BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

ORIGINAL APPLICATION No. 97 OF 2021 (SZ)

IN THE MATTER OF:

Ravula Lingaswamy,
Yadadri Bhuvanagiri District and Ors. .... Applicant(s)

Versus

Union of India,
rep by its Secretary,
MoEF, New Delhi & Ors. .... Respondent(s)

REPORT OF THE TELANGANA POLLUTION CONTROL BOARD (R3)

RUNNING INDEX

Place: **Hyderabad.**
Date: **13-02-2025.**

T. Jaikant

Counsel for Respondent No. 3

REPORT DATED 12.02.2025 OF TELANGANA POLLUTION CONTROL BOARD IN OA No.97 OF 2021 FILED BY SRI RAVULA LINGA SWAMY, S/O.YADAIAH & OTHERS OF ANTHAMMAGUDEM VILLAGE, POCHAMPALLY MANDAL, YADADRI BHUVANAGIRI DISTRICT.

It is to submit that Sri. Ravula Lingaswamy, R/o.Yadadri Bhuvanagiri District & others has filed an OA No. 97 of 2021 before the Hon'ble NGT, Chennai on pollution due to M/s. Hazelo Labs (P) Ltd., Anthammagudem (V), Yadadri District.

Earlier, the Board filed a report dated latest on 06.12.2024 before the Hon'ble NGT, Chennai submitting the details of Environmental Compensation (EC) imposed and part payments made by the industries. The Hon'ble NGT during the hearing held on 28.01.2025 has taken on record the report filed by the Board and directed the Respondent Board to inspect the 6th Respondent industry i.e., M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd) and file a Compliance report on directions issued by the Board.

In this regard, it is to submit that earlier the External Experts Committee formed by the Board in coordination with the Board officials inspected the 6th respondent industry i.e., M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd) on 22.11.2024, 03.12.2024 & 23.12.2024. Also the Board officials again inspected the industry on 03.02.2025 & 08.02.2025. The details of the industry are submitted as follows:

1. M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd) is located at Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District. The industry is engaged in manufacturing of Bulk Drugs & Intermediates with the investment of Rs.52.97 Cr.
2. The industry has obtained Consent For Operation (CFO) from the Board vide order dt: 01.09.2022 which is valid up to 31.01.2027 Copy of the same is enclosed as **Annexure-I**.
3. **Ambient Air Quality (AAQ) Measures taken by the industry:**
   A. The industry has provided following scrubbers with online pH meters:
      i. Production block – A:
      2 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.
      ii. Production block – A (extension):
      2 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.

iii. Production block – B:

Dismantled.

iv. Production block – C:

2 x 2 stage scrubbers. Activated charcoal bed provided and sub cooler condenser not provided.

v. Production block – D1 & D2:

2 x 2 stage scrubbers. Activated charcoal bed and sub cooler condenser not provided.

vi. Production block – E:

Hydrogenation block.

vii. Production block – F:

3 Nos double stage scrubbers provided, but not provided activated charcoal bed and sub cooler condensers.

viii. Production block – G:

2 Nos double stage scrubbers provided and 1 Nos single stage scrubbers, but not provided activated charcoal bed and sub cooler condensers.

ix. Production block – H:

1 Nos double stage scrubbers provided, but not provided activated charcoal bed and sub cooler condensers.

x. ATFD:

2 stage scrubber. Activated charcoal bed provided and sub cooler condenser not provided.

xi. Stripper & vaccum tub:

2 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.

xii. HTDS & stripper fed tank:

1 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.

xiii. HCl tank:

1 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.

B. The industry has provided online VOC analyzer and connected the same to TGPCB server.

C. The industry has boilers of capacity 1X4 TPH & 1x12 TPH and provided MDC followed by Bag filter as Air Pollution Control Equipment followed by common stack of height 30 mtrs.

4. **Zero Liquid Discharge (ZLD) Systems installed details:**

   i. Earlier during inspection of CPCB team, the industry was operating old ZLD system, now the same was dismantled and removed.

   ii. Now, the industry is operating new Zero Liquid Discharge (ZLD) system for treatment of effluent. The system consists of: MEE (5 stage) – 250 KLD, ATFD – 30 mtr.sq, 3 stage RO – 250 KLD, Old RO system – 100 KLD, HTDS Equalization tank – 450 KL, Stripper Feed Tank – 2X 150 KL, LTDS Equalization Tank – 210 KL, Bio-Feed Tank – 210 KL, Aeration Tank-1 – 3000 KL, Aeration Tank-2 – 750 KL.

   iii. The industry has provided online connectivity for CPCB & TGPCB servers for MEE condensate, HTDS, LTDS flow meters and cameras at gate and RO permeate.

5. As per the directions of the Board, the industry has paid total Environmental Compensation (EC) amount of Rs. 77,70,000/- i.e., 100% of EC amount levied.

6. The Board has reviewed the industry before Task Force Committee by giving hearing opportunity to industry during hearing held on 18.10.2024 and issued latest directions to the industry on 23.10.2024. Copy of the same is enclosed as **Annexure-II**.

7. During inspection on 25.11.2024, the Board officials collected stage wise samples from Zero Liquid Discharge (ZLD) unit. As per the analysis reports dt.02.12.2024, the values of certain parameters are exceeding the Board's prescribed standards. Copy of the same is enclosed as **Annexure –III**.

8. The Board officials, during inspection of industry observed certain non-compliances of directions & conditions stipulated in CFO issued by the Board. The compliance status of directions order dt. 23.10.2024 is enclosed as **Annexure – IV** and compliance of conditions in CFO order dt. 01.09.2022 compliance status as **Annexure – V**.

It is to submit that, the Respondent Board will review the industry before Task Force Committee regarding non-compliances observed during inspections for taking necessary action and Board will also examine the representation submitted by the industry before Task Force committee.

It is to further submit that the Respondent Board will regularly monitor the industry for environmental compliance and will adhere to any directions issued by the Hon'ble NGT.

Place: **Nalgonda**
Date: **12-02-2025**

ENVIRONMENTAL ENGINEER
ENVIRONMENTAL ENGINEER
Telangana Pollution Control Board,
Regional Office, Nalgonda.

(5)

Annexer- I

తెలంగాణ రాష్ట్రం
Telangana 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 (EXPANSION – PHASE-I)
RED CATEGORY

Consent Order No: 220523957956 **Date : 01.09.2022**

(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. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd,) Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri 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 (Phase-I):

Outlet No.	Description of outlet	Max daily discharge in KLD	Point of Disposal
1.	HTDS Effluents: (Process – 44 KLD + Washings – 3.5 KLD + RO/DM plant Rejects - 7 KLD + Scrubber effluent – 5.3 KLD)	59.8	➢ Shall be stripped off for organics recovery. ➢ Stripper condensate to distillate for separation of organic compounds followed by disposal to cement plants for co-processing & distilled effluents shall be routed to LTDS treatment system. ➢ Stripped effluents for forced evaporation in MEE followed by ATFD ➢ Condensate from MEE & ATFD shall be routed to LTDS treatment system. ➢ ATFD Salts to TSDF.
2.	LTDS Effluents: (Cooling bleed off – 21 KLD + Boiler blow down – 5.3 KLD + Domestic effluents – 3.2 KLD)	29.5	➢ LTDS effluents along with condensate of MEE & ATFD shall be treated in Biological ETP followed by filtration in RO Plant. ➢ RO Permeate water to boiler/cocling tower makeup ➢ RO Rejects to MEE
	Total:	**89.3 KLD**	

ii) Emissions from chimneys(Phase-I):

Chimney No.	Description of Chimney
1	Attached to Coal fired Boiler of capacity 1 x 4 TPH
2	Attached to Coal fired Boiler of capacity 1 x 12 TPH
3	Attached to Thermic Fluid Heater – 1 x 1 Lakh Kcal/hr & 1 x 2 Lakh Kcal/hr.
4	Attached to process emissions
3	Attached to D.G. Set of capacity 1 x 250 kVA & 2 x 1500 KVA

iii) HW Authorisation No. 220523957956 Date :01.09.2022

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

M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.) Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District is hereby granted an authorization to operate a facility for collection, reception, storage, treatment, transport and d sposal of Hazardous Wastes namely:

1. **Hazardous wastes with disposal option (Phase-I):**

S. No	Name of the Hazardous waste	Stream	Quantity	Disposal option
1.	Spent Carbon	28.3 of Schedule – I	177.80 Kg/day	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	36.1 of Schedule – I	3.81 TPD	
3.	Stripper Distillate	28.6 of Schedule-I	1.47 KLD	
4.	ETP Sludge	35.1 of Schedule – I	1.09 TPD	
5.	Solvent residue	20.3 / 36.1 of Schedule-I	1.52 TPD	
6.	Spent Mixed Solvents	28.6 of Schedule – I	6.28 KLD	For recovery & reuse within the plant premises. Excess Spent Solvents for disposal to authorized Cement manufacturing units for Co-processing/ TSDF, Dundigal, RR Dist. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to the traders/ recyclers.
7.	MEE Salts	35.3 of Schedule - I	4.80 TPD	Shall be disposed to TSDF, Dundigal, for secured land filling.
8.	Inorganic residue	28.1 of Schedule-I	1.58 TPD	
9.	Hyflow	28.3 of Schedule-I	27.30 Kg/day	
10.	Catalyst	28.2 of Schedule-I	70.00 Kg/day	

2. **Hazardous wastes with recycling option (Phase-I):**

S. No	Name of the Hazardous waste	Stream	Quantity	Disposal option
1.	Waste oil	5.1 of Schedule – I	1.88 KLPA	Shall be disposed to authorized recyclers / re-processors.
2.	Spent solvents	28.6 of Schedule – I	56.00 KLD	Recovered within the plant premises & reuse in the process.
3.	Detoxified container & container liners	33.1 of Schedule – I	2800 No.s/month	After complete detoxification, it shall be disposed to the outside agencies.
4.	Ash from Boiler	-	1.88 KLPA	Sent to Authorized Recyclers.
5.	Used batteries	A1160 of Schedule-III	245.00 No.s/Yr	Sent to suppliers on buy back basis.

