

**Senior Environmental Engineer
(Task Force - UH-IV)**



BY REGD. POST WITH ACK. DUE

105

ORDERS ISSUED UNDER WATER (P&CP) AMENDMENT ACT, 1988

Order No. NLG-54/TSPCB/TF/HO/2024-1475

Date: 03.01.2024

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 06.12.2022.
 7. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 8. EPTRI, Hyderabad Study report dt.24.04.2023.
 9. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 10. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 11. The industry filed a WP No. 19039 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Hon'ble NGT, (SZ), Chennai Orders dated 03.11.2023 in O.A.No.15 of 2022.
 16. Extension of Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 19. RO Nalgonda report dated 28.12.2023.
 20. Dothigudem Industrial Association representation dated 03.01.2024.
 21. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period up to 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board Issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, vide reference 6th cited, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The Industry shall continue to segregate the effluents into HTDS and LTDS.
 - v. The industry shall regularly operate the New ZLD system for treatment of effluents. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.

- vi. The industry shall install & maintain online TDS meter for HTDS effluent generation and connect the same to TSPCB server.
- vii. The industry shall connect & maintain the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server.
- viii. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- x. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xi. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
- xiii. The industry shall provide & maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
- xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xv. The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.
- xvi. The industry shall maintain proper housekeeping within the premises.
- xvii. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, Issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the

water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 8th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 9th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs.45,00,000/- along with other directions vide reference 10th cited.
 12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19039 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has to improve housekeeping at HTDS circulation tank.
 - ii. Odour was observed within the industry premises it may lead to surrounding areas during the wind flow.
 - iii. The industry has not submitted latest LDAR status report.
 14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
 15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19039 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on

08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter".

16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings.
 - ii. The industry has stored hazardous waste, and there was lot of odour.
 - iii. Odour was observed at MEE & ETP area.
 - iv. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.
18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
19. **WHEREAS**, vide reference 15th cited, O.A No.15 of 2023 was filed by Sri Gummi Narendra Reddy against pollution being caused by the industry before Hon'ble NGT Chennai. The Hon'ble NGT vide order dated:03.10.2023 has taken on record that the TSPCB has imposed Environmental Compensation of Rs.45,00,000/- against the industry. Further, it was also stated that even before recovery of the same, the power supply to the respondent industry was restored.
20. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
 - i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/-.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- iii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iv. The industry has not provided shed for storage of Coal ash.
- v. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- vi. The industry has to shift the gate camera of internal gate to main gate.
- vii. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

22. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- ii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iii. The industry has not provided shed for storage of Coal ash.
- iv. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- v. The industry has to shift the gate camera of internal gate to main gate.
- vi. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- vii. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

23. **WHEREAS**, vide reference 18th cited, based on the recommendations of the committee, the Board Issued **SHOW CAUSE** for the following reasons:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.45,00,000/- for violations.

(111)

iii. **Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.**

24. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³). The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
 - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
 5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the Industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
25. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
26. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.



TELANGANA STATE POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHNAGAR, HYDERABAD - 500 018.

Phone: 040-23887500
Fax: 040-23815631
Website: tspcb.cgg.gov.in

BY REGD. POST WITH ACK. DUE

ORDER ISSUED UNDER AIR (P&C) AMENDMENT ACT, 1987

Order No. NLG-54/TSPCB/TF/HO/2024-1476

Date: 03.01.2024

Sub: TSPCB - M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - Extension of Temporary Revocation of Closure Order for a period of Three Months - Orders Issued - Reg.

- Ref:**
1. CFO&HWA Order dt.13.01.2023 with validity up to 31.12.2027.
 2. Closure Order No.NLG-54/TSPCB/TF/HO/2017-2131 & 2132, dt.02.03.2022.
 3. Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2017-161, Dt: 26.04.2022.
 4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
 5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
 6. Extension of Temporary Revocation of Closure Order No.NLG-47/TSPCB/TF/HO/2016, Dt: 06.12.2022.
 7. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
 8. EPTRI, Hyderabad Study report dt.24.04.2023.
 9. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
 10. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
 11. The industry filed a WP No. 19039 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
 12. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
 13. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
 14. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
 15. Hon'ble NGT, (SZ), Chennai Orders dated 03.11.2023 in O.A.No.15 of 2022.
 16. Extension of Temporary Revocation of Closure Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
 17. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
 18. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
 19. RO Nalgonda report dated 28.12.2023.
 20. Dothigudem Industrial Association representation dated 03.01.2024.
 21. Hearing held on 03.01.2024.

* * *

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO&HWA order dt.13.01.2023 with a validity period up to 31.12.2027.
3. **WHEREAS**, vide reference 2nd cited, the Board issued Closure order to the industry on 02.03.2022 for non compliance of the Board directions / Consent conditions and causing pollution in the surrounding area.

