

**BEFORE THE NATIONAL GREEN TRIBUNAL
(SOUTHERN ZONE) CHENNAI**

ORIGINAL APPLICATION NO. 66 OF 2017 (SZ)

IN THE MATTER OF:

Vallapureddy Gari Govardhan Reddy and Ors.

.... Applicant

Versus

Union of India and Ors.

.... Respondent(s)

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Place: Chennai

Date: 25 .06.2025



Counsel for Central Pollution Control Board

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Compliance report of CPCB on order dt 27.02.2025
of Hon'ble NGT(SZ) in O.A. No. 66/2017 (SZ)

1. Hon'ble NGT (SZ) in its order dated 27.02.2025, directed as follows:

"1. Respondent No.1/MoEF&CC has filed a memo dated 01.08.2024.

2. The present matter relates to the probable pollution that is likely to be caused on account of nano industries, including the Precipitated Calcium Carbonate Unit, etc.

3. Admittedly, the EIA Notification, 2006 does not find a mention about these Nano Technology Industries, whether to obtain prior Environmental Clearance or not. In this regard, a direction was issued to the MoEF&CC to make a thorough study, bring in the appropriate guidelines and include the Nano Technology Industries in the EIA Notification, 2006.

4. Pursuant to the same, the MoEF&CC has submitted the proposal to the National Environmental Engineering Research Institute (NEERI) and the same was approved by the competent authority. They are yet to sign the agreement with NEERI for this purpose.

5. Let the MoEF&CC file an additional report to state whether the agreement with NEERI has been entered into and the timeline within which they can complete the study.

6. We are passing this order in the matter of the year 2017 wherein the judgment was passed in 2022. Despite the passage of so many years, there is no complete progress made. While a thorough study is being entrusted to NEERI, there should be some kind of regulations for those industries involving Nano Technology, for which, the MoEF&CC and the Central Pollution Control Board (CPCB) to join hands and issue guidelines pending the detailed study.

7. As already the pollution that may be caused in this regard is highlighted in the Original Application, we only direct the MoEF&CC and the CPCB to take a serious view on this matter, expedite the process and issue appropriate guidelines in consultation with the scientists of the APPCB before the NEERI report comes.”

2. In reference to the directions in above-mentioned Para 7 of the order, MoEF&CC vide O.M. dated 22.05.2025 requested Central Pollution Control Board (CPCB) and Andhra Pradesh Pollution Control Board (APPCB) to provide appropriate draft guidelines to the Ministry for the regulation of those industries involving Nano Technology till the report of CSIR-NEERI comes out. Therefore, CPCB proposed to carry out detailed inspection of the particular unit mentioned in the O.A. by a joint team of CPCB RD-Chennai and APPCB, in which MoEF&CC RO was also to be associated, so that based on the joint inspection, the joint team may suggest necessary safeguards and conditions, which can be enforced through consent mechanism.

However, in reference to letter dated 20.03.2025 of CPCB-RD, Chennai, APPCB vide letter dated 07.05.2025 replied that the unit mentioned in the O.A. - M/s Santhiram Chemicals Pvt. Ltd. (the unit) has proposed to establish a project for the manufacture of Precipitated calcium carbonate and Nano Precipitated calcium carbonate plant at Sy.No.570/1, Kondajatur (V), Panyam (M), Nandyal District (Erstwhile Kurnool) covering an extent of 150 acres. The project/activity is not covered in the schedule of the EIA Notification, 2006 and its subsequent amendments. APPCB, Zonal office, Kurnool had issued Consent for Establishment of the Board to the unit on 23.09.2016 with a validity period of 7 years i.e. 22.09.2023 permitting the construction of the unit for manufacture of the Precipitated Calcium Carbonate and Nano Precipitated Calcium Carbonate. The validity of the Consent for Establishment order issued by the Board expired on 22.09.2023. The unit has not started any construction activity since 2016 to till date, except the construction of boundary walls. APPCB officials inspected the site on 26.10.2023 and observed that there is no construction activity since 2016, except the construction of boundary walls. The status remains the same from 2016 onwards. It is therefore

respectfully submitted that the unit under reference has not yet been established as informed by APPCB. The copy of aforementioned letter of APPCB is enclosed as **Annexure -I**.

3. The online search over internet indicated that an industry M/s Himachal Polyolefins Limited, Himachal Pradesh may be manufacturing nano precipitated calcium carbonate. Accordingly, CPCB vide letter dated 21.05.2025 requested CPCB RD Chandigarh, MoEF&CC, and Himachal Pradesh State Pollution Control Board (HPSPCB) to conduct a joint inspection and suggest necessary safeguards and conditions for such units, which can be enforced through consent mechanism. However, it has been informed by CPCB, RD Chandigarh that HPSPCB RO, Sirmour has informed that M/s Himachal Polyolefins Limited does not produce nano calcium carbonate and has no facility to produce nano calcium carbonate.

