BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

ORIGINAL APPLICATION No. 239 OF 2025 (SZ)
[Earlier, OA No. 538 of 2025 (PB)]

IN THE MATTER OF:

Tribunal on its own motion **Suo Motu**
based on the news item published in
The Telangana Today dated 24.09.2025,
"Sangareddy: Villages activists protest
Pharma Effluent discharge at Nalla Cheruvu"

and

Central Pollution Control Board,
Through its Member Secretary,
New Delhi and Ors ...Respondent (s)

REPORT OF THE TELANGANA POLLUTION CONTROL BOARD (TGPCB)
(RESPONDENT No. 3)

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Place: Hyderabad
Date: 02-02-2026.

T. Jaykrishnan

COUNSEL FOR RESPONDENT BOARD (R3)
T. SAI KRISHNAN

REPORT OF THE ENVIRONMENTAL ENGINEER, TELANGANA POLLUTION CONTROL BOARD (TGPCB), REGIONAL OFFICE, R.C. PURAM (RESPONDENT NO. 3) IN OA NO.239 of 2025 SUO MOTU IN THE HON'BLE NGT, CHENNAI.

1. It is to submit that, The Hon'ble NGT (Principal Bench), Delhi has registered suo-motu case on the basis of the news item titled "Sangareddy: Villagers activists protest Pharma effluent discharge at NallaCheruvu" appearing in Telangana Today dated 24.09.2025 in the matter of Original Application No. 538/2025.

The news item relates to a protest held at Nalla Cheruvu in Domadugu village, Gummadidala mandal, Sangareddy district, Telangana, where villagers and environmental activists demonstrated against the discharge of pharmaceutical effluents into the local water body. As per the news item, pharmaceutical companies are releasing toxic effluents into the water body. The news item mentions that the villagers demanded the government to halt the release of effluents into the lake..

Subsequently, the Hon'ble NGT (Principal Bench), Delhi transferred the case to the Hon'ble NGT Southern Zonal Bench, Chennai, as OA No 239 of 2025 for appropriate further action.

2. The Telangana Pollution Control Board (Board) is the 3rd respondent in the above case.

3. The Hon,ble NGT, Southern Zone, Chennai heard the case and issued order dt. 03.12.2025 directing the TGPCB to take appropriate action and also explain the reasons for any delay in taking action till then.

4. In this regard, it is to submit that, M/s Hetero Drugs Ltd., Unit – I is located at Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District (industry) and engaged in manufacture of Bulk Drugs with project cost of Rs. 316.83 Cr and the total area of the industry is 35 Acres.

5. The Board issued Consent for Operation (CFO) order dated 02.07.2022 to the industry with a validity period up to 31.10.2026 stipulating certain conditions.**(Annexure-I)**

6. The Board earlier received complaints regarding pollution caused by the industry. The Board officials inspected the industry on 14.07.2022 and submitted report. The Committee Member also inspected the industry on 21.11.2022. The status of the industry was reviewed in the Task Force Committee meeting held on 17.12.2022 and issued directions to the industry vide order dated 12.01.2023 to comply.**(Annexure-II)**

7. Subsequently, the Board officials inspected the industry on 02.08.2023 and observed certain non-compliance of consent conditions and Board Directions by the industry. A show cause Notice dt. 05.08.2023 was issued to the industry.

8. The Board received complaint from local residents of Domadugu (V), regarding discharge of effluents into Nallakuntacheruvu by the industry. Inspection and monitoring of the industry was carried out on 07.06.2024 and 11.06.2024 and observed certain non-compliance. A show cause Notice dt. 15.06.2024 was issued to the industry and submitted report to the Board Office, TGPCB for taking further action.

9. The status of the industry was reviewed in the Task Force Committee meeting and the Committee recommended to re-inspect the industry by the Task Force Committee members. The Board's Task Force Committee membersalong with Regional OfficeOfficials inspected the industry on 03.08.2024to verify the compliance status and submitted report dt.23.01.2025.

10. The status of the industry was reviewed in the Task Force Committee Meeting held on 23.01.2025. After detailed discussions, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the report.The Task Force Committee membersalong with Regional Office Officials inspected the industry on 04.03.2025and submitted report dt.08.04.2025.

11. The Regional Office, TGPCB, RC Puram received complaint dt.15.04.2025 from M. Jaipal Reddy regarding air and water pollution caused by industry and discharge of effluents into the Nallakuntacheruvu by the industry.In this regard, the Board officials inspected the industry and Nallakuntacheruvu on 16.04.2025and observed certain non-compliance. Notice was issued to the industry and report was submitted to Board Office, TGPCB on 28.04.2025.

12. The status of the industry was reviewed in Task Force meeting held on 01.05.2025 and the Board issued Directions dt:03.05.2025 to the industry.**(Annexure-III)**

13. Subsequently, the Task Force Committee members along with Regional Office Officials inspected the industry on 01.08.2025 to verify compliance status and submitted report to Board office on 02.09.2025.It was observed that industry is repeatedly not complying with consent conditions and Board directions as noted during the earlier inspections conducted on 14.07.2022, 02.08.2023, 07.06.2024, 03.08.2024, 04.03.2025, 16.04.2025& 01.08.2025.Written compliant was received from villagers of Domadugu on 18.09.2025 regarding water pollution in Nallakunta cheruvu.

14. The status of the industry was reviewed in Task Force Committee meeting held on 19.09.2025 at Board office.The Committee observed that the industry is not complying with certain consent conditions. The industry representative informed about the corrective action taken by the industry to comply with the consent conditions, carried out rectification of effluent treatment system and informed that they have engaged IIT-Hyderabad to carry out study of NallakuntaCheruvu.The Committee deferred the case and directed the Regional Office to inspect the industry after one month to verify compliances of the industry and submit the report

15. The Board received regular complaints regarding pollution of Nallakuntacheruvu caused by the industry and adverse press clippings also appeared in various daily newspapers in this regard. A report dt. 27.09.2025 was submitted to the Board Office on the same.

16. As per the Board directions, the industry engaged IIT-Hyderabad to carry out study of Nallakunta Cheruvu and submitted report. **(Annexure-IV)** The study report was conducted by Dr. D. V. Sai Praneeth, Assistant Professor, Department of Civil Engineering, IIT Hyderabad.As per the Observations made in the report, the surface water exhibited distinct pink pigmentation due to bacteria and COD levels in the range of 120 to 136 mg/l indicating pollution of the lake. The conclusions and recommendations are as follows:

- The overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven

primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity, and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake.

- As a result, heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling.
- Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities.
- The combination of organic matter, nutrients, sulfide, light penetration in shallow waters, and lack of oxygen created ideal conditions for Purple Sulfur Bacteria and Purple Non-Sulfur Bacteria (Chromatium, Rhodobacter) to multiply extensively. These bacteria are well-known for producing purple, pink, or reddish pigments that impart distinctive coloration to water bodies undergoing anoxic stress. As they grow, these bacteria form buoyant aggregates and biofilms that rise to the surface, producing the visible pinkish scum and floating layers observed in the lake. The settling of these aggregates upon senescence further explains the accumulation of brown/reddish colored sediments at the bottom.
- Overall, pink coloration is biological response to excessive nutrient loading and prolonged anoxic conditions. The lake is undergoing a shift from a healthy aerobic ecosystem to a stressed, anaerobic, microbially driven system, signaling deteriorating ecological health.
- Immediate interventions including identifying the source of nutrients, restoring aeration, and removing accumulated organic sludge (if any) are essential to prevent further degradation and to reestablish normal aerobic conditions.
- Without timely restoration efforts, the lake is likely to continue experiencing recurring microbial blooms, foul odors, poor water clarity, and long-term ecological damage.
- Here are the below possible recommended technologies that can potentially reduce the current issue.

a.<u>Aeration + Circulation</u>:

- Aeration directly breaks this cycle by:
- Increasing dissolved oxygen
- Eliminating anoxic layers
- Inhibiting sulfur bacteria
- Oxidizing H_2S
- Improving water clarity

b. <u>Floating Treatment Wetlands (FTWs) Inside the Lake</u>:

Floating wetlands can:

- Uptake N, P, and organic compounds directly.
- Shade the water and reduce light for phototrophic bacteria
- Provide oxygenation to the top layer
- Encourage growth of beneficial biofilms
- Reduce turbidity and suspended colloids

c. <u>Chemical Oxidation (Targeted Pink Color Removal During Events)</u>:

Rhodobacter and Chromatium pigments can be oxidized safely using mild oxidants.

Suitable oxidants:

- Sodium hypochlorite (very low dose for lake-wide use)
- Hydrogen peroxide (most environmentally friendly)
- Potassium permanganate (low dose only)

Functions:

- Kills pigment-producing bacteria
- Oxidizes organic matter
- Breaks biofilms and floating scum
- Removes color

17. The industry has submitted ZLD performance study report conducted by M/s. Right Source Industrial Solutions Pvt Ltd., on 18.09.2025. Following recommendations were made in the study report:

a) It is recommended to improve the ETP performance further through improved monitoring of facility parameters and training to staff which results in operational improvements, maintenance and administration. This includes source control. Reduce shock loads like hydraulic load changes and change in effluent characteristics due to frequent change in production campaign.
b) It is also recommended to avoid shock loads on Aeration system of bio ETP.
c) CIP (Cleaning in process to be scheduled on regular basis) for further improving the performances of MEE and RO System.
d) It is observed during the field study primary clarifiers of both HTDS & LTDS are under maintenance for removal of sludge. Primary treatment is to be ensured for effective treatment of HTDS effluents in Stripper / MEE for effective evaporation and output. It also reduces fouling and scaling of calandria tubes of MEE system.
e) It is suggested to ensure and avoid leakages from stripper and MEE flow pumps and other transfer pumps at treatment systems.

The above recommendations confirm the non-compliance of ZLD / effluent treatment systems observed by the Board officials and Task Force Committee members during inspection of the industry at various times.

18. Subsequently, the industry removed the old ZLD system and installed new ZLD system. The Board officials monitored various units of ZLD system on 07.11.2025 and collected samples. The analysis reports indicated the following deviations / issues:

pH:

The pH values of influents to MEE system and Biological ETP should be in neutral pH i.e., 6.5 to 7.5 for effective functioning of MEE system and Biological ETP.

However, the pH values of samples bearing No.11063 to 11070 are ranging from 9.0 to 10.75. indicating the industry is not carrying out pre-treatment of the effluents properly before feeding to MEE system and Biological ETP.

TDS:

The TDS values of the samples bearing No.11063 (HTDS effluents) to 11066(LTDS effluents) are almost same (11893 mg/L & 11326mg/L respectively) indicating improper segregation of the HTDS and LTDS effluents by the industry.

The TDS value of the samples No.11070(RO feed) is 15533 mg/L and for samples No.11071(RO Reject) is 2996 mg/L. The RO system is should reduce inorganic solids i.e., TDS load in the treated effluents and the TDS load will come out as RO reject. Hence, the RO reject will have more TDS values whereas, in this case low TDS value of samples bearing No.11071 (RO Reject) indicates poor performance of RO system.

COD:

The COD value of the samples bearing No.11066(LTDS effluents) is 4,816 mg/L, whereas for samples bearing No.11070(Outlet of ETP (RO feed)) is 10,000 mg/L.

The COD load should be reduced from inlet of ETP to outlet of ETP, whereas, in this case there is increase in COD values after treatment in biological ETP indicating poor performance of the Biological ETP.

As per the analysis reports, the Performance of ZLD system is not satisfactory.

19. The Board officials have collected samples of Nallakunta Cheruvu in connection with public complaints on various occasions. As per the analysis reports, the values of certain important parameters are as follows:

S.No.	Date of sample collected	Chemical Oxygen Demand (COD) in mg/l	Dissolved Oxygen (DO) in mg/l
1	10.06.2021	64	5.2
2	14.07.2022	74	6.2
3	26.07.2022	65	6.3
4	08.09.2022	53	6.5
5	07.06.2024	946	Nil
6	03.08.2024	240	3.2
7	04.03.2025	180	1.8
8	01.08.2025	1676	1.2
9	20.09.2025	649	--

The above COD and Dissolved oxygen levels indicate pollution of NallakuntaCheruvu.

The observations as per the finger printing Analysis reports of the samples collected on 20.09.2025 from Nallakunta Cheruvu, back water entering from Nallakunta cheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry.

Sertraline HCl is consented product in CFO order Dt:02.07.2022 and is found in stagnated back water sample entering from Nallakunta cheruvu into Air force academy.(542).

The chemicals found in Water sample of Nallakunta Cheruvu, Domadugu (V), Sangareddy (D)

1. **N,N-Dimethylpivalamide**

   Present in NallakuntaCheruvu(543), Rain water storage tank5 (536) and stagnated back water sample entering from Nallakuntacheruvu into airforce academy(542).

2. **N-Formylmorpholine**

   Present in NallakuntaCheruvu(543), Rain water storage tank5(536), Rain water storage tank 6 (537)and stagnated back water sample entering from Nallakuntacheruvu into airforce academy(542).

3. **Morpholine-4-carbonylchloride**

   Present in NallakuntaCheruvu (543), Rain water storage tank5 (536) and stagnated back water sample entering from Nallakuntacheruvu into airforceacademy(542).

4. **[2,2'-Bi-1H-indene]-1,1'-dione, 2,2',3,3'-tetra**

   Present in NallakuntaCheruvu (543),stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North

side) (540) and stagnated back water sample entering from Nallakuntacheruvu into airforce academy (542).

5. **1,2:4,6-Di-O-isopropylidene-L-sorbopyranos**

   Present in NallakuntaCheruvu (543), and stagnated back water sample entering from Nallakuntacheruvu into airforceacademy(542).

6. **1,4-Benzenedicarboxylicacid, bis(2-methylp**

   Present in NallakuntaCheruvu(543), Rain water storage tank 6(537) and stagnated back water sample entering from Nallakuntacheruvu into airforce academy(542).

7. **Pyrrolidine, 1-[4-(4-chlorophenyl)-3-phenyl-**

   Present in NallakuntaCheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakuntacheruvu into airforceacademy(542).

8. **6,7-Dichloro-4b, 10-ethenobenz(a)azulene**

   Present in Nallakunta Cheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakunta cheruvu into Air force academy (541).

   The above reports indicated presence of same chemicals in Nallakunta Cheruvu, back water entering from Nallakunta cheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry confirming that effluents discharged by the industry is resulting in pollution of Nallakunta Cheruvu.

20. The Regional Office Officials inspected the industry on 14.11.2025 and observed certain non-compliance and report dt. 12.12.2025 submitted to the Board Office, TGPCB for necessary action.The status of the industry was reviewed in Task Force meeting held on 23.12.2025 and the Board issued Directions dt:01.01.2026 to the industry.**(Annexure-V)**

21. The Board officials inspected the industry on 24.01.2026 and 30.01.2026 to verify the compliance status. The compliance status of the industry with the conditions stipulated in CFO order and directions issued by the Board is follows:

The compliance status with the Consent conditions issued vide CFO& HWA order dt:02.07.2022:

<table>
<tr><th>S. No</th><th>Condition</th><th>Compliance status</th></tr>
<tr><td>1.</td><td>Total fresh Water Consumption shall not exceed 443.8 KLD
<table>
<tr><th>S. No</th><th>Purpose</th><th>Quantity in KLD</th></tr>
<tr><td>1</td><td>Process & Washings</td><td>113.8</td></tr>
<tr><td>2</td><td>Boiler Feed</td><td>50</td></tr>
<tr><td>3</td><td>Cooling towers</td><td>150</td></tr>
<tr><td>4</td><td>Domestic</td><td>50</td></tr>
<tr><td>5</td><td>DM Plant / RO</td><td>80</td></tr>
<tr><td></td><td>Total</td><td>443.8 KLD</td></tr>
</table></td><td>--.</td></tr>
<tr><td>2.</td><td>During the maintenance / breakdown of ZLD, the pre-treated effluent sent to CETP for a period of maximum 15 days in calendar year, duly meeting the following inlet standards.</td><td>During inspection, new MEE was in operation and Biological ETP comprising of aeration, secondary clarifier was in operation and primary clarifier, RO system was not in operation.
The industry is sending the water from secondary clarifier to aeration tanks as observed during inspection. The industry has not provided sludge removal system from the Bio-ETP.</td></tr>
<tr><td>3.</td><td>The emissions shall not contain constituents in excess of the prescribed limits mentioned below.
<table>
<tr><th>Chimney No.</th><th>Description of Chimney</th><th>Parameter</th><th>Emission standards</th></tr>
<tr><td>1</td><td>Attached to Coal fired Boiler of capacity 8.0 TPH</td><td>SPM</td><td>115 mg/Nm3</td></tr>
<tr><td></td><td></td><td>SO_2 *</td><td>600 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel</td></tr>
<tr><td></td><td></td><td>NO_x*</td><td>300 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel</td></tr>
<tr><td>2</td><td>Attached to Coal fired Boiler of capacity 3.0 TPH (standby)</td><td>SPM</td><td>115 mg/Nm3</td></tr>
<tr><td></td><td></td><td>SO_2 *</td><td>600 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel</td></tr>
<tr><td></td><td></td><td>NO_x*</td><td>300 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel</td></tr>
<tr><td>3</td><td>Attached to Process Vents</td><td>HCl</td><td>35 mg/Nm^3</td></tr>
<tr><td>4</td><td>Attached to D.G. Set of capacity 2 x 320 KVA , 2 x 720 KVA, 2 x 1020 KVA</td><td>SPM</td><td>115 mg/Nm^3</td></tr>
</table></td><td>During inspection, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and existing 8 TPH boiler is kept as stand by.

Now, the industry has applied for CFO amendment for boilers and report is being submitted to Board office, Hyderabad for further action.</td></tr>
</table>

4.	The industry shall not manufacture any un-consented products and exceeding capacities without obtaining prior Consent for Establishment (CFE) and Consent for Operation (CFO) of the Board.	As per the details submitted by the industry for the period from April'25 to Oct'25, the avg. quantity of production is within the consented capacity.
5.	The industry shall comply with emission limits for DG sets upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets more than 800 KW should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.	--.
6.	The industry shall comply with ambient air quality standards of PM10(Particulate Matter size less than 10μm) - 100 μg/ m3; PM2.5(Particulate Matter size less than 2.5 μm) - 60 μg/ m3; SO2 - 80 μg/ m3; NOx - 80 μg/m3, outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009 Noise Levels: Day time - (6 AM to 10 PM) - 75 dB (A) Night time - (10 PM to 6 AM) - 70 dB (A)	--.
7.	The industry has paid CFO fee Rs. 43,15,000/- for a period upto 31.03.2024	--.

8.	The industry shall pay balance consent fee annually as per rates notified in G.O.Ms.No.22. The payment of annual consent fee shall be made at the concerned RO for every financial year (i.e., April to March) within the stipulated time period i.e., 1st quarter of every financial year (April to June) is mandatory for the industry / project, failing which, the validity of the Consent Order automatically stands cancelled and operation industry / project without valid consent attracts penal action under the provision of Water Act, Air Act & Hazardous and Other Wastes (Management &Transboundary Movement) Rules, 2016.	--.
9.	The industry either paying annual fee or total fee for Consented period, shall pay the balance fee as per the revised rates as applicable from time to time.	--.
10.	As per the directions of the Hon'ble NGT order dated 24.10.2017, the industry shall contribute corpus fund of 0.5% on annual turnover of 2016-17,2017-18, 2018-19 till complete restoration of the entire affected area and till the Tribunal passes appropriate orders. The industry has paid 0.5% of Corpus fund of Rs. 3.95 Crores for the financial year 2018-19 and paid 1% corpus fund of Rs.6.56 crores for the financial year 2014-15. The industry shall contribute corpus fund for remaining above financial years and the contribution shall be continued till complete restoration of the entire affected area and till the Tribunal passes appropriate orders.	--.
11.	The industry shall maintain separate water meters for recording water consumption for process, boiler feed, cooling and domestic purposes and also maintain daily records.	Complied.

12.	The industry shall segregate effluents into LTDS & HTDS effluents separately.	Industry has provided above ground RCC tank of capacity 2x250 KL for collection HTDS effluents and 2x120 KL for collection LTDS effluents separately. The industry has provided new MEE system of 200 KLD consisting of Stripper, MEE, ATFD (1x30 M^2) & ATFD (1x30 M^2) for treatment of HTDS effluents. The industry has provided biological ETP of capacity 250 KLD followed by RO System of capacity 300 KLD to treat the LTDS effluents along with condensate of MEE &ATFD. The RO permeate is reused for cooling tower make up and the RO rejects are sent to MEE for evaporation along with other effluents. The industry has provided STP of capacity 60 KLD for treatment of domestic waste water. The treated water is sent to Biological ETP to stabilize the MLSS.
13.	The industry shall maintain vent condensers for chemical / solvent storage tanks to control fugitive emissions.	The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.

14.	The industry shall maintain digital flow meters with totalisers (RS-485 communication) for recording the quantity of HTDS, LTDS effluent & RO permeate and also maintain daily records. They shall connect the flow totaliser data to TSPCB & CPCB servers as per CPCB protocol. They shall also install digital flow meter at RO permeate and connect the same to TSPCB & CPCB server.	The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP instead of LTDS generation pipelines connected to the collection tanks as observed during inspection on 14.11.2025. This does not give actual LTDS effluent generation readings. During present inspection, it was observed that the industry is carrying works to shift the LTDS flow meter. The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks as observed during inspection on 14.11.2025.This does not give actual HTDS effluent generation readings.During present inspection, it was observed that the industry is carrying works to shift the HTDS flow meter.
15.	The industry shall maintain 2 stage scrubber along with online pH monitoring system to all the production blocks for control of process emissions. They shall maintain log book for operation of scrubber for monitoring active scrubbing media.	Industry has provided single stage scrubbers and multi stage scrubbers at production blocks to control the process emissions.
16.	The industry shall monitor VOCs in ambient air with online VOC analyze with proper range & connect the same to TSPCB server.	The online connectivity provided to the flow meters, VOC meters and cameras are not showing in the TGPCB website.
17.	The industry shall maintain elevated platform with leachate/spillages collection pit to store drums containing chemicals & wastes to control spillages / discharges of chemicals / effluents on ground.	Complied.
18.	The industry shall maintain IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at effluent collection system (HTDS, LTDS & RO permeate) as per CPCB norms and at back side of the industry covering total view of the drain. They shall connect the data to CPCB & TSPCB server.	The online connectivity provided to the flow meters, VOC meters and cameras. However, the same is not showing in the TGPCB website.

19.	The industry shall provide and operate IP Camera with PAN, Zoom, 5x or above focal length, with night vision capability, at main gate entrance & at other gates where there is movement of effluent tankers, Solvent tankers, Chemical tankers, Hazardous Waste carrying vehicles & other material carrying vehicles. These cameras shall be connected to the website of TSPCB, with minimum backup of three months.	The online connectivity provided to the flow meters, VOC meters and cameras. However, the same is not showing in the TGPCB website.
20.	During the maintenance / breakdown of ZLD system, the industry is permitted to send HTDS effluents to the MEE system of M/s. JETL, Jeedimetla and LTDS effluents to M/s. PETL, Patancheru duly meeting the inlet standards stipulated at Schedule –B for not more than 15 days, in a calendar year and shall maintain records.	During inspection, new MEE was in operation and Biological ETP comprising of aeration, secondary clarifier was in operation and primary clarifier, RO system was not in operation. The industry is sending the effluent from secondary clarifier to aeration tanks as observed during inspection. The industry has not provided sludge removal system from the clarifiers of Bio-ETP.
21.	The industry shall provide and maintain hood with extraction systems to the HTDS collection tanks and connect to the scrubbers to control the odor problem.	Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hoodwhich make the system ineffective.The HTDS collection tanks wall connected to hood was damaged in one side & causing odour nuisance. During inspection, it was observed that the double stage scrubber provided to the HTDS & LTDS collection tanks was not in operation. The industry representative informed that they have stopped the scrubber as they have recently carried painting works to the scrubber & also carrying out repairing works of the scrubber.
22.	The industry shall install on line TDS meter for HTDS effluent generation. They shall maintain the records for effluent generation, TDS values, salts generation on daily basis.	Industry has provided online TDS meter for HTDS effluents.
23.	The industry shall develop greenbelt as per norms.	Complied.

24.	The industry shall provide adequate closed storage facilities above the ground with proper lining for storage of effluents before its treatment.	Industry has provided 2 x 250 KL RCC tanks and 4 x 30 KL MS tanks for HTDS effluent storage and 2 x 120 KL for LTDS effluent storage.
25.	The industry shall not use effluents in cooling towers under any circumstances.	During inspection, the coloured water with smellwas observed in the MEE cooling towers. Samples were collected from the MEE cooling tower-1, 2 and Solvent recovery plant cooling tower& submitted to Zonal Laboratory, RC Puram for analysis.
26.	The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD within one month as committed vide lr.dt. 04.06.2022.	Not complied. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
27.	All the process and vacuum leak sources shall be collected through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed to control air pollution, within one month as committed vide lr.dt. 04.06.2022.	Not complied. The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.
28.	The industry shall take all necessary precautions to avoid seepages outside the industry premises and shall not discharge any effluents onland or outside the premises under any circumstances.	Spillages of effluents observed at following places: 1. Near first-cut rain water storage tanks. 2. In storm water drains near production blocks. 3. Under the HTDS collection tanks and around the effluent collection tanks & MEE area. Severe odour was observed near effluent storage tanks &in the ZLD premises.
29.	The industry shall provide storm water drains to avoid mixing of effluent/spillages with run-off water during rains.	
30.	The industry shall collect & store the Hazardous Solid waste in an elevated closed storage shed with impervious lining and Leach ate collection system.	Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. Storage of about 50 tons of Hazardous waste was observed in the premises.
31.	The industry shall carry out Leak Detection and Repair Study (LDAR) to access the solvent losses within 2 weeks as committed videlr.dt. 04.06.2022	Industry conducted LDAR study in Sept'2025 through M/s Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.
32.	Under no circumstances, the Hazardous Waste shall be burnt in the boiler.	Complied.

33.	The industry shall provide sufficient storage collection tank to ensure the collection of first run off rain water. The industry shall collect contaminated rain water and shall dispose the same to the CETP, after confirming to the influent standards of CETP or treat within the premises, duly maintaining separate records.	The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks –III, IV, V& VI. The storage tanks - III, IV, Vwere full. Industry has sentpart of effluent from storage tank – VI to CETP and part is treated in ZLD system. Sludge (in semisolid form) was observed in the storage tank – VI. During inspection, the industry is removing one side wall of the storage tank – VI using excavator.
34.	The industry shall provide arrangement to by-pass the rain water collection tank of first run off rain water for subsequent water flow.	Complied.
35.	The industry shall take measures to prevent the seepages such as cement concrete flooring with proper collection system to collect contaminants / spillages in the relevant areas in the industry premises.	The industry has concreted the ZLD area and process area.
36.	The industry shall provide Stack Monitoring facility as per Emission Regulation part-3 (ERP-3) norms for all the major stacks of the industry within a period of two months.	Complied.
37.	The industry shall ensure that the Port hole and ladder facility for the Stacks is safe to carry out Stack monitoring. In place of monkey ladder, spiral type/scaffold ladder shall be provided to ensure safety of monitoring personnel within a period of two months.	Complied.
38.	The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials outsourced.	Not complied.
39.	The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption, within one month as committed vide lr.dt. 04.06.2022.	Provided.

40.	The evaporation losses in solvents shall be controlled by taking all preventive measures such as circulation of Chilled brine, transfer of solvents by using pumps instead of manual handling, closed centrifuges, providing primary & secondary condensers to all the reactor vents and all the solvent storage tanks and keeping solvent storage in ground storage tanks with closed pipeline to Reactors.	The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
41.	(a) The industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection. i) Daily production details. ii) Quantity of Effluents generated and reused. iii) Log Books for pollution control systems. iv) Daily solid waste generated and disposed (b) The industry shall submit consolidated statement of the above on monthly basis to the Concerned Regional Office.	As per the consolidated statement submitted by the industry for the period from April'2025 to Oct'2025, the quantity of Hazardous waste disposal is within the consented capacity.
42.	The industry shall implement the odour control measures at source of generation and from ETP and shall ensure to maintain the same effectively to control odour problems.	The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area. Severe odour was observed near effluent storage tanks & in the ZLD premises due to spillages.
43.	The industry shall ensure that there shall not be any change in process technology and scope of working without prior approval from the Board.	Industry shall comply.
44.	As per G.O.Rt.No.286, the industry shall transport the industrial effluents and plying on the roads is allowed between 6 A.M. to 6 P.M. only.	--.
45.	The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular movement.	--.
46.	The industry shall comply with the all the directions issued by the Board from time to time.	Compliance is submitted below.

47.	The applicant shall submit Environment statement in Form V to the Regional office before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof.	--.
48.	The conditions stipulated in this order are without any prejudice to rights and contentions of this Board in any Hon'ble court of Law.	--.