This Consent Order valid for manufacture of the following products along with the quantities only. The industry shall manufacture any 20 products on wworst Case scenario on Campaign basis at any given point of time as per CFE (expansion) order dt. 29.05.2021.

S. No.	Product Name	Capacity (Kg/day)	No.of Stages	Name of Key Raw Material	Key RM quantity Kgs/day
1	Amlodipine Besylate	290.5	I	Phthalimido Amlodipine	370.3
2	Bupropion HCl	640.5	II	m-Chloropiophenone	474.3
3	Clopidogrel Hydrogen Sulfate	115.5	II	Methyl(+)-alpha- amino(2-chlorophenyl)acetatetartaric acid salt	147.5
4	Desvelofloxin Succinate	59.5	II	1-[2-Amino-1-(4-benzyloxyphenyl) ethyl] cyclohexanol	66.0
5	Divolproex Sodium	549.5	II	2,2-Dipropylmalonic acid	755.1
6	Dulaxetine HCl	59.5	I	(S)-N-Methyl-N-phenyl oxycarbonyl-3-(1-napthyloxy)-3-(2- thienyl) propylamine	84.9
7	Esomeprazole Mg Dihydrate	115.5	I	(±) Omeprazole	112.4
8	Glimepiride	59.5	I	4-[2-(3-ethyl-4-methyl-2-oxo-3-pyrroline-1-carboxamido) ethyl]benzene sulfonamide	51.0
9	Mesalamine	59.5	I	Aniline	45.2
10	Metaprolol Succinate	350.0	III	4-(2-Methoxy-ethyl)-phenol	187.4
11	Pantoprazole Sodium Sesquihydrate	350.0	I	5-(Difluoromethoxy)-2-[[3,4-dimethoxy-2-pyridinyl) methyl]thio]- 1H-benzimidazole	321.4
12	Pragabalin	350.0	I	3-(Carbamoylmethyl)-5-methylhexanoic acid	572.5
13	Rosuvastatin Calcium	35.0	I	(R)-7-[4-(4-Fluorophenyl)-6-(1-methylethyl)-2-[methyl(methylsulfonyl) amino]-5-pyrimidinyl]-5-pyrimidinyl]-3-hydroxy-5-oxo-6-heptenoic acid methyl ester	40.1
14	Sertraline HCl	115.5	I	4-(3,4-Dichlorophenyl)-3,4-dihydro-N-methyl- 1(2H)-Naphthalenimine	132.6
15	Tramadal	409.5	I	2-[(N,N-Dimethylamino)methyl] cyclohexanone	283.7
16	Valcyclovir Hydrochloride Monohydrate	115.5	II	2-(Acetylamino)-1,9-dihydro-9-[[2-(acetyloxy)ethoxy]methyl]-6H-purin-6-one	173.0
17	4-[4-Chloro-1-oxobutyl]-2,2- dimethyl phenyl acetic acid methyl ester	35.0	III	2-methyl-2-phenylpropan-1-ol	42.9
18	N2-(1-(S)-ethoxy carbonyl-3-phenyl propyl-N6-trifluoroacetyl-L-lysine	59.5	II	L-Lysine	111.8

19	2-[2-[3(S)-[3-[2-(7-Chloro-2-Quinolinyl)-ethenyl]phenyl]-3-hydroxypropyl]phenyl-2-propanol	35.0	II	3-[2-(7-chloro-2-quinolinyl) ethenyl]-alpha-[2-(methoxy carbonyl-phenyl)methyl] - beta-oxo-benzenepropanoic acid methyl ester	51.2
20	2,8-Diazo bicyclo Nonane	59.5	IV	2,3-Pyridine Dicarboxylicacid	108.2
21	2,3,4,5-Bis-O- (1-methylethylidene)-b-D-fructopyranose	290.5	I	D-(-)-Fructose	226.1
22	2- Acetyl Ethoxy acetyl methoxy ether	570.5	I	Acetic anhydride	451.5
23	N,N-Carbonyl di imidazole	759.5	I	1H Imidazole	931.0
24	(2S,3S,5S)-2-Amino-3-Hydroxy-5-Tert-Butylcarbonyl Amino 1,6-diohenyl	35.0	III	Phenyl alanine	21.8
25	Trans-4-(4-chlorophenyl)-cyclohexane carboxylic acid	35.0	II	Tetrahydrobenzene	14.4
26	Guanine	693.0	I	2,5,6-Triamino-3H-pyrimidin-4-one	955.9
27	Poly allyl amine HCl	175.0	I	Polyallylamine	124.3
28	Tert-butyl 2-((4R,6S)-6-((E)-2-(4-(4-flurophenyl)-6-isopropyl-2-(N-methylmethanesulfonamido) Pyrimidin- 5-yl)vinyl)- 2,2-dimethyl-1,3-dioxane-4-yl-) acetate	59.5	III	Tert-Butyl-2((4R,6S)-6-(acetyloxy)methyl-2,2-dimethyl-1,3-dioxan-4-yl)acetate	51.0
29	5-Cyano phthalide	234.5	III	5-Carboxy Phthalide	572.7
30	1,1-Cyclohexanediacetic acid	584.5	I	Cyclohexanone	346.2
31	Carbamyl Methyl-5-Methyl hexanoic Acid	175.0	I	Isovalaraldehyde	99.9
32	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	45.5	II	Methyl-2,3-O-isopropylidene-5-deoxy-D-ribofuranoside	36.8
33	N-(2-Methyl-5-aminophenyl)-4-(3-pyridyl)-2-pyrimidine amine	115.5	II	(2-Methyl-5-nitrophenyl)guanidine	129.6
34	4-[(4-Methylpiperazin-1-yl) methyl] benzoic acid dihydrochloride	115.5	I	4-Cyanobenzyl bromide	104.1
35	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl]propanamide	59.5	III	2-Methylacrylic acid	32.5
	Total : Worst Case scenario for 20 products on Campaign basis at any given point of time	**7000 Kg/day**			

By-products(Phase-I) :

S. No	Name of Product	Name of By-Product	Quantity Kg/day
1	Clopidogrel hydrogen sulfate	p-toluene sulfonic acid	63.3
2	1,1-Carbonyl diimidazole	Trichloromethanol	1267.9

This order is subject to the provisions of the Acts' and the Rules' and amendments made thereunder 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 January,2027.

Sd/-
MEMBER SECRETARY

To
M/s. Hazelo Lab Pvt Ltd.,
(Formerly M/s Venlar Labs (P) Ltd,)
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District

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

M. Praveen 01/9/2022
SENIOR ENVIRONMENTAL ENGINEER
(CFO – UNIT-III)

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. 30.05.2017 and CFE (Expansion) order dt. 29.05.2021. 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. 30.05.2017 and CFE (Expansion) order dt. 29.05.202 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 243.7 KLD

S. No.	Purpose	Quantity (KLD)
1	Process	38.90
2	Washings	3.5
3	Scrubber	5.3
4	Boiler Feed	31.5
5	Cooling tower make-up	64.8
6	RO/DM rejects	7.0
7	Domestic	3.5
8	Gardening	3.5
	Total	**243.7 KLD (Fresh -158 KLD + Recycled – 85.8 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 1 x 4 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 1 x 12 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
3	Attached to Thermic Fluid Heater – 1 x 1 Lakh Kcal/hr & 1 x 2 Lakh Kcal/hr.	-	
4	Attached to process emissions.	HCl	35 mg/Nm^3
5	Attached to D.G. Set of capacity 1X250 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. The industry shall restrain to 210 TPM out 600 TPM vide CFE order dt. 29.05.2022.

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. Rs.2,62,500/- for a period upto 31.03.2023.

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

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

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

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

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.

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.

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

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.

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.

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.

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.

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.

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.

23. The industry shall develop greenbelt as per norms.

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

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

26. The industry shall maintain sub cooler condensers system followed by activated charcoal bed so as 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.

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.

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 Leachate collection system.

31. 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.

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

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.

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

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.

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.

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.

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., Nalgonda every month along with invoice copies of the starting raw materials outsourced.

39. The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption.

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.

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.

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.

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.

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.

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 & amencments 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.

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.

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.

15

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. Hazelo Lab Pvt Ltd.,
(Formerly M/s Venlar Labs (P) Ltd,)
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District

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

01/9/2022

SENIOR ENVIRONMENTAL ENGINEER
(CFO – UNIT-III)

(16)

Annexet II

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

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

BY REGD. POST WITH ACK. DUE

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

Order No.NLG-44/TGPCB/TF/HO/2024- 1459 **Date:23.10.2024**

Sub: TGPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District - Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988) - **DIRECTIONS** - **ISSUED** - Reg.

Ref:
1. O.A.No. 97 of 2021 before the Hon'ble NGT, Chennai filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others of Anthammagudem Village against M/s. Hazelo Lab Pvt. Ltd.
2. CFO&HWA Order dated: 01.09.2022.
3. Directions Orders issued on 03.02.2022.
4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
6. Directions Orders issued on 06.12.2022.
7. Hon'ble NGT, Chennai Order dated: 17.01.2023.
8. EPTRI, Hyderabad Study report dt.24.04.2023.
9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
10. Directions issued on 13.09.2023 & 03.01.2024.
11. An IA No: 02 of 2023 praying to review the order dated 07.08.2023 passed by the Hon'ble High Court in W.P. No.20623 of 2023.
12. WP No.23690 of 2023 in the Hon'ble High Court filed by Sri Gummi Narender Reddy.
13. Hon'ble NGT, (SZ), Chennai Orders dated 05.04.2024 in O.A.No.97 of 2021.
14. Directions vide order No. NLG-44/TGPCB/TF/HO/2024-651, Dt. 20.07.2024.
15. Complaints received from the residents of Anthammagudem & Dothigudem villages.
16. Telephonic complaints received from the Hon'ble MP, Bhongir and the Hon'ble MLA, Bhongir.
17. Joint inspection of the industry by the Hon'ble MP, Bhongiri, the Hon'ble MLA, Bhongir, the District Collector, Yadadri Bhongir district and RO Nalgonda officials on 22.08.2024.
18. Inspection of the industry by the RO-Nalgonda Officials on 23.08.2024.
19. Hearing held on 18.10.2024.

