

**BEFORE THE NATIONAL GREEN TRIBUNAL**

**SOUTHERN ZONE, CHENNAI**

**APPEAL No. 73 OF 2025 (SZ)**

**IN THE MATTER OF:**

Manchala Ramakrishna Reddy  
& Others

... Appellant(s)

Versus

Union of India & Ors

... Respondent(s)

**REPORT OF THE TELANGANA POLLUTION CONTROL BOARD (R - 4)**

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**Place:** Hyderabad

**Date:** 05-03-2026

*T. Sai Krishnan*

**COUNSEL FOR RESPONDENT No. 4**

**T. SAI KRISHNAN**

**REPORT DATED:02.03.2026 OF TELANGANA POLLUTION CONTROL BOARD (R – 4) IN APPEAL NO:73 OF 2025 (SZ) FILED BY MANCHALA RAMAKRISHNA REDDY & OTHERS.**

It is submitted that Sri Manchala Ramakrishna Reddy and others have filed Appeal No. 73 of 2025 before the Hon'ble National Green Tribunal, Chennai, seeking the following reliefs:

1. Quash and set aside the Environmental Clearance dated 29.10.2025 granted to M/s. TGV SRAAC Limited, citing it as arbitrary, scientifically flawed, and violative of the Precautionary Principle and Article 21 rights.
2. Alternatively, remand the matter to the Ministry of Environment, Forest and Climate Change (MoEF&CC) with directions for a de novo appraisal, including:
  - a) Mandating the use of Suspension Polymerization technology and prohibiting fluorinated surfactants in PTFE production.
  - b) Conducting a supplementary EIA covering areas in Telangana.
  - c) Installing a thermal oxidizer for HFC-23 destruction.
  - d) Setting specific discharge limits for Total Organic Fluorine (TOF) and Adsorbable Organic Halogens (AOX).
3. Direct the respondent to deposit an Environmental Performance Guarantee for Riverine Ecosystem Monitoring.
4. Appoint an Expert Committee to inspect the site and verify the Zero Liquid Discharge system.
5. Stay the operation of the Environmental Clearance and restrain construction/expansion activities until the appeal's disposal.

**In this regard, following is submitted:**

1. The Ministry of Environment, Forest and Climate Change (MoEF&CC), Government of India vide order dated:29.10.2025 granted Environmental Clearance (EC) to M/s. TGV SRAAC Limited situated at Godiparla Village, Kurnool District of Andhra Pradesh State under line of activity as '4(d) – Chlor-

Alkaki Industry' and '5(f) – Synthetic Organic Chemicals industry' under Category 'A'. (Annexure – I)

2. The respondent industry, M/s. TGV SRAAC Limited, is situated at Godiparla Village, Kurnool District, Andhra Pradesh State, and lies outside the administrative control boundary of the Telangana Pollution Control Board, although it is located adjacent to the state boundary.
3. The primary allegations raised by the petitioner/appellant are as follows:

S.No	Allegations raised in the appeal	Remarks of the Respondent Board.
i.	The Project Site is situated in Gondiparla Village, Kurnool, immediately adjacent (approx. 600 meters) to the Tungabhadra River. Furthermore, the site is geographically located merely 1.3 km from the interstate boundary with Telangana state. Despite this extreme proximity to a shared interstate water resource and a neighboring state's population, the Environmental Impact Assessment (EIA) was restricted solely to Andhra Pradesh, ignoring the "Impact Zone" extending into Telangana state.	The respondent Board respectfully submits that the issuance of Terms of Reference (TOR) for the Environmental Impact Assessment (EIA) study and the scrutiny of the EIA report fall within the purview of the Expert Appraisal Committee (EAC) of the Ministry of Environment, Forest and Climate Change (MoEF&CC).
ii.	The EC omits a binding condition for Suspension Polymerization, allowing a potential shift to dirtier Emulsion Polymerization, violating the Precautionary Principle.	The matter falls within the jurisdiction of the Environmental Clearance (EC) issuing authority, namely the Ministry of Environment, Forest and Climate Change (MoEF&CC).

<p>iii.</p>	<p>The Miteni case (Italy) involved a PFAS-producing chemical plant near a river, where despite safety assurances and containment measures, contamination affected 350,000 people. The court held that Mitsubishi/ICI knew of risks but failed to prevent pollution. Similarly, the TGV SRAAC project in Kurnool involves a fluorochemical plant near a riverbank, relying on potentially inadequate "Zero Liquid Discharge" technology. The MoEF&amp;CC's approval disregards this precedent, posing catastrophic aquifer contamination risks.</p>	<p>The concerned authorities in this matter are the Andhra Pradesh State Pollution Control Board (APSPCB) and the Environmental Clearance (EC) issuing authority, namely the Ministry of Environment, Forest and Climate Change (MoEF&amp;CC).</p>
<p>iv.</p>	<p>Condition No. (xvii) of the Specific Conditions in the impugned EC states:</p> <p><i>"No PFOA, PFOS and hexafluoropropylene oxide dimer acid (HFPO-DA) shall be used in manufacturing process of PTFE."</i></p> <p>By banning only three specific CAS numbers (PFOA, PFOS, HFPO-DA), the MoEF&amp;CC has implicitly authorized the use of thousands of other fluorinated surfactants</p>	<p>The matter falls within the jurisdiction of the Environmental Clearance (EC) issuing authority, namely the Ministry of Environment, Forest and Climate Change (MoEF&amp;CC).</p>
<p>v.</p>	<p>The European Union Regulation 2024/2462, dated 19.09.2024, explicitly restricts PFHxA (Perfluorohexanoic acid), its salts, and related substances, recognizing them as "very persistent" and "mobile in the aquatic</p>	

