

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

**ORIGINAL APPLICATION NO. 97 OF 2021**

RAVULA Lingaswami & Others

...Applicants

Versus

Union of India & others

...Respondents

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Place: CHENNAI

DATE: 28.02.2024

*T. Hemadatta*

**COUNSEL FOR SIXTH RESPONDENT**

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

**ORIGINAL APPLICATION NO. 97 OF 2021**

RAVULA Lingaswami & Others

...Applicants

Versus

Union of India & 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 paid a sum of Rs.19,45,000.00 on 23.12.2023 and another Rs.19,45,000.00 on 17.02.2024 towards Environmental compensation totally amounting to 50% of the demand.

In addition this respondent has also furnished fresh bank guarantee dated 06.01.2024 for a sum of Rs.24,00,000/- as demanded by the bank. The relevant records are enclosed as annexure to this memo.

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 this 28th day of February 2024

*T. Hemalatha*

Counsel for Respondent No.6

# 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

Date: 17/02/2024

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

17 FEB 2024



Respected Sir,

**Sub:** Submission of part payment of environmental compensation (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.  
3) Task Force technical committee meeting held on dated: 03.01.2024

With reference to the above-mentioned subject, we are herewith submitting part payment of environmental compensation (25%) details as enclosed below.

S.No	UTR DETAILS & DATE	AMOUNT IN RS.
01	INDBR32024021600466107 Date: 16/02/2024	19,45,000.00

Further, we wish to inform you that, we have paid totally 50% of Environmental Compensation and the balance amount will be made by industry subjected to outcome of the Hon'ble NGT Judgement of O.A.No.97 of 2021.

Kindly acknowledge the receipt of the same.

Thanking you,

Yours faithfully,  
M/s. HAZELO LAB PRIVATE LIMITED

  
V.JAGADEESWAR  
DEPUTY GENERAL MANAGER – CORP. EHS.

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

# 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

Date: 13/02/2024

The Environmental Engineer,  
Telangana State Pollution Control Board,  
Regional Office, Nalgonda,  
Nalgonda Dist

Sir,

**Sub: Submission of Original Bank Guarantee for Rs.24 Lakhs – Reg.**  
**Ref: Order No.NLG-44/TSPCB/TF/HO/2024-1459, Dated: 03.01.2024**

With reference to the above-mentioned subject, we are herewith submitting Original Bank Guarantee with validity from 06<sup>TH</sup> January 2024 to 05<sup>TH</sup> January 2025 which is issued on 06<sup>th</sup> January 2024 as follows:

S.NO	BANK GUARANTEE NO/ISSUE DATE	AMOUNT in Rs.
1	OGT0004240090398 ISSUED ON 06/01/2024	24,00,000/- (Rupees Twenty four Lakhs Only)

Hence, we request your good selves to please receive the Original Bank Guarantee for Rs.24,00,000/- (Rupees Twenty four lakhs only) and acknowledge the same.

Thanking you

Yours faithfully  
For HAZELO LAB PRIVATE LIMITED

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

C.C to The Member Secretary, TSPCB, Paryavaran Bhavan, Sanathnagar, Hyd.



Phone No:  
Sold To/Issued To:  
Sahil Arora  
For Whom/ID:Proof:  
IndusInd Bank Ltd.

भारत INDIA  
INDIA NON JUDICIAL  
YADARSH KOMMURU  
S.L.NO:2/2012/2006  
BL.NO:2-1277015494  
SUNRIYA COMPLEX 13 ROAD  
SECUNDERABAD-500047  
TELANGANA  
ఆంధ్రప్రదేశ్  
भारतीय गैर न्यायिक



NOV-20-2023 13:28:37

₹ 0000200/- 4  
ZERO ZERO ZERO ZERO TWO ZERO ZERO  
Other  
38153271700486917944-00316093  
3815327 11/2012

BANK GUARANTEE NO: OGT0004240090399

Date: 06/01/24

This forms an integral part of the bank guarantee number OGT0004240090399  
(issuance/amendment) dated 06/Jan/24 for INR. 24,00,000/-  
Rs twenty four lakh only.  
issued on behalf of Hazelo lab private limited.