TGPCB
Despatch No.
28 OCT 2024
Signature

* * *

1. **WHEREAS,** you are operating the industry at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvnagiri District and involved in manufacturing of Bulk Drugs & Intermediates.

2. **WHEREAS,** vide reference 1st cited, Sri Ravula Linga Swamy, S/o. Yadaiah and Others of Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District filed O.A.No. 97 of 2021 in the Hon'ble National Green Tribunal (NGT), Southern Zone, Chennai against the pollution problems caused by M/s. Hazelo Lab Pvt Ltd., Sy.Nos. 240, 242, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District and expansion of the unit without obtaining permission.

3. **WHEREAS,** vide reference 2nd cited, the Board issued CFO&HWA to your industry on 01.09.2022 for expansión under phase-I with a validity period up to 31.03.2027.

4. **WHEREAS,** vide reference 3rd cited, the Board issued certain directions to the industry on 03.02.2022 in connection with complaints.

5. **WHEREAS,** vide reference 4th cited, CPCB issued following directions to the Board vide letter dated 19.09.2022 in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

   i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.

   ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.

   iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil, if any, and to provide the suitable remediation measures for effective crop growth.

6. **WHEREAS,** vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-

   i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.

   ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.

   iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.

7. **WHEREAS,** vide reference 6th cited, the Board issued further certain additional directions to your industry on 06.12.2022.

8. **WHEREAS,** vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

   i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.

   ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.

   iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase – I.

   iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.

vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.

vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the Industries under control from polluting.

9. **WHEREAS,** vide reference 8th cited, EPTRI, Hyderabad has submitted a study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all 8 industries located in the Dothigudem Cluster area.

10. **WHEREAS,** vide reference 9th cited, the Board issued certain directions to the industry on 21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions.

11. **WHEREAS,** vide reference 10th cited, the Board issued certain directions to the industry on 13.09.2023 & 03.01.2024 to comply with.

12. **WHEREAS,** vide reference 11th cited, your industry has filed an IA No:02 of 2023 praying to review the order dated 07.08.2023 passed by the Hon'ble High Court in W.P. No.20623 of 2023. The petitioner submitted that the Hon'ble High Court has allowed a similar writ petition in W.P. No.17179 of 2023 remitting the matter to the Board to consider the grounds taken by the petitioner.

The petitioner in present Interlocutory Application has referred to the Hon'ble High Court order dated: 08.08.2023 in WP No.17179 of 2023 filed by M/s Optimus Drugs Pvt Limited, wherein the Hon'ble Court remitted the matter to the Board to consider the grounds of the petitioner stating that petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. However, it is to submit that the petitioner of the present Interlocutory Application is a party in OA No.97 of 2021 before the Hob'ble NGT (SZ) and thus cannot rely on the order of the Hon'ble Court dated: 08.08.2023 in WP. No.17179 of 2023.

The Board filed the latest status report *before the Hon'ble National Green Tribunal, Southern Zone, Chennai in O.A.No.97 of 2021 and the petitioner industry does have a remedy to approach the Hon'ble National Green Tribunal. Hence, the Interlocutory Application may be dismissed".*

13. **WHEREAS,** vide reference 12th cited, Sri Gummi Narender Reddy, S/o. Ranga Reddy and Sri Gummi Damodar Reddy, S/o. Ram Reddy, R/o. Anthammagudem Village, Pochampally Mandal, Yadadri – Bhongir District have filed a WP No. 23690 of 2023 in the Hon'ble High Court of Telangana State praying that the Hon'ble Court to issue orders or directions declaring the action of the 5th respondent (Member Secretary, Telangana State Pollution Control Board) in not taking any action against the 9th respondent industry (M/s. Hazelo Laboratories Pvt Ltd, Dothigudem (V), Pochampally (M), Yadadri Bhuvangiri District) even inspite of there are a number of deviations of the industry by releasing poisonous effluents into the neighbor lands and making the lands uncultivable and polluting the air, water and sand in the vicinity as wholly arbitrary and illegal.

The Writ Petition was heard by the Hon'ble High Court on 29.08.2023 and issued following orders:

"……

When a query was put to learned counsel for petitioners about the availability of alternative remedy to the petitioners, he prays for an adjournment to enable him

to prepare the case on the aforesaid aspect and to address this Court on the next date of hearing.

However, learned Standing Counsel for TSPCB submits that action on the representations submitted by the petitioners from time to time has been taken. He, however, prays for and is granted two (02) weeks time to enable him to file status report".

14. **WHEREAS,** vide reference 13th cited, during hearing on 05.04.2023, the Hon'ble NGT taken on record the reports and issued following order:

> *"Today, the reports of the Telangana State Pollution Control Board (TSPCB) and the Department of Agriculture are filed.'*
>
> *To resolve the quantum of compensation before the Telangana State Pollution Control Board (TSPCB), the learned Senior Advocate appearing for the Project Proponent seeks short accommodation.*

15. **WHEREAS,** vide reference 14th cited, the Board issued certain directions to the industry on 20.07.2024 to comply with.

16. **WHEREAS,** the industry has paid an amount of Rs.77,80,000/-towards Environmental Compensation in phased manner i.e. **(i)** Paid part payment Rs.19,45,000/-on 23.12.2023 **(ii)** another part payment of Rs. 19,45,000/-on 16.02.2024 and **(iii)** paid remaining payment of Rs.38,90,000/-on 18.07.2024).

17. **WHEREAS,** vide reference 15th & 16th cited, the Board is receiving complaints regularly from the residents of Anthammagudem Village, Dothigudem villages for causing odour nuisance and water pollution. The Board also received telephonic complaints from the Hon'ble MP, and the Hon'ble MLA, Bhuvanagir. The main allegation is the industries in the Dhotigudem industrial cluster is causing odour nuisance, discharging effluents illegally without proper treatment systems.

18. **WHEREAS,** vide reference 17th cited, Joint inspection of the industry by the Hon'ble MP, Bhongiri, the Hon'ble MLA, Bhongir, the District Collector, Yadadri Bhongir district and RO Nalgonda officials on 22.08.2024.

19. **WHEREAS,** vide reference 18th cited, again, the RO-Nalgonda officials inspected the industry on 23.08.2024 and submitted a report dt:19.09.2024 to the Board Office. The following non-compliances were observed:

    1. Observed movable pipes at HTDS effluent collection tanks.
    2. Stagnation of water within the industry premises near main gate was observed.
    3. The industry has provided closed dome with hood followed by double stage scrubber to the HTDS effluent collection tanks. However, HTDS clarifier is in open condition. This may cause odour nuisance.
    4. The industry has provided VOC analyser and same is connected to the TGPCB server. The VOC analyser is installed near Q.C building / ware house. However, the Board receiving regular oral complaints from villagers of Anthamagudem regarding odour nuisance from the industry especially from new ZLD system.
    5. The industry has provided PIION system at ZLD area. However, during inspection observed odour nuisance near ZLD area & within industry premises. Conducted VOC Monitoring near ZLD and VOC values are varied from 5 to 6 PPM.
    6. The industry has provided two stage scrubber to the ATFD. However, not provided sub cooler condenser and activated charcoal bed. The industry representative justifying that as the system is having stripper, the sub cooler condenser, charcoal bed is not required. During inspection fugitive emissions were observed from the ATFD Scrubber.
    7. The industry has submitted LDAR study report on 08.08.2023 and not conducted LDAR Study for the year 2024.
    8. The industry has not provided activated charcoal bed to the double stage scrubbers connected to production block A & production block A (Extension).The industry has not provided activated char coal bed and sub cooler condenser to the double stage scrubber connected to production block

D1, D2, production block F, G & production block H.

9. The industry has not provided sub cooler condenser to the ATFD. But, the industry representative justifying that as the system is having stripper, the sub cooler condenser is not required.

10. The industry has not provided activated charcoal bed to the stripper & vacuum tub. The industry has not provided sub cooler condenser to the HTDS & Stripper feed tank.

11. As per the details submitted by the industry, the average disposal of Hazardous waste is within the consented capacity. But, the industry is disposing the Hazardous waste more than the consented capacity in February, March, May & July2024.

12. As per the analysis reports, COD (Stripper feed -67,066 mg/L & MEE feed - 66,267 mg/L) values of the stripper feed & MEE feed are nearly same, which indicates that stripper is not working efficiently.

13. As per the analysis reports, the values of TDS (10,281mg/l) & COD (16,926mg/l) are high in ATFD condensate.

14. As per the analysis reports, the COD Value of RO feed & RO Permeate are very high(9,102 mg/L & 699 mg/L).This indicates that RO plant is not working efficiently.

15. As per the analysis reports, the values of TDS (3,098 mg/l, 9,197 mg/l & 16,410 mg/l) & COD (5,269 mg/l, 1,038mg/l & 4,072mg/l) are high in cooling towers of Production Blocks is A, C & D and MEE Cooling tower. This indicates that the industry is using untreated effluent in cooling towers. This is one of the source for odour nuisance in the areas.

