

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI  
SOUTHERN ZONE, CHENNAI**

**ORIGINAL APPLICATION NO. 97 OF 2021 (SZ)**

Ravula Lingaswamy,  
& 3 others

...Applicants

Versus

Union of India,  
& 5 others

...Respondents

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Place: CHENNAI

DATE: 18.01.2024

*T. Hemalatha*

COUNSEL FOR 6TH RESPONDENT

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI**  
**SOUTHERN ZONE, CHENNAI**

1

**ORIGINAL APPLICATION NO. 97 OF 2021 (SZ)**

Ravula Lingaswamy,  
Yadadri Bhuvanagiri Dt.  
& 3 others

...Applicants

Versus

Union of India,  
Rep by its Secretary to Government,  
MoEF, New Delhi  
& 5 others

...Respondents

**MEMO FILED ON BEHALF OF THE 6TH RESPONDENT**

It is respectfully submitted that pursuant to the show cause notice issued by the Telangana State Pollution Control Board dated 05.12.2023 this respondent has submitted a detailed reply establishing compliance with all pollution control measures.

It is submitted that without prejudice to the contention of this respondent that no compensation is payable, in order to facilitate an opportunity that may be granted by the authority, this respondent has deposited a sum of Rs.19,45,000/- amounting to 25% of compensation as claimed. The Board has also issued further proceedings dated 03.01.2024.

It is therefore prayed that this Hon'ble court may be pleased to take this memo on record and thus render justice.

Dated at Chennai on this the 18th day of January, 2024

  
Counsel for 6th Respondent

	<b>TELANGANA STATE POLLUTION CONTROL BOARD</b> <b>PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,</b> <b>SANATHNAGAR, HYDERABAD - 500 018.</b>	Phone: 040-23887500 Fax: 040-23815631 Website: tspcb.cgg.gov.in

**BY REGD. POST WITH ACK. DUE**

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

**Notice No. NLG-85/TSPCB/UH-II/2023- 1208**

**Date:05.12.2023**

**SHOW CAUSE NOTICE**

**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) - Non-compliances of the consent conditions and Board Directions - Non payment of Environmental Compensation - **SHOW CAUSE NOTICE - 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-Naigonda 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. Hearing held on 29.11.2023.

\* \* \*

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> 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 2<sup>nd</sup> 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 3<sup>rd</sup> 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 Bhuvangiri 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 4<sup>th</sup> 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 5<sup>th</sup> 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 6<sup>th</sup> 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 7<sup>th</sup> 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 8<sup>th</sup> 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 9<sup>th</sup> 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 10<sup>th</sup> 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 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 11<sup>th</sup> 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 12<sup>th</sup> 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 13<sup>th</sup> 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**, 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-Naigonda 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.
  - 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 & 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/Nm<sup>3</sup> against 115 mg/Nm<sup>3</sup>) 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**, vide reference 14<sup>th</sup> 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. 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. In view of the above, based on the recommendations of committee, you are hereby directed to **SHOWCAUSE** 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. Your reply including payment of Environmental compensation and bank guarantee shall reach TSPCB, Head Office, Sanathnagar, Hyderabad within 7 days from the date of receipt of this notice, failing which the Board will initiate necessary action for recovery of environmental compensation and also action including closure order

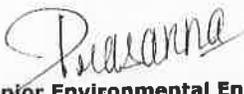
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against your industry under the provisions of the Water (Prevention & Control of Pollution) Amendment Act, 1988 in the interest of Public Health and Environment.

**Sd/-  
MEMBER SECRETARY**

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

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

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

This Order has the Digital Approval by the Member Secretary.



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

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**BY REGD. POST WITH ACK. DUE**

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

**Notice No. NLG-85/TSPCB/UH-II/2023-1207**

**Date: 05.12.2023**

**SHOW CAUSE NOTICE**

**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) - Non-compliances of the consent conditions and Board Directions - Non payment of Environmental Compensation - **SHOW CAUSE NOTICE - ISSUED** - Reg.

- Ref:**
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  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.
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  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.
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  14. Hearing held on 29.11.2023.