4. In view of the above, CPCB vide letter dated 15.05.2025, also requested CSIR-NEERI to inform name and addresses of existing/operational industries which produce nano precipitated calcium carbonate in the country. However, CSIR-NEERI vide letter dated 06.06.2025 has also replied that CSIR-NEERI does not maintain an independent registry of operational nano industries, implying they also do not have knowledge about an operational nano calcium carbonate producing units. The copy of aforementioned letter of CSIR-NEERI is enclosed as **Annexure -II**.

5. It is submitted that since APPCB has informed that the manufacturing infrastructure of the Nano Precipitated Calcium Carbonate manufacturing unit under reference (M/s Santhiram Chemicals Pvt. Ltd.) has still not been established and its Consent for Establishment has also expired. Therefore, CPCB respectfully submits that:

i) CPCB vide letter dated 23.06.2025 has communicated to all State Pollution Control Boards and Pollution Control Committees to inform the details of operational Nano industries including precipitated Calcium carbonate industries in their jurisdiction, so that the same may be jointly inspected by CPCB and concerned SPCB, along with other relevant agencies, for preparing guidelines for the interim period till the NEERI report comes. Copy of aforementioned CPCB letter to all SPCBs / PCCs is enclosed as **Annexure -III**.

ii) When the unit under reference applies for Consent to Operate in future, the APPCB shall share with CPCB and MoEF&CC the application and documents submitted by the unit for a joint inspection of the manufacturing site. On the basis of joint inspection and keeping in view the pollution potential from the proposed nano precipitated calcium carbonate industry and the necessary measures required for abatement of pollution thereof; the APPCB and CPCB, in consultation with other relevant agencies, shall suggest specific conditions that may be stipulated in the Consent to Operate for compliance by the unit under reference.

DATED AT DELHI ON THIS 25 TH DAY OF JUNE, 2025



Counsel for CPCB



(Nazimuddin)

Scientist 'F'

Division Head, IPC-I

Central Pollution Control Board



ANDHRA PRADESH POLLUTION CONTROL BOARD
REGIONAL OFFICE, KURNOOL

3rd Floor, Dr.YSR Paryavaran Bhavan, Labour Colony, V.R.Colony, Kurnool – 518 003



Lr.No.638- KRN/PCB/RO/KNL/2025

Date: 07.05.2025

To

The Member Secretary,
 A.P. Pollution Control Board,
 Board Office, Vijayawada.

Respected Sir,

Sub:- APPCB – R.O – KNL – Application.No.66 of 2017 filed by Sri. Vallapureddy Gari Govardhan Reddy & Others in the Hon’ble NGT against the Union of India & Others – Latest status report – Submitted – Reg.

Ref:-

1. APPCB, Zonal office, Kurnool email dt: 11.03.2020.
2. Mail received from M/s. Shanthiram Chemicals Private Ltd. on 12.03.2020.
3. T.O submitted status report along with para wise remarks on 12.03.2020.
4. The Board Office, Vijayawada e-mail dt:19.10.2023.
5. Board officials’ inspection on 25.10.2023.
6. APPCB report submitted to Board Office, Vijayawada on 26.10.2023.
7. APPCB report submitted before the Hon’ble NGT on 28.10.2023.
8. Hon’ble NGT order dt.27.02.2025.
9. The Regional Director, CPCB, Chennai has addressed a letter to the Member Secretary, APPCB on 20.03.2025.
10. APPCB Board Office, Vijayawada e-mail dt.28.03.2025.
11. Hon’ble NGT order dt.02.04.2025.

It is to submit that, as per the directions of Hon’ble NGT, the State Pollution Control Board is continuously monitoring the establishment phase of M/s Santhiram Chemicals Pvt. Ltd., Sy.No.570/1, Kondajutur (V), Panyam (M), Nandyal District (Erstwhile Kurnool) and submitting the status report to Hon’ble Authorities.

The matters are pertaining to the grievance in this application is regarding the study to be conducted in respect of impact on environment on account of establishing the nano industry i.e. M/s Santhiram Chemicals Pvt. Ltd. on several aspects. Hon'ble NGT (SZ) vide its order dated.27.02.2025, directed the MoEF &CC and the CPCB to take a serious view on this matter, expedite the process and issue appropriate guidelines in consultation with the scientists of the APPCB before the NEERI report comes. Further the Hon'ble NGT (SZ) vide its order dated.02.04.2025, “the CPCB is yet to come up with the report as sought for by this Tribunal in its Order dated 27.02.2025”. The next hearing is posted on 27.06.2025.