For IndusInd Bank Ltd  
CGMO, Secunderabad Branch

  
Authorised Signatory

SURENDRA KOMMURU  
CHIEF MANAGER  
SS No. 2984



For IndusInd Bank Ltd  
CGMO, Secunderabad Branch

  
Authorised Signatory

NALBAND AMRULLA  
Manager  
SS No: 20994



# IndusInd Bank

BANK GUARANTEE NO: OGT0004240090378

DATE: 06/01/2024

SR No. GTEE/0087980

BANK GUARANTEE

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TO

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

The deed of Guarantee executed at **HYDERABAD** on this **6<sup>th</sup> day of January 2024** by We **INDUSIND BANK LIMITED**, a banking company incorporated and registered under Companies Act 1956 and having license to carry on banking business under the Banking Regulation Act, 1949 having its registered office at 2401, General Thimmayya Road, Cantonment, Pune- 411001 and its Corporate Office at 8th Floor, tower-1, One India bulls Centre, 841, S.B.Marg, Elphinstone Road, Mumbai - 400 013 and its one of branch office at IndusInd Bank, CGMO Department, 4th Floor, Suryodaya Chambers, 1-10-60/3A, Begumpet, Hyderabad - 500016 herein after referred to as "**THE GUARANTOR**" /Bank (which expression shall include its successor or successors) in favour of Telangana State Pollution Control Board (Statutory Body) represented by the Member Secretary, T.S.Pollution Control Board, Paryavarana Bhavan, Industrial Estate, Sanathnagar, Hyderabad (hereinafter referred to as the Board).

WHEREAS **M/s. HAZELO LAB PRIVATE LIMITED** herein after referred to as "**EXECUTOR**" /Company having its Bulk Drug unit at Dhotigudem Village, Pochampally Mandal, Yadadri Bhuvangiri district., has to manufacture Bulk drug and Intermediate products.

WHEREAS the Member Secretary, T.S.Pollution Control Board, Paryavarana Bhavan, Industrial Estate, Sanathnagar, Hyderabad has directed to **M/s. HAZELO LAB PRIVATE LIMITED** to furnish Bank Guarantee for **Rs.24,00,000/- (Rupees Twenty Four Lakhs Only)** for a period of **One YEAR** to comply with the conditions stipulated in the Consent for Establishment/Consent for Operation/Hazardous Waste Authorization/Directions of the Board for Control of Water pollution/Air Pollution/Safe disposal of solid waste for protection of Environment and Public Health, in accordance to the norms laid down by the Board as committed by **M/s. HAZELO LAB PRIVATE LIMITED**

In pursuance of the above we, **INDUSIND BANK LIMITED** Guarantee the observance and performance by the company of the various terms and obligations as provided in the commitment made above and undertake to pay to the Board subject to a maximum sum not exceeding **Rs.24,00,000/- (Rupees Twenty Four Lakhs Only)** on demand and in the event of company failing to comply with the above conditions/Directions.

Our liability under the Guarantee is restricted to **Rs.24,00,000/- (Rupees Twenty Four Lakhs Only)**. Our Guarantee shall remain in force until **05/01/2025** unless a claim under this guarantee is filed in writing against us before **05/01/2025** the date of claim expiry, all your rights under this guarantee shall be forfeited and we shall be relieved and discharged from all liabilities whatsoever there under.

This guarantee will be returned to the bank when the purpose for the issuance of the Instrument has been fulfilled or upon its expiry.

Notwithstanding anything to the contrary contained in these presents,



**SURENDRA KOMMURU**  
CHIEF MANAGER  
SS No. 2994

For IndusInd Bank Ltd.  
CGMO, Secunderabad Branch

*Surendra Kommuru*  
Authorized Signatory



For IndusInd Bank Ltd.  
CGMO, Secunderabad Branch

*Nalband Amrulla*  
Authorized Signatory

**NALBAND AMRULLA**  
Manager  
SS No: 20994



# IndusInd Bank

BANK GUARANTEE NO: OGT00042400903  
DATE: 06/01/2024

SR No. GTEE/0087981

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a. Our liability under this Bank Guarantee shall not exceed **Rs.24,00,000/- (Rupees Twenty Four Lakhs Only)**.