The compliance status with the Board directions dt:03.05.2025:

S.No.	Directions under Air Act	Compliance Status
1.	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	The compliance status is submitted above
2.	The industry shall obtain amendment to CFO for Boilers immediately.	The industry has applied CFO amendment for Boilersand report is being submitted to Board office, Hyderabad for further action.
3.	The industry shall provide dome with suction hood followed by scrubber to the HTDS effluent storage tanks to control the odour nuisance.	Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective. The HTDS collection tanks wall connected to hood was damaged in one side & causing odour nuisance. During inspection, it was observed that the double stage scrubber provided to the HTDS & LTDS collection tanks was not in operation. The industry representative informed that they have stopped the scrubber as they have recently carried painting works to the scrubber & also carrying out repairing works of the scrubber.
4.	The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.	The industry has provided single stage scrubbers & multi stage scrubbers to the production blocks for control of process emissions. During inspection, it was observed that the double stage scrubber provided to the HTDS & LTDS collection tanks was not in operation. The industry representative informed that they have stopped the scrubber as they have recently carried painting

		works to the scrubber & also carrying repairing works to the scrubber.
5.	The industry shall provide automatic system for scrubbing media of scrubbers along with online pH meter. The industry shall carryout regular calibration for pH meter.	Not complied The industry has not provided automatic system for scrubbing media of scrubbers.
6.	The industry shall transfer the chemicals / effluent / in process material in closed conditions to avoid smell nuisance.	Complied.
7.	The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server. The industry shall carryout regular calibration for VOC meter.	The industry has provided online VOC meters.
8.	The industry shall provide / maintain the vent condensers for all the solvent storage/chemical storage tanks to control the fugitive emissions.	The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
9.	The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.	Not complied. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
10.	The industry shall install the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCS.	Not complied. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems.
11.	The industry shall carryout Leak Detection and Repair Study (LDAR) to assess the solvent losses and based on the study, the industry shall take necessary steps to arrest the solvent losses and reduce VOCs in the premises.	Industry conducted LDAR study in Sept'2025 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.
12.	The industry shall not cause any air pollution/ odour nuisance to the surrounding	The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area. Effluent spillages were observed under the HTDS collection tanks and around the effluent collection tanks & MEE area. Severe odour was observed near

		effluent storage tanks & in the ZLD premises.
S. No.	**Directions under Water Act**	**Compliance**
1	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	The compliance status is submitted above
2	The industry shall collect the effluents in the above ground level tanks duly maintaining sufficient free board to avoid over flows and shall dispose the same as per CFO&HWA conditions.	Industry has provided 2 x 250 KL RCC tanks and 4 x 30 KL MS tanks for HTDS effluent storage and 2 x 120 KL for LTDS effluent storage.
3	The industry shall lift the contaminated rain water present in the 6 Nos. of Tanks to M/s PETL, Patancheru / M/s JETL, Jeedimetla within 15 days.	As per vehicle tracking manifest system, the industry has lifted about 1550 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Jan'2026 (till date). The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks –III, IV, V& VI. The storage tanks - III, IV, V were full. Industry has sent part of effluent from storage tank – VI to CETP and part is treated in ZLD system. Sludge (in semisolid form) was observed in the storage tank – VI.
4	The industry shall carryout the detailed study of NallakuntaCheruvu with reputed Organization / Institute.	The industry submitted study report of Nallakunta Cheruvu on 24.11.2025 carried out by IIT-Hyderabad.
5	The industry shall conduct the ZLD performance study through accredited organization.	The industry has submitted ZLD performance study report conducted by M/s Right Source Industrial Solutions Pvt Ltd., on 18.09.2025.
6	The industry shall continue to segregate the effluents Into HTDS and LTDS. The HTDS effluents shall be treated in stripper, MEE and ATFD. The MEE condensate & LTDS effluents shall be treated in Biological ETP followed ROsystem and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.	Industry has provided 2 x 250 KL RCC tanks and 4 x 30 KL MS tanks for HTDS effluent storage and 2 x 120 KL for LTDS effluent storage. During inspection, new MEE was in operation and Biological ETP comprising of aeration, secondary clarifier was in operation and primary clarifier, RO system was not in operation. The industry is sending the effluent from secondary clarifier to aeration
7	The industry shall provide and	

	maintain adequate Bio culture in the aeration tanks of the Biological ETP.	tanks as observed during inspection. The industry has not provided sludge removal system from the clarifiers of Bio-ETP.
8	The industry shall operate Biological ETP effectively based on the sudden shock loads due to production of different products so as to reduce the load on RO Plant for effective operation.	
9	The industry shall ensure that, ZLD system is operated effectively to control water pollution and odour nuisance to the surrounding areas.	
10	The industry shall dispose the first cut rain water regularly to the CETP or treated in their ZLD system and also not to store the same for longer periods and maintain free board to the tanks to avoid overflows/discharges into outside the premises which is finally leads to nearby water bodies.	As per vehicle tracking manifest system, the industry has lifted about 1550 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Jan'2026 (till date).
11	The industry shall collect the first run off water and the same shall be treated within the premises or send to CETP at Patancheru for further treatment duly following the manifest systems	
12	The industry shall provide digital flow meter for the first run off water tank and maintain separate records for the first run off water collected, treated & disposed and the same shall be furnished to the Board on monthly basis.	Complied.
13	The industry shall restrict the quantities of production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities as mentioned in the CFO&HWA order and shall maintain the records separately.	As per records maintained by the industry, the production and hazardous waste quantities are within permitted quantities.
14	The industry shall operate / maintain digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper / MEE feed; condensate	Complied. However, the industry has not provided flow meter to ATFD condensate.

	of MEE & ATFD, RO rejects, RO permeate etc.	
15	The industry shall not discharge any waste water / effluent / contaminated rain water/ spillages / seepages / leakages within & outside the industry premises under any circumstances.	Spillages of effluents observed at following places: 1. Near first-cut rain water storage tanks. 2. In storm water drains near production blocks. 3. Under the HTDS collection tanks and around the effluent collection tanks & MEE area.
16	The Industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks, at MEE area and regularly maintain the same.	Gland and seal leakages were observed at the MEE area and the industry is collecting the same into the collection pit. However, effluent spillages were observed on the concrete platform at the MEE area.
17	The industry shall store drums containing raw material / in process goods /MLs/spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.	Complied.
18	The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system and shall dispose the Hazardous Waste regularly in accordance with the CFO&HWA order.	Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. Storage of about 50 tons of Hazardous waste was observed in the premises.
19	The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure continuous data transmission to the TGPCB server.	The online connectivity provided to the flow meters, VOC meters and cameras. However, the same is not showing in the TGPCB website.
20	The industry shall provide & maintain PTZ (Pan Tilt Zoom) additional cameras to focus the entire premises duly covering ZLD/ effluents storage area, boiler stack & entire boundary of the plant within one month and connect the same to TGPCB Server.	The online connectivity provided to the flow meters, VOC meters and cameras. However, the same is not showing in the TGPCB website.
21	The industry shall provide/maintain operate IP cameras at main gate entrance and shall be connected to the	The online connectivity provided to the flow meters, VOC meters and cameras. However, the same is not showing in the TGPCB website.

	TGPCB Server.	
22	The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed. There shall not be any discharge / spillages of effluent within or outside the premises.	Complied.
23	The industry shall maintain good housekeeping within the plant premises.	Spillages of effluents observed at following places: 1. Near first-cut rain water storage tanks. 2. In storm water drains near production blocks. 3. Under the HTDS collection tanks and around the effluent collection tanks & MEE area.
24	The industry shall revalidate the Bank Guarantee submitted to the Board from time to time before its expiry, till further orders of the Board.	Industry has submitted BG of Rs. 32 Lakhs (BG No.5625IPEBG250014) dt: 19.09.2024 valid upto 18.09.2026.

The compliance status with the Board directions dt:01.01.2026:

Under Water Act:

S. No.	Conditions	Compliance
1.	The industry shall comply with all conditions stipulated in the CFO&HWA order Issued by the Board scrupulously.	Compliance is submitted above.
2.	The industry shall comply the conditions stipulated in the directions issued to the industry vide order dated 03.05.2025.	Compliance is submitted above.
3.	The industry shall lift the contaminated waste water/effluent present in the tanks within the industry premises to CETPS (PETL/ JETL/ MANA CETP/ IDPL/ &Pashamailaram CETP) within 15days and submit the disposal details along with manifest copies to the Board on daily basis.	Not complied. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks –III, IV, V& VI. The storage tanks - III, IV, V were full. Industry has sent part of effluent from storage tank – VI to CETP and part is treated in ZLD system.

		Sludge (in semisolid form) was observed in the storage tank – VI. During inspection, the industry is removing one side wall of the storage tank – VI using excavator. As per vehicle tracking manifest system, the industry has lifted about 1320 KL of effluents to JETL, Jeedimetla during the period from Nov'2025 to Jan'2026 (till date).
4.	The industry shall dismantle 4 No's of tanks out of 6 No's of tanks after lifting the waste water to CETPS I.e. tank wise dismantle after its empty atleast by removing tank wall one side to avoid any further storage.	The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks –III, IV, V& VI. The storage tanks - III, IV, V were full. Industry has sent part of effluent from storage tank – VI to CETP and part is treated in ZLD system. Sludge (in semisolid form) was observed in the storage tank – VI. During inspection, the industry is removing one side wall of the storage tank – VI using excavator.
5.	The industry shall send the effluents generated from the process to CETP till ZLD stabilized and after approval from the Board	As per vehicle tracking manifest system, the industry has lifted about 1320 KL of effluents to JETL, Jeedimetla during the period from Nov'2025 to Jan'2026 (till date).
6.	The industry shall explore for removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and also explore suitable direction for letting of excess rain water.	The industry shall comply. The industry not started any works in this regard.
7.	The industry shall submit an additional Bank Guarantee of Rs.64.0 Lakhs in addition to the	Not complied.

	existing Bank Guarantee of Rs.32.0 Lakhs (Total BG amount is Rs.96.0 Lakhs) within one week.	

Under Air Act:

S. No.	Conditions	Compliance
1.	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	Compliance is submitted above.
2.	The industry shall comply the conditions stipulated in the directions issued to the industry vide order dated 03.05.2025.	Compliance is submitted above.
3.	The industry shall obtain necessary amendments/ consents of the Board for operation of 12.0 TPH Boiler within one month.	As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by. Now, the industry has applied for CFO amendment and same is being submitted to Board office, Hyderabad for further action.
4.	The industry shall take odour control measures at all sources particularly at ZLD system including ATFD & Biological ETP.	The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area. Effluent spillages were observed under the HTDS collection tanks and around the effluent collection tanks & MEE area. Severe odour was observed near effluent storage tanks & in the ZLD premises.
5.	The industry shall operate scrubbers effectively to control the odour.	The industry has provided single stage scrubbers & multi stage scrubbers to the production blocks for control of process emissions. During inspection, it was observed that the double stage

		scrubber provided to the HTDS & LTDS collection tanks was not in operation. The industry representative informed that they have stopped the scrubber as they have recently carried painting works to the scrubber & also carrying out repairing works of the scrubber.

22. Non Compliance observed during inspection of the industry on 30.01.2026:

a) Spillage of effluents observed near first-cut rain water storage tanks.The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.

b) The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each.
During inspection, industry is storing effluents in first cut Rain water tanks –III, IV, V& VI. The storage tanks - III, IV, V were full.
Industry has sent part of effluent from storage tank – VI to CETP and part is treated in ZLD system.
Sludge (in semisolid form) was observed in the storage tank – VI.
During inspection, the industry is removing one side wall of the storage tank – VI using excavator.

c) As per Board directions dt. 01.01.2026, industry shall lift the contaminated waste water/effluent present in the tanks within the industry premises to CETPS within 15 days and submit the disposal details along with manifest copies to the Board on daily basis. However, as per the vehicle tracking manifest system, the industry has lifted only about 1320 KL of effluents to JETL, Jeedimetla during the period from Nov'2025 to Jan'2026 (till date). The industry is not submitting details on daily basis.

d) The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP instead of LTDS generation pipelines connected to the collection tanks. This does not give actual LTDS effluent generation readings. During inspection, it was observed that the industry is carrying works to shift the LTDS flow meter.

e) The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks. This does not give actual HTDS effluent generation readings. During inspection, it was observed that the industry is carrying works to shift the HTDS flow meter.

f) During inspection, new MEE was in operation and Biological ETP comprising of aeration, secondary clarifier was in operation and primary clarifier, RO system was not in operation.

The industry is sending the effluent from secondary clarifier to aeration tanks as observed during inspection. The industry has not provided sludge removal system from the clarifiers of Bio-ETP.

g) The industry has not provided automatic system for scrubbing media of scrubbers.

h) Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective.The HTDS collection tanks wall connected to hood was damaged in one side & causing odour nuisance.

During inspection, it was observed that the double stage scrubber provided to the HTDS & LTDS collection tanks was not in operation. The industry representative informed that they have stopped the scrubber as they have recently carried painting works to the scrubber & also carrying out repairing works of the scrubber.

i) The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.

j) The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system to arrest the VOCs.

k) The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.

l) Gland and seal leakages were observed at the MEE area and the industry is collecting the same into the collection pit. However, effluent spillages were observed on the concrete platform at the MEE area thereby causing odour nuisance. ATFD salts fall openly under ATFD & manually lifting the same into the plastic bags by workers causing odour nuisance.

m) The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area.

Effluent spillages were observed under the HTDS collection tanks and around the effluent collection tanks & MEE area.

Severe odour nuisance was observed near effluent storage tanks & in the ZLD premises.

n) Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. Storage of about 50 tons of Hazardous waste was observed in the premises.

o) The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy access to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.

p) Spillages of effluents observed at following places:

a) Near first-cut rain water storage tanks.
b) In storm water drains near production blocks.
c) Under the HTDS collection tanks and around the effluent collection tanks & MEE area.

q) During inspection, the coloured water with smell observed in the MEE cooling towers. Samples were collected from the MEE cooling tower – 1, 2 and Solvent recovery plant cooling tower & submitted to Zonal Laboratory, RC Puram for analysis.

Photographs taken during inspection are enclosed as **(Annexure-VI)**

23. It is to submit in view of the several complaints filed by the Villagers & others received by the Board through CPCB, EFS&T & CMO Office and adverse press clippings on M/s. Hetero Drugs Ltd., Unit-I, Sangareddy District for causing pollution of Nallakunta Cheruvu and also other pollution problems to the villagers, the status of the industry was reviewed in the Task Force Committee meeting held on 23.12.2025. After detailed discussions, the Committee recommended to carry out a detailed study of Nallakunta Cheruvu with reputed organization like NEERI/ IICT/ NGRI etc, on the following:

I. Collection of effluent samples from the industry and Nallakunta Cheruvu and conduct physical & chemical analysis including finger print analysis with quantitatively.
II. Collection of sediments from the Nallakunta Cheruvu in various locations and the characteristics of sediment with regard to chemicals identified (finger printing analysis) with the Nallakunta Cheruvu water/ effluents of the industry.
III. Source of contamination of Nallakunta Cheruvu.
IV. Remediation measures for restoration of Nallakunta Cheruvu.
V. Recommendations to avoid future contamination / pollution of the Nallakunta Cheruvu including removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and suggest suitable direction for letting of excess rain water.
VI. The cost incurred towards study shall be borne by the industry under Polluter Pay Principle.

Accordingly, the Board vide letter dt. 01.01.2026, requested EPTRI, NEERI and CSIR-IICT to submit the proposals along with financial estimates and time lines (preferably within one month time) for above said study within 10 days so as to enable the Board to take further action. **(Annexure-VII)**

24. It is to submit that the Board has been reviewing the status of the industry and taking action and issuing necessary directions to the industry. The industry and Nallakunta Cheruvu will be monitored regularly and action will be taken in the matter.

Submitted.

Date:31.01.2026.

Place: Hyderabad.

31.01.2026

ENVIRONMENTAL ENGINEER

ENVIRONMENTAL ENGINEER
T.G. Pollution Control Board
Regional Office, R.C.Puram,
Sangareddy Dist. 502 032

Annexure-I

(30)

తెలంగాణ రాష్ట్రం
Iangana State

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

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

CONSENT & HWA ORDER (RENEWAL)
RED CATEGORY

Consent Order No: 220823331744 **Date : 02.07.2022**

(Consent Order for Existing/New or altered discharge of sewage and/or trade effluents/outlet under Section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and amendments thereof, Operation of the plant under section 21/22 of Air (Prevention & Control of Pollution) Act 1981 and amendments thereof and Authorisation / Renewal of Authorisation under Rule 6 of the Hazardous Wastes (Management, Handling & Transboundary, Movement) Rules 2016 & Amendments thereof).

CONSENT is hereby granted under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974, under section 21/22 of Air (Prevention & Control of Pollution) Act 1981 and amendments thereof, and Authorisation under the provisions of HW (MH & TM) Rules, 2016 (hereinafter referred to as 'the Acts', `the Rules') and amendments thereof and the rules and orders made there under to **M/s. Hetero Drugs Ltd., Unit – I, Sy.No. 213, 215 & 253, Bonthapally Village, Gummadidala Mandal, Sangareddy District** (hereinafter referred to as 'the Applicant /Industry') and the industry is authorized to operate the industrial plant to discharge the Effluents from the outlets and the quantity of Emissions per hour from the chimneys, by operating pollution control equipment, as detailed below.

i) Out lets for discharge of Effluents:

Outlet No.	Description of outlet	Max daily discharge in KLD	Point of Disposal
1.	**HTDS Effluents** Process & Washings	120.7	➢ Shall be stripped off for organics recovery. ➢ Condensate of Strippers for distillation for separation of organic compounds followed by disposal to cement plants for co-processing. Distilled effluents shall be routed to ETP. ➢ Stripped effluents for Forced Evaporation in MEEs followed by ATFDs for evaporation. ➢ Condensate from MEEs & ATFDs to Biological ETP. ➢ Evaporation salts from ATFDs to TSDF.
2.	**LTDS Effluents**: (Boiler blow down – 5 KLD + Cooling tower bleed off -10 KLD + DM Plant / RO -80 KLD + Scrubber – 10 KLD) + Domestic – 40 KLD	145.0	➢ Primary treatment consisting of Equalisation, Neutralisation and Primary sedimentation followed by Secondary Biological treatment consisting of Aeration tanks and clarifiers. ➢ Sent to Biological Treatment System (250 KLD) followed by RO. RO Permeate reused for cooling tower makeup. RO Rejects sent to MEE followed by ATFD. ➢ Existing STP of capacity 60 KLD for domestic followed by Biological Treatment System followed by RO.
	Total	**265.7 KLD**	

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ii) Emissions from chimneys:

Chimney No.	Description of Chimney
1	Attached to Coal fired Boiler of capacity 8.0 TPH
2	Attached to Coal fired Boiler of capacity 3.0 TPH (standby)
3	Attached to Process Vents
4	Attached to D.G. Set of capacity 2 x 320 KVA , 2 x 720 KVA, 2 x 1020 KVA

iii) HW Authorisation No. 220823331744 Date :02.07.2022

HAZARDOUS WASTE AUTHORISATION
(FORM – II)
[See Rule 6 (2)]

M/s. Hetero Drugs Ltd., Unit – I, Sy.No. 213, 215 & 253, Bonthapally Village, Gummadidala Mandal, Sangareddy District is hereby granted an authorization to operate a facility for collection, reception, storage treatment, transport and disposal of Hazardous Wastes namely:

1. **Hazardous wastes with disposal option:**

S. No	Name of the Hazardous waste	Stream	Quantity	Mode of Disposal
1.	Solvent Residue	20.3 / 36.1 of Schedule-I	4.94 TPD	Shall be disposed to Cement Units for Co-processing / AFR facility (or) M/s. TSDF, Dundigal for pre-processing, to be sent to Cement units for Co-processing / TSDF Dundigal for incineration.
2.	Process Organic Residue	28.1 of Schedule-I	5.48 TPD	
3.	Stripper Distillate	28.6 of Schedule-I	6.0 KLD	
4.	Spent Carbon	28.3 of Schedule-I	0.31 TPD	
5.	Inorganic Residue	28.1 of Schedule-I	0.16 TPD	M/s. Ultratech Cement Limited, Unit: Andhra Pradesh Cement works, Bhogasamudram, Tadipatri (M), Anantapuram District, Andhra Pradesh / TSDF, Dundigal, for incineration.
6.	Spent Catalyst	28.2 of Schedule-I	35 kg/day	
7.	MEE Salts	35.3 of Schedule-I	6.53TPD	
8.	ETP Sludge	35.3 of Schedule-I	2.3 TPD	
9.	STP Sludge	35.3 of Schedule-I	2.0 kg/day	Shall be used as manure.

2. **Hazardous wastes with recycling option:**

S. No	Name of the Hazardous waste	Stream	Quantity	Disposal Option
1	Spent Solvents	28.6 of Schedule-I	150.0 KLD	Solvents shall be recovered to the maximum extent possible and shall be reused. The Spent/Mixed Solvents, which cannot be reused in the plant, shall be disposed to the End Users/ Authorized Cement manufacturing units for Co-processing / AFR facilities (or) M/s. TSDF, Dundigal for pre-processing to be sent to Cement units for Co-processing / TSDF Dundigal for incineration. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to the traders/ recyclers.
2	Spent Mixed Solvents (Non-Recoverable)	28.6 of Schedule-I	64.0 KLD	

3	Containers and Container Liners of Hazardous Chemicals/Waste	33.1 of Schedule-I	10,000 Nos /Annum	After detoxification, shall be disposed to the outside agencies.
4	Waste Oil	5.1 of Schedule-I	1200 LPM	Shall be sold to authorized Reprocessors / Recyclers.
5	Used Lead Acid Batteries	A1160 of Schedule-III	50 No/Annum	

This Consent Order valid for manufacture of the following products along with the quantities indicated only. The industry shall not manufacture more than 32 products including R&D products and individual capacities mentioned therein at any given point of time.

Sl. No	Product name	Quantity (Kg/day)
1	Alfuzosin HCl	55.0
2	Alvimopan Dihydrate	5.0
3	Amlodipine Besylate	600.0
4	Aprepitant	10.0
5	Atovaquone	80.0
6	Citalopram Hydrobromide	50.0
7	Clopidogrel Bisulphate	115.0
8	Cyclobenzaprine HCl	100.0
9	Donepezil HCl	42.0
10	Dorzolamide HCl	25.0
11	Doxazosin Mesylate	25.0
12	Duloxetine HCl	200.0
13	Eltrombopag olamine	10.0
14	Entecavir Monohydrate	2.0
15	Eprosartan Mesylate	100.0
16	Esomeprazole Magnesium Dihydrate	300.0
17	Famcyclovir	100.0
18	Felbamate	60.0
19	Fingolmod Hydrochloride	12.0
20	Fosaprepitant Dimeglumine	5.0
21	Fosinopril Sodium	41.2
22	Glimepiride	50.0
23	Itraconazole	50.0
24	Ivabridine HCl	12.0
25	Lansoprazole	200.0
26	Lercandipine HCl Hemihydrate	50.0
27	Levofloxacin	300.0
28	Lisinopril Dihydrate	250.0
29	Lurasidone Hydrochloride	12.0
30	Montelukast Sodium	100.0
31	Moxifloxacin HCl	50.0
32	Nebivolol HCl	100.0
33	Olanzapine	85.0
34	Omeprazole	200.0
35	Pantoprazole Sodium Sesquihydrate	850.0
36	Perindopril tert-Butyl amine	30.0
37	Pramipexole DiHCl Monohydrate	30.0
38	Proguanil HCl	30.0
39	Rabeprazole Sodium	30.0
40	Raltegravir Potassium	80.0

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41	Riluzole	19.6
42	Ritonavir	50.0
43	Sertraline HCl	300.0
44	Sildenafil Citrate	200.0
45	Solifenacin Succinate	10.0
46	Tetrabenazine	60.0
47	Tolterodine Tartarate	30.0
48	Tolvaptan	12.0
49	Topiramate	200.0
50	Trandalopril	21.6
51	Valacyclovir HCl.H2O	803.0
52	Ziprasidone HCl	60.0
53	Apremilast	10.0
54	Bupropion Hcl	600.0
55	Dexlansoprazole	100.0
56	vacaftor	10.0
57	Lomitapide Mesylate	10.0
58	Metaprolol succinate	600.0
59	Mirtazapine	50.0
60	Nisolidipine	100.0
61	Roflumilast	5.0
62	Tafacitinib citrate	10.0
63	Telbuvidine	200.0
64	Vigabatrin	40.0
65	R& D Products	25.0
	Total (Worst Case-32 Products + R&D Products)	**7173.0 Kg/day**

This order is subject to the provisions of `the Acts' and the Rules' and amendments made thereuncer and further subject to the terms and conditions incorporated in the schedule A B and C enclosed to this order.

This order of Consents and Authorization is valid for a period upto 31st October,2026.

Sd/-
MEMBER SECRETARY

To
M/s. Hetero Drugs Ltd., Unit – I,
Sy.No. 213, 215 & 253, Bonthapally Village,
Gummadidala Mandal, Sangareddy District

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

BVB Girish

CW **SENIOR ENVIRONMENTAL ENGINEER (FAC)**

SCHEDULE-A

1. The applicant shall make applications through online for renewal of Consent (under Water & Air Acts) and Authorisation under HWM Rules at least 120 days before the date of expiry of this order, along with prescribed fee under Water and Air Acts for obtaining Consent & HW Authorisation of the Board. The applicant can also apply for Auto Renewal of the CFO atleast 30 days before the expiry of this order as per the procedure and eligibility stipulated in the Board Circular dt.19.11.2015 & 08.12.2015 (available in Board s Website: http://tspcb.cgg.gov.in/Pages/Circulars.aspx).

2. This order is issued in line with Board's CFO&HWA order dt. 29.01.2019. Concealing the factual data or submission of false information/ fabricated data and failure to comply with any of the conditions mentioned in this order may result in withdrawal of this order and attract action under the provisions of relevant pollution control Acts. The industry shall comply with all other conditions CFO&HWA order dt. 29.01.2019 is still applicable.

3. Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Rules, to such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of the Water (Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.

4. The industry may explore the possibility of tapping the solar energy for their energy requirements.

5. The Board reserves its right to modify above conditions or stipulate any further conditions and to take action including revoke of this order in the interest of protection of public health and environment.

SCHEDULE-B

1. Total fresh Water Consumption shall not exceed 443.8 KLD

S. No.	Purpose	Quantity (KLD)
1	Process & Washings	113.8
2	Boiler Feed	50
3	Cooling towers	150
4	Domestic	50
5	DM Plant / RO	80
	Total	**443.8 KLD**

2. During the maintenance / breakdown of ZLD, the pre-treated effluent sent to CETP for a period of maximum 15 days in calendar year, duly meeting the following inlet standards.

Parameter	Limiting Standards
pH	5.5 – 9.0
Temperature °C	45.0
Total Dissolved Solids (Inorganic)	5,000 mg/l
Oil and Grease	20 mg/l
Phenolic Compounds (as C_6H_5OH)	5 mg/l
Ammonical Nitrogen (as N)	50 mg/l
Cyanide (as CN)	2 mg/l
Chromium Hexavalent (as Cr^{+6})	2 mg/l
Chromium (total) (as Cr)	2 mg/l
Copper (as Cu)	3 mg/l
Lead (as Pb)	1 mg/l
Nickel (as Ni)	3 mg/l
Zinc (as Zn)	15 mg/l

Arsenic (as As)	0.2 mg/l
Mercury (as Hg)	0.01 mg/l
Cadmium (as Cd)	1 mg/l
Selenium (as Se)	0.05 mg/l
Fluoride (as F)	15 mg/l
Boron (as B)	2 mg/l
COD	15,000 mg/l

3. The emissions shall not contain constituents in excess of the prescribed limits mentioned below.

Chimney No.	Description of Chimney	Parameter	Emission standards
1	Attached to Coal fired Boiler of capacity 8.0 TPH	SPM	115 mg/Nm3
		SO_2*	600 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel
		NO_x*	300 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel
2	Attached to Coal fired Boiler of capacity 3.0 TPH (standby)	SPM	115 mg/Nm3
		SO_2*	600 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel
		NO_x*	300 mg/Nm^3 At 6% dry O_2, for solid fuel and3% dry O_2 for liquid fuel
3	Attached to Process Vents	HCl	35 mg/Nm^3
4	Attached to D.G. Set of capacity 2 x 320 KVA , 2 x 720 KVA, 2 x 1020 KVA	SPM	115 mg/Nm^3

***As per MOEF&CC Notification No.GSR 96(E), dt. 29.01.2018 published under the Environment (Protection)Rules, 1986.**

4. The industry shall not manufacture any un-consented products and exceeding capacities without obtaining prior Consent for Establishment (CFE) and Consent for Operation (CFO) of the Board.

5. The industry shall comply with emission limits for DG sets upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets more than 800 KW should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.

6. The industry shall comply with ambient air quality standards of PM_{10}(Particulate Matter size less than 10µm) - 100 µg/ m^3; $PM_{2.5}$(Particulate Matter size less than 2.5 µm) - 60 µg/ m^3; SO_2 - 80 µg/ m^3; NO_x - 80 µg/m^3, outside the factory premises at the periphery of the industry.

   Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009

   Noise Levels: Day time - (6 AM to 10 PM) - 75 dB (A)
   Night time - (10 PM to 6 AM) - 70 dB (A).

7. The industry has paid CFO fee Rs. 43,15,000/- for a period upto 31.03.2024.

8. The industry shall pay balance consent fee annually as per rates notified in G.O.Ms.No.22. The payment of annual consent fee shall be made at the concerned RO for every financial year (i.e., April to March) within the stipulated time period i.e., 1st quarter of every financial year (April to June) is mandatory for the industry / project, failing which, the validity of the Consent Order automatically stands cancelled and operation industry / project without valid consent attracts penal action under the provision of Water Act, Air Act & Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.

9. The industry either paying annual fee or total fee for Consented period, shall pay the balance fee as per the revised rates as applicable from time to time.

10. As per the directions of the Hon'ble NGT order dated 24.10.2017, the industry shall contribute corpus fund of 0.5% on annual turnover of 2016-17,2017-18, 2018-19 till complete restoration of the entire affected area and till the Tribunal passes appropriate orders. The industry has paid 0.5% of Corpus fund of Rs. 3.95 crores for the financial year 2018-19 and paid 1% corpus fund of Rs.6.56 crores for the financial year 2014-15. The industry shall contribute corpus fund for remaining above financial years and the contribution shall be continued till complete restoration of the entire affected area and till the Tribunal passes appropriate orders.

11. The industry shall maintain separate water meters for recording water consumption for process, boiler feed, cooling and domestic purposes and also maintain daily records.

12. The industry shall segregate effluents into LTDS & HTDS effluents separately.

13. The industry shall maintain vent condensers for chemical / solvent storage tanks to control fugitive emissions.

14. The industry shall maintain separate water meters for recording water consumption for process, boiler feed, Cooling and domestic purposes and also maintain daily records.

15. The industry shall maintain digital flow meters with totalisers (RS-485 communication) for recording the quantity of HTDS, LTDS effluent & RO permeate and also maintain daily records. They shall connect the flow totaliser data to TSPCB & CPCB servers as per CPCB protocol. They shall also install digital flow meter at RO permeate and connect the same to TSPCB & CPCB server.

16. The industry shall maintain 2 stage scrubber along with online pH monitoring system to all the production blocks for control of process emissions. They shall maintain log book for operation of scrubber for monitoring active scrubbing media.

