

**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)**

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**Place: Hyderabad.**  
**Date: 11-07-2024.**



**Counsel for Respondent No. 3**



**REPORT DATED 11-07-2024 OF TELANGANA POLLUTION CONTROL BOARD IN OA No.97 OF 2021 FILED BY SRI RAVULA LINGA SWAMY, S/o.YADARIAH & 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 17.01.2024 and on 30.03.2024 before the Hon'ble NGT, Chennai submitting the details of Environmental Compensation (EC) imposed and part payments made by the industries. The details of the EC imposed and payment made by the industries are submitted below:-

<b>S. No</b>	<b>Name and address of the industry</b>	<b>Environmental Compensation (EC) levied (Rs)</b>	<b>Payment details.</b>
1.	M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	77,70,000/-	Paid an amount of Rs. 38,90,000/-. i.e., 50% of EC levied.
2.	M/s. Ravoos Laboratories Limited (Formerly M/s. Silicon Drugs & Intermediates (P) Ltd.), Sy. No. 210, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	50,40,000/-	Paid an amount of Rs.12,50,000/- vide DD dated: 18.12.2023. i.e, about 25% of EC levied.
3.	M/s. VJ Sai Chem., Sy.No.240/B, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	22,40,000/-	Paid an amount of Rs.5,60,000/- vide DD Dt:16.12.2023. i.e, 25% of EC levied
4.	M/s. SVR Laboratories (P) Ltd., Sy.No. 238 (part), 239/A, 239/E, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	44,80,000/-	Paid an amount of Rs.11,20,000/- vide DD dated:19.12.2023. i.e, 25% of EC levied.
5.	M/s. Chemic Life Sciences (P) Ltd., Sy No. 238 & 239, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	44,80,000/-	Paid an amount Rs.4,48,000/- vide DD dated: 01.01.2024. i.e, 10% of EC levied.
6.	M/s. Archimedis Laboratories (P) Ltd., Sy.No. 238, Dothigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	51,80,000/-	Paid an amount Rs.12,95,000/- vide DD dated: 16.12.2023. i.e, 25% of EC levied.
7.	M/s. Optimus Drugs (P) Ltd. Sy.No. 238, 239, 240 & 248, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.	77,70,000/-	Not paid*
8.	M/s. Brundavan Laboratories (P) Ltd., Yellagiri (V), Choutuppal (M), Yadadri Bhuvanagiri District.	45,00,000/-	Paid an amount of Rs.11,25,000/- vide DD dated:27.12.2023 i.e, 25% of actual EC

S. No	Name and address of the industry	Environmental Compensation (EC) levied (Rs)	Payment details.
			levied

\*--M/s. Optimus Drugs Private Limited has filed a W.P. No. 28698 of 2023 before Hon'ble High Court of Telangana challenging orders of the Board issued directing the petitioner industry to deposit an amount of Rs. 77,70,000/- towards Environmental Compensation. The matter is pending before the Hon'ble High Court.

The Hon'ble NGT during the hearing held on 05.04.2024 has taken on record the report dated : 30.03.2024 filed by the Respondent Board and the learned Senior Advocate appearing for the Project Proponent (M/s. Hazelo Lab Private Limited) sought short accommodation stating to resolve the quantum of compensation before the Telangana Pollution Control Board (TSPCB).