4. **WERHEAS**, vide reference 3rd cited, the Board issued Temporary Revocation of Closure Order to industry on 26.04.2022 for a period of Three months with certain directions to comply.
5. **WHEREAS**, vide reference 4th cited, CPCB issued following directions to the Board in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:
- i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.
 - ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.
 - iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil; if any, and to provide the suitable remediation measures for effective crop growth.
6. **WHEREAS**, vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-
- i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.
 - ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.
 - iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.
7. **WHEREAS**, vide reference 6th cited, the Board issued further extension of temporary revocation of closure order with following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
 - ii. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - iii. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and shall submit the consolidated records to the Regional Office, Nalgonda every month along with invoice copies of the starting raw materials outsourced.
 - iv. The industry shall continue to segregate the effluents into HTDS and LTDS.
 - v. The industry shall regularly operate the New ZLD system for treatment of effluents. The HTDS effluents shall be treated in stripper, MEE and ATFD. The condensate & LTDS effluents shall be treated in Biological ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.

- vi. The industry shall install & maintain online TDS meter for HTDS effluent generation and connect the same to TSPCB server.
- vii. The industry shall connect & maintain the IP camera provided to the LTDS effluents digital flow meter to the TSPCB server.
- viii. The industry shall provide first run off rain water & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment.
- ix. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.
- x. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
- xi. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system. The industry shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.
- xii. The industry shall continuously operate the online monitoring system provided to the HTDS, LTDS & RO permeate as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.
- xiii. The industry shall provide & maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
- xiv. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
- xv. The industry shall not use effluents or any waste water in cooling towers and shall check the quality of the cooling circulation water regularly.
- xvi. The industry shall maintain proper housekeeping within the premises.
- xvii. The Industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
- xviii. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

8. **WHEREAS**, vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

- i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.
- ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.
- iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase - I.
- iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the

water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

- v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.
 - vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.
 - vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.
9. **WHEREAS**, vide reference 8th cited, EPTRI, Hyderabad has submitted study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area.
 10. **WHEREAS**, vide reference 9th cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
 11. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs.45,00,000/- along with other directions vide reference 10th cited.
 12. **WHEREAS**, vide reference 11th cited, the industry have filed a Writ Petition No. 19039 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
 13. **WHEREAS**, vide reference 12th cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:
 - i. The industry has to improve housekeeping at HTDS circulation tank.
 - ii. Odour was observed within the industry premises It may lead to surrounding areas during the wind flow.
 - iii. The industry has not submitted latest LDAR status report.
 14. **WHEREAS**, vide reference 13th cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
 15. **WHEREAS**, the Hon'ble High Court vide order dt.08.08.2023 in WP No. 19039 of 2023, disposed the case ordering as follows:

"For the afore-mentioned reasons, order dated 21.06.2023 passed by the Board cannot be sustained in the eye of law. Accordingly, it is quashed and set aside. The matter is remitted to the Board to consider the grounds taken by the petitioner in the explanation dated 02.06.2023. Needless to state that the Board shall also consider the fact that consent for operation was granted to the petitioner on

08.02.2023 as well as the fact that the petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. The Board shall afford an opportunity of hearing to the petitioner and shall by a speaking order conclude the proceeding initiated in pursuance to show cause notice dated 22.05.2023. It is made clear that this Court has not expressed any opinion on merits of the matter".

- 16. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
- 17. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
 - i. The industry has provided two stage scrubber for HTDS collection tanks with dome. But, during the inspection, scrubber was not in operation causing odour nuisance to surroundings.
 - ii. The industry has stored hazardous waste, and there was lot of odour.
 - iii. Odour was observed at MEE & ETP area.
 - iv. The industry has not provided shed for storage of Coal ash. The industry's representative informed that they will construct the shed for ash storage.
- 18. **WHEREAS**, vide reference 14th cited the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
- 19. **WHEREAS**, vide reference 15th cited, O.A No.15 of 2023 was filed by Sri Gummi Narender Reddy against pollution being caused by the industry before Hon'ble NGT Chennai. The Hon'ble NGT vide order dated:03.10.2023 has taken on record that the TSPCB has imposed Environmental Compensation of Rs.45,00,000/- against the industry. Further, it was also stated that even before recovery of the same, the power supply to the respondent industry was restored.
- 20. **WHEREAS**, vide reference 16th cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, extension of temporary revocation of closure order for a period of 3 months i.e., up to 31.10.2023 with the following directions were issued to your industry vide order dt.13.09.2023:
 - i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
 - ii. The industry shall comply with all the conditions stipulated in the Extension of Temporary Revocation of Closure Order dated: 26.06.2023.
 - iii. The industry shall pay the Environmental Compensation (EC) of Rs.45,00,000/-.
 - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
 - v. The industry has provided aeration tanks for Biological ETP. No biological culture / bacteria (MLSS) is developed in aeration tank. Hence, the industry is not operating the Biological ETP effectively as aeration tank is not in stabilized condition with proper bio-culture.
 - vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

- vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
- viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- ix. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs

21. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:

- i. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- ii. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- iii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iv. The industry has not provided shed for storage of Coal ash.
- v. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- vi. The industry has to shift the gate camera of internal gate to main gate.
- vii. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

22. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

- i. During inspection, the scrubber attached to High TDS collection tank with dome was not in operation.
- ii. The effluents in aerations tanks were observed in septic conditions and lot of odour was observed in the plant premises.
- iii. The industry has not provided shed for storage of Coal ash.
- iv. The industry has not conducted Leak Detection and Repair (LDAR) Study.
- v. The industry has to shift the gate camera of internal gate to main gate.
- vi. The industry has not provided digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
- vii. The industry has not paid Environmental Compensation of Rs.45,00,000/ vide order dated 21.06.2023 & 13.09.2023.
- viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same.

23. **WHEREAS**, vide reference 18th cited, based on the recommendations of the committee, the Board issued **SHOW CAUSE** for the following reasons:

- i. Violating the Consent conditions & directions of the Board as mentioned above.
- ii. Non-payment of Environmental Compensation of Rs.45,00,000/- for violations.

- iii. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

24. **WHEREAS**, vide reference 18th cited, the RO, Nalgonda submitted the report and following observations were made:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (118 mg/Nm³) in stack is slightly exceeding as per the CFO standard (i.e., 115 mg/Nm³). The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from Industries located in the Dothigudem area. The details of the complaint is as given below:
 - iii. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
 - iv. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
 5. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1st week-end of December.
25. **WHEREAS**, vide reference 19th cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
26. **WHEREAS**, vide reference 20th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
 1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 11,25,000/-.
 2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
 3. The Board officials collected the samples from Production Block - B Cooling tower. As per the analysis, the values of TDS & COD are high i.e., TDS - 2,542 mg/l and COD - 3,108 mg/l .
 4. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
 - II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.
 - III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue the Extension of Revocation of Closure orders for a period of three months from the date of receipt of these orders with following directions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

27. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Three Months with the following directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.
3. The industry shall not carryout operations without valid revocation of closure orders. Failing which the Board will be constraint to take action against the industry.

28. **WHEREAS**, the TSSPDCL., Ltd., has been directed to restore the power supply to your industry for a period of Three Months from the date of this order.

29. These directions are issued under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987).

30. You are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under Section 31(A) of the Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) without any further notice to you and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 37(1) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987), the punishment for which include imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

To,
M/s. Brundavan Laboratories (P) Ltd.,
Yellagiri (V), Choutuppal (M),
Yadadri Bhauangiri District.

Copy to:

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information necessary action.
3. Concerned file.

//T.C.F.B.O//

Prasanna
Senior Environmental Engineer
(Task Force - UH-IV)



BY REGD. POST WITH ACK. DUE

Order No.NLG-54/TSPCB/TF/HO/2024- 1477

Date:03.01.2024

Sub : TSPCB – M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District – Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) and Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) – **Extension of Temporary Restoration of Power Supply for a period of Three months – Orders Issued** – Reg.

Ref : 1. Order No.NLG-54/TSPCB/TF/HO/2023, Dt: 13.09.2023.
2. Hearing held on 03.01.2024.
3. Order No.NLG-54/TSPCB/TF/HO/2024- , dt:03.01.2024.

* * * * *

In the 1st reference mentioned above, orders under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 & under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 orders were directed to TSSPDCL to restore the power supply for a period up to 31.10.2023 to M/s. **Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District.**

In the 2nd reference cited, the status of the industry was reviewed before the Board's Task Force Committee meeting held on 03.01.2024. After careful consideration of all the material facts of the case, it was decided to issue extension of temporary revocation of closure orders for a period of Three Months. Accordingly the Board has issued extension of temporary revocation of closure orders to the industry. A copy of the extension of temporary revocation of closure orders is herewith enclosed.

In view of the above, the Board hereby directs the TSSPDCL to extend the power supply to **M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhauangiri District for a period of Three Months from date of This Order** for carrying out the production activities. These directions are issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

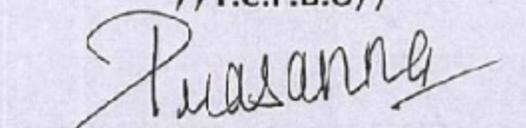
Sd/-
MEMBER SECRETARY

To,
The Superintending Engineer (Operations),
Telangana State Southern Power Distribution Company Ltd.,
Yadadri Bhuvanagiri District.

Copy to:

1. The JCEE, Z.O, R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, Nalgonda for information and necessary action.
3. Concerned file.

//T.C.F.B.O//


Senior Environmental Engineer
(Task Force - UH-IV)