17. The industry shall monitor VOCs in ambient air with online VOC analyze with proper range & connect the same to TSPCB server.

18. The industry shall maintain elevated platform with leachate/spillages collection pit to store drums containing chemicals & wastes to control spillages / discharges of chemicals / effluents on ground.

19. The industry shall maintain IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at effluent collection system (HTDS. LTDS & RO permeate) as per CPCB norms and at back side of the industry covering total view of the drain. They shall connect the data to CPCB & TSPCB server.

20. The industry shall provide and operate IP Camera with PAN, Zoom, 5x or above focal length, with night vision capability, at main gate entrance & at other gates where there is movement of effluent tankers, Solvent tankers, Chemical tankers, Hazardous Waste carrying vehicles & other material carrying vehicles. These cameras shall be connected to the website of TSPCB, with minimum backup of three months.

21. During the maintenance / breakdown of ZLD system, the industry is permitted to send HTDS effluents to the MEE system of M/s. JETL, Jeedimetla and LTDS effluents to M/s. PETL, Patancheru duly meeting the inlet standards stipulated at Schedule –B for not more than 15 days, in a calendar year and shall maintain records.

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22. The industry shall provide and maintain hood with extraction systems to the HTDS collection tanks and connect to the scrubbers to control the odor problem.

23. The industry shall install on line TDS meter for HTDS effluent generation. They shall maintain the records for effluent generation, TDS values, salts generation on daily basis.

24. The industry shall develop greenbelt as per norms.

25. The industry shall provide adequate closed storage facilities above the ground with proper lining for storage of effluents before its treatment.

26. The industry shall not use effluents in cooling towers under any circumstances.

27. The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD within one month as committed vide lr.dt. 04.06.2022.

28. All the process and vacuum leak sources shall be collected through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed to control air pollution, within one month as committed vide lr.dt. 04.06.2022.

29. The industry shall take all necessary precautions to avoid seepages outside the industry premises and shall not discharge any effluents onland or outside the premises under any circumstances.

30. The industry shall provide storm water drains to avoid mixing of effluent/spillages with run-off water during rains.

31. The industry shall collect & store the Hazardous Solid waste in an elevated closed storage shed with impervious lining and Leachate collection system.

32. The industry shall carry out Leak Detection and Repair Study (LDAR) to access the solvent losses within 2 weeks as committed vide lr.dt. 04.06.2022

33. Under no circumstances the Hazardous Waste shall be burnt in the boiler.

34. The industry shall provide sufficient storage collection tank to ensure the collection of first run off rain water. The industry shall collect contaminated rain water and shall dispose the same to the CETP, after confirming to the influent standards of CETP or treat within the premises, duly maintaining separate records.

35. The industry shall provide arrangement to by-pass the rain water collection tank of first run off rain water for subsequent water flow.

36. The industry shall take measures to prevent the seepages such as cement concrete flooring with proper collection system to collect contaminants / spillages in the relevant areas in the industry premises.

37. The industry shall provide Stack Monitoring facility as per Emission Regulation part-3 (ERP-3) norms for all the major stacks of the industry within a period of two months.

38. The industry shall ensure that the Port hole and ladder facility for the Stacks is safe to carry out Stack monitoring. In place of monkey ladder, spiral type/scaffold ladder shall be provided to ensure safety of monitoring personnel within a period of two months.

39. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials outsourced.

40. The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption, within one month as committed vide lr.dt. 04.06.2022.

41. The evaporation losses in solvents shall be controlled by taking all preventive measures such as circulation of Chilled brine, transfer of solvents by using pumps instead of manual handling, closed centrifuges, providing primary & secondary condensers to all the reactor vents and all the solvent storage tanks and keeping solvent storage in ground storage tanks with closed pipeline to Reactors.

42. (a) The industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection.

    i) Daily production details.
    ii) Quantity of Effluents generated and reused.
    iii) Log Books for pollution control systems.
    iv) Daily solid waste generated and disposed

    (b) The industry shall submit consolidated statement of the above on monthly basis to the Concerned Regional Office.

43. The industry shall implement the odour control measures at source of generation and from ETP and shall ensure to maintain the same effectively to control odour problems.

44. The industry shall ensure that there shall not be any change in process technology and scope of working without prior approval from the Board.

45. As per G.O.Rt.No.286, the industry shall transport the industrial effluents and plying on the roads is allowed between 6 A.M. to 6 P.M. only.

46. The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular movement.

47. The industry shall comply with the all the directions issued by the Board from time to time.

48. The applicant shall submit Environment statement in Form V to the Regional office before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments thereof.

49. The conditions stipulated in this order are without any prejudice to rights and contentions of this Board in any Hon'ble court of Law.

SCHEDULE – C
[see rule 6(2)]
[SPECIAL CONDITIONS OF AUTHORISATION FOR OCCUPIER OR OPERATOR HANDLING HAZARDOUS WASTES]

1. The industry shall give top priority for waste minimization and cleaner production practices.

2. The industry shall not store hazardous waste for more than 90 days as per the Hazardous and other Wastes (Management. Handling and Transboundary Movement) Rules, 2016 and amendments thereof. The industry shall maintain 6 copy manifest system for transportation of waste generated and copies of receipt of Consignee shall be submitted to the Concerned Regional office. The industry shall maintain proper records for Hazardous Wastes stated in Authorisation in FORM-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc., and file annual returns in Form- 4 as per Rule 20(2) of the Hazardous and other Wastes (Management, Handling & Transboundary Movement) Rules, 2016 and amendments thereof.

3. The industry shall dispose /sell the Hazardous Waste to only industries/agencies authorized by the State Pollution Control Boards. The industry shall verify the authorization of the Board given to the Party before disposing its waste to the External Party.

4. The industry shall maintain proper records for Hazardous Wastes disposal and its concurrence with authorization. In case of variation in generation, industry shall submit explanation and obtain amendment in Environmental Clearance/ CFE/CFO in this regard.

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5. The industry shall store Used / Waste Oil and Used Lead Acid Batteries in a secured way in their premises till its disposal. Waste oils shall be disposed to the authorized Reprocessors/ Recyclers and Used Lead Acid Batteries shall be disposed to the manufacturers / dealers on buyback basis. The industry shall take necessary practical steps for prevention of oil spillages and carryover of oil from the premises. The industry shall check the Certificate/ Authorisation/order of MoEF issued to the Re-user/Recycle units while disposing the waste oil.

6. The industry shall dispose of e-waste to the authorised recyclers only.

7. The industry shall maintain good housekeeping.

8. The industry shall submit the condition wise compliance report of the conditions stipulated in Schedule B & C of this Order on half yearly basis to Board Office. Hyderabad and concerned Regional Office.

Sd/-
MEMBER SECRETARY

To
M/s. Hetero Drugs Ltd., Unit – I,
Sy.No. 213, 215 & 253, Bonthapally Village,
Gummadidala Mandal, Sangareddy District

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

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Cw **SENIOR ENVIRONMENTAL ENGINEER (FAC)**

Annexure - II

(40)

TELANGANA STATE POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

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

Order No.RCP-30/TSPCB/TF/HO/2023- 1650 **Date:12.01.2023**

C.O.R.No.

DESPATCH NO:

DATE

Sub : TSPCB – **M/s. Hetero Drugs Ltd., Unit–I, Bonthapally Village, Gummadidala Mandal, Sangareddy District** – Water (Prevention and Control of Pollution) Amendment Act, 1988 - **DIRECTIONS – ORDER ISSUED** – Reg.

Ref :
1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions Order No.RCP-30/TSPCB/TF/HO/2017-625, dt. 31.07.2021.
3. Telephonic Complaint received from Sri Srinivas Goud, Ward Member, Sri Mangaiah, Ex Ward member and others of R/o Domadugu Village, Gummadidala (M), Sangareddy District regarding discharge of effluents in to the Nallakunta cheruvu by the industry.
4. Inspection of the industry by Board Officials on 14.07.2022.
5. Hearing held on 15.09.2022.
6. Inspection of the industry by the Committee Member on 21.11.2022.
7. Hearing held on 17.12.2022.

* * * * *

1. **WHEREAS,** you are operating the industry located at Bonthapally, Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021 in connection with a telephonic complaint received from Sri Govardhan Goud MPTC & C.H.Praveen R/o Domadugu Village, Gummadidala (M), Sangareddy District on 26.06.2019 regarding discharge of effluents in to the Nallakunta cheruvu by the industry.

4. **WHEREAS,** vide reference 3rd cited, the Board received a telephonic Complaint from Sri Srinivas, Ward Member, Sri Mangaiah, Ex Ward member and others of R/o Domadugu Village, Gummadidala (M), Sangareddy District on 14.07.2022 regarding discharge of effluents in to the Nallakunta cheruvu by M/s. Hetero Durgs Ltd., Unit-I.

5. **WHEREAS,** vide reference 4th cited, the RO-Sangareddy Officials inspected the Nallakunta cheruvu, its surroundings and also the industry on 08.06.2021 and the following observations were made:

    1. The complainants alleged that, the industry is discharging effluents which ultimately joining into Nallakunta cheruvu through small kunta located inside the premises of Air Force Academy, Dundigal and causing water pollution in the Nallakunta cheruvu thereby damaging their agricultural fields and requested to take action against the industry.
    2. The Nallakunta cheruvu is located in the downstream of M/s Hetero Drugs Ltd, Unit-I & Air Force Academy, Dundigal. The geography of the area is that the North and North-East side of the cheruvu. (i.e., upstream side) is elevated sloping to towards cheruvu due to which, during the rains storm water / contaminated rain water runoff / surface runoff water if any will ultimately find their way in to low lying area i.e., Nallakunta cheruvu.
    3. The surface runoff water from small openings of boundary compound wall of Air Force Academy, Dundigal and joining into Nallakunta cheruvu.

4. The source of surface runoff / contaminated rain water runoff into Air Force Academy, Dundigal is mainly from M/s Hetero Drugs Ltd, Unit-I.

5. The Compliance of the industry on Task Force Directions: Order No. RCP-30/TSPCB/TF/HO/2017, Dt 31.07.2021 with regard to Complaint.

Sl. No	Directions dt 31.07.2021	Compliance
1.	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	The non compliance of CFO & HWA conditions submitted in remarks.
2.	The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.	The industry is having above ground RCC tank of capacity 2x250 KL for collection HTDS effluents and the industry is having above grounds RCC tank of capacity 2x120 KL for collection LTDS effluents separately. The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank. The industry has provided ZLD system consisting of Stripper (240 KLD), MEE (240 KLD), ATFD (1x30 M^2 & 1x15 M^2) for treatment of HTDS effluents. During inspection 30 M^2 is in operation. The industry has provided biological ETP of capacity 250 KLD followed by RO System of capacity 300 KLD to treat the LTDS effluents along with condensate of MEE & ATFD. The RO permeate is reused for cooling tower make up and the RO rejects are sent to MEE for evaporation along with other effluents. The industry is having STP of capacity 60 KLD for treatment of domestic waste water. After treatment the treated water is sending to Bio ETP to stabilize the MLSS
3.	The industry shall cover all the effluent tanks with dome connecting the vent to a common scrubber to avoid smell nuisance from the storage tanks.	The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank.
4.	The industry shall provide / maintain adequate capacity of first runoff of rainwater & seepage collection tank with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The industry shall maintain free Board to the collection tanks.	The industry is having 6 Nos of first cut rain water storage sumps of capacity 2000 KL each. During the inspection 2 Nos of sumps are full with first cut rain water of about 100 KL and about 800 KL in other 2 Nos of sumps and 1 No. of sump is empty. The industry has provided bypass arrangement and not provided flow meter to the first cut rain water sump and not maintaining records to quantify the first cut ran water collected and treated.
5.	The industry shall collect the first run off water and the same shall be treated within the premises / send to CETP for further treatment duly following the manifest systems and the same shall be furnished to the Board on monthly basis.	

6.	The industry shall operate the scrubbers continuously and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.	The industry is having 15 Nos of production blocks. The industry has provided 2 Nos. of double stage scrubbers & 35 Nos. of Single stage scrubbers to the 11 Nos of production blocks. The industry has provided 1 No of online pH meters to the double stage scrubbers and connected to production blocks. The industry has provided 1 No. Double stage scrubber with online Ph meter to HCl storage tanks. The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank.
7.	The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.	The industry has provided where house for storage of raw materials. The industry has provided shed for storage drums containing raw material / in process goods / MLs / Spent Solvents / Wastes etc on concrete plat form.
8.	The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system and shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.	The industry is storing the hazardous waste near ATFD shed with dyke wall and leachate collection pit. As per consolidated statement, the industry has disposed about (1582.5 MT) 4.33 MT/ day of Process Inorganic waste, ATFD salts and ETP sludge against consented capacity 9.34 TPD to TSDF and disposed about (1007.14MT) 2.76 MT/day of Process organic residue, Solvent Residue, Stripper Distillate & spent carbon against permitted capacity 16.73 MT/Month to M/s Cement industries (924.04 Tons) & TSDF (83.1 Tons) during period from Jan 2021 to December 2021.
9.	The industry shall provide / maintain online VOC analyzer to monitor VOCs and connect to TSPCB Server.	The industry has provided 3 Nos. of online VOC analyzers at production block, main gate & ZLD area and same are connected to TSPCB server.
10.	The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.	The industry has provided IP camera to the main gate and same is connected to TSPCB server. The industry has provided digital flow meter & IP camera to RO permeate and connected to TSPCB server.
11.	The industry shall provide and operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.	
12.	The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.	Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, and Biological ETP area.
13.	The industry shall not use any effluent / contaminated waste water in cooling tower under any	--

	circumstances.	
14.	The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks etc.,	During inspection it was observed that Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, and Biological ETP area.
15.	The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD within a month.	Not provided.
16.	The industry shall install the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs within a month.	Not provided.
17.	All the process and vacuum leak sources shall be collected through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed to control air pollution within a month.	Not provided.
18.	The industry shall regularly carryout leak detection and repair study. All the fugitive leak sources shall be monitored and arrested so as to reduce the VOCs concentration in the both work place as well as ambient atmosphere.	The industry has not submitted latest LDAR Study report.
19.	The industry shall maintain proper housekeeping within the premises.	Satisfactory.
20.	The industry shall extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.	The industry has not submitted the BG of Rs. 8.0 Lakhs towards compliance of the directions.

Remarks:

1. During the inspection, Sri. Nagaraju, Plant In charge of the industry was present and the industry was in operation.
2. The industry is having Stripper followed by MEE (200 KLD) and ATFD (15 KLD) for treatment of HTDS effluents. The industry also provided additional Stripper, one more effect (Calendria) to MEE thereby increased the MEE capacity to 250 KLD and additional ATFD (30 KLD) for treatment of HTDS effluents and Primary treatment facility followed by Biological ETP of 250 KLD and RO for treatment of LTDS effluents. During inspection, the ZLD system is in operation.
3. The industry has provided STP of capacity 60 KLD consisting of collection and equalization tank, aeration tank followed by clarifier for treatment of domestic effluents and operating the same.
4. The industry is having 15 Nos of production blocks. The industry has provided 2 Nos. of double stage scrubbers & 35 Nos. of Single stage scrubbers to the 11 Nos of production blocks. The industry has provided 1 No of online PH meters to the double stage scrubbers and connected to production blocks. The industry has provided 1 No. Double stage scrubber with online Ph meter to HCl storage tanks.
5. The industry is operating 8.0TPH coal fired boiler with MDC and bag filters as APCE, the industry has not dismantled 3.0 TPH Coal Fired Boiler and kept it as standby, and it was not in operation.
6. The industry is having 6 Nos of first cut rain water storage sumps of capacity 2000 KL each. During the inspection 2 Nos of sumps are full with first cut rain water of about 100 KL and about 800 KL in other 2 Nos of sumps and 1 No. of sump is empty. The industry has provided bypass arrangement and not provided flow meter to the first cut rain water sump and not maintaining records to quantify the first cut ran water collected and treated.

7. During inspection, numbers of hose pipes were observed near first cut rain water sumps area and the house keeping observed to be very poor in and around first cut rain water sumps area. Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, Biological ETP and SRP area.
8. During inspection, it was observed that, effluent leakages and over flow from vacuum pump of MEE causing pungent Ammonia smell nusiance in the area. The house keeping in the vaccum pump of MEE is very poor.
9. The industry has provided breather valves, nitrogen blanketing to the solvent storage tanks.
10. The industry has not provided separate energy meter to APCEs connected to boiler and process vents.
11. The industry has not provided online TDS meter for HTDS Collection tank as per the Schedule B Condition of CFO & HWA Order Dt. 02.07.2022.
12. The industry has provided 3 Nos. of online VOC analyzers at production block, main gate & ZLD area and same are connected to TSPCB server.
13. The industry is having 2 Nos. of SR plant of capacity 68 KLD with (3x10 KL columns, 2x15 KL columns & 1x5 KL columns) & 38 KLD with (2x15 KL columns & 1x8 KL columns) with primary and secondary columns with primary and secondary columns to recover the spent solvents.
14. The industry has not submitted the latest LDAR study report.
15. The industry has not provided sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the ATFD to control air pollution. The industry also not provided scrubber to the ATFD vents.
16. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.
17. The industry has not provided Cryogenic condensation to the process and vacuum leak sources shall be collected through fume extraction system connected to a followed by activated charcoal bed to control air pollution.

6. During the inspection, the Board officials are collected the samples on 14.07.2022 from following locations and the analysis results are as follows:

- Sample collected from HTDS effluent collection tank
- Sample collected from LTDS effluent collection tank
- Sample collected from first cut rain water collection tank
- Sample collected from Nallakunta cheruvu.

2022 – 07214 : Sample collected from HTDS effluent tank.
2022 – 07215 : Sample collected from LTDS effluent tank.

S. No.	Parameter	Method No*	Results	
			07214	07215
1	pH	4500-H^+-B	8.31	7.69
2	Total Suspended Solids (TSS)	2540-D	126	86
3	Total Dissolved Solids (TDS)	2540-C	24,223	4,350
4	Chemical Oxygen Demand (COD)	5220-B	38,142	2,360

2022 – 07216 : Sample collected from First cut rain water collection tank.

S. No.	Parameter	Method No*	Results
			07216
1	pH	4500-H^+-B	7.21
2	Total Suspended Solids (TSS)	2540-D	24
3	Total Dissolved Solids (TDS)	2540-C	682
4	Chemical Oxygen Demand (COD)	5220-B	52
5	Biological Oxygen Demand (BOD)	5210-B	6
6	Oil & Grease	5520-B,D	BDL

7. During the inspection, the Board officials are collected the samples on 11.07.2022 from following locations and the analysis results are as follows:

2022 – 07151 : Sample collected from HTDS effluent tank.

2022 – 07152 : Sample collected from LTDS effluent tank.

S. No.	Parameter	Method No*	Results	
			07151	07152
1	pH	4500-H^+-B	7.82	7.64
2	Total Suspended Solids (TSS)	2540-D	128	78
3	Total Dissolved Solids (TDS)	2540-C	37,796	4,250
4	Chemical Oxygen Demand (COD)	5220-B	42,400	3,200

2022 – 07153 : Sample collected from First cut rain water collection tank.

2022 – 07154 : Sample collected from hot water circulation pump leakages at back side of Production block-A which is joining into by-Pass arrangement of First cut rain water collection tank.

S. No.	Parameter	Method No*	Results	
			07153	07154
1	pH	4500-H^+-B	7.21	7.86
2	Total Suspended Solids (TSS)	2540-D	20	42
3	Total Dissolved Solids (TDS)	2540-C	630	780
4	Chemical Oxygen Demand (COD)	5220-B	76	128
5	Biological Oxygen Demand (BOD)	5210-B	10	14
6	Oil & Grease	5520-B,D	BDL	BDL

6. **WHEREAS,** vide reference 5th cited, the industry was reviewed in the Task Force Committee meeting held on 15.09.2022. After detailed discussions, the Committee recommended that the Task Force Committee of the Board shall visit the industry to verify the status of the industry and to submit a report to the Board Office.

7. **WHEREAS,** vide reference 6th cited, the Committee Members inspected the industry on 21.11.2022 and the details of the industry and observations made during inspection are submitted as below:

TOPOGRAPHY:

M/s. Hetero Drugs Ltd, Unit-I, Bonthapally (V), Gummaddala (M), Sangareddy District is not a standalone factory in the Industrial area. M/s Honour Labs is in the Northern side after the intervening connecting road. M/s Pavan drugs, M/s Granules India units are also situated on the northern side after Honour labs on much elevated area .Towards South-South East direction of the unit, Air Force Academy premises (small kunta) followed by Water Body, Nallakunta Chervu is located in the down ward direction with sloping from the Drug manufacturing firm located at an elevated upper region due to which possibility of surface run-off, contaminated rain water run-off or contaminated water from the industry if any, will ultimately may reach low lying down stream water body. Towards western side, Bonthapally & Narsapur highway exists whereas Eastern side of the Unit open land with around SIX feet above the manufacturing unit exists. Several water lines(fixed) and some hoses are found on the above six feet compound wall (with Kirby Sheets for safety purpose) for water and fire hydrant purposes.

The M/s. Hetero Drugs Ltd, Unit-I, has 15 number of production blocks with sufficient green belt.

POINTS raised in the TF meeting and Compliance measures:

Sri.Srinivas, Ward Member, Sri.Mangaiah Ex-Ward Member and Sri. Sudhakar Reddy and others of Domadugu Village, Gummadidala(M) of Sangareddy District attended the TF meeting in person and complained of.,

1) Discharge of untreated Effluents in to Nallakunta Chervu by the company.

2) The industry has constructed 6 numbers of first cut rain water collection pits (1900KL each), First one near to the boundary wall of Air Force Academy and 6th one just adjacent to company entrance gate with a by-pass arrangement (as per PCB

guidelines) for excess water, however, NO Flow meter was placed to record to quantify the water let out into AFAcademy is arranged.

2) Complainants also alleged that contaminated effluents are let off through a separate pipeline in to Air Force academy boundary wall ultimately joining in to Nallakunta Chervu through small openings of AFA boundary wall.

All the untreated water is ultimately entering in to Nallakunta chervu and damaging the surrounding agricultural fields.

INTERACTION WITH UNIT OFFICIALS & COMPLAINANTS:

Committee members first interacted with Sri. NagaRaju, GM & Sri. Venkateshwar Reddy, Plant Head. After much persuasion from PCB and Committee Members, M/s.Hetero Drugs Unit management agreed for the entry of complainant, Sri.Mangaiah of Domadugu, Bonthapally, in to the premises.

The team went around the Unit, First Cut Rainwater Collection Pits (6numbers), MEE and ETP area. All of the complainant views were given patient hearing in presence of Company management and seen all the alleged/ suspicious places wherever he had doubts including a Grave yard area outside the factory. Complainant claims that due to alleged discharges the approach road to graveyard is not amenable with dead bodies and said it is much difficult during rainy days.

Committee members and Complainant visited the NallakuntaChervu, 500 meters away from Hetero Drugs unit–I and adjacent to Narsapur highway, where to the suspected contaminants are expected to enter. Few fields with Paddy cultivation could be noticed beyond Nallakunta Chervu irrigation area.

OBSERVATIONS:

During the inspection, the industry was in operation.

Peculiar odour was observed in the production, ETP and MEE areas as all activities are on including ATFD.

Lot of leakages and stagnation were seen in the MEE area, however, management has clarified that the stagnations are intermittently pumped out for treatment and are in the process of rectifying the leaks/ refurbishing the area.

Four of Six, first cut rain Water collection tanks are full though RAINS have stopped almost a month back and other 2 Tanks (1&2) are empty. Management claims that the rainwater is being treated in the biological ETP in a phased manner.

First cut rain water pits have by-pass arrangement system (concreted 4 feet deep underground line from Northern end of Unit to Southern end) up to compound wall near to AF Academy with many manholes in between. No flow of any water is noticed and Committee insisted on to open the crest gate of Last manhole. Hardly few litres of water (not even sufficient for bottling for test) came out. No Flow meter to record and quantify the water let out is arranged.

One drain line (STP WATER) from M/s Honour Labs, R&D Unit situated towards North East side also enters into First Cut rain water tanks.

CONCLUSION & REMARKS:

1. M/s Hetero Drugs Unit-I is involved in Bulk Drug Production. Production is within the consented capacity.
2. House-keeping in the plant premises needs to be improved as gland/ seal leakages observed in the MEE, SRP area and also in the Biological ETP area.
3. The team could observe peculiar smell in general and MEE/ZLD/ETP facility in particular.
4. The unit has SIX FIRST CUT RAIN Water collection pits of 1900KL each with FOUR tanks full to brim. Though by-pass arrangement with many manholes all along the line is provided but not provided flow meter to record and quantify the water let out. Committee suggested to the management to collect a SAMPLE before lifting the crest gate of Last manhole to let-off excess rain water through by-pass line into AFA area and inform the same to PCB if possible with a video recording evidence.

5. There is a scope for contaminated water (First cut rain Water) entering in to the manholes. Committee suggested to the management to lay or deepen the existing small drain line/ increase the side wall so as to avoid contaminated water from entering manholes directly and instead divert towards Northern end from opposite to Service road junction up to concreted by-pass line beginning or storage tank.
6. The industry has not provided sub cooler condensers followed by activated Charcoal bed to ATFD vent to control VOCs.
7. The complainants further alleged that the unit is discharging untreated effluents through a separate pipeline in to the Nallakunta Chervu apart from bypass line, which the committee could not find since one need to enter Air Force Academy(AFA) area to verify it. However, committee members tried to view from top of the nearest Service Block in to AFA area & observed that there exists a PUCCA TAR ROAD all along the compound wall and do not found any seepages/leakages or small kunta except a small lagoon of Water little away from TAR ROAD.
8. The Complainants claim that during the rainy days, heavy outflow of water noticed from the industry reaching small tank inside the AFA, then joining Nallakunta Chervu causing pollution.
9. Approach road to Graveyard. Committee members noticed white mark of contaminants dried up all the way. This is attributed to facility attached to Honour labs R&D unit where a storage yard and waste/useless engineering items are stored. Chances of waste oil dumps or other things from condemned materials are not ruled out.

8. **WHEREAS,** vide reference 7th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 17.12.2022. The industry representative attended the meeting. After detailed discussions, the Committee recommended to issue certain directions to your industry, after submitting the time bound action plan on non compliance and also recommended to forfeit the Bank Guarantee of Rs.4.0 Lakhs.

9. **WHEREAS,** after careful consideration of the material facts of the case, **the Board hereby issue following directions to your industry to comply with:**

1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
2. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
3. The industry shall provide / maintain adequate capacity of first runoff of rainwater & seepage collection tank with proper bypass arrangement for free flow of subsequent rain water (24 KL/acre). The industry shall maintain free Board to the collection tanks.
4. The industry shall collect the first run off water and the same shall be treated within the premises / send to CETP for further treatment duly following the manifest systems and the same shall be furnished to the Board on monthly basis.
5. The industry shall provide digital flow meter to the first cur rain water sump to assess the quantity of contaminated rain water collected. The industry shall also provide ultrasonic flow meter at final manhole before let out the rain water outside the industry to quantify the discharge of rain water.
6. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed. There shall not be any discharge / spillages of effluent within or outside the premises.
7. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
8. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system and shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.

9. The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.

10. The industry shall provide and operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.

11. The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.

12. The industry shall not use any effluent / contaminated waste water in cooling tower under any circumstances.

13. The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks etc.,

14. The industry shall maintain proper housekeeping within the premises.

15. The industry shall provide at least 4 feet free way along the boundary wall towards Air Force Academy for easy access to carryout inspection by the Board Officials.

16. The industry shall submit Bank Guarantee of Rs.4.0 Lakhs recouping amount of Bank Guarantee forfeited in favour of Member Secretary, TSPCB, Hyderabad towards compliance of CFO conditions / directions.

17. The industry shall revalidate the Bank Guarantee of Rs. 8.0 Lakhs submitted to the Board from time to time before its expiry, till further orders of the Board.

10. These directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988.

11. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry. Under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 directing closure of the industry in the interest of Public Health and Environment, without further notice/hearing.

Sd/-
MEMBER SECRETARY

To
M/s. Hetero Drugs Ltd., Unit–I,
Bonthapally (V), Gummadidala (M),
Sangareddy District.

Copy to :

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. He is directed to inspect the industry and shall report the compliance to the Board Office.
3. Concerned file.

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

laptop

Chief Environmental Engineer

(49)

TELANGANA STATE POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

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

Order No.RCP-30/TSPCB/TF/HO/2023- 1649 **Date:12.01.2023**

Sub : TSPCB – **M/s. Hetero Drugs Ltd., Unit–I, Bonthapally Village, Gummadidala Mandal, Sangareddy District** – Air (Prevention and Control of Pollution) Amendment Act, 1987 - **DIRECTIONS** - Issued – Reg.

Ref :
1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions Order No.RCP-30/TSPCB/TF/HO/2017-625, dt. 31.07.2021.
3. Telephonic Complaint received from Sri Srinivas Goud, Ward Member, Sri Mangaiah, Ex Ward member and others of R/o Domadugu Village, Gummadidala (M), Sangareddy District regarding discharge of effluents in to the Nallakunta cheruvu by the industry.
4. Inspection of the industry by Board Officials on 14.07.2022.
5. Hearing held on 15.09.2022.
6. Inspection of the industry by the Committee Member on 21.11.2022.
7. Hearing held on 17.12.2022.

* * * * *

1. **WHEREAS,** you are operating the industry located at Bonthapally, Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021 in connection with a telephonic complaint received from Sri Govardhan Goud MPTC & C.H.Praveen R/o Domadugu Village, Gummadidala (M), Sangareddy District on 26.06.2019 regarding discharge of effluents in to the Nallakunta cheruvu by the industry.

4. **WHEREAS,** vide reference 3rd cited, the Board received a telephonic Complaint from Sri Srinivas, Ward Member, Sri Mangaiah, Ex Ward member and others of R/o Domadugu Village, Gummadidala (M), Sangareddy District on 14.07.2022 regarding discharge of effluents in to the Nallakunta cheruvu by M/s. Hetero Durgs Ltd., Unit-I.