**In this regard, following is submitted regarding respondent industry i.e., M/s.Hazelo Lab Private Limited:**

1. The Hon'ble National Green Tribunal (NGT), Southern Zone, Chennai vide Order dated 03.03.2022 directed the CPCB, RD, Chennai to inspect M/s. Hazelo Labs Pvt Ltd., Dothigudem (V), Pochampally (M), Yadadri-Bhuvanagiri District and submit a factual as well as an Action Taken Report to the Tribunal (**Annexure – I**).
2. The team from CPCB, Chennai inspected the area during March 23-24, 2022 and collected samples from ETP, ground water & soil samples in & around the unit, ambient air and VOCs from the source as well as fugitive. The CPCB, RD, Chennai submitted its report dt.24.08.2023 before the Hon'ble NGT on 01.09.2022. As per the report, the team from CPCB, Chennai found that Respondent industry and other adjacent pharmaceutical industries have discharged their untreated / partially treated effluent on land as well as contributing to VOC emission in Ambient Air.
3. The Hon'ble NGT vide Order dated 31.10.2022 issued directions to the Board to implement the directions given by CPCB and also assess the compensation for the alleged deliberate violations found in the CPCB report (**Annexure – II**).
4. The Hon'ble NGT vide Order dated 17.01.2023 directed the Board to file report on levy of any compensation for having polluted the water and soil.
5. The Respondent Board has entrusted study on ground water and soil quality in Dothigudem (Anthammagudem) Industrial Cluster to M/s. Environment Protection Training & Research Institute (EPTRI), Gachibowli, Hyderabad. M/s EPTRI has submitted the report dated 24.04.2023. As per the above study report, certain bore wells are contaminated with chemicals and the same were matched with the products and derivatives of all the 8 industries located in the area including respondent industry.

6. Accordingly, the Respondent Board issued show-cause notice to the Respondent industry on 22.05.2023 with a view to giving an opportunity to the industry to explain as to why the Environmental Compensation should not be levied. (**Annexure – III**)
7. The Board vide letter dated 20.05.2023 also addressed to the District Collector, Yadadri Bhuvanagiri District requesting to constitute a team to assess the crop compensation and the compensation may awarded to the affected farmers.
8. The Board gave an opportunity of hearing for industries before the board's Task Force Committee meeting held on 13.06.2003. Based on the recommendations of the Committee, the board issued additional directions dt.21.06.2023 (final directions) to the Respondent industry levying Environmental Compensation (EC) for an amount of Rs. 77,70,000/-. (**Annexure – IV**)
9. The Respondent industry paid part payment of Environmental Compensation (EC) of Rs.19,45,000/- i.e., 25% of actual levied Environmental Compensation (EC) of Rs.77,70,000/.
10. The Respondent Board reviewed the industry before the Board's Task Force committee meeting held on 03.01.2024 and issued certain directions to the Respondent industry vide order dated: 03.01.2024 including a direction that the industry shall pay the Environmental Compensation (EC) amount within 6 months period. (**Annexure – V**).
11. In response to the above directions, the Respondent industry vide letter dated:17.02.2024 submitted the pay of another part payment of Rs. 19,45,000/- on 16.02.2024 totaling Rs. 38,90,000/- i.e, 50% of Environmental Compensation amount levied and submitted that the balance amount will be paid subject to outcome of the Hon'ble NGT Judgement. (**Annexure – VI**). The Respondent industry has not disputed the EC amount.
12. The Respondent industry vide letter dated 08.07.2024 reiterated that the balance EC amount will be paid based on the outcome of NGT Judgement and not disputed the EC amount. (**Annexure – VII**).

In view of the above, it is kindly submitted that the Respondent industry has not disputed the EC amount and no representation is pending with Respondent Board in this regard.

**Place: Nalgonda**

**Date: 11-07-2024**

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

ENVIRONMENTAL ENGINEERING  
National Office, Nagano  
Air Quality Control Board

**Item No.10:****BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI****Original Application No. 97 of 2021 (SZ)***(Through Video Conference)***IN THE MATTER OF:**

Ravula Lingaswamy, Yadadri  
Bhuvanagiri District and 3 Ors.

...Applicant(s)

*Versus*

Union of India,  
Rep. By its Secretary, MoEF,  
New Delhi & Ors.

...Respondent(s)

**Date of hearing: 03.03.2022.****CORAM:****HON'BLE Mr. JUSTICE K. RAMAKRISHNAN, JUDICIAL MEMBER****HON'BLE Dr. SATYAGOPAL KORLAPATI, EXPERT MEMBER**

For Applicant(s):

Mr. Sravan Kumar.

For Respondent(s):

Mr. Meyyappan represented  
Mrs. Me. Saraswathy for R1.  
Mrs. H. Yasmee Ali for R2, R4 & R5.  
Mr. T. Saikrishnan through  
Ms. J. Dayana for R3.  
Mr. K.S. Viswanathan for R6.