	environment." The EU found that these substances pose an unacceptable risk to groundwater. Yet, the EC granted a month later (October 2025) does not ban PFHxA, allowing TGV SRAAC to legally use this toxic chemical known to be banned in Europe.	
vi.	The EIA report submitted by the Respondent No. 5 restricted its baseline data collection (air quality monitoring stations, soil sampling, socio-economic surveys) primarily to the Andhra Pradesh side. As highlighted in the representation by Scientists for People, there is "No baseline data for the Telangana study area" and "No Emergency Response Plan for the Telangana area.	The respondent Board respectfully submits that the issuance of Terms of Reference (TOR) for the Environmental Impact Assessment (EIA) study and the scrutiny of the EIA report fall within the purview of the Expert Appraisal Committee (EAC) of the Ministry of Environment, Forest and Climate Change (MoEF&CC).
vii.	The Standard Terms of Reference (TOR) issued on 02.01.2025 mandate a study area of 10 km radius. By effectively ignoring the ~40% of the study area that falls within Telangana, the EIA is legally termed "incomplete and misleading."	
viii.	The Public Hearing was conducted only in Kurnool, Andhra Pradesh. The representation notes that "voices of the directly affected local communities were unjustly prevented from participating." Given the transboundary impact, a joint public hearing or at least a separate	As per the EIA Notification, 2006, in cases where a project site extends beyond a single State or Union Territory, public hearing is mandated in each State or

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	hearing in the affected Telangana districts was mandatory under the spirit of the EIA Notification, 2006. The failure to consult the downstream riparian state is a procedural fatality in the process of Public hearing.	Union Territory where the project is located. Since the respondent's project is situated entirely within the State of Andhra Pradesh, the public hearing was conducted in the state, near the project site, in compliance with the Notification.
ix.	The appellant further objects generation of HFC 23 as waste by-product (a greenhouse gas), not mandating a Continuous Emission Monitoring System (CEMS) for HFC-23 or Total Fluorine in the stack, creating PFAS-rich landfill just 600 m from the river, not having discharge limits for Total Organic Fluorine (TOF) or AOX, etc.,.	The matter falls within the jurisdiction of the Environmental Clearance (EC) issuing authority, namely the Ministry of Environment, Forest and Climate Change (MoEF&CC).

In light of the above submissions, it is respectfully submitted that the allegations raised by the appellant pertain to matters within the purview of the Environmental Clearance (EC) issuing authority, namely the Ministry of Environment, Forest and Climate Change (MoEF&CC). The Respondent Board undertakes to fully comply with any directions or orders that the Hon'ble National Green Tribunal may deem fit to pass in this matter.

**Place: Hyderabad.**

**Date: 02.03.2026.**

  
**ENVIRONMENTAL ENGINEER**

**ENVIRONMENTAL ENGINEER**  
Telangana Pollution Control Board  
Regional Office, Hyderabad,  
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Lakdikapul, Hyderabad-500 004.

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Annexure-I

# ANNEXURE A-5

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सत्यमेव जयते

File No: J-11011/84/2016-IA-II(I)

Government of India

Ministry of Environment, Forest and Climate Change

IA Division

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Date 29/10/2025



To,

Jaswanth Reddy N  
TGV SRAAC LIMITED  
TGV SRAAC LIMITED Gondiparla Village Kurnool Mandal Dist AP 518004 , GONDIPARLA,  
KURNOOL, ANDHRA PRADESH, , 518004  
sraaclab@rediffmail.com

**Subject:** Grant of prior Environmental Clearance (EC) to the proposed project under the provision of the EIA Notification 2006 -regarding.

Sir/Madam,

This is in reference to your application submitted to MoEF&CC vide proposal number IA/AP/IND3/541980/2025 dated 26/06/2025 for grant of prior Environmental Clearance (EC) to the proposed project under the provision of the EIA Notification 2006 and as amended thereof.

2. The particulars of the proposal are as below :

(i) EC Identification No.	EC25A1601AP5694844N
(ii) File No.	J-11011/84/2016-IA-II(I)
(iii) Clearance Type	Fresh EC
(iv) Category	A
(v) Project/Activity Included Schedule No.	4(d) Chlor-alkali industry,5(f) Synthetic organic chemicals industry
(vi) Sector	Industrial Projects - 3 Expansion of Chlor Alkali, Chloromethanes and Synthetic Organic chemicals manufacturing unit at Sy. No. 61/1, 2A, 2B, 2C1, 2C2, 2C3, 56/1, 58/1, 59/1, 60, 62B/2D2, 2C1/A2, 2C1/A3, 2C2/C, 2G/1, 2E, 2F, 1A, 1B, 62A, 62B, 63/1, 64, 70/C2, 72, 73, 27, 28/2 and 66, Gondiparla village, Kurnool mandal and district, Andhra Pradesh by TGV SRAAC LIMITED
(vii) Name of Project	TGV SRAAC LIMITED
(viii) Name of Company/Organization	TGV SRAAC LIMITED
(ix) Location of Project (District, State)	KURNOOL, ANDHRA PRADESH
(x) Issuing Authority	MoEF&CC

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(xi) Applicability of General Conditions as per EIA Notification, 2006 Yes

3. The Proposal is for seeking Environmental Clearance (EC) for expansion of Chlor-Alkali, Chloromethanes, and establishment of Poly Tetra Fluoro Ethylene (PTFE), Chlorinated Polyvinyl Chloride (CPVC), Poly Aluminium Chloride (PAC) (100% Basis) and Hydrogen Peroxide (100% Basis) plants in site area located at Sy. No. 61/1, 2A, 2B, 2C1, 2C2, 2C3, 56/1, 58/1, 59/1, 60, 62B/2D2, 2C1/A2, 2C1/A3, 2C2/C, 2G/1, 2E, 2F, 1A, 1B, 62A, 62B, 63, 64, 70/C2, 72, 73, 27, 28 and 66, Gondiparla village, Kurnool mandal and district, Andhra Pradesh by M/s. TGV SRAAC Limited.

4. All Chlor-Alkali and Synthetic organic chemicals manufacturing units located outside notified industrial area are listed at serial no. 4(d) and 5(f) of Schedule of Environmental Impact Assessment (EIA) Notification, 2006 (amended from time to time) under category 'A' and are appraised at Central Level by Expert Appraisal Committee (EAC). General condition is also applicable as Interstate boundary between Telangana and Andhra Pradesh is at 1.3 km in northeast direction.