5. **WHEREAS,** vide reference 4th cited, the RO-Sangareddy Officials inspected the Nallakunta cheruvu, its surroundings and also the industry on 08.06.2021 & the Committee Member on 21.11.2022 and the following observations were made:

    1. The complainants alleged that, the industry is discharging effluents which ultimately joining into Nallakunta cheruvu through small kunta located inside the premises of Air Force Academy, Dundigal and causing water pollution in the Nallakunta cheruvu thereby damaging their agricultural fields and requested to take action against the industry.

    2. The Nallakunta cheruvu is located in the downstream of M/s Hetero Drugs Ltd, Unit-I & Air Force Academy, Dundigal. The geography of the area is that the North and North-East side of the cheruvu. (i.e., upstream side) is elevated sloping to towards cheruvu due to which, during the rains storm water / contaminated rain water runoff / surface runoff water if any will ultimately find their way in to low lying area i.e., Nallakunta cheruvu.

3. The surface runoff water from small openings of boundary compound wall of Air Force Academy, Dundigal and joining into Nallakunta cheruvu.
4. The source of surface runoff / contaminated rain water runoff into Air Force Academy, Dundigal is mainly from M/s Hetero Drugs Ltd, Unit-I.
5. The Compliance of the industry on Task Force Directions: Order No. RCP-30/TSPCB/TF/HO/2017, Dt 31.07.2021 with regard to Complaint.

Sl. No	Directions dt 31.07.2021	Compliance
1.	The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.	The non compliance of CFO & HWA conditions submitted in remarks.
2.	The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.	The industry is having above ground RCC tank of capacity 2x250 KL for collection HTDS effluents and the industry is having above grounds RCC tank of capacity 2x120 KL for collection LTDS effluents separately. The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank. The industry has provided ZLD system consisting of Stripper (240 KLD), MEE (240 KLD), ATFD (1x30 M^2 & 1x15 M^2) for treatment of HTDS effluents. During inspection 30 M^2 is in operation. The industry has provided biological ETP of capacity 250 KLD followed by RO System of capacity 300 KLD to treat the LTDS effluents along with condensate of MEE & ATFD. The RO permeate is reused for cooling tower make up and the RO rejects are sent to MEE for evaporation along with other effluents. The industry is having STP of capacity 60 KLD for treatment of domestic waste water. After treatment the treated water is sending to Bio ETP to stabilize the MLSS
3.	The industry shall cover all the effluent tanks with dome connecting the vent to a common scrubber to avoid smell nuisance from the storage tanks.	The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank.
4.	The industry shall provide / maintain adequate capacity of first runoff of rainwater & seepage collection tank with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The industry shall maintain free Board to the collection tanks.	The industry is having 6 Nos of first cut rain water storage sumps of capacity 2000 KL each. During the inspection 2 Nos of sumps are full with first cut rain water of about 100 KL and about 800 KL in other 2 Nos of sumps and 1 No. of sump is empty. The industry has provided bypass arrangement and not provided flow meter to the first cut rain water sump and not maintaining records to quantify the first cut ran water collected and
5.	The industry shall collect the first run off water and the same shall be treated within the premises / send to CETP for further treatment duly following the manifest systems and	

	the same shall be furnished to the Board on monthly basis.	treated.
6.	The industry shall operate the scrubbers continuously and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.	The industry is having 15 Nos of production blocks. The industry has provided 2 Nos. of double stage scrubbers & 35 Nos. of Single stage scrubbers to the 11 Nos of production blocks. The industry has provided 1 No of online pH meters to the double stage scrubbers and connected to production blocks. The industry has provided 1 No. Double stage scrubber with online Ph meter to HCl storage tanks. The industry has provided fume extraction system followed by double stage scrubber with online pH meter to the HTDS collection tank.
7.	The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.	The industry has provided where house for storage of raw materials. The industry has provided shed for storage drums containing raw material / in process goods / MLs / Spent Solvents / Wastes etc on concrete plat form.
8.	The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system and shall dispose the Hazardous Waste regularly in accordance with the CFO&HW order and shall not store beyond 90 days.	The industry is storing the hazardous waste near ATFD shed with dyke wall and leachate collection pit. As per consolidated statement, the industry has disposed about (1582.5 MT) 4.33 MT/ day of Process Inorganic waste, ATFD salts and ETP sludge against consented capacity 9.34 TPD to TSDF and disposed about (1007.14MT) 2.76 MT/day of Process organic residue, Solvent Residue, Stripper Distillate & spent carbon against permitted capacity 16.73 MT/Month to M/s Cement industries (924.04 Tons) & TSDF (83.1 Tons) during period from Jan 2021 to December 2021.
9.	The industry shall provide / maintain online VOC analyzer to monitor VOCs and connect to TSPCB Server.	The industry has provided 3 Nos. of online VOC analyzers at production block, main gate & ZLD area and same are connected to TSPCB server.
10.	The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure continuous data transmission to the TSPCB server.	The industry has provided IP camera to the main gate and same is connected to TSPCB server. The industry has provided digital flow meter & IP camera to RO permeate and connected to TSPCB server.
11.	The industry shall provide and operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.	
12.	The industry shall not discharge any effluent/ leakages / spillages / seepages etc. within the premises and outside the industry premises under any circumstances.	Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, and Biological ETP area.

13.	The industry shall not use any effluent / contaminated waste water in cooling tower under any circumstances.	--
14.	The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks etc.,	During inspection it was observed that Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, and Biological ETP area.
15.	The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD within a month.	Not provided.
16.	The industry shall install the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs within a month.	Not provided.
17.	All the process and vacuum leak sources shall be collected through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed to control air pollution within a month.	Not provided.
18.	The industry shall regularly carryout leak detection and repair study. All the fugitive leak sources shall be monitored and arrested so as to reduce the VOCs concentration in the both work place as well as ambient atmosphere.	The industry has not submitted latest LDAR Study report.
19.	The industry shall maintain proper housekeeping within the premises.	Satisfactory.
20.	The industry shall extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.	The industry has not submitted the BG of Rs. 8.0 Lakhs towards compliance of the directions.

Remarks:

1. During the inspection, Sri. Nagaraju, Plant In charge of the industry was present and the industry was in operation.
2. The industry is having Stripper followed by MEE (200 KLD) and ATFD (15 KLD) for treatment of HTDS effluents. The industry also provided additional Stripper, one more effect (Calendria) to MEE thereby increased the MEE capacity to 250 KLD and additional ATFD (30 KLD) for treatment of HTDS effluents and Primary treatment facility followed by Biological ETP of 250 KLD and RO for treatment of LTDS effluents. During inspection, the ZLD system is in operation.
3. The industry has provided STP of capacity 60 KLD consisting of collection and equalization tank, aeration tank followed by clarifier for treatment of domestic effluents and operating the same.
4. The industry is having 15 Nos of production blocks. The industry has provided 2 Nos. of double stage scrubbers & 35 Nos. of Single stage scrubbers to the 11 Nos of production blocks. The industry has provided 1 No of online PH meters to the double stage scrubbers and connected to production blocks. The industry has provided 1 No. Double stage scrubber with online Ph meter to HCl storage tanks.
5. The industry is operating 8.0TPH coal fired boiler with MDC and bag filters as APCE, the industry has not dismantled 3.0 TPH Coal Fired Boiler and kept it as standby, and it was not in operation.
6. The industry is having 6 Nos of first cut rain water storage sumps of capacity 2000 KL each. During the inspection 2 Nos of sumps are full with

first cut rain water of about 100 KL and about 800 KL in other 2 Nos of sumps and 1 No. of sump is empty. The industry has provided bypass arrangement and not provided flow meter to the first cut rain water sump and not maintaining records to quantify the first cut ran water collected and treated.

7. During inspection, numbers of hose pipes were observed near first cut rain water sumps area and the house keeping observed to be very poor in and around first cut rain water sumps area. Gland and seal leakages were observed in MEE system, Biological ETP and SRP area and housekeeping to be improve in the MEE system, Biological ETP and SRP area.
8. During inspection, it was observed that, effluent leakages and over flow from vacuum pump of MEE causing pungent Ammonia smell nusiance in the area. The house keeping in the vaccum pump of MEE is very poor.
9. The industry has provided breather valves, nitrogen blanketing to the solvent storage tanks.
10. The industry has not provided separate energy meter to APCEs connected to boiler and process vents.
11. The industry has not provided online TDS meter for HTDS Collection tank as per the Schedule B Condition of CFO & HWA Order Dt. 02.07.2022.
12. The industry has provided 3 Nos. of online VOC analyzers at production block, main gate & ZLD area and same are connected to TSPCB server.
13. The industry is having 2 Nos. of SR plant of capacity 68 KLD with (3x10 KL columns, 2x15 KL columns & 1x5 KL columns) & 38 KLD with (2x15 KL columns & 1x8 KL columns) with primary and secondary columns with primary and secondary columns to recover the spent solvents.
14. The industry has not submitted the latest LDAR study report.
15. The industry has not provided sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the ATFD to control air pollution. The industry also not provided scrubber to the ATFD vents.
16. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.
17. The industry has not provided Cryogenic condensation to the process and vacuum leak sources shall be collected through fume extraction system connected to a followed by activated charcoal bed to control air pollution.

6. During the inspection, the Board officials are collected the samples on 14.07.2022 from following locations and the analysis results are as follows:

- Sample collected from HTDS effluent collection tank
- Sample collected from LTDS effluent collection tank
- Sample collected from first cut rain water collection tank
- Sample collected from Nallakunta cheruvu.

2022 – 07214 : Sample collected from HTDS effluent tank.
2022 – 07215 : Sample collected from LTDS effluent tank.

S. No.	Parameter	Method No*	Results	
			07214	07215
1	pH	4500-H^+-B	8.31	7.69
2	Total Suspended Solids (TSS)	2540-D	126	86
3	Total Dissolved Solids (TDS)	2540-C	24,223	4,350
4	Chemical Oxygen Demand (COD)	5220-B	38,142	2,360

2022 – 07216 : Sample collected from First cut rain water collection tank.

S. No.	Parameter	Method No*	Results
			07216
1	pH	4500-H^+-B	7.21
2	Total Suspended Solids (TSS)	2540-D	24
3	Total Dissolved Solids (TDS)	2540-C	682
4	Chemical Oxygen Demand (COD)	5220-B	52
5	Biological Oxygen Demand (BOD)	5210-B	6

6	Oil & Grease	5520-B,D	BDL

7. During the inspection, the Board officials are collected the samples on 11.07.2022 from following locations and the analysis results are as follows:

2022 – 07151 : Sample collected from HTDS effluent tank.

2022 – 07152 : Sample collected from LTDS effluent tank.

S. No.	Parameter	Method No*	Results	
			07151	07152
1	pH	4500-H^+-B	7.82	7.64
2	Total Suspended Solids (TSS)	2540-D	128	78
3	Total Dissolved Solids (TDS)	2540-C	37,796	4,250
4	Chemical Oxygen Demand (COD)	5220-B	42,400	3,200

2022 – 07153 : Sample collected from First cut rain water collection tank.

2022 – 07154 : Sample collected from hot water circulation pump leakages at back side of Production block-A which is joining into by-Pass arrangement of First cut rain water collection tank.

S. No.	Parameter	Method No*	Results	
			07153	07154
1	pH	4500-H^+-B	7.21	7.86
2	Total Suspended Solids (TSS)	2540-D	20	42
3	Total Dissolved Solids (TDS)	2540-C	630	780
4	Chemical Oxygen Demand (COD)	5220-B	76	128
5	Biological Oxygen Demand (BOD)	5210-B	10	14
6	Oil & Grease	5520-B,D	BDL	BDL

6. **WHEREAS,** vide reference 5th cited, the industry was reviewed in the Task Force Committee meeting held on 15.09.2022. After detailed discussions, the committee recommended that the Task Force Committee of the Board shall visit the industry to verify the status of the industry and to submit a report to the Board Office.

7. **WHEREAS,** vide reference 6th cited, the Committee Members inspected the industry on 21.11.2022 and the details of the industry and observations made during inspection are submitted as below:

TOPOGRAPHY:

M/s. Hetero Drugs Ltd, Unit-I, Bonthapally (V), Gummaddala(M), Sangareddy District is not a standalone factory in the Industrial area. M/s Honour Labs is in the Northern side after the intervening connecting road. M/s Pavan drugs, M/s Granules India units are also situated on the northern side after Honour labs on much elevated area .Towards South-South East direction of the unit, Air Force Academy premises (small kunta) followed by Water Body, Nallakunta Chervu is located in the down ward direction with sloping from the Drug manufacturing firm located at an elevated upper region due to which possibility of surface run-off, contaminated rain water run-off or contaminated water from the industry if any, will ultimately may reach low lying down stream water body. Towards western side, Bonthapally & Narsapur highway exists whereas Eastern side of the Unit open land with around SIX feet above the manufacturing unit exists. Several water lines(fixed) and some hoses are found on the above six feet compound wall (with Kirby Sheets for safety purpose) for water and fire hydrant purposes.

The M/s. Hetero Drugs Ltd, Unit-I, has 15 number of production blockswith sufficient green belt.

POINTS raised in the TF meeting and Compliance measures:

Sri.Srinivas, Ward Member, Sri.Mangaiah Ex-Ward Member and Sri. Sudhakar Reddy and others of Domadugu Village, Gummadidala(M) of Sangareddy District attended the TF meeting in person and complained of.,

1) Discharge of untreated Effluents in to Nallakunta Chervu by the company.

2) The industry has constructed 6 numbers of first cut rain water collection pits (1900KL each), First one near to the boundary wall of Air Force Academy and 6th one just adjacent to company entrance gate with a by-pass arrangement (as per PCB guidelines) for excess water, however, NO Flow meter was placed to record to quantify the water let out into AFAcademy is arranged.

2) Complainants also alleged that contaminated effluents are let off through a separate pipeline in to Air Force academy boundary wall ultimately joining in to Nallakunta Chervu through small openings of AFA boundary wall.

All the untreated water is ultimately entering in to Nallakunta chervu and damaging the surrounding agricultural fields.

INTERACTION WITH UNIT OFFICIALS & COMPLAINANTS:

Committee members first interacted with Sri. NagaRaju, GM & Sri. Venkateshwar Reddy, Plant Head. After much persuasion from PCB and Committee Members, M/s.Hetero Drugs Unit management agreed for the entry of complainant, Sri.Mangaiah of Domadugu, Bonthapally, in to the premises.

The team went around the Unit, First Cut Rainwater Collection Pits (6numbers), MEE and ETP area. All of the complainant views were given patient hearing in presence of Company management and seen all the alleged/ suspicious places wherever he had doubts including a Grave yard area outside the factory. Complainant claims that due to alleged discharges the approach road to graveyard is not amenable with dead bodies and said it is much difficult during rainy days.

Committee members and Complainant visited the NallakuntaChervu, 500 meters away from Hetero Drugs unit-I and adjacent to Narsapur highway, where to the suspected contaminants are expected to enter. Few fields with Paddy cultivation could be noticed beyond Nallakunta Chervu irrigation area.

OBSERVATIONS:

During the inspection, the industry was in operation.

Peculiar odour was observed in the production, ETP and MEE areas as all activities are on including ATFD.

Lot of leakages and stagnation were seen in the MEE area, however, management has clarified that the stagnations are intermittently pumped out for treatment and are in the process of rectifying the leaks/ refurbishing the area.

Four of Six, first cut rain Water collection tanks are full though RAINS have stopped almost a month back and other 2 Tanks (1&2) are empty. Management claims that the rainwater is being treated in the biological ETP in a phased manner.

First cut rain water pits have by-pass arrangement system (concreted 4 feet deep underground line from Northern end of Unit to Southern end) up to compound wall near to AF Academy with many manholes in between. No flow of any water is noticed and Committee insisted on to open the crest gate of Last manhole. Hardly few litres of water (not even sufficient for bottling for test) came out. No Flow meter to record and quantify the water let out is arranged.

One drain line (STP WATER) from M/s Honour Labs, R&D Unit situated towards North East side also enters into First Cut rain water tanks.

CONCLUSION & REMARKS:

1. M/s Hetero Drugs Unit-I is involved in Bulk Drug Production. Production is within the consented capacity.
2. House-keeping in the plant premises needs to be improved as gland/ seal leakages observed in the MEE, SRP area and also in the Biological ETP area.
3. The team could observe peculiar smell in general and MEE/ZLD/ETP facility in particular.
4. The unit has SIX FIRST CUT RAIN Water collection pits of 1900KL each with FOUR tanks full to brim. Though by-pass arrangement with many manholes all

along the line is provided but not provided flow meter to record and quantify the water let out. Committee suggested to the management to collect a SAMPLE before lifting the crest gate of Last manhole to let-off excess rain water through by-pass line into AFA area and inform the same to PCB if possible with a video recording evidence.

5. There is a scope for contaminated water (First cut rain Water) entering in to the manholes. Committee suggested to the management to lay or deepen the existing small drain line/ increase the side wall so as to avoid contaminated water from entering manholes directly and instead divert towards Northern end from opposite to Service road junction up to concreted by-pass line beginning or storage tank.
6. The industry has not provided sub cooler condensers followed by activated Charcoal bed to ATFD vent to control VOCs.
7. The complainants further alleged that the unit is discharging untreated effluents through a separate pipeline in to the Nallakunta Chervu apart from bypass line, which the committee could not find since one need to enter Air Force Academy(AFA) area to verify it. However, committee members tried to view from top of the nearest Service Block in to AFA area & observed that there exists a PUCCA TAR ROAD all along the compound wall and do not found any seepages/leakages or small kunta except a small lagoon of Water little away from TAR ROAD.
8. The Complainants claim that during the rainy days, heavy outflow of water noticed from the industry reaching small tank inside the AFA, then joining Nallakunta Chervu causing pollution.
9. Approach road to Graveyard. Committee members noticed white mark of contaminants dried up all the way. This is attributed to facility attached to Honour labs R&D unit where a storage yard and waste/useless engineering items are stored. Chances of waste oil dumps or other things from condemned materials are not ruled out.

8. **WHEREAS,** vide reference 7th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 17.12.2022. The industry representative attended the meeting. After detailed discussions, the Committee recommended to issue certain directions to your industry, after submitting the time bound action plan on non compliance and also recommended to forfeit the Bank Guarantee of Rs.4.0 Lakhs.

9. **WHEREAS,** after careful consideration of the material facts of the case, **the Board hereby issue following directions to your industry to comply with:**

   1. The industry shall cover all the effluent tanks with dome connecting the vent to a common scrubber to avoid smell nuisance from the storage tanks.
   2. The industry shall operate the scrubbers continuously and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.
   3. The industry shall provide / maintain online VOC analyzer to monitor VOCs and connect to TSPCB Server.
   4. The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server.
   5. The industry shall provide / maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.
   6. The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD within a month.
   7. The industry shall install the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs within a month.
   8. The industry shall regularly carryout leak detection and repair study. All the fugitive leak sources shall be monitored and arrested so as to reduce the VOCs concentration in the both work place as well as ambient atmosphere.

9. The industry shall not cause any air pollution / odour nuisance in the surrounding areas.

10. These directions are issued under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.

11. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry. Under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 directing closure of the industry in the interest of Public Health and Environment, without further notice/hearing.

Sd/-
MEMBER SECRETARY

To
M/s. Hetero Drugs Ltd., Unit-I,
Bonthapally (V), Gummadidala (M),
Sangareddy District.

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

Chief Environmental Engineer

Annexure – III

(58)

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974
(AS AMENDED BY ACT 53 OF 1988)

Order No.RCP-30/TGPCB/TF/HO/2025- 416 **Date:03.05.2025**

Sub : TGPCB – **M/s Hetero Drugs Ltd., Unit – I, Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District** – Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **DIRECTIONS** – **ORDER ISSUED** – Reg.

Ref :
1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions issued on 31.07.2021 & 12.01.2023.
3. The Board received a complaint from local residents of Domadugu (V), regarding discharge of effluents into Nallakunta cheruvu by the industry.
4. Hearing held on 11.07.2024.
5. The Task Force Committee Members along with RO officials inspected the industry on 03.08.2024.
6. Hearing held on 23.01.2025.
7. The Task Force Committee Members along with RO officials inspected the industry on 04.03.2025.
8. The RO, RC Puram has received a complaint from M.Jaipal Reddy on 15.04.2025 regarding the industry is discharging the effluents into the Nallakunta Cheruvu.
9. Inspection of the industry by RO officials on 16.04.2025.
10. Hearing held on 01.05.2025.

AEE-I PI inspect & report 7/5

* * * * *

1. **WHEREAS,** you are operating the industry located at Bonthapally, Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021 & 12.01.2023 in connection with complaints.

4. **WHEREAS,** vide reference 3rd cited, the Board received a complaint from local residents of Domadugu (V), regarding discharge of effluents into Nallakunta cheruvu by the industry.

5. **WHEREAS,** vide reference 4th cited, the RO RC Puram Officials inspected the industry on 07.06.2024 & 11.06.2024 and submitted the report to the Board Office. The status of the industry was reviewed in the Task Force Committee meeting held on 11.07.2024. After detailed discussions, the Committee recommended to defer the issue and also recommended to inspect the industry by the Task Force Committee Members and submit the report within 15 days.

6. **WHEREAS,** vide reference 5th & 6th cited, the Task Force Committee Members along with RO officials inspected the industry on 03.08.2024 and submitted the report to the Board Office on 17.01.2025 & 21.01.2025. The status of the industry was reviewed in the Task Force Committee meeting held on 23.01.2025. After detailed discussions, the Committee recommended to re-inspect the industry by Task Force Committee Members.

7. **WHEREAS,** vide reference 7th cited, the Task Force Committee Members along with RO officials inspected the industry on 04.03.2025 and submitted the report to the Board Office on 08.04.2025. The following non-compliances are as follows:

1. During inspection, ZLD was not in operation.
2. Spillages of effluents observed near first-cut rain water storage tanks.
3. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
4. The industry is storing HTDS, LTDS effluents in open type MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
5. The clarifier provided near HTDS storage area was not in working condition.
6. The industry is using flexible pipe lines for transfer of effluents in the ZLD area.
7. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks – III, IV, V & VI and tanks - IV, V & VI were full.
8. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
9. Industry has not provided odour control measures near ETP, MEE and ATFD area.
10. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
11. Industry has not provided separate energy meter to APCEs connected to boiler and process vents.
12. The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
13. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
14. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems provided to the production blocks to arrest the VOCs.
15. The VOC value observed near HTDS scrubber in a range of 45.4 to 57.4 PPM.
16. VOC observed near Solvent recovery column in a range of 15.6 PPM to 16.8 PPM
17. During inspection, it was observed that, the industry has stored process residue/spent solvent drums openly near Effluents storage tanks area.
18. The industry has not submitted the latest LDAR study report. Earlier, the industry has conducted LDAR study in Dec'2023 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.

8. **WHEREAS,** vide reference 8th cited, the RO, RC Puram has received a complaint from M. Jaipal Reddy on 15.04.2025 regarding the industry is discharging the effluents into the Nallakunta Cheruvu.
9. **WHEREAS,** vide reference 9th cited, the RO RC Puram Officials inspected the industry on 16.04.2025 and submitted the report to Board office on 28.04.2025. The following non- compliances were observed:
    1. Spillages of effluents observed near first-cut rain water storage tanks.
    2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
    3. The industry is storing HTDS, LTDS effluents in open type MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.

4. The clarifier provided near HTDS storage area was not in working condition.
5. The industry is using flexible pipe lines for transfer of effluents in the ZLD area.
6. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks – III, IV, V & VI and tanks - IV, V & VI were full.
7. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
8. Industry has not provided odour control measures near ETP, MEE and ATFD area.
9. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
10. Industry has not provided separate energy meter to APCEs connected to boiler and process vents.
11. The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
12. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
13. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems provided to the production blocks to arrest the VOCs.
14. The VOC value observed near HTDS scrubber in a range of 45.4 to 57.4 PPM.
15. VOC observed near Solvent recovery column in a range of 15.6 PPM to 16.8 PPM
16. During inspection, it was observed that, the industry has stored process residue/spent solvent drums openly near Effluents storage tanks area.
17. The industry has not submitted the latest LDAR study report. Earlier, the industry has conducted LDAR study in Dec'2023 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.
18. During inspection, the ZLD is in operation.
19. Industry has provided partition for storage of hazardous waste near ATFD area. However, during inspection, the industry has started constructing new MEE system of capacities (Stripper – 200 KLD, MEE – 200 KLD and ATFD – 40 m2) in addition to the existing MEE system in place of hazardous waste storage area.
20. The industry has not maintaining records on source of starting raw material / Intermediates for each product-wise and the consolidated records not submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials.
21. Industry is not maintaining records of hazardous waste and effluent generation and disposal.

10. **WHEREAS,** vide reference 10th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 01.05.2025. The complainants, RO-RC Puram and representative of the industry have attended the meeting.

I. The Committee noted the following non-compliances:

NON-COMPLIANCES AS PER TF COMMITTEE INSPECTION REPORT:

1. During inspection, ZLD was not in operation.
2. Spillages of effluents observed near first-cut rain water storage tanks.
3. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
4. The industry is storing HTDS, LTDS effluents in open type MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
5. The clarifier provided near HTDS storage area was not in working condition.
6. The industry is using flexible pipe lines for transfer of effluents in the ZLD area.
7. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks – III, IV, V & VI and tanks - IV, V & VI were full.
8. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
9. Industry has not provided odour control measures near ETP, MEE and ATFD area.
10. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
11. Industry has not provided separate energy meter to APCEs connected to boiler and process vents.
12. The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
13. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
14. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems provided to the production blocks to arrest the VOCs.
15. The VOC value observed near HTDS scrubber in a range of 45.4 to 57.4 PPM.
16. VOC observed near Solvent recovery column in a range of 15.6 PPM to 16.8 PPM
17. During inspection, it was observed that, the industry has stored process residue/spent solvent drums openly near Effluents storage tanks area.
18. The industry has not submitted the latest LDAR study report. Earlier, the industry has conducted LDAR study in Dec'2023 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.

NON-COMPLIANCES AS PER RO INSPECTION REPORT IN ADDITION TO THE ABOVE NON-COMPLIANCES:

1. During inspection, the ZLD is in operation.
2. Industry has provided partition for storage of hazardous waste near ATFD area. However, during inspection, the industry has started constructing new MEE system of capacities (Stripper – 200 KLD, MEE – 200 KLD and ATFD – 40 m2) in addition to the existing MEE system in place of hazardous waste storage area.
3. The industry has not maintaining records on source of starting raw material / Intermediates for each product-wise and the consolidated records not submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials.

4. Industry is not maintaining records of hazardous waste and effluent generation and disposal.

II. Complainants informed that, they are regularly giving complaints against the industry regarding discharge of effluents in to the Nallakunta Cheruvu which is causing water pollution in the Cheruvu and the same water is being used for their agricultural lands which is reducing their crop yield. Till now the Board has not taken any action against the industry. The complainants requested the Board to take action against the industry.

III. Industry informed the following:

1. Due to maintenance (welding) work at MEE Plant, safety work permit was issued at ZLD Plant. Due to this reason, we have stopped ZLD Plant and the same was observed by committee members during their inspection.
2. They removed all the spillages and maintaining good housekeeping at Rain water storage tanks.
3. They have covered the spillages with fresh soil at NE corner of first cut rain water tanks. As a part of ground leveling & civil project work at NE corner of the first cut rainwater tanks, we have covered the undulating area with fresh soil to avoid stagnation of water.
4. They have cleared the effluents which were stored in open types MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
5. Due to motor problem, the clarifier was not in operating condition at the time of inspection. We have arranged new motor. Now, the clarifier in working condition.
6. They have removed flexible pipelines which were observed by board officials during the inspection with committee members. They have provided fixed lines for transfer of effluent at ZLD area.
7. They have provided first cut rain water collection tanks for storage of first cut rainwater as per the directions issued by TGPCB.
8. The water which was stored in rainwater collection tank-IV, V & VI is not effluent. It is first cut rainwater collection tanks. The same was observed by committee members during their inspection. The same was treated and reused.
9. As part of site security, instead of 4 feet freeways along the boundary wall towards Air Force Academy. We have provided openings in the boundary wall to view the open area towards Air Force Academy.
10. They have provided PIIAN odour suppressant system at MEE and ATFD area to control odour at ZLD Plant.
11. They have obtained CFE of 20 TPH boiler. Presently, we have installed and operating 12 TPH coal fired boiler in place of permitted boilers of capacities (8 TPH & 3 TPH) and the same was informed to board office vide our letter dated 13.03.2023. Meanwhile, they also submitted COPM application along with boilers to board office to regularize 12 TPH boiler with 8 TPH Standby.
12. They have provided separate energy meter APCEs connected to Boiler and process vents.
13. They have provided Breathers values with Nitrogen Blanketing to avoid VOC emissions to all bulk storage tanks.
14. They have connected ATFD vent to condensing system and the condenser vent is connected to double stage scrubbing system to combat VOC emissions. The provision of activated charcoal bed is not feasible in view of safety and the same has been informed previous taskforce meeting as a group concern.
15. The provision of activated charcoal bed to the vents of scrubbing system technically and safety point of view is not feasible.

16. They have connected process vents to primary and secondary condensing system with chilled Brine and RT water cooling media and the condenser vent is connected to scrubbing systems to combat VOC emissions at process areas.
17. They have taken measures to minimize VOC emissions near HTDS scrubber.
    - Monitoring pH of scrubbing liquid.
    - Maintaining and monitoring all the lids of HTDS effluent storage tank in closed condition of Hood and scrubbing system provided at HTDS effluents storage tank.
18. They have taken measures to minimize VOC emissions at Solvent Recovery Column by maintaining and monitoring cooling system of primary, secondary condensing systems.
19. They have removed process residue drums which were observed during inspection by Board officials along with committee members and the drums were disposed to Ramky on next day of inspection. They are not storing process residue drums openly near effluent storage tanks areas.
20. They have conducted latest LDAR studies during in the month of Jan'2025. We have submitted the report on 06.02.2025 to Region Office.
21. Due to New MEE installation work modification works are in progress at the existing Hazardous waste storage tank.
22. They are maintaining records for the key raw materials procurements and the same will be submitted to Board office along with our regularly monthly submission.
23. They are maintaining HW and effluent records.