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ORDER

1. As per order dated 27.08.2021, this Tribunal had considered the report submitted by the Environmental Engineer, Telangana State Pollution Control Board dated 24.06.2021 and extracted in Para (3) of the order and then, passed the following order:-

*"4. The learned counsel appearing for the applicant submitted that the report is not reflecting the real aspects and in fact, it is very difficult to stand near the factory premises due to the odour pollution that is emanating from the effluents discharged from the unit.*

*5. Further, the learned counsel submitted that still the soil quality has not been improved. Though the State Pollution Control Board had taken water samples from the bore well in agricultural lands of Sri Ram Reddy wherein, it was mentioned that it confirms the drinking water specifications except the Total Hardness as CaCO<sub>3</sub> is exceeding the standards, they have not taken the samples from the inlet and outlet of the treatment plant said to have been installed by the 6<sup>th</sup> respondent unit so as to ascertain as to whether the inlet and outlet norms are being in conformity with the standard provided.*

*6. Further, it is also not clear from the report as to whether the ZLD system is operational throughout so as to ascertain whether there is any possibility of untreated discharges are being done by the unit into the agricultural fields. They have also not taken samples from the nearby bore wells and water bodies so as to ascertain the water quality in those areas. It is also not known whether the ZLD system has been bypassed and untreated effluents discharged into water bodies.*

*7. The learned counsel appearing for the 6<sup>th</sup> respondent submitted that closure orders have been revoked on satisfaction of the Pollution Control Board with compliance of the directions issued by them by the 6<sup>th</sup> respondent.*

*8. Instead of calling for a report from the supervisory body i.e. Central Pollution Control Board, we feel it appropriate to direct the High Level Expert Committee of the Telangana State Pollution Control Board itself to inspect the area in question and submit a further report on the basis of the allegations made in the application as well as the observation made by this Tribunal, so that the apprehension of the applicant regarding the alleged pollution that is being caused on account of the operation of the 6<sup>th</sup> respondent unit can be considered in its entirety.*

9. It is also seen from the report that during short period there was a closure, but the unit was functioning. It was not mentioned in the report as to whether any environmental compensation or compensation for violation has been imposed by the State Pollution Control Board in this regard.

10. This aspect also can be considered by the High Level Expert Committee while submitting the report to this Tribunal. The said committee is directed to ascertain as to whether the ZLD is operational continuously without bypassing the ZLD system, whether the Online Continuous Emission/Effluent Monitoring System (OCEMS) is functioning properly and if there is any defect in the system, is there any provision for stopping the production of the unit and if not, what are the measures to be taken for that purpose as has been done by the Telangana State Pollution Control Board in similar issue in Tandur Citizens Welfare Association's case (O.A. No.195 of 2016) in respect of cement factories where interlocking system has been installed.

11. The said committee is directed to submit the report to this Tribunal on or before 22.09.2021 by e-filing in the form of Searchable PDF/OCR Supportable PDF and not in the form of Image PDF along with necessary hardcopies to be produced as per Rules.

12. The applicant is at liberty to file his objection to the committee report and also submit a copy of the same to the High Level Expert Committee as well, so that they can also consider those things before filing the report before this Tribunal.

13. The Registry is directed to communicate this order to the Chairman, Telangana State Pollution Control for giving necessary direction to the High Level Expert Committee functioning under the Telangana State Pollution Control Board to comply with the directions issued by this Tribunal."

2. The case was originally posted to 22.09.2021 for completion of pleadings, filing objections (if any) to the report and also for consideration of further report.
3. Thereafter, since no reports have been filed, the matter has been adjourned from time to time by successive notifications and lastly, it was adjourned to today by notification dated 02.02.2022.