5. Standard ToR has been issued by Ministry vide letter no F. No. J-11011/84/2016-IA II (T) dated 02.01.2025.

6. The project proposal was previously considered by the Expert Appraisal Committee (Industry – 3) in its 105<sup>th</sup> meeting held on 15.07.2025 wherein it was deferred for want of additional information. Now the project proposal was considered by the Expert Appraisal Committee (Industry-3) in its 107<sup>th</sup> meeting held on 12-13<sup>th</sup> August, 2025 wherein the Project Proponent and the accredited consultant namely Team Labs and Consultants (NABET/EIA/25-28/RA 0396 valid till 30.01.2028) made a detail presentation on the salient features of the project.

7. PP reported that existing land area is 152.4 ha land will be used for proposed expansion and no additional land acquired and it's a private own land of TGV SRAAC Limited.

8. PP reported the details of products and capacity as under:

S. No	Product Name	Unit	Capacity As Per EC (04.11.2024)	As Per CTO**	Proposed	Total After Expansion
<b>I. Chlor-Alkali Plant</b>						
1	Caustic Soda Lye (Or) Flakes (100% Basis)	TPD	1420	1220	200	1620
	Caustic Potash Lye (Or) Flakes (100% Basis)	TPD				
2	Liquid Chlorine	TPD	840	720	260	1100
<b>II. Chloromethanes</b>						
1	Methyl Chloride	TPD	1.68	1.68	0.9	2.58
2	Methylene Chloride	TPD	221.2	221.2	113.8	335
3	Chloroform	TPD	110.6	110.6	59.4	170
<b>Total Chloromethanes</b>			<b>333.48</b>	<b>333.48</b>	<b>174.1</b>	<b>507.58</b>
<b>III. Chlorodifluoromethane</b>						
1	Chlorodifluoromethane (R22)	TPD	12	----	----	----
<b>IV. Other Synthetic Organic Chemicals</b>						
1	Poly Tetra Fluoro Ethylene (PTFE)	TPD	----	----	40	40
2	Chlorinated Polyvinyl Chloride (CPVC)	TPD	----	----	200	200
<b>IV. Captive Power Plant</b>						
1	Captive Power Plant (Coal based)	MW	106	76	----	106
2	Power generation Furnace Oil#	MW	31	31	----	31
<b>V. Oil and Fatty Acid Division</b>						
1	Oil and Fatty Acid Products (Non-EC)	TPD	597.5	471	----	597.5

	Poly Aluminium Chloride (PAC) (100% Basis)	TPD	---	---	100	100
3	Hydrogen Peroxide (100% Basis)	TPD	---	---	100	100
<b>By-Products</b>						
<b>I. Chlor-Alkali Plant</b>						
1	Hydrochloric Acid (100%)	TPD	425.1	369.05	74.9	500
2	Hydrogen Gas	Nm <sup>3</sup>	397592	279996	59638	457230
3	Sodium Hypochlorite (100% Cl <sub>2</sub> basis)	TPD	21	18	---	21
4	Barium Sulphate	TPD	10	10	---	10
5	Potassium Carbonate	TPD	50	50	---	50
6	Sodium Sulphate	TPD	14	12	---	14
7	Calcium Hypochlorite (100% Cl <sub>2</sub> basis)	TPD	10	10	---	10
8	Calcium Sulphate	TPD	2	2	---	2
<b>II. Chloromethanes Plant</b>						
1	Carbon tetrachloride*	TPD	16.8	16.8	8.4	25.2
2	Hydrochloric Acid (100 %)	TPD	65.8	65.8	34.4	100.2
<b>III. Chlorodifluoromethane Plant</b>						
1	Hydrochloric Acid (100 %)	TPD	9.92	---	---	---
<b>IV. Other Chemicals</b>						
1	HCl (100%) from PTFE	TPD	---	---	106	106
2	Hexafluoro Propylene	TPD	---	---	1.66	1.66
3	HCl (100%) from CPVC	TPD	---	---	62.4	62.4
4	Sulfuric Acid	TPD	---	---	34.1	34.1
5	Sodium Hypochlorite (8%) from CPVC	TPD	---	---	33.4	33.4
6	Low Grade PVC from CPVC	TPD	---	---	100	100

\* Carbon Tetrachloride (CCl<sub>4</sub>) generated will be sold as a feedstock to Authorized users/excess will be incinerated.

\*\* CTO (01.04.2021); CTO (16.07.2021); CTO (16.11.2022); CTO (09.06.2023); CTO (25.04.2024); CTO (05.02.2025)

# shall be kept as standby. Furnace oil s. all not be used as fuel.

9. PP reported that there is no violation under EIA, 2006/court case/show cause/direction related to the project under consideration.

10. Ministry has issued EC earlier vide letter no F IA-J-11011/84/2016-IA II (I) dated 04.11.2024 for expansion of in favour of M/s. TGV SRAAC Limited.

11. PP reported that Certified compliance report (CCR) was obtained from the Integrated regional office of MoEFCC, Vijayawada, Andhra Pradesh vide letter no. F. No. SO/VIJ/EPA/EC-A/101/06-82/2024/27 dated 07.02.2025.

Summary of Compliance as per CCR dated 07.02.2025 is given below;

S. No	Title	Number
1	Complied	10
2	Partially/Partly Complied	---
3	Not Complied	---
4	Agreed to comply by the project proponent	2
5	Noted by the unit	---
6	Condition not applicable to the unit	---
7	Being Complied	32
	<b>Total Conditions</b>	<b>44</b>

12. Details/ Chronology of existing EC, CTO, CTE

Date of Issue	Description	Letter/ Order No.	Valid till
04.11.2024	Environmental Clearance from MoEF&CC for Phase II (20%) Expansion from MoEFCC	J-11011/84/ 2016-IA. II (I)	04.11.2034

02.01.2024	Environmental Clearance from MoEF&CC for Phase I (20%) Expansion from MoEFCC	J-11011/84/ 2016-IA. II (1)	02.01.2034
01.05.2018	Environmental Clearance from MoEF&CC	J-11011/84/ 2016-IA. II (1)	01.05.2028
01.04.2021	Consent for operation (CFO) for Chlor-Alkali expansion, Co-generation Power plant (CPP) and Castor Oil and Fatty Acid Plant from APPCB	APPCB/KNL/KNL/16322/CFO & HWA/ HO/ 1987	28.02.2026
16.11.2022	Consent for operation (CFO) for Chloromethanes Change in Product Mix from APPCB	1473568/APPCB/KNL/KNL/ CFO &HWA /HO/2022	31.08.2026
05.04.2025	Consent for operation (CFO) for Phase I of EC dated 02.01.2024 from APPCB	1274022/APPCB/KNL/KNL/CTO / HO/ 2025	28.02.2026
05.02.2025	Consent for operation (CFO) for Phase II of EC dated 05.02.2025 from APPCB	1274022/APPCB/KNL/KN/ CTO & HWA/ HO/ 2025	30.11.2025

13. PP reported that there are no National parks, Wildlife sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves, Wildlife Corridors etc. lies within 10 Km distance.