In this connection the Regional Director, CPCB, Chennai vide reference 9th cited above has addressed a letter to the Member Secretary, APPCB and requested to furnish the detailed information on the subject matter including the action taken report. Further, the Board Office, Vijayawada vide reference 10th cited above, has forwarded the letter addressed by the Regional Director, CPCB, Chennai and instructed to furnish the latest information in consultation with the CTE section, so as to furnish the same to the CPCB.

Accordingly, the Regional Office, Kurnool is herewith submitting the latest status report in compliance to the Hon’ble NGT order dt.27.02.2025.

Earlier, M/s Santhiram Chemicals Pvt. Ltd. has proposed to establish mega project with 168 crore in 1st phase, totaling about to 950 crores in 3 phase for manufacture of Precipitated calcium carbonate and Nano Precipitated calcium carbonate plant in Sy.No.570/1, Kondajatur (V), Panyam (M), Nandyal District (Erstwhile Kurnool) in an extent of 150 acres. As per the oral discussion, the Nano technology for manufacturing is supplied by Singapore and this project is first of its kind in India. The industry has not submitted any EIA or EMP on the project. As per the Sl. No.5 (f) of schedule-1 of EIA Notification SO No1533 dt:14.09.2006, synthetic and organic chemicals, intermediates are require Environmental clearance. The product that is proposed to be manufactured here are Precipitated Calcium Carbonate and Nano Precipitated Calcium Carbonate which are completely chemicals that fall into the broad category of intermediates. Apart from the above, the industry has proposed Two Kilns as part of the process similar to the cement kiln which require EC. As this being one of the largest project in Kurnool district and public have complaints against it the District Collector, Kurnool directed me to obtain confirmation from Board Office about requirement of public hearing process on this project. However, this being the mega chemical industry proposed Greenfield area and case pending in the Hon'ble High Court seeking stoppage of proposed plant, the applicability of EC notification has to be examined thoroughly by the SEAC.AP. This office vide report dated 30.08.2016 has requested the Board office to clarify the applicability of the EIA Notification to this Project. The Board office vide letter dated 07.09.2016 has informed that "the proposed product is an inorganic chemical. The project or activity is not covered in the schedule of the EIA Notification, 2006 and its amendments thereof. Hence, Environmental Clearance is not required"

The manufacture of Precipitated Calcium Carbonate involves reception of crushed lime stone of size of 60mm → Transfer of crushed lime stone & coal to the kiln from the top through conveyor → calcination in the Rotary kiln to form calcium oxide (CaO) & CO₂ at a temperature of around 900° C → Solid CaO is discharged from the bottom of the kiln and gaseous CO₂ is propelled from the top of the kiln → Hydration /lime slaking of calcium oxide in hydrator to form Calcium Hydroxide → Carbon dioxide from the kiln is filtered to remove impurities in carbonation plant and mixed with calcium hydroxide to form Precipitated Calcium Carbonate (CaCO₃).

Calcium hydroxide is sent into High gravity controlled precipitation reactor where it is mixed with CO₂ to form Nano Precipitated Carbonate.

On 23.09.2016, the APPCB, Zonal office, Kurnool has issued Consent for Establishment of the Board to M/s Santhiram Chemicals Pvt. Ltd., Sy.No.570/1, Kondajatur (V), Panyam (M), Nandyal District (Erstwhile Kurnool) with a validity period of 7 years i.e. 22.09.2023 permitting the construction of the unit for manufacture of the Precipitated Calcium Carbonate and Nano Precipitated Calcium Carbonate after thorough review by the experts and special invitees. The validity of the Consent for Establishment order issued by the Board was expired on 22.09.2023.

The management of M/s. Santhiram Chemicals Private Ltd., had not started any construction activity since 2016 to till date, even after expiry of the Consent for Establishment order, except the construction of boundary wall in the western direction of their site and a small portion of boundary wall was constructed in the southern direction.

To know the latest status of the establishment phase of M/s. Shanthiram Chemicals Private Ltd, the Board Officials have once again inspected the site on 26.10.2023 to record the violations and observed that, there is no construction activity since 2016, except the construction of boundary wall in the western direction of their site and a small portion of boundary wall was constructed in the southern direction. The status remains the same from 2016 onwards and APPCB is submitting the status reports as and when directions received from the Hon'ble NGT. The Photographs showing the latest status of the proposed site of M/s. Shanthiram Chemicals Private Ltd.

It is further submitted that, the validity of the Consent for Establishment order issued to M/s Santhiram Chemicals Private Limited was expired on 22.09.2023.