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4. We have received the memo dated 01.02.2022 submitted by the Telangana State Pollution Control Board stating that the High Level Committee was constituted by the Board during September 2011 with limited scope and role of recommending suitable Zero Liquid Discharge (ZLD) technology for small scale Bulk Drug & Drug Intermediate industries in the erstwhile Nalgonda District. The High-Level Committee after its study and inspections submitted recommendations and on that basis, the Board has issued directions dated 23.06.2012 to the Bulk drug industries to comply with the recommendations. Thereafter, the High Level Committee became inoperative and they are not now functioning as well.
5. So under such circumstances, we feel it appropriate to direct the Integrated Regional Office of the Central Pollution Control Board, Chennai to inspect the unit in question and submit a factual as well as action taken report, if there is any violation found and if the mechanism provided are not sufficient to control the odour and other pollution alleged, then what are all the methodology to be adopted for the purpose of resolving the issue.

6. The Integrated Regional Office of the Central Pollution Control Board, Chennai is directed to verify the Terms of Reference already issued by this Tribunal directing the State Pollution Control Board to look into the issue for the purpose of filing the report.
7. The Telangana State Pollution Control Board is directed to furnish the copy of the application and their reports already filed before this Tribunal and the orders passed by the Tribunal to the officer who is going to inspect the area from the Integrated Regional Office of the Central Pollution Control Board, Chennai, so that they will get an idea about the case and the things to be done by them.
8. They are directed to submit the report to this Tribunal on or before 31.03.2022 by e-filing in the form of Searchable PDF/OCR Supportable PDF and not in the form of Image PDF along with necessary hardcopies to be produced as per Rules.
9. The Registry is directed to communicate this order to the official respondents, Chairman – Telangana State Pollution Control Board and the Integrated Regional Office of the Central Pollution Control Board, Chennai by e-mail for their information and compliance of directions.

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10. For completion of pleadings, filing objections (if any) to the report and consideration of further report, post on 31.03.2022.

Sd/-  
Justice K. Ramakrishnan, JM

Sd/-  
Dr. Satyagopal Korlapati, EM

O.A. No.97/2021 (SZ),  
03<sup>rd</sup> March 2022. Mn.



**Item No.04:**

BEFORE THE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE, CHENNAI

**Original Application No. 97 of 2021 (SZ)**  
(Through Video Conference)

IN THE MATTER OF:

Ravula Lingaswamy Yadari Bhuvanagiri District

...Applicant(s)

**With**

Union of India and Ors.

...Respondent(s)

**Date of hearing: 31.10.2022.**

**CORAM:**

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

**HON'BLE DR. SATYAGOPAL KORLAPATI, EXPERT MEMBER**

For Applicant(s): Mr. Sravan Kumar

For Respondent(s): Mr. Era Meyappan for R1.  
Ms. Renuka Devi for Ms. H. Yasmeen Ali for R2,  
R4 and R5.  
Ms. Dayana for Mr. T. Sai Krishnan for R3.  
Mr. K.S. Viswanathan for R6.  
Ms. N. Nathami for CPCB.

**ORDER**

1. The Central Pollution Control Board (CPCB) had filed an independent report dated 24.08.2022. The said report has specifically found that the mechanisms provided by the unit to control the odour and other pollution alleged are not in place and even if they are fixed, they have been



tampered with to give correct readings which is a serious offence. The CPCB has also given the methodology to be adopted for the purpose of resolving the odour and other pollutions. The CPCB has finally 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.

2. Despite the fact that the above report with the said direction was filed as early as on 24.08.2022, the Telangana State Pollution Control Board (TSPCB) has not taken any action till today. They do not even seem to have visited the above area.
3. With regret, we have to record that the Telangana State Pollution Control Board (TSPCB) has not been discharging their duty as has been expected from them. We are now constrained to issue direction to the Chairman, Telangana State Pollution Control Board (TSPCB) to look into the issue at the earliest and appropriately give directions to the Board to personally 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.

4. 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.
5. The Learned Counsel for the 6th respondent seeks time to respond to the report of the Central Pollution Control Board (CPCB). While doing so let the 6th respondent comply with the directions of the Central Pollution Control Board (CPCB).
6. Post the matter on 09.12.2022.