14. PP reported Interstate boundary between Telangana and Andhra Pradesh is at 1.3 km in northeast direction. There are two reserve forests in the study area. Gadidmadugu RF at 5.5 km in east direction. Pullaiah RF at 9.3 km in southwest direction. The nearest habitation from the plant is E. Tandrapadu village located at 0.5 km in northwest direction. Tungabhadra River is flowing from northwest to southeast direction at 0.6 km in south direction.

15. PP reported Ambient air quality monitoring was carried out at eight locations during March 2024 -May 2024 and the baseline data indicates that ranges of concentrations of PM10 (25-52  $\mu\text{g}/\text{m}^3$ ), PM2.5 (12-27  $\mu\text{g}/\text{m}^3$ ), SO2 (7-14  $\mu\text{g}/\text{m}^3$ ) and NO2 (8-26  $\mu\text{g}/\text{m}^3$ ) respectively. AAQ modelling study for point source emissions indicates that the maximum incremental GLCS after the proposed project would be 0.45  $\mu\text{g}/\text{m}^3$ , 1.91  $\mu\text{g}/\text{m}^3$ , and 2.61  $\mu\text{g}/\text{m}^3$  with respect to PM10, SOX and NOX. The resultant concentrations are within the National Ambient Air Quality Standards (NAAQS).

16. PP reported the total water requirement after expansion is 22823.5 KLD out of which 19364.2 KLD of fresh water will be met from Tungabhadra River and remaining water requirement of 3459.3 KLD will be met from recycled water. The required water is drawn from Tungabhadra River through infiltration wells. The unit obtained permission to abstract water from Tungabhadra River in the order of 20MLD. The unit obtained NOC letter from superintending engineer, Irrigation circle, Kurnool vide letter no. Proc.No.SE/IC/KNL/TW/JTO/NOC to SRAAC 503m dated 26.06.2025 for utilizing river water.

17. PP reported Effluent generation will be increased from of 2443.9  $\text{m}^3/\text{day}$  to 3500.1  $\text{m}^3/\text{day}$  after expansion. Effluent will be treated through "Zero Liquid Discharge" based effluent treatment system and treated wastewater reused for process, utility make-up and greenbelt development. Rejects from RO are used for brine saturation.

18. PP reported that rainwater storage tank capacity – Storage Pond capacity is 2800 $\text{m}^3$ + 9000  $\text{m}^3$

19. PP reported that power requirement after expansion will be 179.5 MW including existing 155 MW and will be met from AP Transco and captive power plant. Existing unit has standby DG sets of capacity 4 x 6.2 MW, 3 x 500 kVA DG sets as standby during power failure. Stack (height 4 m) provided as per CPCB norms to the DG sets of 3 x 500 kVA, which will be used as standby during power failure.

20. PP reported that no additional utility is proposed for expansion. Existing unit has 1 x 110 TPH, 1 x 100 TPH, 1 x 42 TPH coal fired boilers, 1 x 20 TPH hydrogen gas fired boiler, 1 x 3 TPH oil fired boiler (standby), 1 x 4 TPH oil and hydrogen gas fired boilers and consented (yet to install) 1 x 120 TPH coal fired boiler. Electro Static Precipitators and a stack with height of 80m, 69m, 55m for 1 x 110 TPH, 1 x 100 TPH, 1 x 42 TPH coal fired boilers respectively are installed for controlling the Particulate emissions and ESP with stack height of 80m will be installed for consented (yet to install) 1 x 120 TPH boiler (within statutory limit of 115  $\text{mg}/\text{Nm}^3$ ) and 30m for 1 x 20 TPH hydrogen gas fired boiler and unit has 4 x 3 waste heat recovery boilers, 1 x 20  $\text{lc k.cal/hr}$ , 1 x 35  $\text{lac k.cal/hr}$  thermo

Boilers, 3 x 55 lac k.cal/hr, 2 x 15 lac k.cal/hr salt furnaces. It is proposed to establish LPG/Hydrogen gas fired Incinerator of capacity 1 x 525 kgs/hr in addition to existing 1 x 343 Kg/hr incinerator with wet scrubbing system as APC and stack height of 20m and 12m respectively.

#### 21. Details of fuel: Existing and Proposed

S. N.	Description	Unit	Existing	Proposed	Total
1	Coal	TPD	594.1	----	594.1

#### 22. Details of Process emissions generation and its management:

PP reported that the gaseous emissions from Chlor-Alkali process are Chlorine and Hydrogen Chloride vapors. Scrubbers are provided to neutralize sniff gases effectively. The secondary gaseous pollutant from chloro-alkali plant is hydrogen chloride gas emissions. To avoid emissions in the plant, tail gas vents are connected to a water scrubber and the lean acid formed is used for absorption of Hydrogen chloride gas in absorber.

The gaseous emission from Chloromethane plant is chlorine and hydrogen chloride vapours. HCl gas produced from thermal chlorination unit is used to produce methyl chloride. Excess HCl available is absorbed in HCl absorber to produce 32% HCl. To avoid emissions from HCl absorber, tail gas vents are connected to a tail gas tower followed by organic stripper to remove organics. The gaseous emission from PTFE, CPVC hydrogen chloride vapors, sent to multi stage scrubbing system and scrubbed diluted HCl will be sold as by-product.