After detailed discussions, the committee recommended the following:

- Issue Directions with certain conditions to comply with.
- The industry shall lift the contaminated rain water present in the 6 Nos. of Tanks to M/s. PETL, Patancheru / M/s.JETL, Jeedimetla within 15 days.
- The industry shall carryout the detailed study of Nallakunta Cheruvu with reputed Organization / Institute.
- The industry shall conduct the ZLD performance study through accredited organization.
- The RO shall re-inspect the industry after 20-25 days along with complainants.

11. **WHEREAS,** after careful consideration of the material facts of the case, **the Board hereby issue following directions to your industry to comply with:**
    1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
    2. The industry shall collect the effluents in the above ground level tanks duly maintaining sufficient free board to avoid over flows and shall dispose the same as per CFO&HWA conditions.
    3. **The industry shall lift the contaminated rain water present in the 6 Nos. of Tanks to M/s. PETL, Patancheru / M/s. JETL, Jeedimetla within 15 days.**
    4. **The industry shall carryout the detailed study of Nallakunta Cheruvu with reputed Organization / Institute.**
    5. **The industry shall conduct the ZLD performance study through accredited organization.**
    6. The industry shall continue to segregate the effluents into HTDS and LTDS. The HTDS effluents shall be treated in stripper, MEE and ATFD. The MEE condensate & LTDS effluents shall be treated in Biological ETP followed RO

system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.

7. The industry shall provide and maintain adequate Bio culture in the aeration tanks of the Biological ETP.
8. The industry shall operate Biological ETP effectively based on the sudden shock loads due to production of different products so as to reduce the load on RO Plant for effective operation.
9. The industry shall ensure that, ZLD system is operated effectively to control water pollution and odour nuisance to the surrounding areas.
10. The industry shall dispose the first cut rain water regularly to the CETP or treated in their ZLD system and also not to store the same for longer periods and maintain free board to the tanks to avoid overflows/discharges into outside the premises which is finally leads to nearby water bodies.
11. The industry shall collect the first run off water and the same shall be treated within the premises or send to CETP at Patancheru for further treatment duly following the manifest systems.
12. The industry shall provide digital flow meter for the first run off water tank and maintain separate records for the first run off water collected, treated & disposed and the same shall be furnished to the Board on monthly basis.
13. The industry shall restrict the quantities of production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities as mentioned in the CFO&HWA order and shall maintain the records separately.
14. The industry shall operate / maintain digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper / MEE feed; condensate of MEE & ATFD, RO rejects, RO permeate etc
15. The industry shall not discharge any waste water / effluent / contaminated rain water/ spillages / seepages / leakages within & outside the industry premises under any circumstances.
16. The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks, at MEE area and regularly maintain the same.
17. The industry shall store drums containing raw material / in process goods / MLs /spent solvents / wastes etc., on the concrete platform under covered shed with dyke walls & proper leachate collection system and the industry shall not store drums openly on ground.
18. The industry shall collect & store the hazardous waste in an elevated closed shed with impervious lining and leachate collection system and shall dispose the Hazardous Waste regularly in accordance with the CFO&HWA order.
19. The industry shall continuously operate the online monitoring system provided as per the directions of CPCB and shall ensure continuous data transmission to the TGPCB server.
20. The industry shall provide & maintain PTZ (Pan Tilt Zoom) additional cameras to focus the entire premises duly covering ZLD/ effluents storage area, boiler stack & entire boundary of the plant within one month and connect the same to TGPCB Server.
21. The industry shall provide/maintain operate IP cameras at main gate entrance and shall be connected to the TGPCB Server.
22. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed. There shall not be any discharge / spillages of effluent within or outside the premises.
23. The industry shall maintain good housekeeping within the plant premises.
24. The industry shall revalidate the Bank Guarantee submitted to the Board from time to time before its expiry, till further orders of the Board.

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

13. You are hereby directed to note that, should you misuse these orders to operate the industry violating any of the conditions mentioned above, your unit may be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you may also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

Sd/-
MEMBER SECRETARY

To
M/s Hetero Drugs Ltd., Unit – I,
Sy. No. 213, 215 & 253, Bonthapally Village,
Gummadidala (M), Sangareddy District

Copy to :

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. The RO shall re-inspect the industry after 20-25 days along with complainants
3. Concerned file.

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

(66)

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

AIR (PREVENTION AND CONTROL OF POLLUTION) ACT 1981 (AS AMENDED BY ACT 47 OF 1987)

Order No.RCP-30/TGPCB/TF/HO/2025-415 **Date:03.05.2025**

Sub : TGPCB – **M/s Hetero Drugs Ltd., Unit – I, Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District** – Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) - **DIRECTIONS – ORDER ISSUED** – Reg.

Ref :
1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions issued on 31.07.2021 & 12.01.2023.
3. The Board received a complaint from local residents of Domadugu (V), regarding discharge of effluents into Nallakunta cheruvu by the industry.
4. Hearing held on 11.07.2024.
5. The Task Force Committee Members along with RO officials inspected the industry on 03.08.2024.
6. Hearing held on 23.01.2025.
7. The Task Force Committee Members along with RO officials inspected the industry on 04.03.2025.
8. The RO, RC Puram has received a complaint from M.Jaipal Reddy on 15.04.2025 regarding the industry is discharging the effluents into the Nallakunta Cheruvu.
9. Inspection of the industry by RO officials on 16.04.2025.
10. Hearing held on 01.05.2025.

* * * * *

1. **WHEREAS,** you are operating the industry located at Bonthapally, Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021 & 12.01.2023 in connection with complaints.

4. **WHEREAS,** vide reference 3rd cited, the Board received a complaint from local residents of Domadugu (V), regarding discharge of effluents into Nallakunta cheruvu by the industry.

5. **WHEREAS,** vide reference 4th cited, the RO RC Puram Officials inspected the industry on 07.06.2024 & 11.06.2024 and submitted the report to the Board Office. The status of the industry was reviewed in the Task Force Committee meeting held on 11.07.2024. After detailed discussions, the Committee recommended to defer the issue and also recommended to inspect the industry by the Task Force Committee Members and submit the report within 15 days.

6. **WHEREAS,** vide reference 5th & 6th cited, the Task Force Committee Members along with RO officials inspected the industry on 03.08.2024 and submitted the report to the Board Office on 17.01.2025 & 21.01.2025. The status of the industry was reviewed in the Task Force Committee meeting held on 23.01.2025. After detailed discussions, the Committee recommended to re-inspect the industry by Task Force Committee Members.

7. **WHEREAS,** vide reference 7th cited, the Task Force Committee Members along with RO officials inspected the industry on 04.03.2025 and submitted the report to the Board Office on 08.04.2025. The following non-compliances are as follows:

    1. During inspection, ZLD was not in operation.
    2. Spillages of effluents observed near first-cut rain water storage tanks.
    3. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
    4. The industry is storing HTDS, LTDS effluents in open type MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
    5. The clarifier provided near HTDS storage area was not in working condition.
    6. The industry is using flexible pipe lines for transfer of effluents in the ZLD area.
    7. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks – III, IV, V & VI and tanks - IV, V & VI were full.
    8. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
    9. Industry has not provided odour control measures near ETP, MEE and ATFD area.
    10. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
    11. Industry has not provided separate energy meter to APCEs connected to boiler and process vents.
    12. The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
    13. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
    14. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems provided to the production blocks to arrest the VOCs.
    15. The VOC value observed near HTDS scrubber in a range of 45.4 to 57.4 PPM.
    16. VOC observed near Solvent recovery column in a range of 15.6 PPM to 16.8 PPM
    17. During inspection, it was observed that, the industry has stored process residue/spent solvent drums openly near Effluents storage tanks area.
    18. The industry has not submitted the latest LDAR study report. Earlier, the industry has conducted LDAR study in Dec'2023 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.

8. **WHEREAS,** vide reference 8th cited, the RO, RC Puram has received a complaint from M. Jaipal Reddy on 15.04.2025 regarding the industry is discharging the effluents into the Nallakunta Cheruvu.

9. **WHEREAS,** vide reference 9th cited, the RO RC Puram Officials inspected the industry on 16.04.2025 and submitted the report to Board office on 28.04.2025. The following non- compliances were observed:

    1. Spillages of effluents observed near first-cut rain water storage tanks.
    2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.

3. The industry is storing HTDS, LTDS effluents in open type MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
4. The clarifier provided near HTDS storage area was not in working condition.
5. The industry is using flexible pipe lines for transfer of effluents in the ZLD area.
6. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each. During inspection, industry is storing effluents in first cut Rain water tanks – III, IV, V & VI and tanks - IV, V & VI were full.
7. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
8. Industry has not provided odour control measures near ETP, MEE and ATFD area.
9. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
10. Industry has not provided separate energy meter to APCEs connected to boiler and process vents.
11. The industry has not provided vent condensers to solvent storage tanks. However, the industry has provided Nitrogen blanketing to avoid VOC Emissions.
12. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
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16. During inspection, it was observed that, the industry has stored process residue/spent solvent drums openly near Effluents storage tanks area.
17. The industry has not submitted the latest LDAR study report. Earlier, the industry has conducted LDAR study in Dec'2023 through M/s. Kiwis Eco Laboratory Pvt. Ltd., Hyderabad.
18. During inspection, the ZLD is in operation.
19. Industry has provided partition for storage of hazardous waste near ATFD area. However, during inspection, the industry has started constructing new MEE system of capacities (Stripper – 200 KLD, MEE – 200 KLD and ATFD – 40 m2) in addition to the existing MEE system in place of hazardous waste storage area.
20. The industry has not maintaining records on source of starting raw material / Intermediates for each product-wise and the consolidated records not submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials.
21. Industry is not maintaining records of hazardous waste and effluent generation and disposal.

10. **WHEREAS,** vide reference 10th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 01.05.2025. The complainants, RO-RC Puram and representative of the industry have attended the meeting.

I. The Committee noted the following non-compliances:

NON-COMPLIANCES AS PER TF COMMITTEE INSPECTION REPORT:

1. During inspection, ZLD was not in operation.
2. Spillages of effluents observed near first-cut rain water storage tanks.
3. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
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8. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
9. Industry has not provided odour control measures near ETP, MEE and ATFD area.
10. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
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submitted to R.O., R.C. Puram every month along with invoice copies of the starting raw materials.

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II. Complainants informed that, they are regularly giving complaints against the industry regarding discharge of effluents in to the Nallakunta Cheruvu which is causing water pollution in the Cheruvu and the same water is being used for their agricultural lands which is reducing their crop yield. Till now the Board has not taken any action against the industry. The complainants requested the Board to take action against the industry.

III. Industry informed the following:

1. Due to maintenance (welding) work at MEE Plant, safety work permit was issued at ZLD Plant. Due to this reason, we have stopped ZLD Plant and the same was observed by committee members during their inspection.
2. They removed all the spillages and maintaining good housekeeping at Rain water storage tanks.
3. They have covered the spillages with fresh soil at NE corner of first cut rain water tanks. As a part of ground leveling & civil project work at NE corner of the first cut rainwater tanks, we have covered the undulating area with fresh soil to avoid stagnation of water.
4. They have cleared the effluents which were stored in open types MS tanks near HTDS, LTDS storage and pre-treatment area and ETP area.
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    - Monitoring pH of scrubbing liquid.
    - Maintaining and monitoring all the lids of HTDS effluent storage tank in closed condition of Hood and scrubbing system provided at HTDS effluents storage tank.
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After detailed discussions, the committee recommended the following:

- Issue Directions with certain conditions to comply with.
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- The industry shall conduct the ZLD performance study through accredited organization.
- The RO shall re-inspect the industry after 20-25 days along with complainants.

11. **WHEREAS,** after careful consideration of the material facts of the case, **the Board hereby issue following directions to your industry to comply with:**

1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
2. The industry shall obtain amendment to CFO for Boilers immediately.
3. The industry shall provide dome with suction hood followed by scrubber to the HTDS effluent storage tanks to control the odour nuisance.
4. The industry shall continuously operate scrubbers with online pH meter for control of process emissions and shall take appropriate additional measures for control smell nuisance within & outside the industry premises.
5. The industry shall provide automatic system for scrubbing media of scrubbers along with online pH meter. The industry shall carryout regular calibration for pH meter.

6. The industry shall transfer the chemicals / effluent / in process material in closed conditions to avoid smell nuisance.

7. The industry shall operate & maintain online VOC monitoring system and connect the same to the Board server. The industry shall carryout regular calibration for VOC meter.

8. The industry shall provide / maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.

9. The industry shall install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.

10. The industry shall install the sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing systems so as to arrest the VOCs.

11. The industry shall carryout Leak Detection and Repair Study (LDAR) to assess the solvent losses and based on the study, the industry shall take necessary steps to arrest the solvent losses and reduce VOCs in the premises.

12. The industry shall not cause any air pollution / odour nuisance to the surrounding.

12. 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).

13. 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 Hetero Drugs Ltd., Unit – I,
Sy. No. 213, 215 & 253, Bonthapally Village,
Gummadidala (M), Sangareddy District

Copy to :

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. The RO shall re-inspect the industry after 20-25 days along with complainants
3. Concerned file.

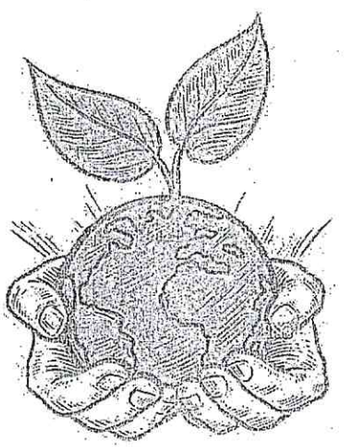
//T.C.F.B.O//

Senior Environmental Engineer
(Task Force - UH-IV)

Annexure-IV

(73)

Study of pink pigmentation in Nallakunta Cheruvu, Domadugu Village, Gummadidal Mandal, Sangareddy District.



A report submitted By

Dr. D.V. Sai Praneeth
Assistant Professor,
Department of Civil Engineering,
IIT Hyderabad

भारतीय प्रौद्योगिकी संस्थान हैदराबाद
Indian Institute of Technology Hyderabad

(74)

Study on Nallakunta Cheruvu

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Study of Nallakunta Cheruvu

1. Background and Objective

Nallakunta Cheruvu is located in Domadugu Village, Gummadidal Municipality, Sangareddy District (Latitude: 17°0.611′ N; Longitude: 78°0.081′ E). The location map and photographic view of Nallakunta Cheruvu are presented in Figure 1 and Figure 2. The present study focuses on the physicochemical and bacteriological/microbiological assessment of the lake water, as the Cheruvu has exhibited unusual pink pigmentation.

This investigation was carried out by Dr. D. V. Sai Praneeth, Doctorate in Environmental Engineering and Assistant Professor, Department of Civil Engineering, IIT Hyderabad, on behalf of Hetero Drugs Limited, Unit-I, Bonthapally, in accordance with the directions issued by the Telangana State Pollution Control Board (TSPCB) for conducting a detailed study of Nallakunta Cheruvu.

For evaluating the water quality of Nallakunta Cheruvu, a set of physicochemical and bacteriological/microbiological parameters were selected. The objective of the study was to assess the overall water quality and to identify the potential causes responsible for the observed pink pigmentation in the Cheruvu water

Reconnaissance, Sampling, and Field Observations

A reconnaissance visit and preliminary survey were carried out during September 2025 to develop an appropriate sampling strategy and to understand the environmental settings surrounding Nallakunta Cheruvu.

During the field survey, the following key observations were documented:

1. Nallakunta Cheruvu was observed at full tank level, attributed to recent rainfall in the region.
2. The surface water exhibited distinct pink pigmentation, as captured in the photographs presented in Figure 2.
3. Vertical openings were noted in the compound wall of the Air Force Academy, facilitating inflow of upstream runoff into the lake.
4. M/s. Hetero Drugs Limited is situated approximately 1.5 km north (upstream) of the lake.
5. A local dump yard and cattle/buffalo farm were identified near the lake boundary, indicating potential organic load contribution.
6. The lake is surrounded by significant greenery, contributing to the natural landscape.
7. A noticeable odorous smell resembling hydrogen sulfide (H_2S) was detected around the lake.

Study of Nallakunta Cheruvu

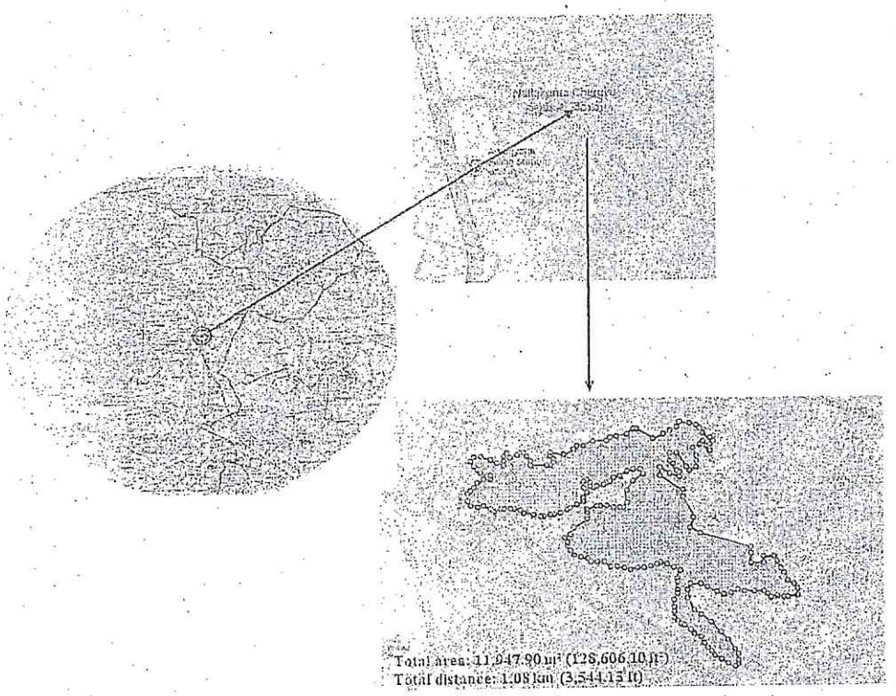

Figure 1 Location of Nallakunta Cheruvu, Domadugu Village, Gummadidal Mandal,

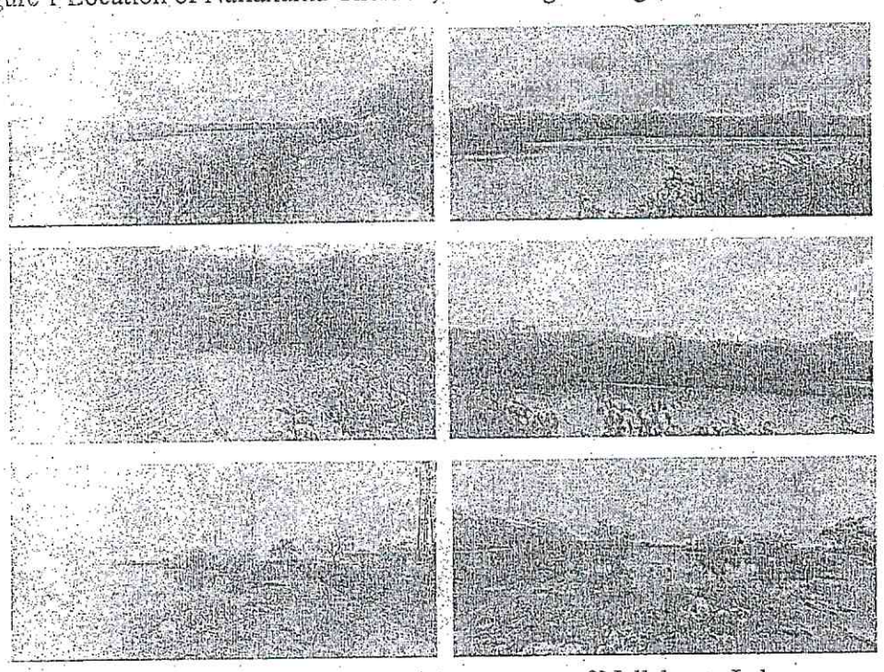

Figure 2 : Surroundings and Appearance of Nallakunta Lake

2. Materials and Methods

A total of twelve representative water samples (S1–S12) were collected from various strategic locations across Nallakunta Cheruvu. The samples were stored in 2-liter sterilized plastic containers (shown in Figure III) to ensure preservation of sample integrity for both physicochemical and bacteriological analyses. Following collection, the samples were transported to IIT Hyderabad, IICT, and CCMB for comprehensive laboratory examination. Detailed sampling information is presented in Table 1.

The physicochemical parameters analyzed included Color, pH, dissolved oxygen (DO), total nitrogen (TN), turbidity, total dissolved solids (TDS), hardness, chemical oxygen demand (COD), Fluoride, Choride, Nitrate, Phosphate, Sulphate and metal concentrations etc.,

Bacteriologial and Microbiological Parameter includes

1. Chlorophyll-a (surface & integrated) indicates algal biomass.
2. Phycocyanin / phycoerythrin (fluorimetric) — detects cyanobacteria (blue green) &amp.
3. some pigmented microbes.
4. Microscopic phytoplankton & bacterioplankton ID & cell counts (light
5. microscopy) detect pigmented algae, cyanobacteria, pigmented bacteria/archaea.
6. Total heterotrophic plate count (HPC) general culturable bacteria estimate.
7. Total coliforms / E. coli / Enterococci — public-health microbial indicators
8. 16S rRNA amplicon sequencing— community composition; detects halophiles,
9. pigment-producing taxa, and plant/archaea signatures.
10. qPCR for specific markers (if you suspect cyanobacteria or known pigment
    a. Productors: e.g., mcy genes (microcystin), pcp or other pigment genes, or taxon-
    b. specific primers.

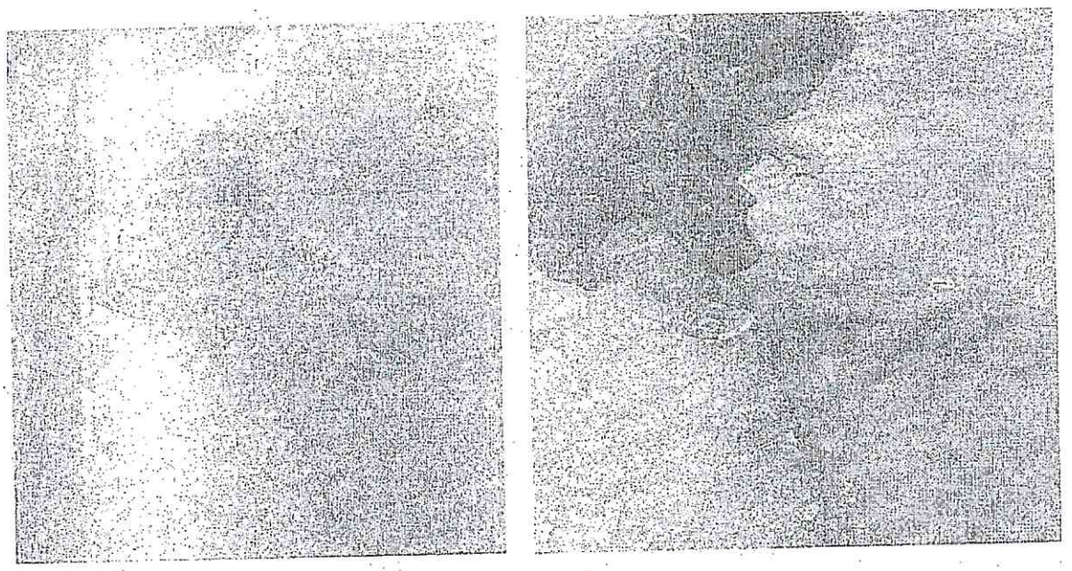

Figure 3 Collection of Samples at Nallakunta Lake

Table 1. Details of Analysis

Type of Analysis	Institute
Physical & Chemical Parameters	IIT -Hyderabad
Metal Concentrations	IICT -Hyderabad
Bacteriological / Microbiological Parameters	CCMB- Hyderabad

3. Results and discussions

3.1. Physical and Chemical Characterization

Table 2. Physical and Chemical characterization of collected water samples from Nallakunta Lake

Parameter	S1 Latitude: 17°39'32.4 N Longitude: 78 °22'33.5 E	S2 Latitude: 17°39'27.4 N Longitude: 78°22'42 E	S3 Latitude: 17°39'30.5 N Longitude: 78 °22'43.2 E
pH	7.7	7.52	7.47
TDS (mg/l)	407	501	507
Turbidity (NTU)	64	100	103
TN (mg/l)	36	45	40

COD (mg/l)	120	136	136
Hardness (mg/l)	95	80	90
DO*	-	-	-
Fluoride (mg/l)	0.64	0.334	ND
Chloride (mg/l)	163.4	159.7	157
Nitrate (mg/l)	ND	ND	ND
Phosphate (mg/l)	4.2	4.2	3.3
Sulphate (mg/l)	36.6	29.8	31.7

DO*- DO of the samples collected from the field will be changed during transportation and can't be validated in the lab.

Table 3. Metal concentrations found in the collected water sample from Nallakunta Cheruvu

S. No	Sample ID	Concentrations (ppb)				
		Chromium	Manganese	Iron	Cobalt	Nickel
1	**Sample 1** **Latitude:** **17°39'32.4 N** **Longitude:** **78 °22'33.5 E**	7.98	424.04	457.90	4.08	12.39
2	**Sample 2** **Latitude:** **17°39'27.4 N** **Longitude:** **78°22'42 E**	6.77	461.15	22.99	4.00	11.59

Physico-Chemical Analysis and Interpretation

- **pH (7.47–7.7)**

The lake water is neutral to slightly alkaline, typical of freshwater systems. No unusual acidity/alkalinity was detected.

- **Total Dissolved Solids (407–507 mg/L)**

Moderate mineralization. Such TDS levels do not indicate brackish or extreme saline conditions. Thus, extreme halophilic algae/archaea (found generally in pink salt lakes) are not supported. But could be possible on combination of other parameters.

- **Turbidity (64–103 NTU) - High**

This is one of the strongest indicators of:

1. Suspended organic particulates
2. Colloidal matter
3. Microbial aggregates
4. Disturbance or runoff events

High turbidity contributes to visible color enhancement and light scattering.

- **Total Nitrogen (36–45 mg/L)**

Elevated nitrogen suggests nutrient-enriched (eutrophic) water. However, nitrogen appears to be rapidly utilized by microbes, as suggested by **zero nitrate.**

- **Nitrate (ND)**

A zero-nitrate reading along with high TN suggests:

1. Rapid microbial uptake
2. Potential onset of anoxic micro zones
3. Dominance of ammonia or organic nitrogen forms
4. This favours anaerobic or microaerophilic pigment-producing bacteria.

- **Phosphate (3.3–4.2 mg/L) - High**

This level is far above **natural background**

It supports:

1. Algal growth
2. Bacterial phototrophs
3. Rhodobacter and Chromatium proliferation

- **COD (120–136 mg/L)**

Moderate pollution considers freshwater systems. Organic load is high enough to shift microbial ecology but not severe enough to be toxic.

- **Hardness, Chloride, Sulphate**

All within normal ranges and not contributing to the pink coloration.

3.2. Biological & Microscopic Analysis

Table 4. Biological parameters and observations for the samples collected from Nallakunta cheruvu

Parameter	Result	Range (limit)
Chlorophyll-A (µg/L)	6.42	<10 µg/L
Phycocyanin (PC), µg/L (equivalent units)	4.85	< 5 µg/L
Phycoerythrin (PE),µg/L (equivalent units)	2.34	< 3 µg/L
Phytoplankton -Total Count (cells/mL)	4,400	<5,000 cells/mL
Bacterioplankton – Visible Pigmented-Cells (cells/mL)	950	No prescribed limit (screening indicator)
Dominant Phytoplankton Taxa	Chlorella sp., Ankistrodesmus sp., Oscillatoria sp.	Morphological Identification
Notable Bacterioplankton/ Pigmented Forms	Rhodobacter sp., Chromatium sp.	Morphological Identification
Total Heterotrophic Plate Count (HPC), CFU/mL	1.8×10^3	$< 10^3$ CFU/mL
Total Coliforms (MPN/100 mL)	< 2	≤ 50
***Escherichia coli* (E. coli) (MPN/100 mL)**	Not Detected	0
Enterococci (MPN/100 mL)	< 1	≤ 10
16S rRNA Amplicon Sequencing	**Dominant Phyla:** Proteobacteria (38%),	No statutory limits

(Bacteria + Archaea)	Bacteroidetes (21%), Firmicutes (16%), Actinobacteria (10%), Cyanobacteria (5%), Euryarchaeota (3%), Minor others (7%)	
Notable Genera Detected	Pseudomonas, Bacillus, Halomonas, **Chromatium**, **Rhodobacter**, Oscillatoria, Nitrosomonas, Methanobacterium	No numeric threshold
mcyA (Microcystin synthesis gene, cyanobacteria)	1.6×10^3	No statutory limit
pcp (Phycocyanin pigment gene, cyanobacteria/pigmented bacteria)	8.5×10^2	No statutory limit
16S rRNA (universal bacterial marker)	4.7×10^5	Relative baseline for microbial load

Biological & Microscopic Analysis Interpretation

- **Chlorophyll-a (6.42 µg/L)**

Low concentration — no algal bloom is present. Thus, the pink coloration is *not* due to algal pigments.

- **Phycocyanin & Phycoerythrin (4.85 µg/L & 2.34 µg/L)**

Low levels, far below bloom thresholds. This again rules out cyanobacterial/algal blooms as the primary colour source.

- **Microscopy Findings**
  1. Phytoplankton: 4,400 cells/mL (low–moderate)

2. Pigmented bacterioplankton: 950 cells/mL

Dominant pigment-producing genera detected:

- Rhodobacter sp. (pink-red photosynthetic bacteria)
- Chromatium sp. (purple sulfur bacteria)

These are classical contributors to reddish/pink coloration in nutrient-rich shallow systems.