Hence, the Board Office, Vijayawada may call M/s. Santhiram Chemicals Private Ltd., for review before the Consent Management Committee meeting (CTE) and direct the management to conduct Environmental Impact Assessment Study and justification with regard to applicability of prior Environmental Clearance (EC) by the MoEF & CC, before establishment and if the Management proposed to start any construction activity, they shall make a representation to the APPCB for extension of validity period Consent to Establishment order to proceed/start any activity. The management shall not make any arrangements for Construction or development work pertaining to Establishment of the said activity without obtaining Consent for Establishment (CFE) of the Board.

This is submitted for kind information and necessary action.

Yours faithfully,

VENKATA KISHORE
REDDY P

Digitally signed by VENKATA
KISHORE REDDY P
Date: 2025.05.07 18:24:24
+05'30'

Environmental Engineer

Encls: as Above:

Copy submitted to the Chief Environmental Engineer, APPCB, Board Office, Vijayawada for kind information and necessary action.

Copy submitted to the Regional Director, CPCB, Chennai for kind information and necessary action.

Copy submitted to the Joint Chief Environmental Engineer (Legal), APPCB, Board Office, Vijayawada for kind information and necessary action.

Copy submitted to the Joint Chief Environmental Engineer (CTE- Section), APPCB, Board Office, Vijayawada for kind information and necessary action.

Copy submitted to the Joint Chief Environmental Engineer (FAC), APPCB, Zonal Office, Kurnool for kind information and necessary action.

Photographs showing the latest status of the proposed site of M/s. Shanthiram Chemicals Private Ltd.,







ANDHRA PRADESH POLLUTION CONTROL BOARD
PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,
SANATHINAGAR, HYDERABAD - 500 018

Phone: 23887500
Website :www.appcb.ap.nic.in

Memo No. 237 /APPCB/CFE/RO-KNL/HO/2016

1203

Dt. 07.09.2016.

859 Sub: APPCB - CFE - M/s. Santhiram Chemicals Pvt Ltd., Sy.No. 570/1, Kondajatur
15/9/16 (V), Panyam (M), Kurnool District – Instructions issued – Reg.

Ref: Report of EE, RO: Kurnool dt. 30.08.2016 recd. On 06.09.2016.

With reference to above, the EE, RO: Kurnool is informed as following:

- The proposed product is an inorganic chemical. The project or activity is not covered in the schedule of the EIA Notification, 2006 and its amendments thereof. Hence, Environmental Clearance (EC) is not required.
- As it is a chemical industry, it is considered under Red category. The powers are vested with JCEE, ZO: Kurnool to process the application.

Hence, the EE, RO: Kurnool is directed to forward the report to the JCEE, ZO: Kurnool to take further necessary action as per the delegated powers.

Sd/-

MEMBER SECRETARY

guy

To
The Environmental Engineer,
Regional Office: Kurnool

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

[Signature]
Senior Environmental Engineer (UH-1)



**ANDHRA PRADESH POLLUTION CONTROL BOARD
ZONAL OFFICE: KURNOOL**

1st Floor, Shankar Shopping Complex, Krishna Nagar Main Road

Phone : 08518-236912,
e-mail: knl.zo.jcee@pcb.ap.gov.in

BY REGD. POST WITH ACK.DUE

CONSENT ORDER FOR ESTABLISHMENT

Order No. KNL-668/PCB/ZOK/CFE/2016- 696

Date: 23.09.2016

Sub: PCB-ZO-KNL-CFE - M/s. Santhiram Chemicals Pvt Ltd., Sy.No.570/1, Kondajatur (V), Panyam (M), Kurnool District -- Consent for Establishment (CFE) Order of the Board under Sec.25 of Water (Prevention & Control of Pollution) Act, 1974 and under Sec.21 of Air (Prevention & Control of Pollution) Act, 1981- Order- Issued- Reg.

Ref: 1. CFE application received through A.P. Single Desk on 16/07/2016 and Clarification sought by this office on 18/07/2016.
2. R.O.KNL Lr.No.638 -KNL/PCB/RO/KRNL/2016 -679, dt. 07.09. 2016
3. CFE committee meeting held at ZO, Kurnool on 19.09.2016

DISPATCHED
on 23/9/16

- 1) In the reference 1st cited, an application was submitted to the Board seeking Consent for Establishment (CFE) order to set up a plant to produce the following products with installed capacities as mentioned below, with a project cost of Rs. 16,839.3 Lakhs.