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1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvnagiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> 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 2<sup>nd</sup> 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 3<sup>rd</sup> 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.

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- 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 4<sup>th</sup> 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 5<sup>th</sup> 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 comply with the directions Issued vide order dt:31.10.2022.
  - iii. 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.
  - iv. 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
  - v. 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.
  - 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.

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7. **WHEREAS**, vide reference 6<sup>th</sup> 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 6<sup>th</sup> 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 7<sup>th</sup> 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 8<sup>th</sup> 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 9<sup>th</sup> 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 10<sup>th</sup> 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 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 11<sup>th</sup> 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 12<sup>th</sup> 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 13<sup>th</sup> 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**, 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 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.
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.

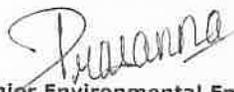
- ii. As per the CFO, the industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel for boilers.
  - iii. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is In operation. But, the biological ETP is not functioning 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. No spillages were observed. 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 "PIICN" 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/Nm<sup>3</sup> against 115 mg/Nm<sup>3</sup>) 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.
  - xlii. 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**, vide reference 14<sup>th</sup> 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. During the review following non-compliances were observed:
- i. 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.
  - ii. Odour was observed near ZLD area and the VOC readings were in the range of 0.033 to 0.78 PPM.
  - iii. 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).
  - iv. The odour was observed near production block and MEE area in the premises.

- v. The industry is one of major industry the Dhotigudem 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.
- vi. 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.
- vii. 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/Nm<sup>3</sup> against 115 mg/Nm<sup>3</sup>) is exceeding the Board standard.
21. In view of the above, based on the recommendations of the Committee, you are hereby directed to **SHOWCAUSE** as to why action should not be initiated against your industry under section 31 (A) of Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) for violation of the Consent conditions & directions of the Board and for causing air pollution in the surrounding areas.
22. Your reply shall reach TSPCB, Head Office, Sanathnagar, Hyderabad within 7 days from the date of receipt of this notice, failing which the Board will initiate necessary action for recovery of environmental compensation and also action including closure order against your industry under the provisions of the Air (Prevention & Control of Pollution) Amendment Act, 1987 in the interest of Public Health and Environment.

Sd/-  
MEMBER SECRETARY

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

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

  
Senior Environmental Engineer  
(Task Force - UH-IV)

This Order has the Digital Approval by the Member Secretary.

# Hazelo Lab

## Hazelo Lab Private Limited

Reg. Off: H. No. 8-3-166/7/1,  
3rd Floor, A Wing, Erragadda,  
Hyderabad, Telangana - 500 018.  
Tel: +91-40-23710405, Fax: +91-40-23700405  
CIN: U24110TG2015PTC098450

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To  
The Member Secretary,  
Telangana State Pollution Control Board,  
Paryavaran Bhavan, A-3 Industrial Estates,  
Sanathnagar, Hyd-500018, Telangana.

Date: 14/12/2023

Respected Sir,

**Sub:** Submission of show cause notice reply-Reg.

**Ref:** 1) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1207-Dated: 05.12.2023

2) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1208-Dated: 05.12.2023.

With reference to the above-mentioned subject, we are herewith submitting point wise show cause notice reply for your kind perusal.

S.No	Task-force Show cause Points	Our Submission
01	The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.	We bring to your notice that we have filed point wise objections and a detailed response before the Hon'ble National Green Tribunal, Southern Zone, Chennai on 8 <sup>th</sup> January 2023 in respect of the report submitted by the Central Pollution Control Board before the Hon'ble NGT on 01.09.2022. Further, we wish to inform you that, the Hon'ble NGT is yet to consider our objections of the report. Under such circumstances, the payment for Levying of Environmental Compensation and Additional directions – Orders issued by TSPCB on 21/06/2023 & 13/09/2023 is premature considering the same is based solely on the report of CPCB observations. Further we are submitted our review petition for Environmental Compensation on 02/11/2023 in High court of Telangana in interest of justice.
02	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.	We bring to your notice that due to scarcity of coal, we are mixing Husk with coal as fuel to the boilers to reduce the emission of greenhouse gases. The same