.....J.M.  
(Smt. Justice Pushpa Sathyanarayana)

.....E.M.  
(Dr. Satyagopal Korlapati)

O.A. No.97/2021 (SZ),  
31<sup>st</sup> October, 2022. (AD)





(13)

**TELANGANA STATE POLLUTION CONTROL BOARD**  
**REGIONAL OFFICE: NALGONDA**

ANNEXURE-111

H.No. 8-15, 1<sup>st</sup> Floor  
Sri Lakshmi Complex  
Sri Vinayaka Nagar, Hyderabad Road  
Nalgonda-508001, Ph: 08682-248005

Notice. No. 12030/PCB/RO-NLG/TF/2023 – 1364,

Date.22.05.2023

**SHOW CAUSE NOTICE**

- Sub:** TSPCB – RO – NLG – Hon'ble NGT, Chennai – M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District – Original Application No.97 of 2021 filed by Ravula Lingaswamy, R/o. Yadadri Bhuvanagiri District & Others Vs Secretary, MoEF, New Delhi & Others – The CPCB, RD, Chennai report dt.24.08.2022 submitted report before the Hon'ble National Green Tribunal, South Zone, Chennai – Hon'ble NGT (SZ), Chennai orders dt. 31.10.2022 – Levy of Environmental Compensation – **Show Cause Notice – Issued** - Reg.
- Ref:**
1. 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.
  2. Hon'ble NGT, (SZ), Chennai orders Order dated 03.03.2022 in O.A. No. 97 of 2021.
  3. The CPCB, RD, Chennai report dt.24.08.2022 submitted report before the Hon'ble National Green Tribunal, South Zone, Chennai.
  4. Hon'ble NGT, (SZ), Chennai orders Order dated 31.10.2022 in O.A. No. 97 of 2021.
  5. Directions Order No.NLG-44/TSPCB/TF/HO/2022-1163 & 1164, Dt.31.10.2022.
  6. Hon'ble NGT, (SZ), Chennai orders Order dated 09.12.2022 in O.A. No. 97 of 2021.
  7. Hon'ble NGT, (SZ), Chennai orders Order dated 17.01.2023 in O.A. No. 97 of 2021.
  8. Additional directions Order No. NLG-44/TSPCB/TF/HO/2022-1370 & 1371, dt.06.12.2022.
  9. Lr.No.RCP-10/TSPCB/TF/BO/2023-327, Dt.20.05.2023.

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**WHEREAS**, vide reference 1<sup>st</sup> cited above, Sri Ravula Linga Swamy, S/o. Yadaiah and Others of Anthammagudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District filed O.A.No. 97 of 2021 before 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.

**WHEREAS**, vide reference 2<sup>nd</sup> cited, the Hon'ble NGT vide Order dated 03.03.2022 directed the CPCB, RD, Chennai to inspect M/s. Hazelo Labs Pvt Ltd., Dhotigudem (V), Pochampally (M), Yadadri-Bhuvanagiri District and submit a factual as well as an Action Taken Report to the Tribunal.

**WHEREAS**, vide reference 3<sup>rd</sup> cited, the team from CPCB, Chennai inspected the area during March 23-24, 2022 and collected samples from ETP, ground water & soil samples in & around the unit, ambient air and VOCs from the source as well as fugitive. The CPCB, RD, Chennai submitted its report dt.24.08.2023 before the Hon'ble NGT on 01.09.2022. As per the report, the team from CPCB, Chennai found that M/s. Hazelo Labs and other adjacent pharmaceutical industries have discharged their untreated / partially treated effluent on land as well as contributing to VOC emission in Ambient Air. Copy the report is herewith enclosed.

**WHEREAS**, vide reference 4<sup>th</sup> cited, the Hon'ble NGT vide Order dated 31.10.2022 issued directions to the Board to implement the directions given by CPCB and also assess the compensation for the alleged deliberate violations found in the CPCB report.

**WHEREAS**, vide reference 5<sup>th</sup> cited, the Board issued certain directions to your industry on 31.10.2022.

**WHEREAS**, vide reference 7<sup>th</sup> cited, the Hon'ble NGT vide Order dated 17.01.2023 directed the Board to file report on levy of any compensation for having polluted the water and soil.

**WHEREAS**, vide reference 8<sup>th</sup> cited, the Board issued certain additional directions to your industry on 06.12.2022.

**WHEREAS**, vide reference 09<sup>th</sup> cited, the Board vide letter dt.20.05.2023 directed the EE-RO-NLG to issue Show Cause Notice to your industry for Levy of Environmental Compensation.