#### 23. Details of solid waste/Hazardous waste generation and its management.

S. No	Description	Units	Cate gory	Existing/ Permitted	Proposed	Total	Method of Disposal
<b>Chlor-Alkali Plant</b>							
1	Sludge from Pre-treatment of brine on dry basis	TPD	35.3	35	5	40	Secured landfill within Plant premises
<b>Potassium Hydroxide</b>							
1	Sludge	TPD	35.3	2.02	0.3	2.32	Secured landfill within Plant premises
<b>Chloromethanes Plant</b>							
1	Calcium Chloride	TPD	16.2	0.06	0.03	0.09	Secured landfill within Plant premises
2	Silica gel	TPD	16.2	0.05	0.03	0.08	
3	Bottom residue	TPD	20.3	0.7	0.37	1.07	Sent to In-house Incinerator
4	Spent Sulphuric acid (75-80%)	TPD		25.41	13.27	38.68	Sold as product
<b>PTFE and CPVC</b>							
1	Bottom residue from PTFE	TPD	20.3		10.4	10.4	Sent to In-house Incinerator
<b>Utilities</b>							
1	Ash from Coal fired Boilers	TPD		762	---	762	Sold to Cement/ brick manufacturers
2	Sludge from FO of DG sets*	KL		0.9	---	0.9	Sent to Authorized Recyclers/ Reused as secondary fuel
3	Sludge from ETP	Kg/day	35.3	340	442	782	Secured Landfill within Plant site

4	Waste Oils	TPA	5.1	0.3	---	0.3	Reused as secondary fuel
5	Used Batteries	Nos./ year		35	---	35	Sent to Authorized Recyclers

24. PP reported Public Hearing for the proposed project was conducted by the Andhra Pradesh Pollution Control Board on 14.05.2025 at 11.00 AM at project site. Public hearing was conducted at project site on date 14.05.2025 presided by the K. Sandeep Kumar, Revenue Divisional Officer, Sub-Divisional Magistrate, Kurnool District. Public hearing notice was published in "Andhra Jyothi" (Telugu daily) and "The New Indian Express" (English daily) on 12.04.2025. The public hearing was attended by 600 no. of persons

The main issues raised during the public hearing are related to employment, potable drinking RO plants, ambulance provision, construction of CC roads, and usage of chemicals in PTFE process, village development and plantation. PP submitted the action plan to address the issues raised during public hearing, which is depicted in chapter 7 of EIA report.

#### 25. Details/Status of approved Water Supply Permission

S. No	Letter No	Dated	Quantity (m <sup>3</sup> )
1	Memo No. 16570/Reforms/A2/2011	12.12.2016	9000
2	G.O.Ms. No.75	06.11.2023	8000
3	G.O.Ms. No.05	12.02.2025	3000
	<b>Total</b>		<b>20000</b>

#### 26. Details of Best technology adopted

PP reported that Complete DCS system for operation of Chlor-alkali and Chloromethanes production. High-efficient reactors with dual condensers to mitigate VOCs. Multistage scrubbers for to mitigate/control process emissions and common vent scrubbers to mitigate odour nuisance. Electro static precipitators followed by effective stack height to control particulate matter from boilers. Zero liquid discharge principle based effluent treatment plant to treat and complete reused of treated effluent. Recovery of Sodium Sulphate from brine sludge will ensure substantial reduction of solid waste generation. High quality salt will be used to reduce treatment chemicals and solid waste generation. Captive incineration facility to dispose organic waste. Highly skilled and trained experts and experienced technicians for operations.

27. PP reported that Industry has already developed Greenbelt in an area of 58.42 % i.e., 89.03 ha out of 152.4 ha of area of the project site.

28. PP reported total Employment will be 100 persons in addition to existing 3785 persons. Industry proposes to allocate Rs. 253 lakhs @ 0.35% towards Corporate Environment Responsibility.

29. PP reported that the estimated project cost for expansion is Rs 710 crores in addition to existing investment of Rs. 1380 crores. Total capital cost earmarked towards environmental pollution control measures is Rs. 25.26 crores and the Recurring cost (operation and maintenance) will be about Rs. 15.52 crores per annum. The breakup of capital and recurring cost is as follows:

S. No	Activity	Capital (Rs. Lakhs)	Recurring Cost (Rs. Lakhs)
1	Air Pollution Control	1610	322
2	Water Pollution Control	95	900.3
3	Noise Pollution Control	90	15
4	Environment Monitoring and Management	72	13.9

	Occupational Health	79.6	65
6	Green Belt	15	9
7	Others (S. Waste)	565	227.2
	<b>Total</b>	<b>2526.6</b>	<b>1552.5</b>

S. No	Particular	Activity	Amount allocated (Rs. Lakhs)
1	Total Cost	Project Cost for expansion	71000
2	EMP Cost	Air Pollution, Water Pollution, Solid waste management, OHS and environment monitoring	2526.6
3	Recurring Cost	Operation and Maintenance	1552.5
4	CER Cost	Potable drinking RO plants, ambulance provision, village development, construction of CC roads and plantation	253
	Land	Existing site area of 152.4 ha	----
5	P.H. Commitment and action plan in brief	Potable drinking RO plants, ambulance provision, village development, construction of CC roads and plantation	253
6	Green belt	Enhancement of density of existing greenbelt	15

30. Deliberations by the EAC:

The following points were discussed in the meeting:

- i. PP confirmed that R-22 shall be used for manufacturing of PTFE in a closed loop system. The following mitigation and control measures proposed to avoid fugitive emissions:
  - a. R22 is stored in liquid state under pressure at room temperature in day tanks under 8-10 bar pressure at room temperature. Dump tank provided in case of any emergency.
  - b. Gas detectors/gas sensors (1-10 ppm) are arranged and connected to DCS control room to monitor to detect any leakages from tanks.
  - c. High pressure, high temperature and high weight alarms and trends provided in DCS control room to monitor and control the fugitive emissions.
  - d. Hydro testing and thickness testing will be done for all day tanks during annual shutdowns.
  - e. Short bolting/Long bolting on flanges avoided to prevent leakages from flanges.
  - f. Preventive maintenance schedules to follow to avoid fugitive emissions.
  - g. All transfer lines of seamless SS 304 provided with DCS operated control valve, PTs and temperature transmitters connected to DCS.
  - h. Transfer line joints are connected with tongue and groove flanges to avoid high pressure leakages.
  - i. Continuous training to operating people to be given to monitor and control the fugitive emissions.
  - j. Pneumatic pressure test for leakages and pressure hold test of transfer lines and storage tanks to be done during startup of plants after each shutdown.
  - k. The plant will be operated in automation mode from DCS control room for better-controlled and efficient operations.
- ii. PP submitted undertaking stating that the fuel used for 31MW power generation will be switched to High Speed Diesel (HSD)
- iii. PP submitted the action plan for management of C & D waste. The waste C&D and metallic scrap of quantity approximately 275 MT. MS Tanks/Vessels/Pots of 100 MT and MS Structural Steel of 120 MT sent to recyclers namely Royal Steel Traders, KGN steel and Sri Venkateshwara Iron traders. Other wastes like concrete waste, bricks of about 40 MT used for levelling and grading the parking area onsite and 15MT of wood waste mainly from packing material will be sent to re-users on buy back basis

Action Plan for Dispose of C&D and Metallic Scrap

S. N	Description	Quantity (MT)	Start Date	End Date
1	C&D Waste	55	01.08.2025	12.09.2025
2	MS Tanks/Vessels/Pots	100	01.08.2025	12.09.2025

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- iv. PP submitted revised layout plan incorporating the interim storage area for hazardous waste. PP informed that area earmarked for interim storage of hazardous waste is 550 m<sup>2</sup>.
- v. CPCB guideline will be followed for installation of captive incinerator.
- vi. PP submitted point wise response to the issues raised in the representations received by the EAC members against the project.
- vii. Water pollution control measures to be adopted for the proposed expansion. The following are the safe guards ensure that no wastewater from project discharged outside the site premises.
  - a. Segregation of wastewater from process and utility
  - b. Above ground wastewater collection tanks
  - c. Treatment of complete wastewater in 'Zero Liquid Discharge' principle based effluent treatment plant of capacity 4 MLD.
  - d. Reuse of treated wastewater (RO permeate) to utility make-up and Rejects from RO is reused in process for brine saturation.
  - e. Above ground ZLD, principle based effluent treatment plant.
  - f. Development of greenbelt from plant boundary to plot boundary. We shall complete the density improvement and greenery till the river course within this monsoon season only.
  - g. No operations except greenbelt development and water pipelines between plant and plot boundary.
  - h. PP has been collecting entire roof runoff water and reuse in cooling towers make-up in addition to 2800 m<sup>3</sup> rainwater storage pond to store runoff.
  - i. PP has proposed to provide 9000 m<sup>3</sup> rainwater storage pond behind the captive power plant in area of 2.5 acres. The storage pond shall have two partitions i.e., 1000 m<sup>3</sup> capacity lined tank to store 1st run-off while 8000 m<sup>3</sup> capacity pond is provided to store the balance run-off. The first run-off collected in 1000 m<sup>3</sup> tank is tested and pre-treated if necessary before reuse in cooling towers along with the other run-off. This is an addition to existing 2800 m<sup>3</sup> rainwater storage pond. The location of the proposed rainwater storage pond presented in the layout diagram. The storage ponds shall be completed within 2 years after obtaining the necessary approvals.
  - j. A sediment pit will be provided before the storm water pond to reduce the silt load.
  - k. Destruction of R-23 - a byproduct of PTFE manufacturing process through thermal oxidizer.
  - l. Technology for manufacturing PTFE. "Suspended Polymerization" process will be used for proposed PTFE manufacturing, wherein there is no usage of surfactants like Perfluorooctanoic acid (PFOA) and hexafluoropropylene oxide dimer acid (HFPO-DA). The following technology providers are shortlisted for technology supply JOC, China and Haulu Engineers, China. The technology provider for suspended polymerization is yet to be finalized.

The committee was satisfied with the response provided by PP on above information.

The EAC deliberated the Onsite and Offsite Emergency plans and also the various mitigation measures proposed during the implementation of the project and advised the PP to implement the provisions of the Rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, as amended from time to time.

The EAC deliberated on the proposal with due diligence in the process as notified under the provisions of the EIA Notification, 2006, as amended from time to time and accordingly made the recommendations to the proposal. The Experts Members of the EAC found the proposal in order and recommended for the grant of environmental clearance.

The EAC is of the view that its recommendation and grant of environmental clearance by the regulatory authority to the project/activity is strictly under the provisions of the EIA Notification 2006 and its subsequent amendments. It does not tantamount/construe to approvals/consent/permissions etc. required to be obtained or standards/conditions to be followed under any other Acts/ Rules/ Subordinate legislations, etc., as may be applicable to the project. The PP shall obtain necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, from the State Pollution Control Board, prior to construction & operation of the project.

31. The EAC, after detailed deliberations, recommended the project for the grant of environmental clearance, subject to the compliance of the terms and conditions, and general terms and conditions in Annexure 1.
32. Minutes of the meeting may kindly be seen at [https://parivesh.nic.in/tutildoc/134304754\\_1755597768322.pdf](https://parivesh.nic.in/tutildoc/134304754_1755597768322.pdf).

33. Based on the recommendations made by EAC in its 107th meeting held on 12 - 13th Aug 2025, the Ministry of Environment, Forest and Climate Change hereby accords Environmental Clearance for " Expansion of Chlor-Alkali, Chloromethanes, and establishment of Poly Tetra Fluoro Ethylene (PTFE), Chlorinated Polyvinyl Chloride (CPVC), Poly Aluminium Chloride (PAC) (100% Basis) and Hydrogen Peroxide (100% Basis) plants in site area located at Sy. No. 61/1, 2A, 2B, 2C1, 2C2, 2C3, 56/1, 58/1, 59/1, 60, 62B/2D2, 2C1/A2, 2C1/A3, 2C2/C, 2G/1, 2E, 2F, 1A, 1B, 62A, 62B, 63, 64, 70/C2, 72, 73, 27, 28 and 66, Gondiparla village, Kurnool mandal and district, Andhra Pradesh by M/s. TGV SRAAC Limited " under the provisions of the EIA Notification, 2006, and the amendments therein, subject to compliance of the Specific and General terms and conditions as mentioned at Annexure-1.