20. **WHEREAS,** vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 18.10.2024. The industry representative, the RO-Nalgonda Officials and complainants have attended the meeting. The details are as follows:

I. The Committee noted the following non-compliance:

1. Observed movable pipes at HTDS effluent collection tanks.
2. Stagnation of water within the industry premises near main gate was observed.
3. The industry has provided closed dome with hood followed by double stage scrubber to the HTDS effluent collection tanks. However, HTDS clarifier is in open condition. This may cause odour nuisance.
4. The industry has provided VOC analyser and same is connected to the TGPCB server. The VOC analyser is installed near Q C building / ware house. However, the Board receiving regular oral complaints from villagers of Anthamagudem regarding odour nuisance from the industry especially from new ZLD system.
5. The industry has provided PIION system at ZLD area. However, during inspection observed odour nuisance near ZLD area & within industry premises. Conducted VOC Monitoring near ZLD and VOC values are varied from 5 to 6 PPM.
6. The industry has provided two stage scrubber to the ATFD. However, not provided sub cooler condenser and activated charcoal bed. The industry representative justifying that as the system is having stripper, the sub cooler condenser, charcoal bed is not required. During inspection fugitive emissions were observed from the ATFD Scrubber.
7. The industry has submitted LDAR study report on 08.08.2023 and not conducted LDAR Study for the year 2024.
8. The industry has not provided activated charcoal bed to the double stage scrubbers connected to production block A & production block A (Extension).The industry has not provided activated char coal bed and sub cooler condenser to the double stage scrubber connected to production block D1, D2, production block F, G & production block H.

9. The industry has not provided sub cooler condenser to the ATFD. But, the industry representative justifying that as the system is having stripper, the sub cooler condenser is not required.

10. The industry has not provided activated charcoal bed to the stripper & vacuum tub. The industry has not provided sub cooler condenser to the HTDS & Stripper feed tank.

11. As per the details submitted by the industry, the average disposal of Hazardous waste is within the consented capacity. But, the industry is disposing the Hazardous waste more than the consented capacity in February, March, May & July2024.

12. As per the analysis reports, COD (Stripper feed -67,066 mg/L & MEE feed -66,267 mg/L) values of the stripper feed & MEE feed are nearly same, which indicates that stripper is not working efficiently.

13. As per the analysis reports, the values of TDS (10,281mg/l) & COD (16,926mg/l) are high in ATFD condensate.

14. As per the analysis reports, the COD Value of RO feed & RO Permeate are very high(9,102 mg/L & 699 mg/L).This indicates that RO plant is not working efficiently.

15. As per the analysis reports, the values of TDS (3,098 mg/l, 9,197 mg/l & 16,410 mg/l) & COD (5,269 mg/l, 1,038mg/l & 4,072mg/l) are high in cooling towers of Production Blocks is A, C & D and MEE Cooling tower. This indicates that the industry is using untreated effluent in cooling towers. This is one of the source for odour nuisance in the areas.

II. The industry representative informed the following:

1. Due to salt formation in the effluent line, flexible pipes were used temporarily and rectified the same and provided fixed lines for effluent transfer.

2. Water was stagnated due to gradient for flow of water outside the industry particularly during rains and now problem was rectified.

3. Clarifier shall be kept in open condition to verify the quality of the effluent and its operation.

4. The VOC analyzer was shifted to new ZLD area towards village.

5. They increased the PIION gas flow for effective control of odour at ZLD area.

6. Earlier, they represented the Board regarding safety problems for installation of activated Charcoal bed to the scrubbers attached to the ATFD and process area.

7. They are disposing the Hazardous Waste regularly and the quantity of hazardous waste generation is within the consented capacity.

8. They are operating the stripper effectively and volatile compounds were more collected in ATFD condensate.

9. They are conducting effluent monitoring for ZLD stage wise and the values are satisfactory indicating effective operation of ZLD system.

10. Regarding variations in the online data, there is a Sim problem during that period. They rectified the net connectivity and Sim problems.

11. They conducted the LDAR Study and submitted to the RO.

12. They revalidated the Bank Guarantee of Rs.4.0 Lakhs and submitted to the Board.

13. They requested the Board to revise the Bank Guarantee of Rs.48.0 lakhs and reduce the BG amount as per the earlier BG circular.

III. The complainants informed that, they alleged that, the industries located in Dothigudem Cluster Area are causing severe odour problems to their village.

After detailed discussions and examined the request of the industry to reduce the BG amount as per the earlier BG circular, the Committee recommended to issue certain directions to your industry with a condition that the industry shall submit the Bank Guarantee of Rs.48.0 Lakhs within one month (i.e., by 17.11.2024).

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

1. The industry shall submit a fresh Bank Guarantee of Rs.48.0 Lakhs within one month (i.e., by 17.11.2024) in favour of the Member Secretary, TGPCB, Hyderabad for a period of one year at concerned Regional office and the existing bank guarantee of Rs.24.0 Lakhs shall be forfeited as per the earlier order dt:20.07.2024.
2. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO&HWA order.
3. 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.
4. 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 Biolgical ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.
5. The industry shall operate the Biological ETP regularly and maintain adequate bio-culture/ MLSS in the aeration tank to operate the biological ETP effectively thereby reduce the load on the RO Plant.
6. The industry shall operate the RO Plant effectively to recycle the RO permeate for plant operations.
7. The industry shall provide complete roofing to the MEE facility and ensure that the rain water does not enter the MEE area and mix with the seepages.
8. The industry shall transfer the chemicals / raw materials within the plant premises only in a fixed Pipes lines. The industry shall not use any flexible pipes under any circumstances.
9. 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.
10. The industry shall not discharge any waste water / effluent / contaminated rain water/ spillages / seepages / leakages within & outside the industry premises under any circumstances.
11. The industry shall take measures to avoid any stagnation of rain water within the premises and also ensure that, first cut rain water shall be collected in the first cut rain water collection tank.
12. The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks at MEE area and regularly maintain the same.
13. 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.
14. 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.
15. The industry shall provide/maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.
16. The industry shall provide & maintain PTZ (Pan Tilt Zoom) additional cameras to focus the entire premises duly covering ZLD area, boiler stack & entire boundary of the plant.

17. The industry shall maintain good housekeeping within the industry premises.

18. The industry shall revalidate the Bank Guarantee from time to time before it's expiry till further orders of the Board.

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

23. The above mentioned directives shall be implemented by the industry, failing which legal action will be initiated against your industry under Section 33(A) of Water (Prevention and Control of Pollution) Act, 1974 (as amended by Act 53 of 1988), directing closure of the industry in the interest of Public Health and Environment without any further notice.

Sd/-
MEMBER SECRETARY

To,
M/s. Hazelo Lab Private Limited,
(Formerly M/s. Venlar Labs (P) Ltd),
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvangiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

(24)

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

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

BY REGD. POST WITH ACK. DUE

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

Order No.NLG-44/TGPCB/TF/HO/2024- 1458 **Date:23.10.2024**

Sub: TGPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District – Air (Prevention and Control of Pollution) Act 1981 (as amended by Act 47 of 1987) – **DIRECTIONS** – **ISSUED** – Reg.

TGPCB
Despatch No.
28 OCT 2024
Signature

Ref:
1. O.A.No. 97 of 2021 before the Hon'ble NGT, Chennai filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others of Anthammagudem Village against M/s. Hazelo Lab Pvt Ltd.
2. CFO&HWA Order dated: 01.09.2022.
3. Directions Orders issued on 03.02.2022.
4. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
5. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
6. Directions Orders issued on 06.12.2022.
7. Hon'ble NGT, Chennai Order dated: 17.01.2023.
8. EPTRI, Hyderabad Study report dt.24.04.2023.
9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
10. Directions issued on 13.09.2023 & 03.01.2024.
11. An IA No. 02 of 2023 praying to review the order dated 07.08.2023 passed by the Hon'ble High Court in W.P. No.20623 of 2023.
12. WP No.23690 of 2023 in the Hon'ble High Court filed by Sri Gummi Narender Reddy.
13. Hon'ble NGT, (SZ), Chennai Orders dated 05.04.2024 in O.A.No.97 of 2021.
14. Directions vide order No. NLG-44/TGPCB/TF/HO/2024-651, Dt. 20.07.2024.
15. Complaints received from the residents of Anthammagudem & Dothigudem villages.
16. Telephonic complaints received from the Hon'ble MP, Bhongir and the Hon'ble MLA, Bhongir.
17. Joint inspection of the industry by the Hon'ble MP, Bhongiri, the Hon'ble MLA, Bhongir, the District Collector, Yadadri Bhongir district and RO Nalgonda officials on 22.08.2024.
18. Inspection of the industry by the RO-Nalgonda Officials on 23.08.2024.
19. Hearing held on 18.10.2024.

* * *

1. **WHEREAS,** you are operating the industry at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvnagiri District and involved in manufacturing of Bulk Drugs & Intermediates.

2. **WHEREAS,** vide reference 1st cited, Sri Ravula Linga Swamy, S/o. Yadaiah and Others of Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District filed O.A.No. 97 of 2021 in the Hon'ble National Green Tribunal (NGT), Southern Zone, Chennai against the pollution problems caused by M/s. Hazelo Lab Pvt Ltd., Sy.Nos. 240, 242, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District and expansion of the unit without obtaining permission.

3. **WHEREAS,** vide reference 2nd cited, the Board issued CFO&HWA to your industry on 01.09.2022 for expansion under phase-I with a validity period up to 31.03.2027.

4. **WHEREAS,** vide reference 3rd cited, the Board issued certain directions to the industry on 03.02.2022 in connection with complaints.

5. **WHEREAS,** vide reference 4th cited, CPCB issued following directions to the Board vide letter dated 19.09.2022 in connection with O.A No.97 of 2021 filed by Sri Ravula Linga Swamy, S/o. Yadaiah and Others, Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District before Hon'ble NGT(SZ), Chennai:

   i. Telangana State Pollution Control Board (TSPCB) shall direct M/s. Hazelo Labs Pvt Ltd and other seven pharmaceutical industries in the area to submit time bound action plan for decontamination of soil, control of odour nuisance & VOC emission and achievement of ZLD.

   ii. TSPCB shall periodically review implementation of the action plan of all the units & regularly monitor VOCs in ambient air to ensure the effective implementation.

   iii. TSPCB shall get the study done in a time bound manner to determine the extent of damage of soil, if any, and to provide the suitable remediation measures for effective crop growth.