These bacteria:

produce carotenoid pigments (pink, red, purple) thrive in organic-rich, low-oxygen, nutrient-rich pockets can cause pinkish or reddish patches or tint, especially when suspended in turbid water. The microscopical investigation below confirming the two pigmented producing genera

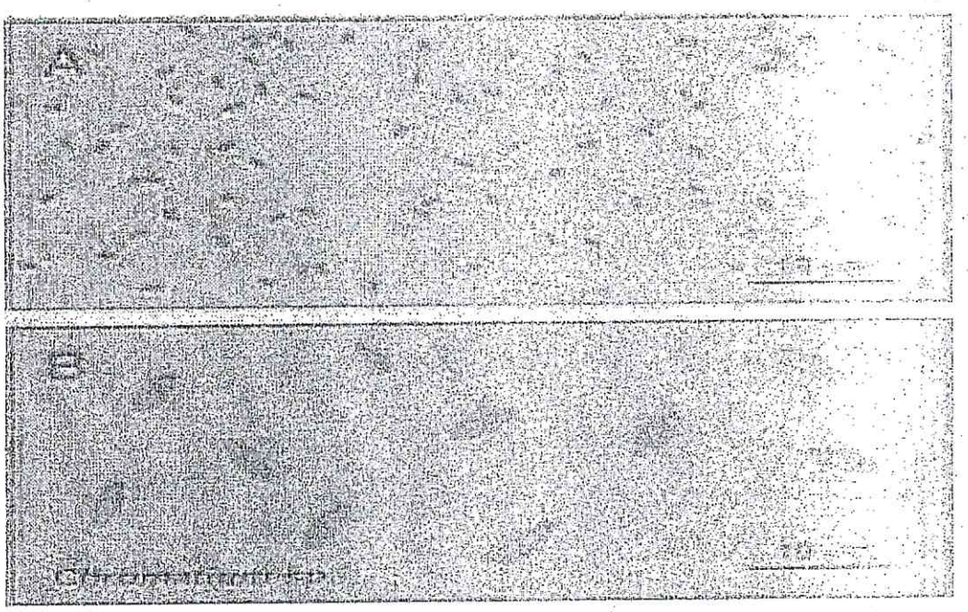

Figure 4 Microscopic investigation: a. Rhodobacter sp b: Chromatium sp.

These organisms thrive in:

low-oxygen micro-habitats pockets of sulphur compounds high turbidity. Their presence is exactly consistent with the chemical data.

- **Molecular Microbial Profiling & Molecular Detection Analysis (16S Sequencing & qPCR)**

- **16S rRNA Sequencing (Comprehensive taxonomic overview of the bacterial and archaeal community of the sample collected from Nallakunta Cheruvu**

- **Dominant Phyla:**
  1. Proteobacteria (38%),
  2. Bacteroidetes (21%),
  3. Firmicutes (16%),
  4. Actinobacteria (10%),
  5. Cyanobacteria (5%),
  6. Euryarchaeota (3%),
  7. Minor others (7%).

Notable genera detected:

1. Rhodobacter
2. Chromatium
3. Oscillatoria
4. Halomonas
5. Pseudomonas (non-pathogenic groups)

This confirms the presence of pigment-producing bacteria.

- **qPCR of Target Genes**
  1. mcyA (microcystin gene): 1.6×10^3 copies/mL, present at low levels, NOT a bloom or toxin alert
  2. pcp pigment gene: 8.5×10^2 copies/mL, **confirms pigment-production capability**
  3. 16S gene copies: 4.7×10^5 per mL, moderate microbial density

Final Diagnosis — Cause of Pink Colour

Pigment-producing bacteria — especially Rhodobacter and Chromatium — thriving in organic, nutrient-rich, turbid water.

These bacteria produce carotenoid pigments:

1. pink
2. red
3. purple

Suspended in highly turbid water, they impart a **light pinkish or reddish tint.**

These matches ALL observed and measured parameters.

Table 5. Summary Table (Quick Interpretation)

Parameter Group	Key Findings	Meaning	Contribution to Pink Colour
Turbidity	64–103 NTU	Very high	✓ Enhances colour Turbid water makes pigment appear more intense. however, turbidity itself does not create pink colour. it only enhances visibility.
Total Nitrogen	36-45	Eutrophic	✓ Supports growth
Phosphate	>3 mg/L	Eutrophic	✓ Supports growth
Chlorophyll-a	Low	No algal bloom	✗ Not algae
Pigment genes	Detected	Active pigment bacteria	✓ Main cause
Rhodobacter / Chromatium	Present	Pink–purple bacteria	✓ Direct cause
Manganese	0.46 mg/L	Too low, colourless	✗ No role Manganese induced pink occurs at much higher concentrations and in oxidizing conditions. Here, Mn is far below colour forming thresholds.

5. Conclusions with detailed steps and recommendations

- **Nutrient Overload**

Nallakunta Cheruvu water has enough organic matter (COD) and excess nutrients (phosphate, nitrogen). This creates a **nutrient-rich**, eutrophic environment.

- **Oxygen Depletion (Anoxia Formation)**

Heterotrophic bacteria rapidly consume this organic load. Their respiration depletes dissolved oxygen, especially:

1. in deeper water
2. at the sediment–water interface
3. in pockets within the turbid water

These **anoxic and low-oxygen** micro-zones are confirmed by the microbial community structure.

- **Sulfur Cycle Activation**

In the absence of oxygen: Sulfate-reducing bacteria (SRB) begin using sulfate as an electron acceptor. They produce hydrogen sulfide (H_2S). H_2S accumulation makes conditions ideal for sulfur-based phototrophic bacteria.

- **Bloom of Pigment-Producing Bacteria**

Two major groups proliferate:

a. **Purple Non-Sulfur Bacteria (Rhodobacter spp.)**

Found in surface layers where:

1. light is available
2. organic matter is high
3. oxygen is low but not zero
4. They produce pink to reddish carotenoid pigments.

b. **Purple Sulfur Bacteria (Chromatium spp.)**

Flourish at the chemocline:

1. Light available
2. H_2S present
3. They produce deep purple and red pigments (bacteriochlorophyll + carotenoids).

This combination creates a pink-purple coloration.

- **Formation of Floating Pigmented Biofilms**

The bacteria form: flocs mucilaginous aggregates gas-filled clusters (due to H_2S and internal storage compounds)

These become buoyant and float to the surface.

This results in visible pinkish layers or floating scum, exactly matching our field observations in Nallakunta Cheruvu.

- **Sedimentation of Dead Biomass**

As these aggregates age pigments fade gas escapes biofilms become heavier

They eventually settle to the bottom, forming reddish or brownish sediments.

Conclusions and Recommendations:

The overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity, and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake. As a result,

heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling. Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities. The combination of organic matter, nutrients, sulfide, light penetration in shallow waters, and lack of oxygen created ideal conditions for Purple Sulfur Bacteria and Purple Non-Sulfur Bacteria (Chromatium, Rhodobacter) to multiply extensively. These bacteria are well-known for producing purple, pink, or reddish pigments that impart distinctive coloration to water bodies undergoing anoxic stress. As they grow, these bacteria form buoyant aggregates and biofilms that rise to the surface, producing the visible pinkish scum and floating layers observed in the lake. The settling of these aggregates upon senescence further explains the accumulation of brown/reddish colored sediments at the bottom.

Overall, pink coloration is **biological response** to excessive nutrient loading and prolonged anoxic conditions. The lake is undergoing a shift from a healthy aerobic ecosystem to a stressed, anaerobic, microbially driven system, signaling deteriorating ecological health.

Immediate interventions—including identifying the source of nutrients, restoring aeration, and removing accumulated organic sludge (if any)—are essential to prevent further degradation and to reestablish normal aerobic conditions.

Without timely restoration efforts, the lake is likely to continue experiencing recurring microbial blooms, foul odors, poor water clarity, and long-term ecological damage.

Here are the below possible recommended technologies that can potentially reduce the current issue.

a. **Aeration + Circulation:**

Aeration directly breaks this cycle by:

- Increasing dissolved oxygen
- Eliminating anoxic layers
- Inhibiting sulfur bacteria
- Oxidizing H_2S
- Improving water clarity

b. **Floating Treatment Wetlands (FTWs) Inside the Lake:**

Floating wetlands can:

- Uptake N, P, and organic compounds directly
- Shade the water and reduce light for phototrophic bacteria
- Provide oxygenation to the top layer
- Encourage growth of beneficial biofilms
- Reduce turbidity and suspended colloids

c. **Chemical Oxidation (Targeted Pink Color Removal During Events)**

Rhodobacter and Chromatium pigments can be oxidized safely using mild oxidants.

Suitable oxidants:

- Sodium hypochlorite (very low dose for lake-wide use)
- Hydrogen peroxide (most environmentally friendly)
- Potassium permanganate (low dose only)

Functions:

- Kills pigment-producing bacteria
- Oxidizes organic matter
- Breaks biofilms and floating scum
- Removes color

When the well is dry, we know the worth of the water
- Benjamin Franklin

D.V. Sai Praneeth
Assistant Professor,
Department of Civil Engineering,
IIT Hyderabad

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Annexure-V

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974
(AS AMENDED BY ACT 53 OF 1988)

Order No.RCP-30/TGPCB/TF/HO/2026- 2569 **Date:01.01.2026**

TGPCB Despatch No. 03 JAN 2026 Signature

Sub : TGPCB – **M/s Hetero Drugs Ltd., Unit – I, Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District** – Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - Complaints filed by the Villagers of Domadugu & Others and Dharna made by the villagers - Non Compliance of Consent Conditions & Board Directions - **DIRECTIONS – ORDER ISSUED** – Reg.

Ref :

1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions issued on 31.07.2021, 2.01.2023 & 03.05.2025.
3. Inspection of the industry by Task Force Committee members along with RO officials on 01.08.2025.
4. Hearing held on 19.09.2025.
5. News Articles published in Telugu Daily News Papers Namaste Telangana on 19.09.2025, Andhra Prabha, Eenadu, ABN Andhra Jyithi, Vartha on 20.09.2025, NamasteTelangana on 21.09.2025, Vartha on 22.09.2025 and in Namaste Telangana on 24.09.2025 regarding water pollution in Nallakuntacheruvu.
6. News Articles published in Indian Express on 20.09.2025, Disha daily on 09.10.2025, Namaste Telangana on 13.10.2025, Andhra Jyithi, Vartha on 13.10.2025,SakshiNews paper on 16.10.2025, Nava Telangana on 17.10.2025, Namaste Telanganaon 20.10.2025, Disha daily on 20.10.2025, Eenadu daily on 23.10.2025 regarding water pollution in Nallakuntacheruvu.
7. Complaint of Dr PLN Rao Environment Social Worker R/o Nallakunta, Hyderabad on 24.09.205 &26.09.2025 against M/S Hetero Drugs Ltd., Bonthapally (V), Gummadidala (M), Sangareddy District.
8. Compliant received from Communist Party of India (MARXIST) of Domadugu on 30.09.2025 regarding water pollution in Nallakunta cheruvu.
9. Online Janavani Complaint received on 08.10.2025 from Maddi Bal Reddy, regarding water pollution in Nallakuntacheruvu
10. Complaints / news articles received through Sangareddy District Collector office Dt:29.09.2025, 16.10.2025, 18.10.2025 against the industry regarding discharge of effluents into Nallakunta cheruvu.
11. Compliant received from Kalushya Vyathireka Porata Committee (KVPC) of Domadugu regarding water pollution in Nallakunta cheruvu submitted on 08.10.2025 & 22.10.2025.
12. Complaint forwarded by Dr G Malsuri (CPRO to CM) dated 21.10.2025, 27.10.2025 & 28.10.2025 against the industry regarding discharge of effluents in Nallakunta cheruvu.
13. Complaint forwarded by Sri S. Somaraju, Private Secretary to Hon'ble Misnister for Environment, Forest & Endownments, Telangana Dt:15.10.2025 against the industry regarding discharge of effluents in Nallakunta cheruvu.
14. Complaint of Dr G Kondal Rao,Chief Engineer (Public Health) regarding discharge of effluents in Nallakunta cheruvu by the industry forwarded by the Principal Secretary to Governement, EFS&T Dept, Telangana Secretariat on 27.10.2025.
15. News Articles published in Disha daily, Surya, Andhra Prabha, Namaste Telangana, Sakshi and Eenadu on 02.11.2025 and in Vartha on 06.11.2025, Kandali News on 10.11.2025.
16. Compliant of Sri Papani Nagaraju R/o Domadugu (V), Gummadidala (M),

Sangareddy District regarding discharge of effluents in Nallakunta cheruvu by the industry on 15.11.2025.

17. News Articles published in Sakshi, ABN Andhra Jyothi, Namaste Telangana, ABN Andhra Jyothi, Andhra Prabha and DishaSangareddy on 18.11.2025.
18. Compliant received from Kalushya Vyathireka Porata Committee (KVPC) of Domadugu on 19.11.2025 regarding water pollution in Nallakunta cheruvu.
19. Complaint of Villagers of Bonthapally Domadugu (V), Sangareddy (D) regarding discharge of effluents in Nallakunta cheruvu by the industry on 20.11.2025.
20. Complaint of Sri Kanneganti Ravi, Sri Mangaiah R/o Domadugu (V), Sangareddy (D) regarding discharge of effluents in Nallakunta cheruvu by the industry on 20.11.2025.
21. News Articles published in Andhra Prabha and ABN Andhra Jyothi on 26.11.2025.
22. Complaint forwarded by CPCB H.D Varalaxmi Reginal Director filed by Sri Dr.BabuRao Kalapala, regarding contamination of NallakuntaCheruvu received through BO Mail Dt:26.11.2025.
23. Complaint received from Group Captain T Srinivasulu SC, Chief Administrative Officer, Air Force Academy Dundigal on 06.12.2025 regarding discharge of effluents in Nallakunta cheruvu by the industry.
24. News Article published in Disha daily on 06.12.2025
25. Complaint forwarded by Principal Secretary to Government, EFS&T Dept., Telangana Secretariat on 29.11.2025, Memo No 5536/For.III/A2/2025 Dt:27.11.2025, Represenattaion received from Additional Director, Intelligence Dept, rearding Protests demanding closure of Hetero Drugs factory at Bonthapally Village, Gummadidala Municipality (Sangareddy District) regarding discharge of effluents in Nallakunta cheruvu by the industry on 03.12.2025.
26. Complaint forwarded by CPCB, HD Varalaxmi, Regional Director, Dt:05.12.2025 filed by Dr. D. Rambabu against severe pollution of Nallakunta Cheruvu due to Hetero manufactured drugs received through BO Mail Dt:09.12.2025.
27. Inspection of the industry by RO Officials on 14.11.2025.
28. The Villagers of Domadugu have filed complaints recently on 06.12.2025 & 12.12.2025
29. Hearing held on 23.12.2025.
30. Industry's undertaking letter received on 30.12.2025.

* * * * *

1. **WHEREAS,** you are operating the industry Unit-I located at Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021, 12.01.2023 & 03.05.2025 in connection with complaints.

4. **WHEREAS,** vide reference 3rd cited, the Task Force Committee members along with RO RCP officials inspected the industry on 01.08.2025 and submitted the report to the Head office on 02.09.2025.

5. **WHEREAS,** vide reference 4th cited, the status of the industry was reviewed in Task Force Committee meeting held on 19.09.2025 at Board office. The committee recommended to defer the case and the RO shall inspect the industry on compliances submitted in the TF meeting after a month and submit the report to Board Office.

6. **WHEREAS,** vide reference 5th to 26th cited, the Board received several complaints filed by the Villagers & others through CPCB, EFS&T & CMO Office etc., and adverse press clippings against the industry for causing pollution of Nallakunta Cheruvu and also other pollution problems to the villagers.

7. **WHEREAS,** vide reference 27th cited, the RO RC Puram Officials monitored the industry on 07.11.2025 and inspected the industry on 14.11.2025 and submitted the report to the Head office on 12.12.2025. The details are as follows:

A. During inspection, following non-compliance of consent conditions and Board directions was observed:

1. Spillage of effluents observed near first-cut rain water storage tanks.
2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
3. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each.
   Industry is storing effluents in first cut Rain water tanks – III, IV, V& VI and were full.
4. The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP insteadof LTDS generation pipelines connected to the collection tanks,this does not give actual LTDS effluent generation readings.
5. The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks, this does not give actual HTDS effluent generation readings.
6. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.

   Now, the industry has applied for CFO amendment and same is being submitted to Board office, Hyderabad for further action.
7. The industry has not provided automatic system for scrubbing media of scrubbers.
8. Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective.
9. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
10. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system to arrest the VOCs.
11. The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.
12. The industry has installed new MEE system and dismantled the old MEE system. The industry not covered the new ATFD area properly and the ATFD salts are being air borne and perceptible odour was observed at the MEE area.
13. The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area and perceptible odour was observed at these areas.
14. Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. About 50 tons of HZ waste was observed in the premises.
15. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
16. Effluent spillages observed in storm water drains provided near production blocks.

17. As per vehicle tracking manifest system, the industry has lifted about 230 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Nov'2025 (till date). As per the records submitted, the industry has treated the contaminated rain water of quantity 4360 KL within the ZLD system. The industry has not lifted contaminated rainwater to JETL, Jeedimetla from the period August'2025 to till now.

B. Complaints and News Paper clippings

The Board has been receiving regular complaints regarding contamination of Nallakuta cheruvu and the news clippings are also appearing in several news papers on this issue.

C. IIT Hyderabad Study Report

As per the Board directions, the industry has engaged IIT-Hyderabad to carry out study of Nallakunta Cheruvu and submitted report.

The study report was conducted by Dr. D. V. Sai Praneeth, Assistant Professor, Department of Civil Engineering, IIT Hyderabad.

As per the Observations made in the report, the surface water exhibited distinct pink pigmentation due to bacteria and COD levels in the range of 120 to 136 mg/l indicating pollution of the lake.

The conclusions and recommendations are as follows:

The overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake.

As a result, heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling.

Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities.

The combination of organic matter, nutrients, sulfide, light penetration in shallow waters, and lack of oxygen created ideal conditions for Purple Sulfur Bacteria and Purple Non-Sulfur Bacteria (Chromatium, Rhodobacter) to multiply extensively. These bacteria are well-known for producing purple, pink, or reddish pigments that impart distinctive coloration to water bodies undergoing anoxic stress. As they grow, these bacteria form buoyant aggregates and biofilms that rise to the surface, producing the visible pinkish scum and floating layers observed in the lake. The settling of these aggregates upon senescence further explains the accumulation of brown/reddish colored sediments at the bottom.

Overall, pink coloration is biological response to excessive nutrient loading and prolonged anoxic conditions. The lake is undergoing a shift from a healthy aerobic ecosystem to a stressed, anaerobic, microbially driven system, signaling deteriorating ecological health.

Immediate interventions including identifying the source of nutrients, restoring aeration, and removing accumulated organic sludge (if any) are essential to prevent further degradation and to reestablish normal aerobic conditions.

Without timely restoration efforts, the lake is likely to continue experiencing recurring microbial blooms, foul odors, poor water clarity, and long-term ecological damage.

Here are the below possible recommended technologies that can potentially reduce the current issue.

a. Aeration + Circulation:

- Aeration directly breaks this cycle by:
- Increasing dissolved oxygen
- Eliminating anoxic layers
- Inhibiting sulfur bacteria
- Oxidizing H_2S
- Improving water clarity

b. Floating Treatment Wetlands (FTWs) Inside the Lake:

Floating wetlands can:

- Uptake N, P, and organic compounds directly.
- Shade the water and reduce light for phototrophic bacteria
- Provide oxygenation to the top layer
- Encourage growth of beneficial biofilms
- Reduce turbidity and suspended colloids

c. Chemical Oxidation (Targeted Pink Color Removal During Events):

Rhodobacter and Chromatium pigments can be oxidized safely using mild oxidants.

Suitable oxidants:

- Sodium hypochlorite (very low dose for lake-wide use)
- Hydrogen peroxide (most environmentally friendly)
- Potassium permanganate (low dose only)

Functions:

- Kills pigment-producing bacteria
- Oxidizes organic matter
- Breaks biofilms and floating scum
- Removes color

D. ZLD Performance:

The industry has submitted ZLD performance study report conducted by M/s. Right Source Industrial Solutions Pvt Ltd., on 18.09.2025. Following recommendations were made in the study report:

1) It is recommended to improve the ETP performance further through improved monitoring of facility parameters and training to staff which results in operational improvements, maintenance and administration. This includes source control. Reduce shock loads like hydraulic load changes and change in effluent characteristics due to frequent change in production campaign.
2) It is also recommended to avoid shock loads on Aeration system of bio ETP.
3) CIP (Cleaning in process to be scheduled on regular basis) for further improving the performances of MEE and RO System.
4) It is observed during the field study primary clarifiers of both HTDS & LTDS are under maintenance for removal of sludge. Primary treatment is to be ensured for effective treatment of HTDS effluents in Stripper / MEE for effective evaporation and output. It also reduces fouling and scaling of calandria tubes of MEE system.
5) It is suggested to ensure and avoid leakages from stripper and MEE flow pumps and other transfer pumps at treatment systems.

The above recommendations confirm the non-compliance of ZLD / effluent treatment systems observed by the Board officials and Task Force Committee members during inspection of the industry at various times.

Subsequently, the industry removed the old ZLD system and installed new ZLD system.

The Board officials monitored various units of ZLD system on 07.11.2025 and collected samples. The analysis reports indicated the following deviations / issues:

pH:

The pH values of influents to MEE system and Biological ETP should be in neutral pH i.e., 6.5 to 7.5 for effective functioning of MEE system and Biological ETP.

However, the pH values of samples bearing No.11063 to 11070 are ranging from 9.0 to 10.75. indicating the industry is not carrying out pre-treatment of the effluents properly before feeding to MEE system and Biological ETP.

TDS:

The TDS values of the samples bearing No.11063 (HTDS effluents) to 11066(LTDS effluents) are almost same (11893 mg/L & 11326mg/L respectively) indicating improper segregation of the HTDS and LTDS effluents by the industry.

The TDS value of the samples No.11070(RO feed) is 15533 mg/L and for samples No.11071(RO Reject) is 2996 mg/L. The RO system is should reduce inorganic solids i.e., TDS load in the treated effluents and the TDS load will come out as RO reject. Hence, the RO reject will have more TDS values whereas, in this case low TDS value of samples bearing No.11071 (RO Reject) indicates poor performance of RO system.

COD:

The COD value of the samples bearing No.11066(LTDS effluents) is 4,816 mg/L, whereas for samples bearing No.11070(Outlet of ETP (RO feed)) is 10,000 mg/L.

The COD load should be reduced from inlet of ETP to outlet of ETP, whereas, in this case there is increase in COD values after treatment in biological ETP indicating poor performance of the Biological ETP.

As per the analysis reports, the Performance of ZLD system is not satisfactory.

It was observed that industry is repeatedly not complying with consent conditions and Board directions as noted during the inspection of the industry conducted on 14.07.2022, 02.08.2023, 07.06.2024, 03.08.2024, 04.03.2025, 16.04.2025, 01.08.2025 and 14.11.2025. The details are as follows:

8. **WHEREAS,** vide reference 28th cited, the Villagers of Domadugu have filed complainants regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members in front of Head Office on 12.12.2025. They are strongly alleged that the industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

9. **WHEREAS,** vide reference 29th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 23.12.2025. The complainants, RO-RC Puram and representative of the industry have attended the meeting.

I. The Committee noted the following:

1. During inspection, it was observed that industry is repeatedly not complying with consent conditions and Board directions as noted during the earlier inspections conducted on 14.07.2022, 02.08.2023, 07.06.2024, 03.08.2024, 04.03.2025, 16.04.2025& 01.08.2025.

2. The Villagers of Domadugu have filed complainats regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members infront of Head Office on 12.12.2025. They are strongly alleged that the industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution

problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

3. **ZLD Performance:**

- The industry has submitted ZLD performance study report conducted by M/s. Right Source Industrial Solutions Pvt Ltd., on 18.09.2025. As per the report they made certain recommendations and confirmed the non-compliance of ZLD / effluent treatment systems observed by the Board officials and Task Force Committee members during inspection of the industry at various times.
- Subsequently, the industry removed the old ZLD system and installed new ZLD system.
- The Board officials monitored the stage wise of new ZLD system on 07.11.2025 and collected samples. The analysis reports indicated the following deviations / issues:

pH:

The pH values of influents to MEE system and Biological ETP should be in neutral pH i.e., 6.5 to 7.5 for effective functioning of MEE system and Biological ETP.

However, the pH values of samples bearing No.11063 to 11070 (HTDS effluents, MEE Feed, MEE Condensate, LTDS Effluents, Aeration Tank-I, Secondary Clarifier Outlet, Aeration Tank-II & Outlet of Bio ETP) are ranging from 9.0 to 10.75 and indicating that the industry is not carrying out pre-treatment of the effluents properly before feeding to MEE system and Biological ETP.

TDS:

The TDS values of the samples bearing No.11063 (HTDS effluents) to 11066(LTDS effluents) are almost same (11893 mg/L & 11326mg/L respectively) indicating improper segregation of the HTDS and LTDS effluents by the industry.

The TDS value of the samples No.11070 (RO feed) is 15533 mg/L and for samples No.11071 (RO Reject) is 2996 mg/L. The RO system is should reduce inorganic solids i.e., TDS load in the treated effluents and the TDS load will come out as RO reject. Hence, the RO reject will have more TDS values whereas, in this case low TDS value of samples bearing No.11071 (RO Reject) indicates poor performance of RO system.

COD:

The COD value of the samples bearing No.11066 (LTDS effluents) is 4,816 mg/L, whereas for samples bearing No.11070 (Outlet of ETP (RO feed)) is 10,000 mg/L.

The COD load should be reduced from inlet of ETP to outlet of ETP, whereas, in this case there is increase in COD values after treatment in biological ETP indicating poor performance of the Biological ETP.

- As per the analysis reports, the Performance of new ZLD system is not satisfactory.

4. **IIT Hyderabad Study Report**

As per the Board directions, the industry has engaged IIT-Hyderabad to carry out study of Nallakunta Cheruvu and submitted report. The study report was conducted by Dr. D. V. Sai Praneeth, Assistant Professor, Department of Civil Engineering, IIT Hyderabad.

As per the Observations made in the report, the surface water exhibited distinct pink pigmentation due to bacteria and COD levels in the range of 120 to 136 mg/l indicating pollution of the lake.

The report concluded that the overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity, and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake.

As a result, heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling.

Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities.

The committee perused the above study report including conclusion & recommendations.

5. **<u>Non Compliance observed on 14.11.2025:</u>**

1. Spillage of effluents observed near first-cut rain water storage tanks.
2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
3. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each.
4. Industry is storing effluents in first cut Rain water tanks – III, IV, V& VI and were full.
5. The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP instead of LTDS generation pipelines connected to the collection tanks, this does not give actual LTDS effluent generation readings.
6. The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks, this does not give actual HTDS effluent generation readings.
7. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
8. Now, the industry has applied for CFO amendment and same is being submitted to Board office, Hyderabad for further action.
9. The industry has not provided automatic system for scrubbing media of scrubbers.
10. Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective.
11. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
12. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system to arrest the VOCs.

13. The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.

14. The industry has installed new MEE system and dismantled the old MEE system. The industry not covered the new ATFD area properly and the ATFD salts are being air borne and perceptible odour was observed at the MEE area.

15. The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area and perceptible odour was observed at these areas.

16. Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. About 50 tons of HZ waste was observed in the premises.

17. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.

18. Effluent spillages observed in storm water drains provided near production blocks.

19. As per vehicle tracking manifest system, the industry has lifted about 230 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Nov'2025 (till date). As per the records submitted, the industry has treated the contaminated rain water of quantity 4360 KL within the ZLD system.

20. The industry has not lifted contaminated rainwater to JETL, Jeedimetla from the period August'2025 to till now. But as per the Board directions dated 03.05.2025, the industry has to lift the contaminated rain water present in the 6 Nos. of Tanks to M/s. PETL, Patancheru / M/s. JETL, Jeedimetla within 15 days.

21. The study conducted and report submitted by the IIT, Hyderabad as per the Board directions, indicates pollution of Nallakunta Cheruvu. The report has recommended certain technological options for reduce the current issue. However, no specific study details are included in the report such as chemical contamination of Nallakuta cheruvu and correlating with effluents of the industry.

6. **Pollution of Nallakunta Cheruvu:**

The Board officials have collected samples of Nallakunta Cheruvu in connection with public complaints on various occasions. As per the analysis reports, the values of certain important parameters are as follows:

S. No.	Date of sample collected	Chemical Oxygen Demand (COD) in mg/l	Dissolved Oxygen (DO) in mg/l
1	10.06.2021	64	5.2
2	14.07.2022	74	6.2
3	26.07.2022	65	6.3
4	08.09.2022	53	6.5
5	07.06.2024	946	**Nil**
6	03.08.2024	240	**3.2**
7	04.03.2025	180	**1.8**
8	01.08.2025	1676	**1.2**
9	20.09.2025	649	--

The above COD and Dissolved oxygen levels indicate pollution of Nallakunta Cheruvu.

As per the finger printing Analysis reports of the samples collected on 20.09.2025 from Nallakunta Cheruvu, back water entering from Nallakunta cheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry.

Sertraline HCl is consented product in CFO order Dt: 02.07.2022 and is found in stagnated back water sample entering from Nallakunta cheruvu into air force academy (542).

The chemicals found in Water sample of Nallakunta Cheruvu, Domadugu (V), Sangareddy (D):

1. **N,N-Dimethylpivalamide**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536) and stagnated back water sample entering from Nallakunta cheruvu into airforce academy (542).

2. **N-Formylmorpholine**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536), Rain water storage tank 6 of industry (537) and stagnated back water sample entering from Nallakunta cheruvu into air force academy (542).

3. **Morpholine-4-carbonylchloride**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536) and stagnated back water sample entering from Nallakunta cheruvu into air force academy (542).

4. **[2,2'-Bi-1H-indene]-1,1'-dione, 2,2',3,3'-tetra**

   Present in NallakuntaCheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakunta Cheruvu into air force academy (542).

5. **1,2:4,6-Di-O-isopropylidene-L-sorbopyranos**

   Present in Nallakunta Cheruvu (543), and stagnated back water sample entering from Nallakunta Cheruvu into air force academy (542).