		has been informed to Board office vide our letter dated 22/08/2022.
03	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.	<p>We bring to your notice that we are operating ZLD system but the biological ETP is not functioning effectively at the time of board official inspection due to low MLSS in the aeration system of Bio ETP. Hence, SVI is not stabilised as required more than 100.</p> <p>In order to improve MLSS, we are further adding bio culture with cow dung in our aeration tanks and controlling shock loads to improve functioning of our Bio ETP system with effective manner.</p>
04	Odour was observed near ZLD area and the VOC readings were in the range of 0.033 to 0.78 PPM.	<p>As per the Board official's observation the VOC levels monitored were in the range of 0.033 to 0.78 The values are within the permissible limit (10 PPM).</p> <p>We have provided odour suppressant mist spray system (Sprinkling of PIION liquid) at ZLD area to minimise odour.</p>
05	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).	<p>The provision of activated charcoal bed to the vents of scrubbing system technically and safety point of view is not feasible.</p> <p>In production blocks, we have connected process vents to primary and secondary condensing system with chilled Brine and RT water as media and the condenser vent is connected to scrubbing systems to combat VOC emissions.</p> <p>In addition to we have provided hood with extraction system to HTDS effluent storage tanks followed by scrubber to control the odour nuisance.</p>
06	The odour was observed near production block and MEE area in the premises.	As per the Board official's observation the VOC levels monitored were in the range of 0.033 to 0.78 PPM. VOC values are within the permissible limit (10 PPM).
07	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	We bring to your notice that we have appointed one Senior Executive person at ZLD Operations, who is having more than

	garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.	10 years of experience in the field of ZLD operations Also, we have appointed one more senior person to monitor Environmental Compliance including ZLD functional area for smooth ZLD operations. The same has been informed to Board Officials at the time of inspection.
08	The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.	We have provided dedicated storage area with collection pit to handle HW properly. Further, inform you that as per the board officials' observation we will close the hazardous waste storage area with protecting sheets within one month.
09	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.	As per the board direction, we are provided odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment & MEE area to control VOCs and to control odour. As per the Board official's observation the VOC levels were in the range of 0.033 to 0.78 PPM. VOC values are within the permissible limit.
10	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 crisis.	We bring to your notice that, we have submitted our request letter to Board Office for exemption to submit BG and its forfeiture due to lack of our product demand, heavy competition in Global Market and financial crisis. Further, our request has been submitted through Dothigudem Industrial Association vide letter dated 04.10.2023.
11	As per the analysis reports the value of TDS, COD & BOD in rain water outlet drain of the industry are very high.	We bring to your notice that as per CPCB observation, we have constructed compound wall in our plant to obstruct the flow of rainwater from upstream to our industry. Also as per the CPCB & Board official inspections there is no discharges from our unit.
12	The board Officials conducted stack & ambient air quality monitoring on 10.11.2023. As per the analysis reports	Due to damage of filter bags in the bag filter, the value of SPM was exceeded at the time of board officials monitoring. The damaged bags were replaced with

	the value of SPM is exceeding the Board standard.	new bags and checked the air quality with authorised agency. Now the value of SPM is within the permissible limit.
<b>13</b>	As per the Analysis reports the value of TDS, COD & BOD in MEE cooling tower and production block cooling tower is very high	We bring to your notice that higher TDS in the CT (Cooling Tower) water is due to low water blow down from cooling tower. We add booster chemicals to CT water to reduce scale formation in the pipelines which attributes COD and BOD in the CT water. We are improving our CT blow down system to maintain CT water parameters.

Hence, we request your good selves don't initiate any action against our industry.

Thanking you,

**Yours faithfully,**

**For M/s. HAZELO LAB PRIVATE LIMITED**

**V.JAGADEESWAR**

**DEPUTY GENERAL MANAGER – CORP. EHS.**

CC to: To the Environmental Engineer, TSPCB, Regional Office, Nalgonda Dist.