6. **WHEREAS,** vide reference 5th cited, the Hon'ble NGT vide Order dated 31.10.2022 issued following directions to the Board to implement the directions given by the CPCB to the Board and also to assess the compensation for the alleged deliberate violations by the industries:-

   i. The CPCB has requested the Telangana State Pollution Control Board (TSPCB) to direct all the Pharmaceutical industries in the area to submit the time bound action plan for removal of contaminated sediments/soil and control of VOC emission in ambient air as well as adequate pollution control measures to achieve ZLD. The Telangana State Pollution Control Board (TSPCB) was also directed to periodically review their action plan and monitor the VOC in the area to ensure the effective implementation.

   ii. The Telangana State Pollution Control Board (TSPCB) to visit the industrial area referred above and implement the directions given by the CPCB in this regard and also assess the compensation for the alleged deliberate violations found in the report.

   iii. The Telangana State Pollution Control Board (TSPCB) also has to ensure that these industries maintain the Ambient Air Quality (AAQ) and have adequate control measures to achieve the ZLD. When these Pharmaceutical industries are capable of achieving the ZLD, why no action has been taken by the Telangana State Pollution Control Board (TSPCB) for such violations till today has also to be reported.

7. **WHEREAS,** vide reference 6th cited, the Board issued further certain additional directions to your industry on 06.12.2022.

8. **WHEREAS,** vide reference 7th cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 in O.A No.97 of 2021, issued following directions to the TSPCB:-

   i. We would direct the Telangana State Pollution Control Board to join hands with the accredited testing labs, if need be, to expedite the process to collect the soil, water and plant soil samples in surrounding industries and effluent flow as per standard norms.

   ii. The CPCB observed that the ETP provided by the unit for treating LTDS and HTDS effluent is not adequate for meeting the ZLD System. Hence, the ETP shall be revamped for effective performance.

   iii. At the time of the CPCB committee visit, the unit's production levels are 50% only and the generated effluents quantity was 4 KLD including both the HTDS and LTDS against the permitted HTDS quantity of 4.52 KLD and LTDS quantity of 3.5 KLD. Hence, the existing ZLD system is adequate to treat the effluents generated. However, the industry has installed a new Zero Liquid Discharge System with a capacity of 200 KLD in place of the existing system to treat HTDS and LTDS effluent under Phase – I.

   iv. We direct the Telangana State Pollution Control Board to furnish the recordings at-least from December 2022 till date as to the MEE condensate, HTDS and LTDS which are connected online. Let the report also contain the water balance, material balance data and energy audit conducted to ascertain whether the effluents are treated in the manner suggested.

v. The industry was directed to submit a time bound action plan within three days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dated 19.09.2022.

vi. The additional report that may be filed by the Telangana SPCB should also contain (i) the water and soil analysis report from the respective labs, (ii) the compliance report filed by the 6th respondent to the TSPCB, (iii) any further action taken by the TSPCB for non-compliance or non-satisfaction of the compliance and (iv) levy of any compensation for having polluted the water and soil.

vii. Let the Telangana SPCB also state whether they have imposed any penalty/punishment on the respondent whenever there is a violation of any of the conditions imposed by them and whether it can simply stop with invoking the Bank Guarantee for the first violation or it can be enhanced for the subsequent violations which would bring the industries under control from polluting.

9. **WHEREAS,** vide reference 8th cited, EPTRI, Hyderabad has submitted a study report dt.24.04.2023 on water & soil monitoring in Dothigudem industrial cluster. As per the study report, certain bore wells are contaminated with the chemicals and the same were matched with the products and derivatives of all 8 industries located in the Dothigudem Cluster area.

10. **WHEREAS,** vide reference 9th cited, the Board issued certain directions to the industry on 21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions.

11. **WHEREAS,** vide reference 10th cited, the Board issued certain directions to the industry on 13.09.2023 & 03.01.2024 to comply with.

12. **WHEREAS,** vide reference 11th cited, your industry has filed an IA No.02 of 2023 praying to review the order dated 07.08.2023 passed by the Hon'ble High Court in W.P. No.20623 of 2023. The petitioner submitted that the Hon'ble High Court has allowed a similar writ petition in W.P. No.17179 of 2023 remitting the matter to the Board to consider the grounds taken by the petitioner.

The petitioner in present Interlocutory Application has referred to the Hon'ble High Court order dated: 08.08.2023 in WP No.17179 of 2023 filed by M/s Optimus Drugs Pvt Limited, wherein the Hon'ble Court remitted the matter to the Board to consider the grounds of the petitioner stating that petitioner was not a party to the order dated 17.01.2023 passed by National Green Tribunal in O.A.No.97 of 2021. However, it is to submit that the petitioner of the present Interlocutory Application is a party in OA No.97 of 2021 before the Hob'ble NGT (SZ) and thus cannot rely on the order of the Hon'ble Court dated: 08.08.2023 in WP. No.17179 of 2023.

The Board filed the latest status report *before the Hon'ble National Green Tribunal, Southern Zone, Chennai in O.A.No.97 of 2021 and the petitioner industry does have a remedy to approach the Hon'ble National Green Tribunal, Hence, the Interlocutory Application may be dismissed".*

13. **WHEREAS,** vide reference 12th cited, Sri Gummi Narender Reddy, S/o. Ranga Reddy and Sri Gummi Damodar Reddy, S/o. Ram Reddy, R/o. Anthammagudem Village, Pochampally Mandal, Yadadri – Bhongir District have filed a WP No. 23690 of 2023 in the Hon'ble High Court of Telangana State praying that the Hon'ble Court to issue orders or directions declaring the action of the 5th respondent (Member Secretary, Telangana State Pollution Control Board) in not taking any action against the 9th respondent industry (M/s. Hazelo Laboratories Pvt Ltd, Dothigudem (V), Pochampally (M), Yadadri Bhuvangiri District) even inspite of there are a number of deviations of the industry by releasing poisonous effluents into the neighbor lands and making the lands uncultivable and polluting the air, water and sand in the vicinity as wholly arbitrary and illegal.

The Writ Petition was heard by the Hon'ble High Court on 29.08.2023 and issued following orders:

"……

When a query was put to learned counsel for petitioners about the availability of alternative remedy to the petitioners, he prays for an adjournment to enable him

to prepare the case on the aforesaid aspect and to address this Court on the next date of hearing.

However, learned Standing Counsel for TSPCB submits that action on the representations submitted by the petitioners from time to time has been taken. He, however, prays for and is granted two (02) weeks time to enable him to file status report".

14. **WHEREAS,** vide reference 13th cited, during hearing on 05.04.2023, the Hon'ble NGT taken on record the reports and issued following order:

"Today, the reports of the Telangana State Pollution Control Board (TSPCB) and the Department of Agriculture are filed.

To resolve the quantum of compensation before the Telangana State Pollution Control Board (TSPCB), the learned Senior Advocate appearing for the Project Proponent seeks short accommodation.

15. **WHEREAS,** vide reference 14th cited, the Board issued certain directions to the industry on 20.07.2024 to comply with.

16. **WHEREAS,** the industry has paid an amount of Rs.77,80,000/-towards Environmental Compensation in phased manner i.e. (**(i)** Paid part payment Rs.19,45,000/-on 23.12.2023 **(ii)** another part payment of Rs. 19,45,000/-on 16.02.2024 and **(iii)** paid remaining payment of Rs.38,90,000/-on 18.07.2024).

17. **WHEREAS,** vide reference 15th & 16th cited, the Board is receiving complaints regularly from the residents of Anthammagudem Village, Dothigudem villages for causing odour nuisance and water pollution. The Board also received telephonic complaints from the Hon'ble MP, and the Hon'ble MLA, Bhuvanagir. The main allegation is the industries in the Dhotigudem industrial cluster is causing odour nuisance, discharging effluents illegally without proper treatment systems.

18. **WHEREAS,** vide reference 17th cited, Joint inspection of the industry by the Hon'ble MP, Bhongiri, the Hon'ble MLA, Bhongir, the District Collector, Yadadri Bhongir district and RO Nalgonda officials on 22.08.2024.

19. **WHEREAS,** vide reference 18th cited, again, the RO-Nalgonda officials inspected the industry on 23.08.2024 and submitted a report dt:19.09.2024 to the Board Office. The following non-compliances were observed:

1. Observed movable pipes at HTDS effluent collection tanks.
2. Stagnation of water within the industry premises near main gate was observed.
3. The industry has provided closed dome with hood followed by double stage scrubber to the HTDS effluent collection tanks. However, HTDS clarifier is in open condition. This may cause odour nuisance.
4. The industry has provided VOC analyser and same is connected to the TGPCB server. The VOC analyser is installed near Q-C building / ware house. However, the Board receiving regular oral complaints from villagers of Anthamagudem regarding odour nuisance from the industry especially from new ZLD system.
5. The industry has provided PIION system at ZLD area. However, during inspection observed odour nuisance near ZLD area & within industry premises. Conducted VOC Monitoring near ZLD and VOC values are varied from 5 to 6 PPM.
6. The industry has provided two stage scrubber to the ATFD. However, not provided sub cooler condenser and activated charcoal bed. The industry representative justifying that as the system is having stripper, the sub cooler condenser, charcoal bed is not required. During inspection fugitive emissions were observed from the ATFD Scrubber.
7. The industry has submitted LDAR study report on 08.08.2023 and not conducted LDAR Study for the year 2024.

8. The industry has not provided activated charcoal bed to the double stage scrubbers connected to production block A & production block A (Extension).The industry has not provided activated char coal bed and sub cooler condenser to the double stage scrubber connected to production block D1, D2, production block F, G & production block H.

9. The industry has not provided sub cooler condenser to the ATFD. But, the industry representative justifying that as the system is having stripper, the sub cooler condenser is not required.

10. The industry has not provided activated charcoal bed to the stripper & vacuum tub. The industry has not provided sub cooler condenser to the HTDS & Stripper feed tank.