Sl. No.	Products	Capacity
1	Precipitated Calcium Carbonate	500 TPD
2	Nano Precipitated Calcium Carbonate	200 TPD

- 2) As per the application, the above activity is to be carried out at Sy.No.570/1, Kondajatur (V), Panyam (M), Kurnool District
- 3) The above site was inspected by Environmental Engineer and Asst. Environmental Engineer, Regional Office, Kurnool on 20.07.2016, 05.08.2016 & 04.09.2016 and found that it is surrounded by the following:
North: Barren lands followed by SRBC canal
South: Panyam to Gorukallu Village road followed by agricultural lands
East : Barren lands followed by Agricultural lands.
West : Barren lands followed by Agricultural lands
- 4) The Board, after careful scrutiny of the application and verification report of Regional Office, hereby issues CONSENT FOR ESTABLISHMENT(CFE) to your INDUSTRY under section 25 of Water (Prevention & Control of Pollution) Act, 1974 and under Section 21 of Air (Prevention & Control of Pollution) Act, 1981 and the rules made there under. This order is issued to manufacture the products mentioned at para (1) only.
- 5) This consent order issued is subject to the conditions mentioned in the Annexure.
- 6) This order is issued from pollution control point of view only. Zoning and other regulations are not considered.
- 7) This consent order is valid for a period of 7 years from the date of issue

Encl: Schedule 'A' & 'B'

**JOINT CHIEF ENVIRONMENTAL ENGINEER
ZONAL OFFICE, KURNOOL**

To
M/s. Santhiram Chemicals Pvt Ltd.,
C/o M.Santhiramudu,
D.No.25/602, Srinivasa Nagar,
Nandyal, Kurnool dist. - 518 501.

Copy to the Environmental Engineer, Regional Office, APPCB, Kurnool for information.

Annexure**SCHEDULE - A**

1. The proponent shall obtain Consent for Operation (CFO) from APPCB, as required Under Section 25/26 of Water (P & C of P) Act, 1974 and under Sec 21/22 of the Air (P&C of P) Act, 1981, before commencement of the trial runs.
2. The applicant shall install or provide separate energy meters for Effluent Treatment Plant (ETP) and Air Pollution Control equipments to record energy consumed. An alternative electric power source sufficient to operate all pollution control systems shall be provided.
3. The industry shall construct separate storm water drains and provide rain water harvesting structures. No effluent shall be discharged in to the storm water drains.

SCHEDULE - B**Water**

1. The maximum permitted water consumption is as follows:

Sl. No.	Purpose			Quantity in KLD
1.	Precipitated Calcium Carbonate (CaCO₃):			
		Fresh water	Recycled water	Total
	Hydrated Lime Tank	340 KLD	2160 KLD	2500 KLD
	Grit Classifier			
	Cyclones			
	screens			
	CaCO ₃ slurry tank			
	Filter unit			
Filter water silo				
Dryer				
2.	Nano Precipitated Calcium Carbonate:			
	Slurry tank	Nil	2600 KLD	2600 KLD
	HGCP Reactor			
	Frame Filter			
	Drying drums			
	Floor & equipment washings	Nil	30 KLD	30 KLD
	Cooling makeup & sealing	Nil	10 KLD	10 KLD
	Gardening	160 KLD	---	160 KLD
	Domestic	---	140 KLD	140 KLD
	Total	500 KLD	4,940 KLD	5,440 KLD

Separate meters with necessary pipe-line shall be provided for assessing the quantity of water used for each of the purposes mentioned below.

2. The project proponent informed that as per new Industrial Promotion Policy and MoU signed by them with Govt. of A.P., the Government will identify source of water and supply accordingly. Hence the project proponent shall obtain necessary permissions from the competent authorities to draw water from the nearby surface water bodies. The project proponent shall not dig bore wells without the permission of competent authority. The project proponent shall not draw water from bore wells, as the water requirement for the project is huge and may deplete the ground water in that area.
3. The maximum waste water generation shall not exceed the following:

S. N	Source	Quantity in KLD
1	Precipitated Calcium Carbonate (CaCO₃):	
	Grit Classifier	125 KLD
	Cyclones	45 KLD
	screens	50 KLD
2	Nano Precipitated Calcium Carbonate:	
	Frame Filter	400 KLD
	Floor & equipment washings	30 KLD
	Cooling & sealing	10 KLD
	Domestic	140 KLD
	Total	800 KLD

Treatment & Disposal:

Source of effluent	Capacity of Treatment units	Mode of final disposal
Process effluents – 660 KLD	Shall provide appropriate treatment facilities of capacity – 1000 KLD to treat the process effluents suitable for complete recycling.	After treatment, the entire treated waste water shall be recycled back into the process to achieve Zero Liquid Discharge (ZLD) system.
Domestic – 140 KLD	Shall provide appropriate Sewage Treatment Plant (STP) of capacity 200 KLD.	After treatment, the entire treated domestic waste water shall be recycled back into the process to achieve Zero Liquid Discharge (ZLD) system.

4. The project proponent shall construct all the units of ETP & STP above the ground level.
5. The project proponent shall achieve Zero Liquid Discharge (ZLD) system for both trade & domestic effluents, by providing appropriate treatment facilities to recycle the entire waste water.
6. Effluents shall not be discharged on land or into any water bodies or into aquifers under any circumstances.