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# Hazelo Lab

## Hazelo Lab Private Limited

Reg. Off: H. No. 8-3-166/7/1,  
3rd Floor, A Wing, Erragadda,  
Hyderabad, Telangana - 500 018.  
Tel: +91-40-23710405, Fax: +91-40-23700405  
CIN: U24110TG2015PTC098450

To

Date: 23/12/2023

The Member Secretary,  
Telangana State Pollution Control Board,  
Paryavaran Bhavan, A-3 Industrial Estates,  
Sanathnagar,  
Hyderabad - 500018,  
Telangana.

Respected Sir,

**Sub: Submission of Environmental Compensation payment (25%) req. - Reg.**

**Ref: 1) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1207-Dated: 05.12.2023  
2) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1208-Dated: 05.12.2023.**

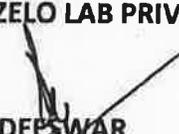
With reference to the above-mentioned subject, we are herewith submitting Environmental compensation (25%) payment details for your kind perusal as follows:

S.No		UTR Details	Amount in Rs.
01	S74026520	R/INDB24BP2868/TSPCB/INDBR32023122200109676/	19,45,000.00

Hence, please receive and acknowledge the same.

Thanking you,

**Yours faithfully,  
For HAZELO LAB PRIVATE LIMITED**

  
**V.JAGADEESWAR  
DEPUTY GENERAL MANAGER – CORP. EHS.**

CC to: To the Environmental Engineer, TSPCB, Regional Office, Nalgonda Dist.

**BY REGD. POST WITH ACK. DUE**

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

**Order No.NLG-44/TSPCB/TF/HO/2024- 1459**

**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 Bhuvnagiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> 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 2<sup>nd</sup> 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 3<sup>rd</sup> 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 4<sup>th</sup> 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 5<sup>th</sup> 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.

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7. **WHEREAS**, vide reference 6<sup>th</sup> 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 6<sup>th</sup> 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 7<sup>th</sup> 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 8<sup>th</sup> 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 9<sup>th</sup> 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 10<sup>th</sup> 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 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 11<sup>th</sup> 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 12<sup>th</sup> 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.

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- 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 13<sup>th</sup> 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 14<sup>th</sup> 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 & 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/Nm<sup>3</sup> agaisnt 115 mg/Nm<sup>3</sup>) 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: 28

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 16<sup>th</sup> 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 17<sup>th</sup> 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 anlysis 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 anlysis reports the values of TDS & COD (TDS - 4,086 mg/L ) & (COD - 259 mg/L) are high.

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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/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).
  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 1<sup>st</sup> week-end of December.
23. **WHEREAS**, vide reference 18<sup>th</sup> 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 19<sup>th</sup> 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/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).
  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.

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- 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.

//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.

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**BY REGD. POST WITH ACK. DUE**

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

**Order No. NLG-44/TSPCB/TF/HO/2024- 146D**

**Date: 03.01.2024**

**Sub: TSPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District - Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - 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 1<sup>st</sup> 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 2<sup>nd</sup> 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 3<sup>rd</sup> 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 4<sup>th</sup> 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 5<sup>th</sup> 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 6<sup>th</sup> 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 7<sup>th</sup> 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 8<sup>th</sup> 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 9<sup>th</sup> 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 10<sup>th</sup> 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 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 11<sup>th</sup> 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 12<sup>th</sup> 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 13<sup>th</sup> 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 14<sup>th</sup> 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.

- 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/Nm<sup>3</sup> against 115 mg/Nm<sup>3</sup>) 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.

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- 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 drain 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 16<sup>th</sup> 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 17<sup>th</sup> 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 1<sup>st</sup> week-end of December.

23. **WHEREAS**, vide reference 18<sup>th</sup> 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 19<sup>th</sup> 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. Dhotigudem 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 Dhotigudem 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.

508284

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

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

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI  
SOUTHERN ZONE, CHENNAI**

**ORIGINAL APPLICATION NO. 97 OF 2021 (SZ)**

**Ravula Lingaswami  
& 3 Others**

**...Applicants**

**Versus**

**Union of India  
& 5 others**

**...Respondents**

**MEMO FILED ON BEHALF OF THE 6TH RESPONDENT**

**M/S.T.HEMALATHA  
COUNSEL FOR 6TH RESPONDENT**