11. As per the details submitted by the industry, the average disposal of Hazardous waste is within the consented capacity. But, the industry is disposing the Hazardous waste more than the consented capacity in February, March, May & July2024.

12. As per the analysis reports, COD (Stripper feed -67,066 mg/L & MEE feed - 66,267 mg/L) values of the stripper feed & MEE feed are nearly same, which indicates that stripper is not working efficiently.

13. As per the analysis reports, the values of TDS (10,281mg/l) & COD (16,926mg/l) are high in ATFD condensate.

14. As per the analysis reports, the COD Value of RO feed & RO Permeate are very high(9,102 mg/L & 699 mg/L).This indicates that RO plant is not working efficiently.

15. As per the analysis reports, the values of TDS (3,098 mg/l, 9,197 mg/l & 16,410 mg/l) & COD (5,269 mg/l, 1,038mg/l & 4,072mg/l) are high in cooling towers of Production Blocks is A, C & D and MEE Cooling tower. This indicates that the industry is using untreated effluent in cooling towers. This is one of the source for odour nuisance in the areas.

20. **WHEREAS,** vide reference 19th cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 18.10.2024. The industry representative, the RO-Nalgonda Officials and complainants have attended the meeting. The details are as follows:

I. The Committee noted the following non-compliance:

1. Observed movable pipe s at HTDS effluent collection tanks.
2. Stagnation of water within the industry premises near main gate was observed.
3. The industry has provided closed dome with hood followed by double stage scrubber to the HTDS effluent collection tanks. However, HTDS clarifier is in open condition. This may cause odour nuisance.
4. The industry has provided VOC analyser and same is connected to the TGPCB server. The VOC analyser is installed near Q C building / ware house. However, the Board receiving regular oral complaints from villagers of Anthamagudem regarding odour nuisance from the industry especially from new ZLD system.
5. The industry has provided PIION system at ZLD area. However, during inspection observed odour nuisance near ZLD area & within industry premises. Conducted VOC Monitoring near ZLD and VOC values are varied from 5 to 6 PPM.
6. The industry has provided two stage scrubber to the ATFD. However, not provided sub cooler condenser and activated charcoal bed. The industry representative justifying that as the system is having stripper, the sub cooler condenser, charcoal bed is not required. During inspection fugitive emissions were observed from the ATFD Scrubber.
7. The industry has submitted LDAR study report on 08.08.2023 and not conducted LDAR Study for the year 2024.

8. The industry has not provided activated charcoal bed to the double stage scrubbers connected to production block A & production block A (Extension).The industry has not provided activated char coal bed and sub cooler condenser to the double stage scrubber connected to production block D1, D2, production block F, G & production block H.

9. The industry has not provided sub cooler condenser to the ATFD. But, the industry representative justifying that as the system is having stripper, the sub cooler condenser is not required.

10. The industry has not provided activated charcoal bed to the stripper & vacuum tub. The industry has not provided sub cooler condenser to the HTDS & Stripper feed tank.

11. As per the details submitted by the industry, the average disposal of Hazardous waste is within the consented capacity. But, the industry is disposing the Hazardous waste more than the consented capacity in February, March, May & July2024.

12. As per the analysis reports, COD (Stripper feed -67,066 mg/L & MEE feed -66,267 mg/L) values of the stripper feed & MEE feed are nearly same, which indicates that stripper is not working efficiently.

13. As per the analysis reports, the values of TDS (10,281mg/l) & COD (16,926mg/l) are high in ATFD condensate.

14. As per the analysis reports, the COD Value of RO feed & RO Permeate are very high(9,102 mg/L & 699 mg/L).This indicates that RO plant is not working efficiently.

15. As per the analysis reports, the values of TDS (3,098 mg/l, 9,197 mg/l & 16,410 mg/l) & COD (5,269 mg/l, 1,038mg/l & 4,072mg/l) are high in cooling towers of Production Blocks is A, C & D and MEE Cooling tower. This indicates that the industry is using untreated effluent in cooling towers. This is one of the source for odour nuisance in the areas.

II. The industry representative informed the following:

1. Due to salt formation in the effluent line, flexible pipes were used temporarily and rectified the same and provided fixed lines for effluent transfer.

2. Water was stagnated due to gradient for flow of water outside the industry particularly during rains and now problem was rectified.

3. Clarifier shall be kept in open condition to verify the quality of the effluent and its operation.

4. The VOC analyzer was shifted to new ZLD area towards village.

5. They increased the PIION gas flow for effective control of odour at ZLD area.

6. Earlier, they represented the Board regarding safety problems for installation of activated Charcoal bed to the scrubbers attached to the ATFD and process area.

7. They are disposing the Hazardous Waste regularly and the quantity of hazardous waste generation is within the consented capacity.

8. They are operating the stripper effectively and volatile compounds were more collected in ATFD condensate.

9. They are conducting effluent monitoring for ZLD stage wise and the values are satisfactory indicating effective operation of ZLD system.

10. Regarding variations in the online data, there is a Sim problem during that period. They rectified the net connectivity and Sim problems.

11. They conducted the LDAR Study and submitted to the RO.

12. They revalidated the Bank Guarantee of Rs.4.0 Lakhs and submitted to the Board.

13. They requested the Board to revise the Bank Guarantee of Rs.48.0 lakhs and reduce the BG amount as per the earlier BG circular.

III. The complainants informed that, they alleged that, the industries located in Dothigudem Cluster Area are causing severe odour problems to their village.

After detailed discussions and examined the request of the industry to reduce the BG amount as per the earlier BG circular, the Committee recommended to issue certain directions to your industry with a condition that the industry shall submit the Bank Guarantee of Rs.48.0 Lakhs within one month (i.e., by 17.11.2024).

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

1. The industry shall provide dome with suction hood followed by double stage scrubber to the HTDS effluent storage tanks to control the odour problem.
2. The industry shall operate & maintain online VOC monitoring system at ZLD area towards Village and connect the same to the Board server.
3. The industry shall provide / maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.
4. The industry shall maintain odour suppressant mist spray / sprinkle "PIION" liquid effectively at ZLD area including effluent treatment area to control VOCs.
5. The industry shall construct / maintain closed shed for storage of coal & coal ash to control fugitive emissions in the area.
6. The industry shall maintain / install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD & vents of the scrubbing systems provided to the production blocks.
7. The industry shall regularly 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.
8. The industry shall not cause any air pollution / smell nuisance in the surrounding areas.

22. 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).

23. 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. Hazelo Lab Private Limited,
(Formerly M/s. Venlar Labs (P) Ltd),
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvangiri District.

Copy to:

1. The JCEE, TSPCB, ZO, RC Puram for information and necessary action.
2. The EE, TSPCB, RO, Nalgonda for information and necessary action
3. Concerned File.

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

Prasanna

Senior Environmental Engineer
(Task Force - UH-IV)

(31)

Annexure III

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-3, Industrial Estate, Sanathnagar, Hyderabad - 500 018
Ph: 040-23887500

CENTRAL LABORATORY
FORM - X
(See Rule 26)

Report No: SR/10/TGPCB/HO/R00/LAB/24/11/582-586
Issue date: 02/12/2024
Page No. 1 of 3

I hereby certify that I, Dr. M.S. Satyanarayana Rao, State Board Analyst duly appointed under Sub – section (3) of Section 53 of the Water (Prevention and Control of Pollution) Act, 1974 (6 of 1974) received on 25/11/2024 and collected on 22/11/2024 by AES-II, RO-NLG a 1 Ltr. of sample M/s. Hazelo Lab Private Limited., Sy No: 242, 247, 248 & 249, Dothigudem (V), B. Pochampally (M), Jiblakpally Yadadri Bhuvanagiri District.

Sample code	:	Sample details / collection point
24/11/582	-	HTDS/Stripper Feed
24/11/583	-	Stripper Distillate
24/11/584	-	MEE Feed
24/11/585	-	MEE Condensate
24/11/586	-	MEE Concentrate

The sample was in a condition fit for analysis reported below:

The condition of the seals, fastening and container on receipt was intact

I further certify that I have analysed the above mentioned sample on 25/11/2024 to 02/12/2024 and declare the results of the analysis to be as follows.

Parameter	Method (*) No.	Unit	Results				
			24/11/582	24/11/583	24/11/584	24/11/585	24/11/586
pH at 25° C	4500-H+B	-	6.18	5.89	5.56	7.49	5.96
Total Suspended Solids	2540 - D	mg/L	4,152	24	1,076	14	968
Total Dissolved Solids	2540-C	mg/L	97,784	875	1,11,320	502	1,13,910
Chemical Oxygen Demand	5220-B	mg/L	1,13,344	63,958	69,626	627	59,910

Note: Results related to sample as received.
(*) Standard methods of APHA, 24th Edition.

Signed this: 02 /12/2024
Address:
Central Laboratory
TGPCB Hyderabad

Board Analyst

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TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-3, Industrial Estate, Sanathnagar, Hyderabad - 500 018
Ph: 040-23887500

CENTRAL LABORATORY
FORM - X
(See Rule 26)

Report No: SR/10/TGPCB/HO/R00/LAB/24/11/587-591
Issue date: 02 /12/2024

I hereby certify that I, **Dr. M.S. Satyanarayana Rao, State Board Analyst** duly appointed under Sub – section (3) of Section 53 of the Water (Prevention and Control of Pollution) Act, 1974 (6 of 1974) received on **25/11/2024** and collected on **22/11/2024** by **AES-II, RO-NLG** a 1 Ltr. of sample **M/s. Hazelo Lab Private Limited., Sy No: 242, 247, 248 & 249, Dothigudem (V), B. Pochampally (M), Jiblakpally Yadadri Bhuvanagiri District.**

Sample code	:	Sample details / collection point
24/11/587	-	ATFD Condensate
24/11/588	-	LTDS
24/11/589	-	Aeration Tank – 1 Outlet
24/11/590	-	Aeration Tank – 2 Outlet
24/11/591	-	Ro-Feed/Inlet

The sample was in a condition fit for analysis reported below:

The condition of the seals, fastening and container on receipt was intact

I further certify that I have analysed the above mentioned sample on **25/11/2024** to **02/12/2024** and declare the results of the analysis to be as follows.