Air:

7. The industry shall comply with the following for controlling air pollution.

Sl. No.	Details of Stack	Stack 1	Stack 2	Stack 3	Stack 4	Stack 5
a)	Attached to:	Rotary lime kiln	Rotary Lime kiln	Lime stone crusher	Hot blast furnaces	DG set
b)	Capacity	350 TPD	350 TPD	700 TPD	26.0 Lakhs K.cal & 15.0 Lakhs K cal	1000 KVA
c)	Name of the Fuel :	Coal -110 TPD		-	50 TPD	HSD
d)	Stack height above ground (m)	40mts with 1.2 mtrs dia		30 mtrs	40 mtrs	11mts
e)	Air Pollution Control Equipment:	Cyclone, Desulfurization tower, Electro static Precipitator (ESP) or bag filters	Cyclone, Desulfurization tower, Electro static Precipitator or (ESP) or bag filters.	Bag filters	Desulfurization tower and bag filter	Silencer with acoustic enclosure
f)	Conc. of Particulate matter	30 mg/Nm ³		30 mg/Nm ³	30 mg/Nm ³	-
g)	Sulphur Dioxide (SO ₂)	100 mg/Nm ³		-	100 mg/Nm ³	-
h)	Oxides of Nitrogen (NO _x)	600 mg/Nm ³		-	600 mg/Nm ³	-

8. The project proponent shall take appropriate measures to achieve the desired emission standards i.e., 30 mg/Nm³ of Particulate Matter to the rotary kiln stacks and hot blast furnace stack as the process is Calcination.
9. The project proponent shall provide appropriate technology to control SO₂ and NO_x emissions to meet the standards.
10. The project proponent shall adopt the following "Environmental guidelines for prevention and control of fugitive emissions" specified to Cement Plants by CPCB to control fugitive emissions from all sources of generation.

- a. Enclosure should be provided for all unloading operations of raw materials. The enclosures for the unloading sides could be flexible curtain type material covering up to height of dumpers discharge from the roof.
 - b. Water shall be sprayed on the material prior and during unloading. Dry fog dust suppression system shall be provided.
 - c. All transfer point locations should be fully enclosed.
 - d. Airborne dust at all transfer operations / points should be controlled by extracting to bag filter.
 - e. All belt conveyors should be closed.
 - f. All the raw materials and products shall be stored under covered shed. The enclosure should be from three sides and roof so as to contain the airborne emissions.
 - g. The silo vent shall be provided with a bag filter type system to vent out the air borne fines.
 - h. All roads on which vehicle movement of raw materials or products take place should be paved.
 - i. Limit the speed of vehicle to 10 Km/h for heavy vehicles with in the plant premises to prevent the road dust emissions
 - j. Employ preventive measures to minimize dust build up on roads.
 - k. Carry out regular sweeping of roads to minimize emissions.
 - l. The project proponent shall employ or contract a "dust control officer"
 - m. Regular training should be given to the personnel operating and maintaining fugitive emissions control systems on the operational and maintenance aspects and record keeping responsibility.
 - n. The project proponent should prevent fugitive emission from all active operation and storage piles, such that the emissions are not visible in the atmosphere beyond the boundary line of the emission source.
 - o. The project proponent shall conduct active operations by utilizing the applicable best available control measures to minimize the fugitive dust emission from each fugitive dust source type within active operation.
 - p. All storage piles should be kept in moist condition by spraying water at regular intervals for controlling fugitive emission, wherever possible.
 - q. The operation of the pay loaders shall be slow down whenever the average wind speed is high exceeding 50 km/h, which may cause fugitive emission.
 - r. All storage silos shall be vented to bag filters, which should have proper bag cleaning arrangement so as to avoid choking of filter bags, thereby to avoid pressurization of silos.
 - s. Regular inspection at a pre-determined frequency be carried out of all fugitive dust control system and records be maintained of such inspection and corrective action taken if any.
11. The project proponent shall install minimum of 3 AAQ monitoring stations covering upstream and downstream predominant wind direction and report the same to the A.P Pollution Control Board, Regional Office, Kurnool as prescribed.
 12. The project proponent shall install online continuous emission monitoring systems and connect the monitoring system to APPCB Website.
 13. The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoE&F, Gol vide notification No.GSR 826 (E), Dt. 16.11.2009 during construction and regular operational phase of the project at the periphery.
The generator shall be installed in a closed area with a silencer and suitable noise absorption systems. The ambient noise level shall not exceed 75 dB (A) during day time and 70 dB (A) during night time.