**WHEREAS**, the team from CPCB, Chennai inspected the area during March 23-24, 2022 and collected samples from ETP, ground water & soil samples in & around the your unit, ambient air and VOCs from the source as well as fugitive. The CPCB, RD, Chennai submitted its report dt.24.08.2023 before the Hon'ble NGT on 01.09.2022. As per the report, the team from CPCB, Chennai found that M/s. Hazelo Labs and other adjacent pharmaceutical industries have discharged their untreated / partially treated effluent on land as well as contributing to VOC emission in Ambient Air. The Hon'ble NGT vide Order dated 31.10.2022 issued directions to the Board to implement the directions given by CPCB and also assess the compensation for the alleged deliberate violations found in the report.

Therefore, with a view to give you an opportunity to explain as to why the Environmental Compensation should not be levied, this show cause notice is being issued to you. The Environmental Compensation (EC) is proposed to be levied as follows:-

1. The Environmental Compensation (EC) is estimated base on the pollution index method developed by Central Pollution Control Board in the guidelines "Policy for levying Environmental Compensation (EC) for Industries" Vide Order No:B-400 (S)/IPC-III/2019-20/1162, Dt.4.09.2019 and action plan to utilize the fund. The Hon'ble NGT has accepted the method and mentioned in the order dt.19.02.2019 in

the matter of Original Application No.593/2017, (W.P) (Civil) No. 375/2012, Paryavaran Suraksha Samiti & Anr. Versus Union of India & Ors.

2. The following equation is used for estimating Environmental Compensation (EC):

$$\text{Environmental Compensation (EC)} = P_1 \times N \times R \times S \times L_f$$

Where

$P_1$  – Pollution index of industrial sector

N - No of days of violation took place

R – A factor in Rupees for EC

S – Factor for scale of operation

$L_f$  – Location factor

3. Pollution index of industrial sector (PI): The Telangana State Pollution Control Board categorized your industry into 'Red' category and accordingly the combined CFO & HWA order has been granted. For 'Red' category of industries, average pollution index is 80. **Thus  $P_1$  is considered as 80 in the EC estimation for this industry.**
4. Factor in Rupees (R) (Rs): As per the environmental compensation estimation guidelines, factor of rupees may be minimum of Rs. 100/- and maximum of Rs. 500/-. In the guidelines it is suggested to consider R as Rs.250/-, as environmental compensation in case of violation. Hence, **Factor in Rupees (R) for EC estimation is considered as 250.**
5. Scale of operation (S): As per the records, the Gross Block/Fixed assets of your industry is Rs. 52.97 Crores and **large scale industry and Scale of Operation (S) as 1.5.**
6. Location Factor (LF): The industry is located in Dhotigudem village of Pochampally Mandal, Yadadri Bhuvangiri District and no other eco sensitive regions are located in the region. The total population in the region is less than one million. **Thus location factor (LF) is considered as 1 for EC estimation.**
7. No of days of violation took place (N): The details of the violations and dates considered for calculation of period of violation for estimating EC is given as below:

S.No.	Date of violation observed	Action taken for violation	Date of compliance observed	Number of days of violation	Remarks, if any. Summarise the violations.
1.	23.03.2022 (CPCB team inspection)	Issued directions vide order dt. 06.12.2022.	--	259  (From 23.03.2022 to 06.12.2022)	<u>CPCB observations:</u> The above industry and other adjacent pharmaceutical industries have discharged their untreated/partially treated effluent on land as well as contributing to VOC emission in Ambient Air.
<b>Number of days of violation</b>				<b>259</b>	

Based on the above factors, the Environmental Compensation (EC) is estimated as given below:

Period of non-compliance	PI	S	LF	R (Rs)	N (Days)	Environmental compensation
From 23.03.2022 to 06.12.2022.	80	1.5	1.0	250	259	Rs.77,70,000/-

In view of the above, the Board hereby proposes to levy Environmental Compensation of Rs.77,70,000/- on your unit for the non-compliance and the violations committed by your unit and directions are proposed to be issued under section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 for the levy of Environmental Compensation.