34. The Ministry reserves the right to stipulate additional conditions, if found necessary. The Environmental Clearance to the aforementioned project is under provisions of EIA Notification, 2006. It does not tantamount to approvals/consent/permissions etc. required to be obtained under any other Act/Rule/regulation. The Project Proponent is under obligation to obtain approvals /clearances under any other Acts/ Regulations or Statutes, as applicable, to the project. The Project Proponent is under obligation to implement commitments made in the Environment Management Plan, which forms part of this EC.

35. General Instructions:

- (a) The project proponent shall prominently advertise it at least in two local newspapers of the District or State, of which one shall be in the vernacular language within seven days indicating that the project has been accorded environment clearance and the details of MoEF&CC/SEIAA website where it is displayed.
- (b) The copies of the environmental clearance shall be submitted by the project proponents to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.
- (c) The project proponent shall have a well laid down environmental policy duly approved by the Board of Directors (in case of Company) or competent authority, duly prescribing standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental / forest / wildlife norms / conditions.
- (d) Action plan for implementing EMP and environmental conditions along with responsibility matrix of the project proponent (during construction phase) and authorized entity mandated with compliance of conditions (during perational phase) shall be prepared. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Six monthly progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six-Monthly Compliance Report.
- (e) Concealing factual data or submission of false/fabricated data may result in revocation of this environmental clearance and attract action under the provisions of Environment (Protection) Act, 1986.
- (f) The Regional Office of this Ministry shall monitor compliance of the stipulated conditions. The project authorities should extend full cooperation to the officer (s) of the Regional Office by furnishing the requisite data / information/monitoring reports.
- (g) Any appeal against this EC shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

This issues with the approval of the Competent Authority.

**Copy To**

1. ANDHRA PRADESH ENVIRONMENT MANAGEMENT CORPORATION LTD Environment, Forests, Science & Technology Department, Government of Andhra Pradesh , 2nd Floor, AP.Markfed Building, APIIC Colony, Jawahar Auto Nagar, Vijayawada-520007



2. Inspector General of Forests, Ministry of Environment, Forest and Climate Change, Integrated Regional Office, Vijayawada Green House, Gopalareddy Road, Vijayawada – 520010, Andhra Pradesh
3. The Member Secretary, Andhra Pradesh Pollution Control Board, Paryavaran Bhavan, APIIC Colony Road, Gurunanak Colony, Autonagar, Vijayawada- 520007.
4. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, East Arjun Nagar, Delhi – 32
5. The Collector & District Magistrate, Collectors Office, Collectorate complex, Kurnool - 518002
6. Guard File/Monitoring File/PARIVESH

## Annexure 1

## Specific EC Conditions for (Synthetic Organic Chemicals Industry)

## 1. Specific Conditions

S. No	EC Conditions
1.1	(i) The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
1.2	(ii) APCE ESP along with 55m, 69m, 80 m, stack height of shall be provided to the existing coal based (1x42 + 1x 100TPH +1x110 TPH+ 1x 120 TPH ) boiler respectively for controlling the particulate matter emissions within the statutory limit of 50 mg/Nm <sup>3</sup> . 30m stack height shall be provided to the existing 1 x 55 lac salt furnace. At no time, the emission levels shall exceed the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency. Performance assessment of pollution control devices/ systems will be conducted annually. Adequate Stack height along with acoustic enclosure shall be provided to each of the proposed D.G sets (3 x 500 KVA) as per CPCB/SPCB norms. As proposed, the fuel used for 31MW power generation shall be switched to High Speed Diesel (HSD)
1.3	(iii) Emergency Scrubbing System along with adequate stack height shall be provided to Chlorine Compressor House, Chlorine filling and Chlorine storage to control process emissions viz. Cl <sub>2</sub> . Tail Gas Tower followed by Scrubber along with adequate stack height shall be provided to HCl Furnace to control process emissions viz. HCl. Scrubbing system along with adequate stack height shall be provided to HCl storage and HCl from PTFE to control process emissions viz. HCl. The scrubbed water should be sent to ETP for further treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. At no time, the emission levels shall go beyond the prescribed standards.
1.4	(iv) Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB. Chlorine Sensors and alert system shall be installed at prominent location of project site. Proper hood alongwith suction and channelization system followed by scrubber shall be provided at the Chlorine storage and transfer points.

S. No	EC Conditions
1.5	(v) PP shall dispose off C & D waste as per the action plan submitted for management of C & D waste within the prescribed timeline. Action Taken Report shall be submitted to the IRO, MoEF&CC within 3 months from the date of issue of the letter.
1.6	(vi) Total fresh water requirement after expansion from Tungabhadra River shall not exceed 19364 KLD. The PP shall ensure that water supply should not be above the permissible limit and fresh water shall be withdrawn only after obtaining requisite approval of the Concerned Authority. The PP shall submit the details of utilization to the Integrated Regional Office (IRO), MoEF&CC before 1st July of every year for the activities carried out during the previous year.
1.7	(vii) The total effluent generation shall not exceed 3500 KLD. Effluent shall be treated in the effluent treatment plant followed by Ultra filtration and RO. Treated effluent shall be recycled for manufacturing process and cooling water make up. Domestic effluent shall be treated in the STP and treated water shall be reused for horticulture purpose. This unit shall maintain Zero Liquid Discharge (ZLD).
1.8	(viii) The PP has developed /maintained greenbelt over an area of 89.03 Ha i.e. 58.4 % by planting 2,30,000 number of saplings. PP shall develop additional 5000 number of saplings preferably within a year of grant of EC. Besides, PP shall develop greenbelt between plant boundary and plot boundary towards river side. The saplings selected for the plantation should be of sufficient height, preferably 6-ft. The budget earmarked for the plantation shall be kept in separate account and should be audited annually. PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.
1.9	(ix) Plantation of saplings shall be carried out as a part of tree plantation campaign "EK PED MA ke NAAM" and details of the same to be uploaded in the MeriLiFE portal ( <a href="https://merilife.nic.in">https://merilife.nic.in</a> ) in respect to this Ministry's OM No. IA3-22/3/2024-IA.III(E-241594) dated 24th July 2024.
1.10	(x) A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions and shall also engage HOD EHS Division- HOD Q&A division- HOD O& F division - HOD CMS division. In addition to this one safety & health officer as per the qualification given in Factories Act 1948 shall be engaged within a month of grant of EC. PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person engaged to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.
1.11	(xi) The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented. The budget propose under EMP is 12.816 crores (Capital cost) and 13.955 crores per annum (Recurring cost) shall be kept in separate account and should be audited annually. The PP should submit the annual audited statement along with proof of implementation of