Solid Waste:

14. The project proponent shall store the solid wastes in a closed shed.
15. The proponent shall comply with the following:

S. No	Source of solid waste	Proposed quantity	Method of disposal
a)	Gall stone (un burnt lime from kiln consisting of impurities SiO ₂ and mg etc..)	62.0 TPD	Explore the possibility of sending the waste to the cement industries for co-processing or Shall be disposed scientifically designed land fill, depending on the characteristics of waste
b)	Coal ash	5.3 TPD	Shall be sold brick manufacturers
c)	Dust from APCE	8.4 TPD	Explore the possibility of sending the waste to the cement industries for co --

			processing or Shall be disposed scientifically designed land fill, depending on the characteristics of waste
d)	ETP Sludge	130 Kgs/day	Shall be disposed to cement industries for co-processing / lifted to TSDF, Parawada, Visakapatnam
e)	Waste oil from DG sets	100 Ltrs/month	Shall be sold out authorized parties recyclers/re-processors of APPCB.

Other conditions:

16. The storm water drain shall be constructed with proper design to collect and reuse in the process. The process & domestic effluents shall not be mixed with storm water drains under any circumstances.
17. The project proponent has to undertake a study to establish the base line environmental conditions covering air, water, soil & noise by any reputed government organization like NEERI, NPC etc., in the core and buffer zones.
18. The project proponent shall provide at least 10 piezo monitoring wells along the boundary and report the ground water quality data to the A. P. Pollution Control Board, Regional Office, Kurnool quarterly as prescribed.
19. The project proponent shall provide a trench of 1 mtr depth along the southern boundary to collect seepages if any and the seepages shall be taken back in to the ETP for further treatment.
20. The project proponent shall leave a set back distance of 25mtrs from Panyam to Gorukallu (V) road. No construction activity except green belt development shall be undertaken in this area.
21. The project proponent shall develop thick green belt of width 25mtrs all along the boundary with tall growing trees with good canopy and the green belt shall be in a minimum of 33% of total area.
22. The project proponent shall submit all the technical design details of process and pollution control equipment to the A.P. Pollution Control Board, Regional Office, Kurnool within 3 months.
23. The project proponent shall not use any chemicals in the process except lime stone, coal and water as committed during the CFE Meeting.
24. The proponent shall ensure that there shall not be any change in the process technology, source & composition of raw materials and scope of working without prior approval from the Board.
25. 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 attracts action under the provisions of relevant pollution control Acts.
26. Notwithstanding anything contained in this conditional letter or consent, the Board hereby reserved to it the right and power under section 27 (2) of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21 (4) of the Air (Prevention & Control of Pollution) Act, 1981 to review any or all the conditions imposed herein above and to make such alternation as deemed fit and stipulate any additional conditions or revoke the order in the interest of environment protection.
27. Any person aggrieved with this order may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to 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.


JOINT CHIEF ENVIRONMENTAL ENGINEER
ZONAL OFFICE, KURNOOL

To
M/s. Santhiram Chemicals Pvt Ltd.,
C/o M.Santhiramudu,
D.No.25/602, Srinivasa Nagar,
Nandyal, Kurnool dist. - 518 501.



सीएसआयआर-राष्ट्रीय पर्यावरण अभियांत्रिकी अनुसंधान संस्थान
नेहरू मार्ग, नागपुर - 440 020
CSIR - National Environmental Engineering Research Institute
Nehru Marg, Nagpur – 440 020



Dr. Hemant Bherwani

वरिष्ठ वैज्ञानिक / Senior Scientist

सतत पर्यावरणीय प्रक्रियाएँ कार्यक्षेत्र / Sustainable Environmental Processes Vertical

(पर्यावरणीय स्थिरता और हरित अर्थव्यवस्था उप ऊर्ध्वधर) / Environmental Sustainability and Green Economy Sub-Vertical

To
Dr. Nazimuddin
The Scientist 'F' & Divisional Head
IPC – I Division
Central Pollution Control Board (CPCB)
Parivesh Bhawan, East Arjun Nagar
Delhi – 110032

06/06/2025

Subject: Response to CPCB Letter no CM-13013/13/2025-TECH-RD-CHENNAI-RD dated 15 May 2025 regarding Hon'ble NGT O.A. No. 66 of 2017 (SZ) – Interim Guidelines for Nano Industries

Dear Sir,

Greetings from CSIR-NEERI!

This is with reference to your letter dated 15 May 2025 regarding the directions of the Hon'ble National Green Tribunal (Southern Zone) in O.A. No. 66 of 2017, in the matter concerning potential pollution arising from nano industries, including those involved in the production of nano precipitated calcium carbonate.

CSIR-NEERI has recently initiated the study entrusted by the Ministry of Environment, Forest and Climate Change (MoEF&CC), and preparatory work including data collation is currently underway. As part of this effort, we have formally approached MoEF&CC for relevant background information and datasets to support the scientific investigation.