Hence, you are hereby called upon to **Show Cause within 15 days** of receipt of this notice as to why the above proposed Environmental Compensation is not levied on your unit. The explanation should reach the under-signed within the above time limit failing which it shall be presumed that you have nothing to offer by way of explanation and the Environmental Compensation shall be levied as proposed herein.

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

  
**ENVIRONMENTAL ENGINEER**

ENVIRONMENTAL ENGINEER  
 T.S. Pollution Control Board,  
 Regional Office, Nalgonda.

Copy Submitted to:

1. The Member Secretary, TSPCB, Board Office, Sanathnagar, Hyderabad for favor of kind information.
2. The District Collector & District Magistrate, Yadadri Bhuanagiri, Yadadri Bhuanagiri District for favor of kind information and necessary action.
3. The JCEE-UH-II (Legal), TSPCB, Board Office, Sanathnagar, Hyderabad for favor of kind information and necessary action.
4. The SEE-UH-IV (TF), TSPCB, Board Office, Sanathnagar, Hyderabad for favor of kind information and necessary action.



(17)  
ANNEXURE - IV  
TELANGANA STATE 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**

**Order No. NLG-44/TSPCB/TF/HO/2023- 428**

**Date: 21.06.2023**

**Sub :** TSPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s. Venlar Labs (P) Ltd), Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District - Causing of damage to the Environment due to operation of the industry - **LEVYING OF ENVIRONMENTAL COMPENSATION** and Water (Prevention and Control of Pollution) Amendment Act, 1988 - Air (Prevention and control of Pollution) Amendment Act, 1987 - **ADDITIONAL DIRECTIONS - ORDERS ISSUED** - Reg.

- Ref :**
1. CFO Order dated; 01.09.2022, which is valid upto 31.03.2027.
  2. Closure Order No. NLG-44/TSPCB/U-II/TF/2016 -789, dt. 01.07.2019.
  3. Revocation of Closure Order No. NLG-44/TSPCB/TF/HO/2016 -490, dt. 09.07.2021.
  4. Directions Order No. NLG-44/TSPCB/TF/HO/2022-, dt: 02.03.2022.
  5. Directions Order No. NLG-44/TSPCB/TF/HO/2022-, dt: 31.10.2022.
  6. CPCB Letter No. F.No. B-29016/04/06/IPC-I/438, Dt. 19.09.2022, received on 13.10.2022 /28.10.2022.
  7. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
  8. Additional Directions issued on 06.12.2022.
  9. Directions issued on 30.05.2023.
  10. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
  11. EPTRI, Hyderabad Study report dt. 24.04.2023.
  12. Directions Order dated: 30.05.2023.
  13. Show Cause Notice issued on 22.05.2023.
  14. Hearing held on 13.06.2023.

\* \* \* \* \*

1. **WHEREAS**, you are operating the manufacturing of Bulk Drugs Intermediates unit at Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> cited, the Board issued CFO&HWA to your industry on 01.09.2022, which is valid upto 31.03.2027.
3. **WHEREAS**, vide reference 2<sup>nd</sup> cited, the Board issued closure orders to the industry on 01.07.2019 for operating the industry against stop production orders issued to the industry by the Board.
4. **WHEREAS**, vide reference 3<sup>rd</sup> cited, the Board issued Revocation of Closure Order to the industry on 09.07.2021 with certain directions to comply with.
5. **WHEREAS**, vide reference 4<sup>th</sup> & 5<sup>th</sup> cited, the Board issued certain directions to the industry on 02.03.2022, 31.10.2022. in connection with complaints.
6. **WHEREAS**, vide reference 6<sup>th</sup> cited, CPCB issued certain directions to the Board 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.
7. **WHEREAS**, vide reference 7<sup>th</sup> cited, the Hon'ble NGT vide Order dated 31.10.2022 issued directions to the Board to implement the directions given by the CPCB to the Board and also assess the compensation for the alleged deliberate violations found in the CPCB report.
8. **WHEREAS**, vide reference 8<sup>th</sup> & 9<sup>th</sup> cited, the Board issued certain directions to the industry on 06.12.2022 & 30.05.2023 based on the observations made in the CPCB report.