S. No	EC Conditions
	activities proposed under EMP duly supported by photographs (before & after with geo-location date & time) and other document as applicable to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.
1.12	(xii) The use of cleaner fuel shall be explored. Furnace oil shall not be used as fuel.
1.13	(xiii) Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB servers. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
1.14	(xiv) Bottom residue from chloromethanes shall be sent to inhouse incinerator. ETP sludge and process inorganic residues shall be sent to secured landfill within the plant premises. The same mechanism shall also be continued for the existing units also.
1.15	(xv) All the hazardous waste shall be managed and disposed as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Hazardous waste such as Distillation Residue and Off Specification Products shall be either sent to common incineration site or sent for coprocessing. Solid waste shall be segregated into dry and wet garbage at site in accordance to the Solid Waste Management Rules, 2016. Wet waste shall be converted into compost and used as manure for greenbelt development. Fly ash shall be collected in silo and sent to cement manufacturing unit/brick manufacturing unit.
1.16	(xvi) Captive hazardous waste incinerator shall be designed according to the guidelines provided by the Central Pollution Control Board (CPCB). The incinerator shall meet specific performance standards and pollution control norms. Incinerated ash shall be sent to treatment storage disposal facility (TSDF).
1.17	(xvii) No banned chemicals shall be manufactured by the project proponent. No banned raw materials shall be used in the unit. The project proponent shall adhere to the notifications/guidelines of the Government in this regard.
1.18	(xviii) The project proponent shall comply with the environment norms for synthetic organic chemical as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 608 (E), dated 21. 7.2010 under the provisions of the Environment (Protection) Rules, 1986.
1.19	(xix) The project proponent shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.
1.20	(xx) All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The project proponent shall implement the onsite/offsite

S. No	EC Conditions
	emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996. The occupier of new as well as expansion projects shall be required to comply with the provisions of the MSHIC Rules, 1989 including notifying their activities or seeking site approval from the concerned authorities, to address operational safety aspects. In doing so, various schedule, particularly Schedule-5 of the said rules may be referred.
1.21	(xxi) The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.
1.22	(xxii) The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
1.23	(xxiii) The occupational health centre for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.
1.24	(xxiv) Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.
1.25	(xxv) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
1.26	(xxvi) The solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be fire proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
1.27	(xxvii) The storm water from the roof top shall be channelized through pipes to the storage tank size of 2800m <sup>3</sup> constructed for harvesting of rain water in the premises and surface storm water shall be collected in the storage tanks of 9000 m <sup>3</sup> . Harvested water shall be used for various industrial processes in the unit. No recharge shall be permitted within the premises. Process effluent/ any wastewater shall not be allowed to mix with storm water.
1.28	(xxviii) PP shall obtain registration under Ozone Depleting Substances (Regulation and Control) Rules 2000 as amended from time to time for generation of HCFC -22 as products for feedstock applications and Carbon Tetra Chloride as byproduct, which is an Ozone Depleting Substance. PP shall ensure that HCFC-22 shall not be used for controlled application/prohibited applications.

S. No	EC Conditions
	Incinerator shall be installed to destruct generated HFC23.
1.29	(xxix) The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapor recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.
1.30	(xxx) The activities and the action plan proposed by the project proponent to address the issues raised during the public hearing as well as the related socio-economic issues in the study area shall be completed as per the schedule presented before the Committee and as described in the EIA report in letter and spirit.

Standard EC Conditions for (Synthetic organic chemicals industry)

I.

S. No	EC Conditions
1.1	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
1.2	The Project proponent shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, and Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 and other rules notified under various Acts.
1.3	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
1.4	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
1.5	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
1.6	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to

S. No	EC Conditions
	implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
1.7	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
1.8	The project proponent shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
1.9	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
1.10	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at <a href="https://parivesh.nic.in/">https://parivesh.nic.in/</a> . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
1.11	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
1.12	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

#### Additional EC Conditions

(i) No PFOA, PFOS and hexafluoropropylene oxide dimer acid (HFPO-DA) shall be used in manufacturing process of PTFE.

(ii) As regards to PTFE manufacturing, PP shall provide proper air pollution control measures and effluent treatment measures and ensure to maintain 'ZLD'.

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(III) The APPCB shall, before granting CTO, satisfy itself with - the fact that the technology deployed for production is proven, sturdiness of the operational processes/ checks and balances regarding accidental releases/discharges and adequacy of the pollution control measures implemented by the PP.



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Annexure-II

**Item No.01:**

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

[Through Physical Hearing (Hybrid Option)]

**Appeal No.73 of 2025(SZ)**

IN THE MATTER OF:

Manchala Ramakrishna Reddy & Another.

... Appellant (s)

*Versus*

Union of India & Others.

... Respondent(s)

Date of hearing: 06.01.2026.



**CORAM:**

**HON'BLE Smt. JUSTICE PUSHPA SATHYANARAYANA, JUDICIAL MEMBER**

**HON'BLE DR. PRASHANT GARGAVA, EXPERT MEMBER**

For Appellant: M/s. K.M. Meenal, Kumar Abhishek,  
G. Sushmitha, M. Harshini.

For Respondent: None.

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**ORDER**

1. Let notice be issued to the respondents through the Tribunal as well as privately.
2. Post the matter on 09.03.2026.

Sd/-

Smt. Justice Pushpa Sathyanarayana, JM

Sd/-

Dr. Prashant Gargava, EM

Appeal No.73/2025(SZ)  
06<sup>th</sup> January, 2026. AD.

