

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

**ORIGINAL APPLICATION No.127 OF 2023 (SZ) (LP)**

Pradeep  
Telangana

... Applicant

Versus

District Collector  
Sangareddy District and others

... Respondents

**REPLY FILED ON BEHALF OF THE 4TH RESPONDENT**

The 4th respondent above named respectfully submits as follows:

- 1) The above application has been filed by one Mr. Pradeep belonging to Telangana State as Party in Person. It is submitted that the copy of the Letter petition addressed to this Tribunal which has been numbered as O.A.No.127/23 (SZ) (LP) has not been furnished to this respondent so far. Therefore this respondent is placing the details available at their disposal for the purpose of filing this reply.
- 2) This respondent however reserves liberty to address any other issue that may have been raised in the letter petition once the copy is served on this respondent.
- 3) The above original application at first came up on 04.09.2023 before this Hon'ble Tribunal wherein it is noted that the complaint is with regard to pollution of Bamana Cheruvu located in Alinagar Village, Jinnaram Mandal, Sangareddy District, State of Telangana. This Hon'ble Tribunal directed an inspection to be conducted by the TSPCB and called for a detailed report.
- 4) Subsequently when the matter came up on 04.10.2023 the applicant has apparently alleged large scale fish mortality in Bamana Cheruvu. Therefore, pollution control board was directed to find out the cause of fish mortality and an inspection of the respondent company as well as any other company which are alleged to be polluting the Bamana Cheruvu was also directed by the Tribunal.



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- 5) Subsequently in the hearing on 20.10.2023 this respondent entered appearance. The tribunal further impleaded the Department of Fisheries, State of Telangana as a party to the proceedings and directed a report to be filed. The matter was reposted subsequently.
- 6) When the matter came up on 24.04.2024 it was noted that the Fisheries Department has filed a report dated 10.01.2024. This Hon'ble Tribunal permitted this respondent to file objections to the report filed by the fisheries department and adjourned the case to 08.07.2024.
- 7) This respondent states that their industry unit is located Survey No.42, Alinagar, Chetlapotharam (v), Gaddapotharam (GP), Jinnaram Mandal, Sangareddy District. The TSPCB has issued CFO by its order dated 23.02.2016 to the industry to manufacture 6 No's of Bulk drugs with individual quantities with a validity period up to 30.11.2020.
- 8) Subsequently this industry has obtained auto renewal of CFO which is valid up to 30.11.2025. The industry has provided separate above ground level MS storage tanks of capacity 4 X 40 KL for storage of HTDS effluents and above ground level MS storage tank of capacity 25 KL for storage of LTDS effluents.
- 9) The industry has provided MEE system of 50 KLD capacity (Stripper, MEE & ATFD) for treatment of HTDS effluents. The industry is sending LTDS effluents along with MEE and ATFD condensate to M/s PETL (CETP).
- 10) This industry has disposed 10.22 KLD of LTDS to PETL during the period from May, 2023 to June, 2023. The industry has provided below ground level sump of capacity 400 KL for collection of first run off rain water.
- 11) It is submitted that the industry has provided separate closed sheds for storage of hazardous waste.
- 12) It is submitted that pursuant to the directions of this Hon'ble Tribunal the TSPCB has filed a report dated 17.10.2024 before this Hon'ble Tribunal after inspection of the industry on 13.10.2023. Along with this respondent company many other industries were also inspected. In the report, in so far this respondent industry is



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concerned, the Board has clearly observed that during inspection, no spillages or discharge of effluents was observed.

- 13) It is submitted that the Board also refers to the earlier inspections done on 24.07.2023 and 27.07.2023 and has stated that no fish death was observed in Bamana Cheruvu. It is also stated that District Fisheries Officer , Sangareddy District vide letter dated 13.10.2023 has informed the board that no specific complaint regarding the death of fish in Bamana Cheruvu was received during the period from October 2022 to September 2023.
- 14) The TSPCB report further states that the analysis report of the water samples collected from Bamana Cheruvu on 07.10.2023 reveals that the water quality falls under class "B" ie., suitable for outdoor bathing as per CPCB water quality criteria.
- 15) It is therefore submitted that the allegations in the application are totally false and at any event this respondent industry is not responsible for any alleged pollution in Bamana Cheruvu, in as much as the same is not attributable to any of the effluents generated through the manufacturing process employed by this respondent.
- 16) It is submitted that the Fisheries Department has also filed a report dated 10.01.2024 wherein it has been reiterated that there are no specific complaints of fish death in Bamana Cheruvu. However, in the report it is stated that the Fisheries Society has informed that due to draining of water from the respondent unit into Bamana Cheruvu in the previous year about 400 kilogram of fish mortality had occurred and the cost was about Rs.32,000 to Rs.42,000/- and that the society had further informed the department that there is no problem at present.
- 17) In so far as this industry is concerned any fish mortality that had occurred in Bamana Cheruvu is not on account of any untreated effluent from this industry. As already stated this industry has installed a proper Effluent Treatment System as mentioned in the report of TSPCB and therefore there is no question of this industry letting out any untreated effluent into Bamana Cheruvu.



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Under these circumstances, there is no merit in the letter petition in O.A.No.127/2023 and it is therefore prayed that the application may be closed recording the reports of the official respondents and thus render justice.

*T. Hemalatha*

Counsel for 4th Respondent



*[Signature]*

4th Respondent

**VERIFICATION**

I, P.M.Dayakar, Corporate Technical Manager, M/s. Metrochem API Pvt Ltd., the 4th Respondent herein do hereby verify that what are all stated above are true and correct to the best of my knowledge, information and belief.

Verified at *28<sup>th</sup>* on this the  day of June 2024



*[Signature]*

4th Respondent



ATTESTED

*B. Agaiiah*  
B. AGAIAH, B.A., LL.M.  
ADVOCATE / NOTARY

Indra Reddy Alkwyn Colony,  
Miyapur, R.R. Dist., G.O.M.S. No.1972/121  
My Commission Expires on 15-11-2026