At present, no analytical models or site-specific datasets have yet been generated, and therefore it is not feasible to provide interim findings. It may also be noted that CSIR-NEERI does not maintain an independent registry of operational nano industries, and given the site-specific and evolving nature of this study, CSIR-NEERI will carry out detailed studies of the sites selected by CSIR-NEERI and MoEF&CC

In light of the Hon'ble Tribunal's directions for MoEF&CC and CPCB to jointly formulate interim guidelines pending completion of NEERI's study, we believe that the development of preliminary regulatory frameworks—based on existing knowledge, stakeholder consultations, and institutional expertise—would provide important orientation and contextual input to our technical evaluation. To this end, if CPCB has developed or compiled any relevant material such as draft guidelines, technical notes, inspection reports, environmental monitoring data, or consent records for nano-based industrial operations (including nano precipitated calcium



सीएसआयआर-राष्ट्रीय पर्यावरण अभियांत्रिकी अनुसंधान संस्थान
नेहरू मार्ग, नागपुर - 440 020
CSIR - National Environmental Engineering Research Institute
Nehru Marg, Nagpur – 440 020



Dr. Hemant Bherwani

वरिष्ठ वैज्ञानिक / Senior Scientist

सतत पर्यावरणीय प्रक्रियाएँ कार्यक्षेत्र / Sustainable Environmental Processes Vertical

(पर्यावरणीय स्थिरता और हरित अर्थव्यवस्था उप ऊर्ध्वधर) / Environmental Sustainability and Green Economy Sub-Vertical

carbonate units), we kindly request that such resources be shared with CSIR-NEERI to enrich the quality and comprehensiveness of the study.

We remain committed to supporting this important national mandate and look forward to continued collaboration with CPCB and MoEF&CC in building a scientifically robust and policy-relevant response to the emerging challenges posed by nano-scale industrial activities.

With warm regards,

Yours sincerely,

Dr. Hemant Bherwani,

Senior Scientist, CSIR-NEERI, Nagpur.



केन्द्रीय प्रदूषण नियंत्रण बोर्ड
CENTRAL POLLUTION CONTROL BOARD
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार.
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE, GOVT. OF INDIA.

By Email

URGENT

CM-13013/13/2025-TECH-RD-CHENNAI-RD (Chennai)

June 23, 2025

To

The Member Secretary
All SPCBs/ PCCs

Sub: Urgent request to provide details of nano industries, including the Precipitated Calcium Carbonate industry -reg.

Sir,

This has reference to Hon'ble National Green Tribunal (South Zone) order dated 27.02.2025 in the matter of OA No. 66/ 2017 (SZ) wherein it is directed that the Ministry of Environment, Forests and Climate Change and Central Pollution Control Board (CPCB) shall issue guidelines regarding Nano industries, including the Precipitated Calcium Carbonate industry.

It is to inform that the Ministry of Environment, forest and Climate Change has assigned a study to CSRI-National Environmental Engineering Research Institute (NEERI) in this regard in 2024. However, Hon'ble NGT has directed to meanwhile issue appropriate guidelines on such industries, pending the detailed study by NEERI.

In this regard, it is requested to kindly inform the name and contact address of operational Nano industries, including the Precipitated Calcium Carbonate industry in your States / Union Territories so that they may be inspected jointly by CPCB, concerned SPCB / PCC and other concerned agencies for the purpose of preparing interim guidelines as directed by Hon'ble NGT(SZ) .

Considering urgency, it is requested to kindly submit the aforementioned information **within 07 days**.

Encl: As above

Yours Faithfully

(Signature)
(Nazimuddin)
Sc. F & DH,
IPC – I Division

Copy to:

1. Director
Control of Pollution Division (CP)
Ministry of Environment
Forest and Climate Change
Indira Paryavaran Bhawan
Jorbagh Road
New Delhi – 110 003
2. Divisional Head
Law Division
CPCB

(Nazimuddin)

‘परिवेश भवन’ पूर्वी अर्जुन नगर, दिल्ली - 110032.
Parivesh Bhawan, East Arjun Nagar, Delhi - 110 032.

दूरभाष /Tel : 43102030, 22305792, वेबसाइट/Website: www.cpcb.nic.in

**BEFORE THE NATIONAL GREEN TRIBUNAL
(SOUTHERN ZONE) CHENNAI**

ORIGINAL APPLICATION No. 66 of 2017

In the matter of:

Vallapureddy Gari Govardhan Reddy and Ors.
.... Applicant

Versus

Union of India and Ors.
.... Respondent(s)

REPORT ON BEHALF OF
CENTRAL POLLUTION CONTROL BOARD

M/s.R.Thirunavukarasu

Counsel for CPCB

M-9444012986