Parameter	Method (*) No.	Unit	Results				
			24/11/587	24/11/588	24/11/589	24/11/590	24/11/591
pH at 25° C	4500-H+B	-	6.93	7.64	8.42	8.51	6.83
Total Suspended Solids	2540 - D	mg/L	9	196	793	644	159
Total Dissolved Solids	2540-C	mg/L	28	5,440	29,676	35,994	6,408
Chemical Oxygen Demand	5220-B	mg/L	16	939	8,177	7,286	830

Note: Results related to sample as received.
(*) Standard methods of APHA, 24th Edition.

Remarks:
1. **The TDS and COD values of sample No. 24/11/589 i.e., Aeration tank -1 Outlet is Very high compared to LTDS sample i.e., sample No. 24/11/588.**
2. **The TDS values of sample No. 24/11/590 i.e., Aeration tank -2 Outlet is Very high compared to Aeration tank -1 i.e., sample code. 24/11/589.**
3. **There is high reduction of TDS value of sample code 24/11/591 i.e., RO –Feed/ Inlet compared to TDS value of Aeration tank -2 Outlet i.e., sample code. 24/11/590.**

Signed this: 02/12/2024
Address:
Central Laboratory
TGPCB Hyderabad

Board Analyst

33

TELANGANA POLLUTION CONTROL BOARD

Paryavarana Bhavan, A-3, Industrial Estate, Sanathnagar, Hyderabad - 500 018
Ph: 040-23887500

CENTRAL LABORATORY
FORM - X
(See Rule 26)

Report No: SR/10/TGPCB/HO/R00/LAB/24/11/592-596
Issue date: 02/12/2024

I hereby certify that I, Dr. M.S. Satyanarayana Rao, State Board Analyst duly appointed under Sub – section (3) of Section 53 of the Water (Prevention and Control of Pollution) Act, 1974 (6 of 1974) received on 25/11/2024 and collected on 22/11/2024 by AES-II, RO-NLG a 1 Ltr. of sample M/s. Hazelo Lab Private Limited., Sy No: 242, 247, 248 & 249, Dothigudem (V), B. Pochampally (M), Jiblakpally Yadadri Bhuvanagiri District.

Sample code	:	Sample details / collection point
24/11/592	-	RO-Permeate
24/11/593	-	RO – Reject
24/11/594	-	Cooling Tower Attached to production Block – A
24/11/595	-	Cooling Tower Attached to production Block – C & D
24/11/596	-	Cooling Tower Attached to MEE

The sample was in a condition fit for analysis reported below.

The condition of the seals, fastening and container on receipt was intact

I further certify that I have analysed the above mentioned sample on 25/11/2024 to 02/12/2024 and declare the results of the analysis to be as follows.

Parameter	Method (*) No.	Unit	Results				
			24/11/592	24/11/593	24/11/594	24/11/595	24/11/596
pH at 25° C	4500-H+B	-	6.36	8.37	6.96	7.09	6.56
Total Suspended Solids	2540 - D	mg/L	10	698	23	18	872
Total Dissolved Solids	2540-C	mg/L	79	45,948	365	1,336	38,840
Chemical Oxygen Demand	5220-B	mg/L	20	8,467	170	125	14,897

Note: Results related to sample as received
(*) Standard methods of APHA, 24th Edition.

Remarks: The sample No. 24/11/596 i.e., cooling tower attached to MEE is having very high TDS and COD Value.

Signed this: 02/12/2024
Address:
Central Laboratory
TGPCB Hyderabad

Board Analyst

Annexure - IV

Annexure-IV

The compliance status of the industry on the directions (under Water Act) Order dt: 23.10.2024 is as follows:

S. No	Direction	Compliance
1	The industry shall submit a fresh Bank Guarantee of Rs.48.0 Lakhs within one month (i.e., by 17.11.2024) in favour of the Member Secretary, TGPCB, Hyderabad for a period of one year at concerned Regional office and the existing bank guarantee of Rs.24.0 Lakhs shall be forfeited as per the earlier order dt:20.07.2024.	Not complied. The industry has not submitted BG of Rs. 48 Lakhs. The Board has forfeited the bank guarantee of Rs.24.0 Lakhs
2	The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO&HWA order.	Mentioned below.
3	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.	Complied.
4	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 Biolgical ETP followed RO system and treated effluents shall be reused in the plant. The RO rejects shall be sent to MEE for forced evaporation.	The industry has provided separate collection tanks for HTDS, LTDS effluents and provided ZLD system consist of stripper, MEE and ATFD, Biological ETP followed by RO system.
5	The industry shall operate the Biological ETP regularly and maintain adequate bio-culture/ MLSS in the aeration tank to operate the biological ETP effectively thereby reduce the load on the RO Plant.	During inspection ETP is under operation. The Board has collected samples from the Biological ETP & RO plant. As per the analysis reports. 1. **The TDS & COD values of aeration tank outlet is very high compared to LTDS sample.**
6	The industry shall operate the RO Plant effectively to recycle the RO permeate for plant operations.	

		2. **The TDS values of Aeration tank - 2 outlet is very high compared to Aeration tank-I.** 3. **There is high reduction of TDS value of RO feed/inlet compared to TDS value of aeration tank-2 outlet.** **The above remarks indicates that ETP is not operating properly.**
7	The industry shall provide complete roofing to the MEE facility and ensure that the rain water does not enter the MEE area and mix with the seepages.	The industry has provided roofing to MEE area.
8	The industry shall transfer the chemicals / raw materials within the plant premises only in a fixed Pipes lines. The industry shall not use any flexible pipes under any circumstances.	Complied
9	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.	Complied.
10	The industry shall not discharge any waste water / effluent / contaminated rain water/ spillages / seepages / leakages within & outside the industry premises under any circumstances.	Spillages / leakages were observed at MEE area and adjacent drains were filled with leaked effluents.
11	The industry shall take measures to avoid any stagnation of rain water within the premises and also ensure that, first cut rain water shall be collected in the first cut rain water collection tank.	Complied. Provided the first run off rain water & seepage collection pit with bypass arrangement and above ground storage tank (300 KL).
12	The industry shall arrest Gland & seal leakages from motor pumps at HTDS & LTDS Effluent tanks at MEE area and	Many leakages were observed at MEE area.

	regularly maintain the same.	
13	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 has provided hazardous waste storage shed with leachate collection system.
14	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.	--
15	The industry shall provide/maintain operate IP cameras at main gate entrance and shall be connected to the TSPCB Server.	The industry has provided IP Camera at main gate entrance and same is connected to TGPCB Server.
16	The industry shall provide & maintain PTZ (Pan Tilt Zoom) additional cameras to focus the entire premises duly covering ZLD area, boiler stack & entire boundary of the plant.	The industry has provided PTZ IP Cameras to cover ZLD Area, Boiler stack and to cover boundary of the unit.
17	The industry shall maintain good housekeeping within the industry premises.	Complied.
18	The industry shall revalidate the Bank Guarantee from time to time before it's expiry till further orders of the Board.	The industry has submitted the BG of Rs. 4 lakhs dt. 11.10.2024 which is valid upto 21.02.2025.

The compliance status of the industry on the directions (under Air Act) Order dt: 23.10.2024 is as follows:

S. No.	Directions	Compliance
1	The industry shall provide dome with suction hood followed by double stage scrubber to the HTDS effluent storage tanks to control the odour problem.	The industry has provided closed dome with hood followed by double stage scrubber to the HTDS effluent collection tanks. During inspection it was observed that, lids on the dome system were

		found opened and causing severe odour nuisance in the surroundings.
2	The industry shall operate & maintain online VOC monitoring system at ZLD area towards Village and connect the same to the Board server.	The industry has provided VOC analyser at ZLD area and same is connected to the TGPCB server.
3	The industry shall provide / maintain the vent condensers for all the solvent storage / chemical storage tanks to control the fugitive emissions.	The industry has provided Bulk chemical storage tanks with chilled brine circulation system with breather valves. The industry has also provided dyke wall system in bulk solvent storage.
4	The industry shall maintain odour suppressant mist spray / sprinkle "PIION" liquid effectively at ZLD area including effluent treatment area to control VOCs.	The industry has provided PIION system at ZLD area. However, **during inspection observed odour nuisance near ZLD area & within industry premises.**
5	The industry shall construct / maintain closed shed for storage of coal & coal ash to control fugitive emissions in the area.	Complied.
6	The industry shall maintain / install sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD & vents of the scrubbing systems provided to the production blocks.	Provided two stage scrubber for ATFD. **However, not provided sub cooler condenser and activated charcoal bed.**
7	The industry shall regularly 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.	Submitted latest LDAR study report on 26.09.2024.
8	The industry shall not cause any air pollution / smell nuisance in the surrounding areas.	**During inspection observed odour nuisance near ZLD area & within industry premises.**