6. **1,4-Benzenedicarboxylicacid, bis(2-methylp**

   Present in Nallakunta Cheruvu(543), Rain water storage tank 6 of industry (537) and stagnated back water sample entering from Nallakunta Cheruvu into airforce academy(542).

7. **Pyrrolidine, 1-[4-(4-chlorophenyl)-3-phenyl-**

   Present in NallakuntaCheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakunta Cheruvu into air force academy(542).

8. **6,7-Dichloro-4b, 10-ethenobenz(a)azulene**

   Present in NallakuntaCheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakuntacheruvu into airforce academy(541).

The above reports indicates that presence of same chemicals in Nallakunta Cheruvu, back water entering from Nallakuntacheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry is confirming that effluents discharged by the industry is resulting in pollution of Nallakunta Cheruvu.

7. The Hon'ble NGT (Principal Bench), Delhi has registered suo-motu case on the basis of the news item titled "**Sangareddy: Villagers activists protest Pharma effluent discharge at NallaCheruvu**" appearing in Telangana Today dated 24.09.2025 in the matter of Original Application No. 538/2025. Subsequently, the the Hon'ble NGT (Principal Bench), Delhi has transferred the case to the Hon'ble NGT Southern Zonal Bench, Chennai, as OA No 239 of 2025 for appropriate further

action. **The CPCB, Sangareddy District Collector and TGPCB are made respondents in the case. The Board has to file action taken report.**

II. The industry has informed the following:

1. They arrested spillages near fist cut rain water storage tanks. In order to avoid spillages and seepages at North-East corner of the first cut rainwater tanks, stone riveting and levelling work with soil was done.
2. They are not storing effluents in rainwater storage tanks. The water in the storage tanks-III, IV, V &VI are the first cut rainwater which was collected during this rainy season till october'2025. They unable to send the contaminated rain water/ effluents to M/s.JETL, Jeedimetla as M/s. JETL has insisted them to take the RO permeate(Treatd water) back to the industry so as to lift the contaminated rain water/ effluents from the their indusrty. However, they proposed to lift the same to all CETPs located in and around Hyderabad city with immediate effect.
3. They will dismantle the 4 Nos. of first cut rain water tanks i.e. tank wise after disposal of effluents/ contaminated rain water to the CETPs.
4. They requested the committee for further study on contamination of Nallakunta Cheruvu with their effluents if any including finger print analysis and requested to take further action on the pollution of Nallakunta Cheruvu.
5. They connected flow meter to LTDS effluents generation pipelines joints collection tank to measure LTDS effluent generation.
6. The raw high TDS effluent lines from all production block with block identification are arranged and are being connected to common pipeline and is connected to HTDS flow meter to measure High TDS effluent generation.
7. They have installed and operating 12 TPH coal fire boiler in place of permitted boilers of capacities (8 TPH & 3 TPH) and the same was informed to board office vide our letter dated 13.03.2023. They also submitted application to board office to regularize 12 TPH boiler with 8 TPH standby which is under process at Board office.
8. They have provided hooter system at hood and scrubbing system of HTDS and LTDS storage tanks for effective scrubbing. They have provided hood with extraction systems for HTDS and LTDS effluent storage tanks. The hood system has inbuilt holes with valves to avoid implosion inside hood areas of the extraction system.
9. They have connected ATFD vent to sub cooling condenser and the condenser vent is connected to scrubbing system to combat VOC emissions. The provision of activated charcoal bed is not feasible in view of safety.
10. They have connected process vent to primary and secondary condensing system with chilled Brine and RT water as cooling media and the condenser vent is connected to scrubbing system to cambat VOC emissions. The provision of activated charcoal bed to the vents of scrubbing system technically and safety point of view is not feasible.
11. They have stopped open collection of ATFD Salts and provided closed trolley for collection of ATFD salts to control localised odour at our New ATFD area.
12. They will extend the existing installed PIION Spraying system at HTDS storage tanks, pre-treatment area and Bio-ETP area within a month.
13. They have provided dedicated Hazardous waste storage shed with leachate collection pit and safety arrangements for storage of Hazardous waste.
14. They have provide opening in the boundary wall to view the open area towards Air Force Academy.
15. They have removed effluent spillages to storm water drains provided near production block.
16. They have lifted 230 KL of contaminated rainwater to JETL and treated 5433 KL contaminated rainwater up to 11.12.2025.

The committee examined the following:

a) The Villagers of Domadugu have filed complaints regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members in front of Head Office on 12.12.2025. They are strongly alleged that the

industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

b) Adverse press clippings regarding pollution of Nallakunta Cheruvu.

c) Complaints from Air Force Academy regarding pollution of Nallakunta Cheruvu.

d) The Pollution of Nallakunta Cheruvu and recommendations as per the study report of the IIT, Hyderabad.

e) Non compliances by the industry and the industry request during the meeting that they will lift the contaminated rain water/ effluents from the their industry to all CETPs located in and around Hyderabad city with immediate effect and also they requested the committee for further study on contamination of Nallakunta Cheruvu with their effluents if any including finger print analysis and requested to take further action on the pollution of Nallakunta Cheruvu.

After detailed discussions, the committee recommended the following:

1. To issue directions to the industry after submission of the undertaking letter as committed during meeting.
2. The industry shall lift the all contaminated waste water/effluent present in the tanks within the industry premises to CETPs (PETL/ JETL/ MANA CETP/ IDPL/ & Pashamailaram CETP) within 15 days and submit the disposal details along with manifest copies to the Board on daily basis.
3. The industry shall dismantle 4 Nos of tanks out of 6 Nos of tanks after lifting the waste water to CETPs i.e. tank wise dismantle after its empty atleast by removing tank wall one side to avoid any further storage.
4. The industry shall send the effluents generated from the process to CETP till ZLD stabilized and after approval from the Board.
5. The industry shall explore for removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and also explore suitable direction for letting of excess rain water
6. A detailed study shall be carried on the following with reputed organization like NEERI/ IICT/ NGRI etc.
    i. Collection of effluent samples from the industry and Nallakunta Cheruvu and conduct physical & chemical analysis including finger print analysis with quantitatively.
    ii. Collection of sediments from the Nallakunta Cheruvu in various locations and the characteristics of sediment with regard to chemicals identified (finger printing analysis) with the Nallakunta Cheruvu water/ effluents of the industry.
    iii. Source of contamination of Nallakunta Cheruvu.
    iv. Remediation measures for restoration of Nallakunta Cheruvu.
    v. Recommendations to avoid future contamination/ pollution of the Nallakunta Cheruvu including removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and suggest suitable direction for letting of excess rain water.
    vi. The cost incurred towards study shall be borne by the industry under Polluter Pay Principle.
7. The industry shall submit an additional Bank Guarantee of Rs.64.0 Lakhs in addition to the existing Bank Guarantee of Rs.32.0 Lakhs (Total BG amount is Rs.96.0 Lakhs) within one week.

8. The industry shall be reviewed after a month.

10. **WHEREAS, vide reference 30th cited,** the industry has submitted undertaking letter along with the compliance status on 30.12.2025.

11. **WHEREAS, after careful consideration of the material facts of the case, the Board hereby issue following directions to your industry to comply within one month:**

    1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
    2. The industry shall comply the conditions stipulated in the directions issued to the industry vide order dated 03.05.2025.
    3. The industry shall lift the contaminated waste water/effluent present in the tanks within the industry premises to CETPs (PETL/ JETL/ MANA CETP/ IDPL/ & Pashamailaram CETP) within 15days and submit the disposal details along with manifest copies to the Board on daily basis.
    4. The industry shall dismantle 4 Nos of tanks out of 6 Nos of tanks after lifting the waste water to CETPs i.e. tank wise dismantle after its empty atleast by removing tank wall one side to avoid any further storage.
    5. The industry shall send the effluents generated from the process to CETP till ZLD stabilized and after approval from the Board.
    6. The industry shall explore for removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and also explore suitable direction for letting of excess rain water
    7. The industry shall submit an additional Bank Guarantee of Rs.64.0 Lakhs in addition to the existing Bank Guarantee of Rs.32.0 Lakhs (Total BG amount is Rs.96.0 Lakhs) within one week.

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

13. You are hereby directed to note that, should you misuse these orders to operate the industry violating any of the conditions mentioned above, your unit may be closed under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) without any further notice to you and you may also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988).

Sd/-
MEMBER SECRETARY

To
M/s Hetero Drugs Ltd., Unit – I,
Sy. No. 213, 215 & 253, Bonthapally Village,
Gummadidala (M), Sangareddy District

Copy to :

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. The RO shall inspect the industry after a month and submit the report.
3. Concerned file.

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

(102)

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-III, Industrial Estate, Sanathnagar, Hyderabad-500 018
Phones : 040-23887500 Fax: 040 – 23887519

BY REGD. POST WITH ACK. DUE

AIR (PREVENTION AND CONTROL OF POLLUTION) ACT 1981

(AS AMENDED BY ACT 47 OF 1987)

Order No.RCP-30/TGPCB/TF/HO/2026- 2570 **Date:01.01.2026**

Sub : TGPCB – **M/s Hetero Drugs Ltd., Unit – I, Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District** – Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) – Complaints filed by the Villagers of Domadugu & Others and Dharna made by the villagers - Non Compliance of Consent Conditions & Board Directions - **DIRECTIONS – ORDER ISSUED** – Reg.

TGPCB Desp... 03 JAN 2026 Signatu...

Ref :

1. CFO dated 02.07.2022 valid upto 31.10.2026.
2. Directions issued on 31.07.2021, 2.01.2023 & 03.05.2025.
3. Inspection of the industry by Task Force Committee members along with RO officials on 01.08.2025.
4. Hearing held on 19.09.2025.
5. News Articles published in Telugu Daily News Papers Namaste Telangana on 19.09.2025, Andhra Prabha, Eenadu, ABN Andhra Jyithi, Vartha on 20.09.2025, NamasteTelangana on 21.09.2025, Vartha on 22.09.2025 and in Namaste Telangana on 24.09.2025 regarding water pollution in Nallakuntacheruvu.
6. News Articles published in Indian Express on 20.09.2025, Disha daily on 09.10.2025, Namaste Telangana on 13.10.2025, Andhra Jyithi, Vartha on 13.10.2025,SakshiNews paper on 16.10.2025, Nava Telangana on 17.10.2025, Namaste Telanganaon 20.10.2025, Disha daily on 20.10.2025, Eenadu daily on 23.10.2025 regarding water pollution in Nallakuntacheruvu.
7. Complaint of Dr PLN Rao Environment Social Worker R/o Nallakunta, Hyderabad on 24.09.205 &26.09.2025 against M/S Hetero Drugs Ltd., Bonthapally (V), Gummadidala (M), Sangareddy District.
8. Compliant received from Communist Party of India (MARXIST) of Domadugu on 30.09.2025 regarding water pollution in Nallakunta cheruvu.
9. Online Janavani Complaint received on 08.10.2025 from Maddi Bal Reddy, regarding water pollution in Nallakuntacheruvu
10. Complaints / news articles received through Sangareddy District Collector office Dt:29.09.2025, 16.10.2025, 18.10.2025 against the industry regarding discharge of effluents into Nallakunta cheruvu.
11. Compliant received from Kalushya Vyathireka Porata Committee (KVPC) of Domadugu regarding water pollution in Nallakunta cheruvu submitted on 08.10.2025 & 22.10.2025.
12. Complaint forwarded by Dr G Malsuri (CPRO to CM) dated 21.10.2025, 27.10.2025 & 28.10.2025 against the industry regarding discharge of effluents in Nallakunta cheruvu.
13. Complaint forwarded by Sri S. Somaraju, Private Secretary to Hon'ble Misnister for Environment, Forest & Endownments, Telangana Dt:15.10.2025 against the industry regarding discharge of effluents in Nallakunta cheruvu.
14. Complaint of Dr G Kondal Rao,Chief Engineer (Public Health) regarding discharge of effluents in Nallakunta cheruvu by the industry forwarded by the Principal Secretary to Governement, EFS&T Dept, Telangana Secretariat on 27.10.2025.
15. News Articles published in Disha daily, Surya, Andhra Prabha, Namaste Telangana, Sakshi and Eenadu on 02.11.2025 and in Vartha on 06.11.2025, Kandali News on 10.11.2025.
16. Compliant of Sri Papani Nagaraju R/o Domadugu (V), Gummadidala (M), Sangareddy District regarding discharge of effluents in Nallakunta

cheruvu by the industry on 15.11.2025.

17. News Articles published in Sakshi, ABN Andhra Jyothi, Namaste Telangana, ABN Andhra Jyothi, Andhra Prabha and DishaSangareddy on 18.11.2025.
18. Compliant received from Kalushya Vyathireka Porata Committee (KVPC) of Domadugu on 19.11.2025 regarding water pollution in Nallakunta cheruvu.
19. Complaint of Villagers of Bonthapally Domadugu (V), Sangareddy (D) regarding discharge of effluents in Nallakunta cheruvu by the industry on 20.11.2025.
20. Complaint of Sri Kanneganti Ravi, Sri Mangaiah R/o Domadugu (V), Sangareddy (D) regarding discharge of effluents in Nallakunta cheruvu by the industry on 20.11.2025.
21. News Articles published in Andhra Prabha and ABN Andhra Jyothi on 26.11.2025.
22. Complaint forwarded by CPCB H.D Varalaxmi Reginal Director filed by Sri Dr.BabuRao Kalapala, regarding contamination of NallakuntaCheruvu received through BO Mail Dt:26.11.2025.
23. Complaint received from Group Captain T Srinivasulu SC, Chief Administrative Officer, Air Force Academy Dundigal on 06.12.2025 regarding discharge of effluents in Nallakunta cheruvu by the industry.
24. News Article published in Disha daily on 06.12.2025
25. Complaint forwarded by Principal Secretary to Government, EFS&T Dept., Telangana Secretariat on 29.11.2025, Memo No 5536/For.III/A2/2025 Dt:27.11.2025, Represenattaion received from Additional Director, Intelligence Dept, rearding Protests demanding closure of Hetero Drugs factory at Bonthapally Village, Gummadidala Municipality (Sangareddy District) regarding discharge of effluents in Nallakunta cheruvu by the industry on 03.12.2025.
26. Complaint forwarded by CPCB, HD Varalaxmi, Regional Director, Dt:05.12.2025 filed by Dr. D. Rambabu against severe pollution of Nallakunta Cheruvu due to Hetero manufactured drugs received through BO Mail Dt:09.12.2025.
27. Inspection of the industry by RO Officials on 14.11.2025.
28. The Villagers of Domadugu have filed complaints recently on 06.12.2025 & 12.12.2025
29. Hearing held on 23.12.2025.
30. Industry's undertaking letter received on 30.12.2025.

* * * * *

1. **WHEREAS,** you are operating the industry Unit-I located at Sy. No.213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District and engaged in manufacturing of Bulk Drugs.

2. **WHEREAS,** vide reference 1st cited, the industry has obtained CFO & HWA order dated:02.07.2022 from the Board for manufacture of bulk drugs & drug intermediates with a production capacity of 7173.0 Kgs/day, with a condition that the industry shall not manufacture more than 32 products including R&D products at any given point of time with a validity period up to 31.10.2026.

3. **WHEREAS,** vide reference 2nd cited, the Board issued certain directions to the industry on 31.07.2021, 12.01.2023 & 03.05.2025 in connection with complaints.

4. **WHEREAS,** vide reference 3rd cited, the Task Force Committee members along with RO RCP officials inspected the industry on 01.08.2025 and submitted the report to the Head office on 02.09.2025.

5. **WHEREAS,** vide reference 4th cited, the status of the industry was reviewed in Task Force Committee meeting held on 19.09.2025 at Board office. The committee recommended to defer the case and the RO shall inspect the industry on compliances submitted in the TF meeting after a month and submit the report to Board Office.

6. **WHEREAS,** vide reference 5th to 26th cited, the Board received several complaints filed by the Villagers & others through CPCB, EFS&T & CMO Office etc., and adverse press clippings against the industry for causing pollution of Nallakunta Cheruvu and also other pollution problems to the villagers.

7. **WHEREAS,** vide reference 27th cited, the RO RC Puram Officials monitored the industry on 07.11.2025 and inspected the industry on 14.11.2025 and submitted the report to the Head office on 12.12.2025. The details are as follows:

A. During inspection, following non-compliance of consent conditions and Board directions was observed:

1. Spillage of effluents observed near first-cut rain water storage tanks.
2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
3. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each.
   Industry is storing effluents in first cut Rain water tanks – III, IV, V& VI and were full.
4. The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP instead of LTDS generation pipelines connected to the collection tanks, this does not give actual LTDS effluent generation readings.
5. The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks, this does not give actual HTDS effluent generation readings.
6. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.

   Now, the industry has applied for CFO amendment and same is being submitted to Board office, Hyderabad for further action.
7. The industry has not provided automatic system for scrubbing media of scrubbers.
8. Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective.
9. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
10. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system to arrest the VOCs.
11. The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.
12. The industry has installed new MEE system and dismantled the old MEE system. The industry not covered the new ATFD area properly and the ATFD salts are being air borne and perceptible odour was observed at the MEE area.
13. The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area and perceptible odour was observed at these areas.
14. Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. About 50 tons of HZ waste was observed in the premises.
15. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.
16. Effluent spillages observed in storm water drains provided near production blocks.

17. As per vehicle tracking manifest system, the industry has lifted about 230 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Nov'2025 (till date). As per the records submitted, the industry has treated the contaminated rain water of quantity 4360 KL within the ZLD system. The industry has not lifted contaminated rainwater to JETL, Jeedimetla from the period August'2025 to till now.

B. Complaints and News Paper clippings

The Board has been receiving regular complaints regarding contamination of Nallakuta cheruvu and the news clippings are also appearing in several news papers on this issue.

C. IIT Hyderabad Study Report

As per the Board directions, the industry has engaged IIT-Hyderabad to carry out study of Nallakunta Cheruvu and submitted report.

The study report was conducted by Dr. D. V. Sai Praneeth, Assistant Professor, Department of Civil Engineering, IIT Hyderabad.

As per the Observations made in the report, the surface water exhibited distinct pink pigmentation due to bacteria and COD levels in the range of 120 to 136 mg/l indicating pollution of the lake..

The conclusions and recommendations are as follows:

The overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake.

As a result, heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling.

Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities.

The combination of organic matter, nutrients, sulfide, light penetration in shallow waters, and lack of oxygen created ideal conditions for Purple Sulfur Bacteria and Purple Non-Sulfur Bacteria (Chromatium, Rhodobacter) to multiply extensively. These bacteria are well-known for producing purple, pink, or reddish pigments that impart distinctive coloration to water bodies undergoing anoxic stress. As they grow, these bacteria form buoyant aggregates and biofilms that rise to the surface, producing the visible pinkish scum and floating layers observed in the lake. The settling of these aggregates upon senescence further explains the accumulation of brown/reddish colored sediments at the bottom.

Overall, pink coloration is biological response to excessive nutrient loading and prolonged anoxic conditions. The lake is undergoing a shift from a healthy aerobic ecosystem to a stressed, anaerobic, microbially driven system, signaling deteriorating ecological health.

Immediate interventions including identifying the source of nutrients, restoring aeration, and removing accumulated organic sludge (if any) are essential to prevent further degradation and to reestablish normal aerobic conditions.

Without timely restoration efforts, the lake is likely to continue experiencing recurring microbial blooms, foul odors, poor water clarity, and long-term ecological damage.

Here are the below possible recommended technologies that can potentially reduce the current issue.

a. <u>Aeration + Circulation</u>:

- Aeration directly breaks this cycle by:
- Increasing dissolved oxygen
- Eliminating anoxic layers
- Inhibiting sulfur bacteria
- Oxidizing H_2S
- Improving water clarity

b. <u>Floating Treatment Wetlands (FTWs) Inside the Lake</u>:

Floating wetlands can:

- Uptake N, P, and organic compounds directly.
- Shade the water and reduce light for phototrophic bacteria
- Provide oxygenation to the top layer
- Encourage growth of beneficial biofilms
- Reduce turbidity and suspended colloids

c. <u>Chemical Oxidation (Targeted Pink Color Removal During Events)</u>:

Rhodobacter and Chromatium pigments can be oxidized safely using mild oxidants.

Suitable oxidants:

- Sodium hypochlorite (very low dose for lake-wide use)
- Hydrogen peroxide (most environmentally friendly)
- Potassium permanganate (low dose only)

Functions:

- Kills pigment-producing bacteria
- Oxidizes organic matter
- Breaks biofilms and floating scum
- Removes color

D. ZLD Performance:

The industry has submitted ZLD performance study report conducted by M/s. Right Source Industrial Solutions Pvt Ltd., on 18.09.2025. Following recommendations were made in the study report:

1) It is recommended to improve the ETP performance further through improved monitoring of facility parameters and training to staff which results in operational improvements, maintenance and administration. This includes source control. Reduce shock loads like hydraulic load changes and change in effluent characteristics due to frequent change in production campaign.
2) It is also recommended to avoid shock loads on Aeration system of bio ETP.
3) CIP (Cleaning in process to be scheduled on regular basis) for further improving the performances of MEE and RO System.
4) It is observed during the field study primary clarifiers of both HTDS & LTDS are under maintenance for removal of sludge. Primary treatment is to be ensured for effective treatment of HTDS effluents in Stripper / MEE for effective evaporation and output. It also reduces fouling and scaling of calandria tubes of MEE system.
5) It is suggested to ensure and avoid leakages from stripper and MEE flow pumps and other transfer pumps at treatment systems.

The above recommendations confirm the non-compliance of ZLD / effluent treatment systems observed by the Board officials and Task Force Committee members during inspection of the industry at various times.

Subsequently, the industry removed the old ZLD system and installed new ZLD system.

The Board officials monitored various units of ZLD system on 07.11.2025 and collected samples. The analysis reports indicated the following deviations / issues:

pH:

The pH values of influents to MEE system and Biological ETP should be in neutral pH i.e., 6.5 to 7.5 for effective functioning of MEE system and Biological ETP.

However, the pH values of samples bearing No.11063 to 11070 are ranging from 9.0 to 10.75. indicating the industry is not carrying out pre-treatment of the effluents properly before feeding to MEE system and Biological ETP.

TDS:

The TDS values of the samples bearing No.11063 (HTDS effluents) to 11066(LTDS effluents) are almost same (11893 mg/L & 11326mg/L respectively) indicating improper segregation of the HTDS and LTDS effluents by the industry.

The TDS value of the samples No.11070 (RO feed) is 15533 mg/L and for samples No.11071(RO Reject) is 2996 mg/L. The RO system is should reduce inorganic solids i.e., TDS load in the treated effluents and the TDS load will come out as RO reject. Hence, the RO reject will have more TDS values whereas, in this case low TDS value of samples bearing No.11071 (RO Reject) indicates poor performance of RO system.

COD:

The COD value of the samples bearing No.11066(LTDS effluents) is 4,816 mg/L, whereas for samples bearing No.11070(Outlet of ETP (RO feed)) is 10,000 mg/L.

The COD load should be reduced from inlet of ETP to outlet of ETP, whereas, in this case there is increase in COD values after treatment in biological ETP indicating poor performance of the Biological ETP.

As per the analysis reports, the Performance of ZLD system is not satisfactory.

It was observed that industry is repeatedly not complying with consent conditions and Board directions as noted during the inspection of the industry conducted on 14.07.2022, 02.08.2023, 07.06.2024, 03.08.2024, 04.03.2025, 16.04.2025, 01.08.2025 and 14.11.2025. The details are as follows:

8. **WHEREAS,** vide reference 28th cited, the Villagers of Domadugu have filed complainants regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members in front of Head Office on 12.12.2025. They are strongly alleged that the industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

9. **WHEREAS,** vide reference 29th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 23.12.2025. The complainants, RO-RC Puram and representative of the industry have attended the meeting.

   I. The Committee noted the following:

      1. During inspection, it was observed that industry is repeatedly not complying with consent conditions and Board directions as noted during the earlier inspections conducted on 14.07.2022, 02.08.2023, 07.06.2024, 03.08.2024, 04.03.2025, 16.04.2025& 01.08.2025.

      2. The Villagers of Domadugu have filed complainants regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members in front of Head Office on 12.12.2025. They are strongly alleged that the industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution

problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

3. **ZLD Performance:**

- The industry has submitted ZLD performance study report conducted by M/s. Right Source Industrial Solutions Pvt Ltd., on 18.09.2025. As per the report they made certain recommendations and confirmed the non-compliance of ZLD / effluent treatment systems observed by the Board officials and Task Force Committee members during inspection of the industry at various times.
- Subsequently, the industry removed the old ZLD system and installed new ZLD system.
- The Board officials monitored the stage wise of new ZLD system on 07.11.2025 and collected samples. The analysis reports indicated the following deviations / issues:

pH:

The pH values of influents to MEE system and Biological ETP should be in neutral pH i.e., 6.5 to 7.5 for effective functioning of MEE system and Biological ETP.

However, the pH values of samples bearing No.11063 to 11070 (HTDS effluents, MEE Feed, MEE Condensate, LTDS Effluents, Aeration Tank-I, Secondary Clarifier Outlet, Aeration Tank-II & Outlet of Bio ETP) are ranging from 9.0 to 10.75 and indicating that the industry is not carrying out pre-treatment of the effluents properly before feeding to MEE system and Biological ETP.

TDS:

The TDS values of the samples bearing No.11063 (HTDS effluents) to 11066(LTDS effluents) are almost same (11893 mg/L & 11326mg/L respectively) indicating improper segregation of the HTDS and LTDS effluents by the industry.

The TDS value of the samples No.11070 (RO feed) is 15533 mg/L and for samples No.11071 (RO Reject) is 2996 mg/L. The RO system is should reduce inorganic solids i.e., TDS load in the treated effluents and the TDS load will come out as RO reject. Hence, the RO reject will have more TDS values whereas, in this case low TDS value of samples bearing No.11071 (RO Reject) indicates poor performance of RO system.

COD:

The COD value of the samples bearing No.11066 (LTDS effluents) is 4,816 mg/L, whereas for samples bearing No.11070 (Outlet of ETP (RO feed)) is 10,000 mg/L.

The COD load should be reduced from inlet of ETP to outlet of ETP, whereas, in this case there is increase in COD values after treatment in biological ETP indicating poor performance of the Biological ETP.

- As per the analysis reports, the Performance of new ZLD system is not satisfactory.

4. **IIT Hyderabad Study Report**

As per the Board directions, the industry has engaged IIT-Hyderabad to carry out study of Nallakunta Cheruvu and submitted report. The study report was conducted by Dr. D. V. Sai Praneeth, Assistant Professor, Department of Civil Engineering, IIT Hyderabad.

As per the Observations made in the report, the surface water exhibited distinct pink pigmentation due to bacteria and COD levels in the range of 120 to 136 mg/l indicating pollution of the lake.

The report concluded that the overall assessment of the lake clearly indicates that the pink coloration is a symptom of severe ecological imbalance driven primarily by Nutrient overloading and subsequent development of anoxic, microbially active conditions. The physicochemical data show elevated turbidity, and significant nutrient enrichment from nitrogen and phosphorus. These inputs have overwhelmed the natural assimilative capacity of the lake.

As a result, heterotrophic microorganisms rapidly decompose the organic matter/nutrients, consuming dissolved oxygen in the water column and the sediments below. This oxygen depletion created stratified anoxic zones that fundamentally altered the lake's biogeochemical cycling.

Under these oxygen-poor conditions, sulfate-reducing bacteria became active, generating hydrogen sulfide and providing the chemical environment necessary for the proliferation of specialized pigmented microbial communities.

The committee perused the above study report including conclusion & recommendations.

5. **Non Compliance observed on 14.11.2025:**

1. Spillage of effluents observed near first-cut rain water storage tanks.
2. The industry has covered the spillages towards the North – East corner of the first cut rain water tanks with fresh soil.
3. The industry is having 6 No's of first cut rain water storage sumps of capacity 2000 KL each.
4. Industry is storing effluents in first cut Rain water tanks – III, IV, V& VI and were full.
5. The industry has provided LTDS flow meter with camera at domestic pipeline connected to STP instead of LTDS generation pipelines connected to the collection tanks, this does not give actual LTDS effluent generation readings.
6. The industry has provided HTDS flow meter connected to the common pipeline attached to effluent lines coming from some production blocks only and remaining HTDS pipelines are directly connected to storage tanks, this does not give actual HTDS effluent generation readings.
7. As per CFO, the industry is permitted to install and operate 8 TPH and 3 TPH (stand by) Coal fired Boilers. However, industry has installed and operating 12 TPH coal fired boiler without obtaining CFO of the Board and 8 TPH boiler is kept as stand by.
8. Now, the industry has applied for CFO amendment and same is being submitted to Board office, Hyderabad for further action.
9. The industry has not provided automatic system for scrubbing media of scrubbers.
10. Industry has provided hood with extraction systems to the HTDS collection tanks. However, certain holes were observed in the hood which make the system ineffective.
11. The industry has not provided sub cooler condensers system followed by activated charcoal bed to arrest the VOCs from the scrubber attached to ATFD.
12. The industry has not provided sub cooler condensers system followed by activated charcoal bed to the vents of scrubbing system to arrest the VOCs.

13. The industry has not connected the process and vacuum leak sources through fume extraction system connected to a Cryogenic condensation followed by activated charcoal bed.

14. The industry has installed new MEE system and dismantled the old MEE system. The industry not covered the new ATFD area properly and the ATFD salts are being air borne and perceptible odour was observed at the MEE area.

15. The industry has provided PIION spraying system at the MEE area but, not provided at HTDS storage tanks, pre-treatment area and Bio-ETP area and perceptible odour was observed at these areas.

16. Industry has provided open shed with leachate collection pit for storage of hazardous waste behind new MEE system. About 50 tons of HZ waste was observed in the premises.

17. The industry has not provided 4 feet free way along the boundary wall towards Air Force Academy for easy excess to carryout inspection of the industry by the Board Officials. Instead the industry has provided openings in their boundary wall to view the open area towards Air Force Academy.

18. Effluent spillages observed in storm water drains provided near production blocks.

19. As per vehicle tracking manifest system, the industry has lifted about 230 KL of effluents to JETL, Jeedimetla during the period from April'2025 to Nov'2025 (till date). As per the records submitted, the industry has treated the contaminated rain water of quantity 4360 KL within the ZLD system.