b. This Bank Guarantee shall be valid up to **05/01/2025** (Expiry Date) only;

c. We shall be liable to pay you the guaranteed amount or any part thereof under this Bank Guarantee upon receipt of written demand on or before **05/01/2025** (the claim expiry date).

d. In case no demand is made before the claim expiry date specified in Clause c above, the Bank shall stand discharged from all its liabilities under this Bank Guarantee, irrespective of the fact whether the original Bank Guarantee is returned back to us or not; and

e. Any disputes or claims arising out of this Bank Guarantee, are necessarily required to be enforced before the competent court of law within one (1) year from the date of demand, provided that such demand is received by the Bank before the claim expiry date specified in Clause c above.

THIS BANK GUARANTEE IS SUBJECT TO THE ICC UNIFORM RULES FOR DEMAND GUARANTEES (ICC PUBLICATION NO. 758) AND SHALL BE GOVERNED BY AND CONSTRUED IN ALL RESPECTS, IN ACCORDANCE WITH THE LAWS OF INDIA.

Date: 06/01/2024  
Place: Hyderabad

For IndusInd Bank Limited

For IndusInd Bank Limited

(Authorised Signatory)  
(Name and Designation /SS NO)



**SURENDRA KOMMURU**  
CHIEF MANAGER  
SS No 2984

(Authorised Signatory)  
(Name and Designation /SS NO)

**NALBAND AMRULLA**  
Manager  
SS No: 20994



# 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.



Factory : H.No.4-166, Survey No. 242, 247, 248 & 249, Dhothigudem Village, Jiblakpally, B. Pochampally Mandal,  
Yadadri Bhongir District, Telangana-508284, INDIA. Mnhile : 9989867941

To

The Member Secretary,  
Telangana State Pollution Control Board,  
Paryavaran Bhavan,  
Santhnagar,  
Hyderabad – 500 018.

Date: 20.02.2024



Respected Sir,

**Sub:** Submission of point wise Task-force Directions Compliance Status Report – Reg.**Ref:** 1. Task-force Technical Committee meeting held on 03.01.2024.  
2. Order No.NLG-44/TSPCB/TF/HO/2024-1459, Dated: 03.01.2024.  
3. Order No.NLG-44/TSPCB/TF/HO/2024-1460, Dated: 03.01.2024.

With reference to the above-mentioned subject, we are herewith submitting point wise Task-force directions compliance status report for your kind perusal.

S.No	Directions	Our submission
1	The industry shall comply with the directions issued by the board including the conditions stipulated in the CFO& HWA order.	We are complying 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.	We are operating continuously ZLD system including biological ETP effectively.
3	The industry shall pay the Environmental compensation amount within 06 months period.	We bring to your notice that 50% of Environmental Compensation payment paid by us the balance amount of Environmental Compensation will be made by industry subjected to outcome of the Hon'ble NGT Judgement of OA.No. 97 of 2021. Enclosed payment details as Annexure-I
4	The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.	Herewith enclosed the submission acknowledgement of B.G for Rs.24 Lakhs as Annexure-II.
5	The industry shall comply with the directions issued by the board including the conditions stipulated in the CFO&HWA order.	We are complying all the directions including the conditions stipulated in the CFO & HWA Order.
6	The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.	We are operating all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.

*We have complied all the above Task-force directions against above orders, hence don't initiate any action against our unit.*

Thanking you

Yours faithfully

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



**V.JAGADEESWAR**

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

**CC: To the Environmental Engineer, TSPCB, Regional Office, Nalgonda District.**

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI**  
**ORIGINAL APPLICATION NO. 97 OF 2021**

RAVULA Lingaswami & Others

...Applicants

Versus

Union of India & others

...Respondents

**MEMO ALONG WITH ANNEXURES FILED ON BEHALF OF THE 6TH**  
**RESPONDENT**

T.HEMALATHA, R.RAJMOHAN & S.DEEPIKA

COUNSEL FOR RESPONDENT NO.6