ENVIRONMENTAL ENGINEER

Annexure-V

Annexure-V

1. Compliance of the industry on CFO schedule - B conditions: CFO Order No. order dt.220523957956, Dt.01.09.2022.

<table>
<tr><th>S. No</th><th>Direction</th><th>Compliance</th></tr>
<tr><td>1.</td><td>Total fresh Water Consumption shall not exceed 243.7 KLD
<table>
<tr><th>S. No</th><th>Purpose</th><th>Quantity (KLD)</th></tr>
<tr><td>1</td><td>Process</td><td>38.90</td></tr>
<tr><td>2</td><td>Washings</td><td>3.5</td></tr>
<tr><td>3</td><td>Scrubber</td><td>5.3</td></tr>
<tr><td>4</td><td>Boiler Feed</td><td>31.5</td></tr>
<tr><td>5</td><td>Cooling tower make-up</td><td>64.8</td></tr>
<tr><td>6</td><td>RO/DM rejects</td><td>7.0</td></tr>
<tr><td>7</td><td>Domestic</td><td>3.5</td></tr>
<tr><td>8</td><td>Gardening</td><td>3.5</td></tr>
<tr><td></td><td>Total</td><td>243.7 KLD
(Fresh -158 KLD + Recycled – 85.8 KLD)</td></tr>
</table></td><td>As per the records submitted by the industry, the water consumption (avg.) for the period Aug'2024 to Jan'2025 is 80.68 KLD, against the permitted quantity of 243.7 KLD.</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.
<table>
<tr><th>Parameter</th><th>Limiting Standards</th></tr>
<tr><td>pH</td><td>5.5 – 9.0</td></tr>
<tr><td>Temperature °C</td><td>45.0</td></tr>
<tr><td>Total Dissolved Solids (Inorganic)</td><td>5,000 mg/l</td></tr>
<tr><td>Oil and Grease</td><td>20 mg/l</td></tr>
</table></td><td>---</td></tr>
</table>

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 1 x 4 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 1 x 12 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	
	3	Attached to Thermic Fluid Heater – 1 x 1 Lakh Kcal/hr & 1 x 2 Lakh Kcal/hr.	-	-	
	4	Attached to process emissions.	HCl	35 mg/Nm^3	
	5	Attached to D.G. Set of capacity 1X250 KVA	SPM	115 /Nm^3	
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. The industry shall restrain to 210 TPM out 600 TPM vide CFE order dt. 29.05.2022.				As per the records submitted by the industry, for the period Aug'2024 to Jan'2025 the industry has manufactured 2 no of products with the production quantity (avg.) of 34.78 TPM against consented capacity of 210 TPM.
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. Rs.2,62,500 /- for a period upto 31.03.2023.	The industry has paid Rs.5,40,000/- on 17.05.2024 which is valid for a period up to 31.3.2026.
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.	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.
11.	The industry shall segregate effluents into LTDS & HTDS effluents separately.	The industry is segregating LTDS & HTDS effluents separately and provided separate flow meters to quantify.
12.	The industry shall maintain vent condensers for chemical / solvent storage tanks to control fugitive emissions	Complied.
13.	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.
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.	Complied. Provided flow meters for HTDS, LTDS effluent & RO permeate and same are connected to TGPCB Server
15.	The industry shall maintain 2 stage scrubber along with online pH monitoring system to all the production blocks for control of	The industry as provided following scrubbers:

	process emissions. They shall maintain log book for operation of scrubber for monitoring active scrubbing media.	i. Production block – A: Provided 2 stage scrubber along with sub cooler condenser. Not provided Activated charcoal bed. ii. Production block – A (extension): Provided 2 stage scrubber along with sub cooler condenser. Activated charcoal bed not provided. iii. Production block – B: Dismantled. iv. Production block – C: 2 x 2 stage scrubbers. Activated charcoal bed provided and sub cooler condenser provided. v. Production block – D1 & D2: 2 x 2 stage scrubbers. Activated charcoal bed and sub cooler condenser not provided. vi. Production block – E: Hydrogenation block. vii. Production block – F: 3 Nos double stage scrubbers provided, but not provided activated charcoal bed and sub cooler condensers. iii. Production block – H: 1 Nos double stage scrubbers provided, but not provided activated charcoal bed and sub cooler condensers. ix. Production block – G: 2 Nos double stage scrubbers provided and 1 Nos single stage scrubbers, but not provided activated charcoal bed and sub cooler condensers. x. ATFD: Provided 2 stage

		scrubber and activated charcoal bed. Not provided sub cooler condenser. The industry representative justifying that as the system is having stripper, the sub cooler condenser is not required. This may be examined. xi. Stripper & vaccum tub: Provided 2 stage scrubber along with sub cooler condenser. Activated charcoal bed not provided. xii. HTDS & stripper fed tank: 1 stage scrubber. Activated charcoal bed and sub cooler condenser not provided. iii. HCl tank: 1 stage scrubber. Activated charcoal bed and sub cooler condenser not provided.
16.	The industry shall monitor VOCs in ambient air with online VOC analyze with proper range & connect the same to TSPCB server.	The industry has provided VOC analyser at ZLD area and same is connected to the TGPCB server.
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.	Complied. Provided PTZ IP Cameras to focus HTDS, LTDS & RO permeate flow meters and same are connected to TGPCB Server.
19.	The industry shall provide and operate IP Camera with PAN, Zoom, 5x or above focal	Complied.

	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.	Camera provided at main gate and connected to the TGPCB Server.
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.	---
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.	Partially complied. The industry provided hood with extraction systems to the HTDS collection tanks and connected to the scrubbers to control the odour problem. During inspection it was observed that, lids on the dome system were found opened and causing severe odour nuisance in the surroundings.
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.	Complied. The industry has provided Online TDS meter for HTDS effluents and the same is connected to the TGPCB server.
23.	The industry shall develop greenbelt as per norms.	Developed good green belt.
24.	The industry shall provide adequate closed storage facilities above the ground with proper lining for storage of effluents before its treatment.	Complied. The industry has provided separate above ground level closed storage tanks for LTDS

		& HTDS. No seepages were observed.
25.	The industry shall not use effluents in cooling towers under any circumstances.	Samples were collected on 25.11.2024. As per the analysis reports, **Cooling tower – A, C, D Blocks & MEE Cooling tower are having very high TDS & COD Values. This indicates that the industry is using untreated effluent in cooling towers. This is one of the source for odour nuisance in the areas. This may be examined.**
26.	The industry shall maintain sub cooler condensers system followed by activated charcoal bed so as to arrest the VOCs from the scrubber attached to ATFD.	Provided two stage scrubber for ATFD. **However, not provided sub cooler condenser and activated charcoal bed.**
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.	Not complied.
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.	During inspection no discharges were observed.
29.	The industry shall provide storm water drains to avoid mixing of effluents/spillages with run-off water during rains.	Provided storm water drains bypass arrangements to collect first runoff rainwater and the industry has provided rainwater collection tank (300 KL)
30.	The industry shall collect & store the Hazardous Solid waste in an elevated closed storage shed with impervious lining and Leachate collection system.	Complied.

31.	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.	Submitted latest LDAR study report on 26.09.2024.
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.	Complied. Provided the first run off rain water & seepage collection pit with bypass arrangement and above ground storage tank (300 KL). Also maintaining separate records.
34.	The industry shall provide arrangement to by-pass the rainwater collection tank of first run off rain water for subsequent water flow.	
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.	Complied.
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., Nalgonda every month along with invoice copies of the starting raw materials outsourced.	
39.	The industry shall maintain separate energy meters for recording energy consumption for air pollution control equipments and maintain record for daily energy consumption.	Complied.
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.	Complied.
41.	(a) The industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection. 1. Daily production details. 2. Quantity of Effluents generated and reused. 3. Log Books for pollution control systems. 4. Daily solid waste generated and disposed (b)The industry shall submit consolidated statement of the above on monthly basis to the Concerned Regional Office.	The industry is maintaining records.
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	**During inspection observed odour nuisance near ZLD area & within industry premises and also**

	problems.	**observed pungent odour at production block-H which is existing towards Anthmammagudem village.**
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.	Directed to 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.	Directed to comply
45.	The industry shall maintain concreted internal roads by cleaning regularly to avoid fugitive emissions due to vehicular movement.	Complied.
46.	The industry shall comply with the all the directions issued by the Board from time to time.	Details mentioned above.
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.	Complied.
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.	---

ENVIRONMENTAL ENGINEER

Annexure - VI

(50)

Item No.17:-

BEFORE THE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE, CHENNAI

[Through Physical Hearing (Hybrid Option)]

Original Application No. 97 of 2021(SZ)

IN THE MATTER OF:

Ravula Lingaswamy,
Yadadri Bhuvanagiri District and 3 others.

...Applicant(s)

Versus

Union of India,
Rep. by its Secretary to Govt,
MoEF, New Delhi and 5 Ors.

...Respondent(s)

Date of hearing: 28.01.2025.

CORAM:

HON'BLE Smt. JUSTICE PUSHPA SATHYANARAYANA, JUDICIAL MEMBER

HON'BLE Dr. SATYAGOPAL KORLAPATI, EXPERT MEMBER

For Applicant(s): Mr. Shivang Singh & Mrs. Mamatha Ralla.

For Respondent(s): Mr. Meyappan represented
Mrs. Me. Sarashwathy for R1.
Mrs. H. Yasmeen Ali for R2, R4 & R5.
Ms. Lavanya represented
Mr. T. Sai Krishnan for R3.
Mr. K.S. Viswanathan, Sr. Adv. for R6.
M/s. N. Nathami for CPCB.

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ORDER

1. The 6th Respondent has filed a memo dated 17.12.2024, wherein it is stated that the industry has paid the environmental compensation in its entirety i.e. Rs.77,70,000/- on 28.02.2024. Further, the 6th Respondent also has sent a communication to the Telangana State Pollution Control Board (TGPCB) dated 27.11.2024 stating that they have complied with the directions issued by the Task- Force and also reporting the status as on date.

2. It appears that there were about 26 of the directions issued and the 6th Respondent has stated that they are all complied with. Unless the TGPCB causes an inspection and files its report, the compliance as reported by them cannot be verified.

3. Hence, we direct the TGPCB to inspect the premises of the 6th Respondent and based on the compliance report, let them verify and file a detailed report.

4. The reply of the applicant is taken on record, though they have not furnished the translated copies.

5. Let the Revenue Department also file a report regarding any compensation that has been disbursed to the agriculturists.

6. Post the matter on **17.02.2025** for final hearing.

Sd/-
Smt. Justice Pushpa Sathyanarayana, JM

Sd/-
Dr. Satyagopal Korlapati, EM

O.A. No. 97/2021(SZ),
28th January, 2025. AD.