20. The industry has not lifted contaminated rainwater to JETL, Jeedimetla from the period August'2025 to till now. But as per the Board directions dated 03.05.2025, the industry has to lift the contaminated rain water present in the 6 Nos. of Tanks to M/s. PETL, Patancheru / M/s. JETL, Jeedimetla within 15 days.

21. The study conducted and report submitted by the IIT, Hyderabad as per the Board directions, indicates pollution of Nallakunta Cheruvu. The report has recommended certain technological options for reduce the current issue. However, no specific study details are included in the report such as chemical contamination of Nallakuta cheruvu and correlating with effluents of the industry.

6. **Pollution of Nallakunta Cheruvu:**

The Board officials have collected samples of Nallakunta Cheruvu in connection with public complaints on various occasions. As per the analysis reports, the values of certain important parameters are as follows:

S. No.	Date of sample collected	Chemical Oxygen Demand (COD) in mg/l	Dissolved Oxygen (DO) in mg/l
1	10.06.2021	64	5.2
2	14.07.2022	74	6.2
3	26.07.2022	65	6.3
4	08.09.2022	53	6.5
5	07.06.2024	946	Nil
6	03.08.2024	240	3.2
7	04.03.2025	180	1.8
8	01.08.2025	1676	1.2
9	20.09.2025	649	--

The above COD and Dissolved oxygen levels indicate pollution of Nallakunta Cheruvu.

As per the finger printing Analysis reports of the samples collected on 20.09.2025 from Nallakunta Cheruvu, back water entering from Nallakunta cheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry.

Sertraline HCl is consented product in CFO order Dt: 02.07.2022 and is found in stagnated back water sample entering from Nallakunta cheruvu into airforce academy (542).

The chemicals found in Water sample of Nallakunta Cheruvu, Domadugu (V), Sangareddy (D):

1. **N,N-Dimethylpivalamide**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536) and stagnated back water sample entering from Nallakunta cheruvu into airforce academy (542).

2. **N-Formylmorpholine**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536), Rain water storage tank 6 of industry (537) and stagnated back water sample entering from Nallakunta cheruvu into air force academy (542).

3. **Morpholine-4-carbonylchloride**

   Present in Nallakunta Cheruvu (543), Rain water storage tank5 of industry (536) and stagnated back water sample entering from Nallakunta cheruvu into airforce academy (542).

4. **[2,2'-Bi-1H-indene]-1,1'-dione, 2,2',3,3'-tetra**

   Present in Nallakunta Cheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakuntacheruvu into airforce academy (542).

5. **1,2:4,6-Di-O-isopropylidene-L-sorbopyranos**

   Present in Nallakunta Cheruvu (543), and stagnated back water sample entering from Nallakunta cheruvu into air force academy (542).

6. **1,4-Benzenedicarboxylicacid, bis(2-methylp**

   Present in Nallakunta Cheruvu(543), Rain water storage tank 6 of industry (537) and stagnated back water sample entering from Nallakuntacheruvu into air force academy(542).

7. **Pyrrolidine, 1-[4-(4-chlorophenyl)-3-phenyl-**

   Present in Nallakunta Cheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakuntacheruvu into air force academy(542).

8. **6,7-Dichloro-4b, 10-ethenobenz(a)azulene**

   Present in Nallakunta Cheruvu (543), stagnated waste water collected from outside the compound wall of M/s Hetero Drugs Unit-I (North side) (540) and stagnated back water sample entering from Nallakuntacheruvu into air force academy(541).

The above reports indicates that presence of same chemicals in Nallakunta Cheruvu, back water entering from Nallakunta cheruvu into Air Force Academy, stagnated waste water outside the compound wall of the industry (North side) and Rain water storage tanks of the industry is confirming that effluents discharged by the industry is resulting in pollution of Nallakunta Cheruvu.

7. The Hon'ble NGT (Principal Bench), Delhi has registered suo-motu case on the basis of the news item titled **"Sangareddy: Villagers activists protest Pharma effluent discharge at NallaCheruvu"** appearing in Telangana Today dated 24.09.2025 in the matter of Original Application No. 538/2025. Subsequently, the the Hon'ble NGT (Principal Bench), Delhi has transferred the case to the Hon'ble NGT Southern Zonal Bench, Chennai, as OA No 239 of 2025 for appropriate further

action. **The CPCB, Sangareddy District Collector and TGPCB are made respondents in the case. The Board has to file action taken report.**

II. The industry has informed the following:

1. They arrested spillages near fist cut rain water storage tanks. In order to avoid spillages and seepages at North-East corner of the first cut rainwater tanks, stone riveting and levelling work with soil was done.
2. They are not storing effluents in rainwater storage tanks. The water in the storage tanks-III, IV, V &VI are the first cut rainwater which was collected during this rainy season till october'2025. They unable to send the contaminated rain water/ effluents to M/s.JETL, Jeedimetla as M/s. JETL has insisted them to take the RO permeate(Treatd water) back to the industry so as to lift the contaminated rain water/ effluents from the their indusrty. However, they proposed to lift the same to all CETPs located in and around Hyderabad city with immediate effect.
3. They will dismantle the 4 Nos. of first cut rain water tanks i.e. tank wise after disposal of effluents/ contaminated rain water to the CETPs.
4. They requested the committee for further study on contamination of Nallakunta Cheruvu with their effluents if any including finger print analysis and requested to take further action on the pollution of Nallakunta Cheruvu.
5. They connected flow meter to LTDS effluents generation pipelines joints collection tank to measure LTDS effluent generation.
6. The raw high TDS effluent lines from all production block with block identification are arranged and are being connected to common pipeline and is connected to HTDS flow meter to measure High TDS effluent generation.
7. They have installed and operating 12 TPH coal fire boiler in place of permitted boilers of capacities (8 TPH & 3 TPH) and the same was informed to board office vide our letter dated 13.03.2023. They also submitted application to board office to regularize 12 TPH boiler with 8 TPH standby which is under process at Board office.
8. They have provided hooter system at hood and scrubbing system of HTDS and LTDS storage tanks for effective scrubbing. They have provided hood with extraction systems for HTDS and LTDS effluent storage tanks. The hood system has inbuilt holes with valves to avoid implosion inside hood areas of the extraction system.
9. They have connected ATFD vent to sub cooling condenser and the condenser vent is connected to scrubbing system to combat VOC emissions. The provision of activated charcoal bed is not feasible in view of safety.
10. They have connected process vent to primary and secondary condensing system with chilled Brine and RT water as cooling media and the condenser vent is connected to scrubbing system to cambat VOC emissions. The provision of activated charcoal bed to the vents of scrubbing system technically and safety point of view is not feasible.
11. They have stopped open collection of ATFD Salts and provided closed trolley for collection of ATFD salts to control localised odour at our New ATFD area.
12. They will extend the existing installed PIION Spraying system at HTDS storage tanks, pre-treatment area and Bio-ETP area within a month.
13. They have provided dedicated Hazardous waste storage shed with leachate collection pit and safety arrangements for storage of Hazardous waste.
14. They have provide opening in the boundary wall to view the open area towards Air Force Academy.
15. They have removed effluent spillages to storm water drains provided near production block.
16. They have lifted 230 KL of contaminated rainwater to JETL and treated 5433 KL contaminated rainwater up to 11.12.2025.

The committee examined the following:

a) The Villagers of Domadugu have filed complaints regularly and recently on 06.12.2025 & 12.12.2025. They made Dharna with villagers about 80 members

in front of Head Office on 12.12.2025. They are strongly alleged that the industry is located in Bonthapally Village and causing severe water pollution to their village tank i.e. Nallakunta Cheruvu since long time. In the year 2012, the industry has lifted the contaminated polluted water (Pink Colour) from the Nallakunta Cheruvu and similarly they polluted the tank & water become pink colour with chemical smell. They requested the Board to close the industry or to evacuate their village people to other place so as to avoid facing pollution problems to the villagers. The villagers are affected several dieses such as skin problems, lungs problems, cancer related issues and the ladies are suffering with Gynic issues.

b) Adverse press clippings regarding pollution of Nallakunta Cheruvu.

c) Complaints from Air Force Academy regarding pollution of Nallakunta Cheruvu.

d) The Pollution of Nallakunta Cheruvu and recommendations as per the study report of the IIT, Hyderabad.

e) Non compliances by the industry and the industry request during the meeting that they will lift the contaminated rain water/ effluents from the their industry to all CETPs located in and around Hyderabad city with immediate effect and also they requested the committee for further study on contamination of Nallakunta Cheruvu with their effluents if any including finger print analysis and requested to take further action on the pollution of Nallakunta Cheruvu.

After detailed discussions, the committee recommended the following:

1. To issue directions to the industry after submission of the undertaking letter as committed during meeting.
2. The industry shall lift the all contaminated waste water/effluent present in the tanks within the industry premises to CETPs (PETL/ JETL/ MANA CETP/ IDPL/ & Pashamailaram CETP) within 15 days and submit the disposal details along with manifest copies to the Board on daily basis.
3. The industry shall dismantle 4 Nos. of tanks out of 6 Nos of tanks after lifting the waste water to CETPs i.e. tank wise dismantle after its empty atleast by removing tank wall one side to avoid any further storage.
4. The industry shall send the effluents generated from the process to CETP till ZLD stabilized and after approval from the Board.
5. The industry shall explore for removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and also explore suitable direction for letting of excess rain water
6. A detailed study shall be carried on the following with reputed organization like NEERI/ IICT/ NGRI etc.
    i. Collection of effluent samples from the industry and Nallakunta Cheruvu and conduct physical & chemical analysis including finger print analysis with quantitatively.
    ii. Collection of sediments from the Nallakunta Cheruvu in various locations and the characteristics of sediment with regard to chemicals identified (finger printing analysis) with the Nallakunta Cheruvu water/ effluents of the industry.
    iii. Source of contamination of Nallakunta Cheruvu.
    iv. Remediation measures for restoration of Nallakunta Cheruvu.
    v. Recommendations to avoid future contamination/ pollution of the Nallakunta Cheruvu including removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and suggest suitable direction for letting of excess rain water.

vi. The cost incurred towards study shall be borne by the industry under Polluter Pay Principle.

7. The industry shall submit an additional Bank Guarantee of Rs.64.0 Lakhs in addition to the existing Bank Guarantee of Rs.32.0 Lakhs (Total BG amount is Rs.96.0 Lakhs) within one week.
8. The industry shall be reviewed after a month.

10. **WHEREAS,** vide reference 30th cited, the industry has submitted undertaking letter along with the compliance status on 30.12.2025.
11. **WHEREAS, after careful consideration of the material facts of the case, the Board hereby issue following directions to your industry to comply within one month:**
    1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
    2. The industry shall comply the conditions stipulated in the directions issued to the industry vide order dated 03.05.2025.
    3. The industry shall obtain necessary amendments/ consents of the Board for operation of 12.0 TPH Boiler with in one month.
    4. The industry shall take odour control measures at all sources particularly at ZLD system including ATFD & Biological ETP.
    5. The industry shall operate scrubbers effectively to control the odour.
12. 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).
13. 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 Hetero Drugs Ltd., Unit – I,
Sy. No. 213, 215 & 253, Bonthapally Village,
Gummadidala (M), Sangareddy District

Copy to :

1. The JCEE., Z.O., R.C.Puram for information and necessary action.
2. The Environmental Engineer, Regional Office, RC Puram for information and necessary action. The RO shall inspect the industry after a month and submit the report.
3. Concerned file.

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

Annexure-VI

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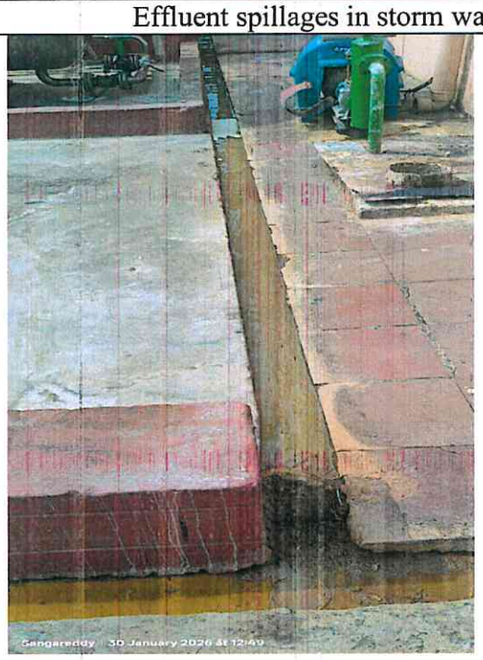
Photograph taken during inspection of M/s Hetero Drugs Ltd., Unit – I is located at Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District on 30.01.2026

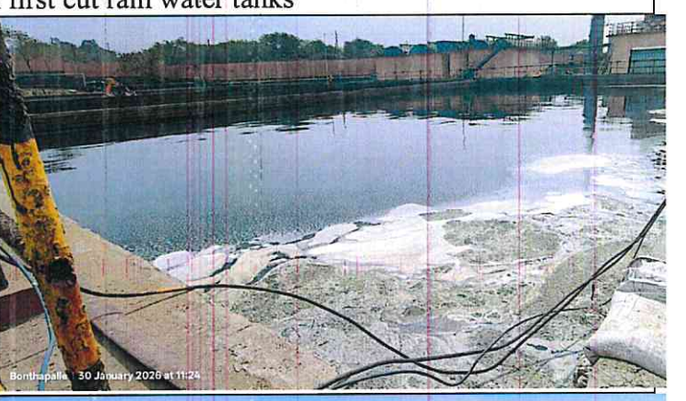
Effluent spillages at the intermediate effluent collection tank near Production block - L

Effluent spillages in storm water drains near production blocks



RO system is not working during inspection

Effluent stored in first cut rain water tanks

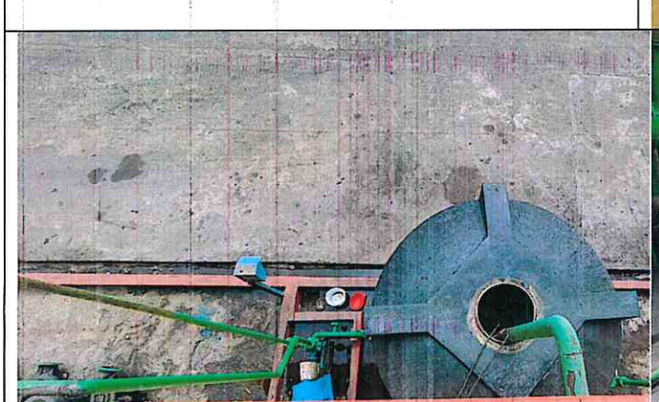


Sludge after removing effluent from tank – VI & carrying one side wall removing works by excavator

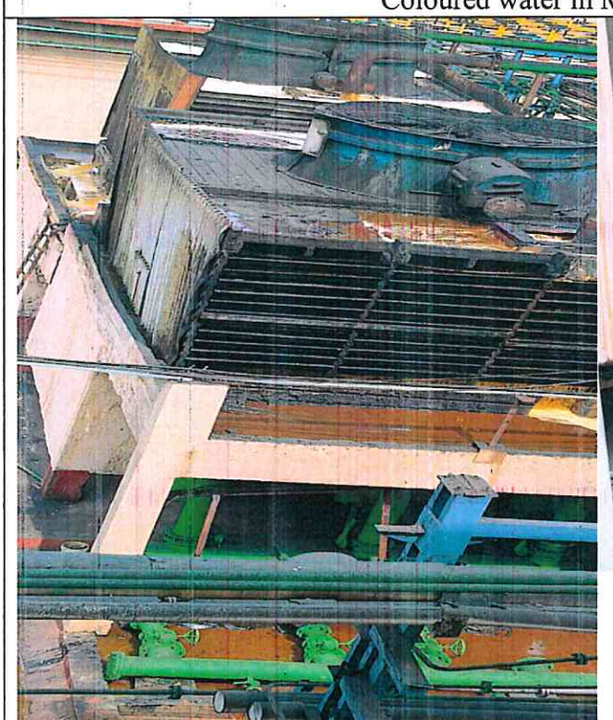
117

Effluent spillages near first cut rain water tanks

Effluent spillages under HTDS storage tanks, near effluent tanks & MEE area

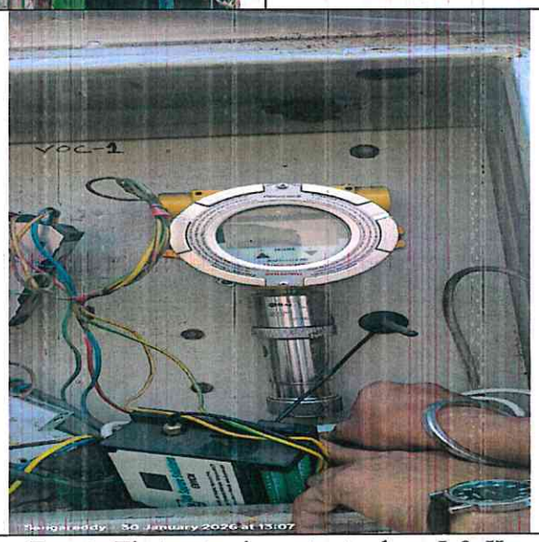


Coloured water in MEE cooling towers

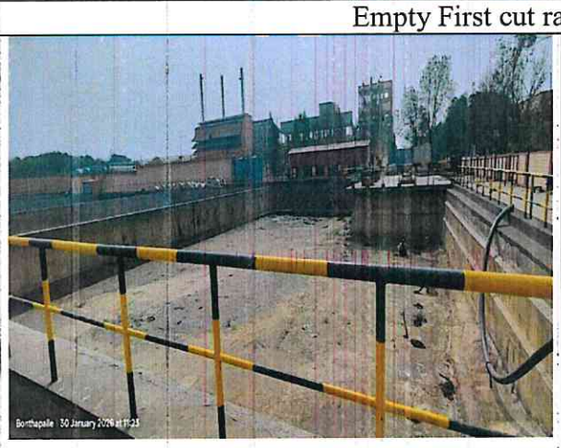


Scrubber attached to HTDS effluent storage tanks not working

LTDS & HTDS effleunt flow meters & shifting works under progress



Empty First cut rain water tanks – I & II

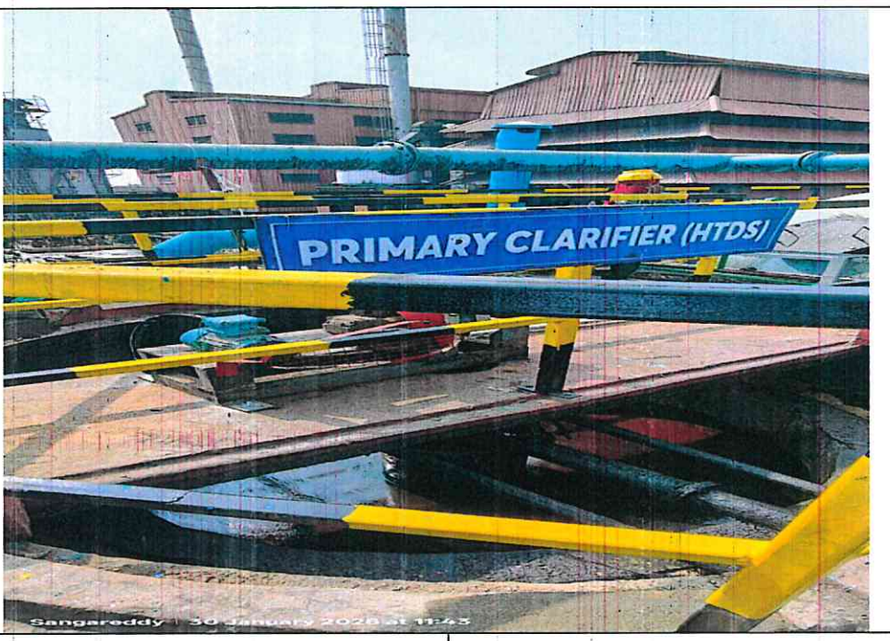


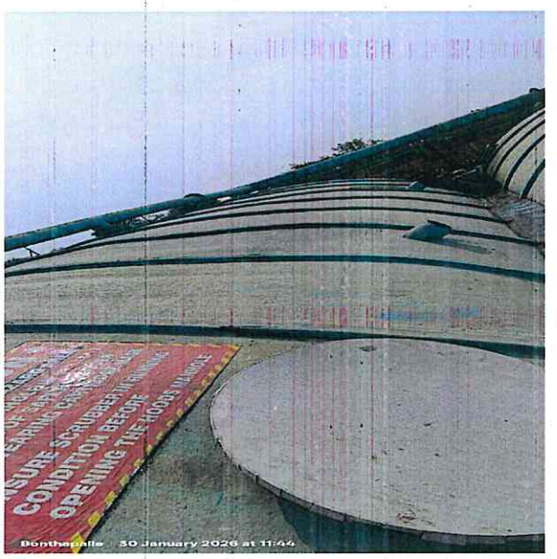
120

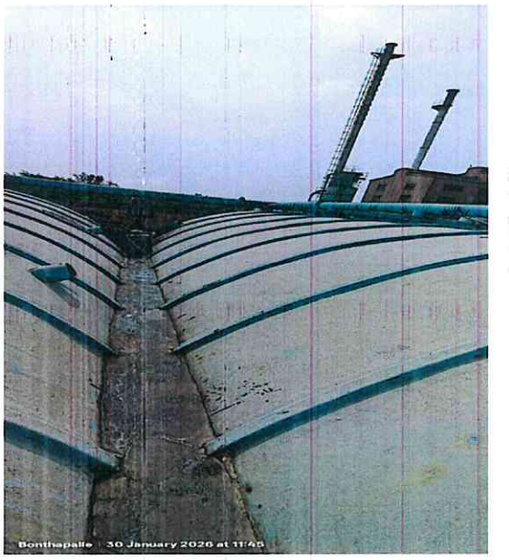

Bonthapalle 30 January 2026 at 11:28


Sangareddy | 30 January 2026 at 13:40

121







ATFD Salts stored openly & spillages observed


Bonthapalle 30 January 2026 at 12:09

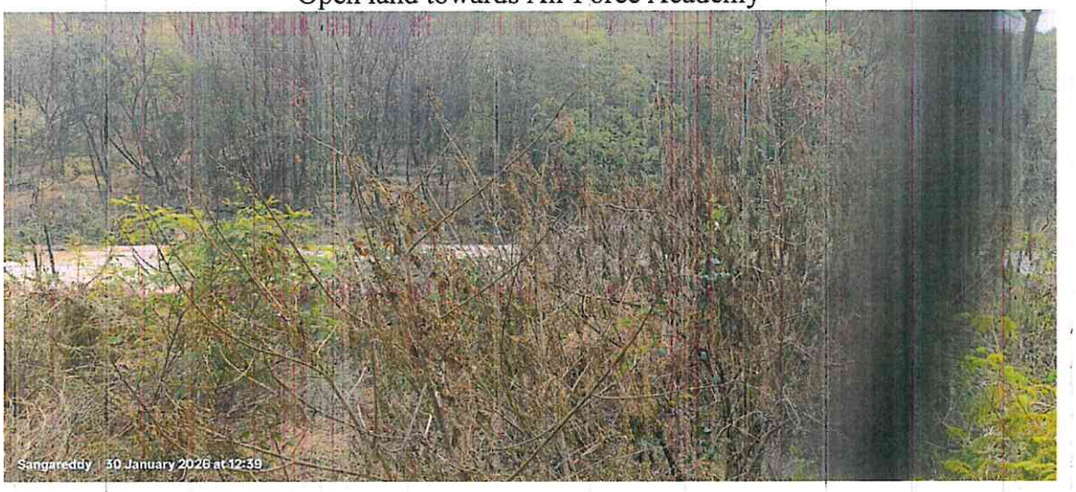

Sangareddy 30 January 2026 at 12:08


FINAL CLARIFIER


Sangareddy 30 January 2026 at 12:31

Sewage Treatment Plant

Open land towards Air Force Academy



Storm water drain from the industry towards open lands in Air Force Academy

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Annexure-VII

TELANGANA POLLUTION CONTROL BOARD
Paryavarana Bhavan, A-3, Industrial Estate,
Sanathnagar, Hyderabad – 500 018

124

Ph: 040-23887500

Lr. No.TGPCB/TF/CPCB/2025- 2568 **Date:01.01.2026**

To
The Chief Scientist,
Environment Protection Training and Research Institute [EPTRI],
91/4, Gachibowli - Miyapur Road, Indira Nagar,
Gachibowli, Hyderabad,
Telangana 500 032.
Email:chiefscientist.eptri@gmail.com

T.G.P.C.B. REGIONAL OFFICE INWARD DATE 5893 SIGN 09/01/26 R.C. Puram, Sangareddy Dist.

The Chief Scientist,
National Environmental Engineering Research Institute
IICT Colony, Tarnaka,
Secunderabad, Telangana 500 007
Email:shaik.basha@csi.res.in

The Chief Scientist,
The Business Development & Research Management ,
CSIR-Indian Institute of Chemical Technology [CSIR-IICT]
Uppal Road, Hubsiguda,
Hyderabad - 500 007.
rmohan.iict@csir.res.in

Sir,

Sub: TGPCB – Conduct of detailed study on Pollution of Nallakunta Cheruvu- Request for proposals with financial estimates - Reg.

Ref: 1. Several complaints filed by the Villagers & others through CPCB, EFS&T & CMO Office etc., and adverse press clippings against on M/s.Hetero Drugs Ltd., Unit-I, Sangareddy District.
2. Task Force Committee Meeting held on 23.12.2025.

*****

It is to inform that the Board received several complaints filed by the Villagers & others through CPCB, EFS&T & CMO Office etc., and adverse press clippings against on the industry M/s.Hetero Drugs Ltd., Unit-I, Sangareddy District for causing pollution of Nallakunta Cheruvu and also other pollution problems to the villagers.

The status of M/s Hetero Drugs Ltd., Unit – I, Sy. No. 213, 215 & 253, Bonthapally Village, Gummadidala (M), Sangareddy District was reviewed in the Task Force Committee meeting held on 23.12.2025. After detailed discussions, the committee recommended to carry out a detailed study of Nallakunta Cheruvu with reputed organization like NEERI/ IICT/ NGRI etc, on the following:

i. Collection of effluent samples from the industry and Nallakunta Cheruvu and conduct physical & chemical analysis including finger print analysis with quantitatively.
ii. Collection of sediments from the Nallakunta Cheruvu in various locations and the characteristics of sediment with regard to chemicals identified (finger printing analysis) with the Nallakunta Cheruvu water/ effluents of the industry.
iii. Source of contamination of Nallakunta Cheruvu.
iv. Remediation measures for restoration of Nallakunta Cheruvu.

v. Recommendations to avoid future contamination/ pollution of the Nallakunta Cheruvu including removal of existing rain water drain outlet located towards Air Force Academy to avoid contamination / pollution of Nallakunta Cheruvu in future and suggest suitable direction for letting of excess rain water.

vi. The cost incurred towards study shall be borne by the industry under Polluter Pay Principle.

In view of the above, it is requested to submit the proposals along with financial estimates and time lines (**preferably within one month time**) for above said study within 10 days so as to enable the Board to take further action.

Sd/-
MEMBER SECRETARY

Copy to :

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

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

(126) Annexure – VIII

Item No.01:-

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

[Through Physical Hearing (Hybrid Option)]

Original Application No.239 of 2025 (SZ)
[Earlier O.A. No.538 of 2025(PB)]

IN THE MATTER OF:

Tribunal on its own motion **SUO MOTU** based on the news item published in Telangana Today, dated 24.09.2025, **"Sangareddy: Villages activists protest Pharma effluent discharge at Nalla Cheruvu".**

And

Central Pollution Control Board,
Through its Member Secretary,
New Delhi and Ors.

...Respondent(s)

Date of hearing: 03.12.2025.

CORAM:

HON'BLE Smt. JUSTICE PUSHPA SATHYANARAYANA, JUDICIAL MEMBER

HON'BLE Dr. PRASHANT GARGAVA, EXPERT MEMBER

For Applicant(s): Suo Motu.

For Respondent(s): Mr. Mohamed Aathic represented Mrs. H. Yasmeen Ali for R2.

(127)

Mr. B. Rajaprabhakar represented
Mr. T. Sai Krishnan for R3.

ORDER

1. The above matter was Suo Motu registered by the Principal Bench of the National Green Tribunal, New Delhi, as *Original Application No.538 of 2025 (PB)*, based on a news item published in 'Telangana Today' dated 24.09.2025, titled ***"Sangareddy: Villagers activists protest Pharma effluent discharge at Nalla Cheruvu"***. Thereafter, it has been transferred to this Bench and renumbered as *Original Application No. 239 of 2025 (SZ)*.

2. It is reported in the news item that an environmental activist, Mr. Paladugu Ganeshwar, along with the villagers of Dommadugu, staged a protest against the discharge of toxic effluents by pharmaceutical companies. In view of the same, it would be appropriate to implead him as a party to the present proceeding.

3. Let notice be issued to the respondents through the Tribunal along with a copy of the newspaper report.

4. The learned counsel Mr. Mohamed Aathic representing Mrs. H. Yasmeen Ali accepts notice on behalf of Respondent No.2 and Mr. B. Rajaprabhakar representing Mr. T. Sai Krishnan accepts notice on behalf of Respondent No.3.

(128)

5. The learned counsels appearing for the official respondents are directed to take the papers from the Registry and file a report before the next date of hearing.

6. The Telangana Pollution Control Board (TGPCB), while inspecting the area near Nalla Cheruvu referred to in the application, is directed to identify the pharmaceutical companies involved and the environmental activist, Mr. Paladugu Gnaneshwar, who reportedly protested against the discharge of toxic effluents, as mentioned in the news item, and to furnish their names and addresses to the Registry. Thereafter, they shall be impleaded as party respondents.

7. In the meantime, if any violations are observed during the inspection, let the TGPCB take appropriate action and also explain the reasons for any delay in taking action till then.

8. Post the matter on **05.02.2026.**

Sd/-
Smt. Justice Pushpa Sathyanarayana, JM

Sd/-
Dr. Prashant Gargava, EM

O.A. No.239/2025 (SZ)
03rd December, 2025. AD.