9. **WHEREAS**, vide reference 10<sup>th</sup> cited, the Hon'ble NGT, Chennai vide Order dated: 17.01.2023 directed the TSPCB to furnish the compliance report on water & soil analysis.
10. **WHEREAS**, vide reference 11<sup>th</sup> cited, EPTRI, Hyderabad has submitted 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 the 8 industries located in the area.
11. **WHEREAS**, The TSPCB filed a report dt.25.04.2023 before Hon'ble NGT submitting that the TSPCB will take necessary action, based on the finding of the study report dated 24.04.2023 of M/s Environment Protection Training & Research Institute (EPTRI), Gachibowli, Hyderabad.
12. **WHEREAS**, vide reference 12<sup>th</sup> & 13<sup>th</sup> cited, the Board issued further direction and issued show cause notice to the industry on levy of Environmental Compensation (EC).
13. **WHEREAS**, the Board calculated the Environmental Compensation (EC). The details are as mentioned below:

1. The Environmental Compensation (EC) is estimated base on the pollution index method developed by Central Pollution Control Board in the guidelines "Policy for levying Environmental Compensation (EC) for Industries" Vide Order No:B-400 (S)/IPC-III/2019-20/1162, Dt.4.09.2019 and action plan to utilize the fund. The Hon'ble NGT has accepted the method and mentioned in the order dt.19.02.2019 in the matter of Original Application No.593/2017, (W.P) (Civil) No. 375/2012, Paryavaran Suraksha Samiti & Anr. Versus Union of India & Ors.

2. The following equation is used for estimating Environmental Compensation (EC):

$$\text{Environmental Compensation (EC)} = P_1 \times N \times R \times S \times L_f$$

Where

$P_1$  - Pollution index of industrial sector

N - No of days of violation took place

R - A factor in Rupees for EC

S - Factor for scale of operation

$L_f$  - Location factor

3. Pollution index of industrial sector (PI): The Telangana State Pollution Control Board categorized these industries into '**Red**' category and accordingly the combined CFO & HWA order has been granted. For '**Red**' category of industries, average pollution index is 80. **Thus  $P_1$  is considered as 80 in the EC estimation for this industry.**
4. Factor in Rupees @ (Rs): As per the environmental compensation estimation guidelines, factor of rupees may be minimum of Rs. 100/- and maximum of Rs. 500/-. In the guidelines it is suggested to consider R as Rs.250/-, as environmental compensation in case of violation. Hence, **Factor in Rupees (R) for EC estimation is considered as 250.**
5. Scale of operation (S):

S.No	Name of the industry	Small / Medium / Large	Scale of operation (S).
i.	M/s. Hazelo Lab Private Limited, (Gross Block/Fixed assests:52.97 Crores)	Large	1.5
<p>➤ As per website of Ministry of Micro, Small &amp; Medium Enterprises, the small scale unit criteria is upto Rs. 10 Crore of investment and Rs 50 Crore of turnover and medium scale unit criteria is upto Rs. 50 Crore of investment and Rs. 250 Crore of turnover.</p> <p>➤ Accordingly, the large scale unit criteria has considered as above Rs 50 Crores</p>			

of investment.  
> Turnover of the industry is not considered for above calculation.

- 6. Location Factor (LF): The industries are located in Dhotigudem village of Pochampally Mandal and Yellagiri (V), Choutuppal (M), of Yadadri Bhuvangiri District and no other eco sensitive regions are located in the region. The total population in the region is less than one million. **Thus location factor (LF) is considered as 1 for EC estimation.**
- 7. No of days of violation took place (N): The details of the violations and dates considered for calculation of period of violation for estimating EC is given as below:

S.No.	Date of violation observed	Action taken for violation	Date of compliance observed	Number of days of violation	Remarks, if any. Summarise the violations.
<b>M/s. Hazelo Lab Private Limited:</b>					
1.	23.03.2022 (CPCB team inspection)	Issued directions vide order dt. 06.12.2022.	--	259 (From 23.03.2022 to 06.12.2022)	<u>CPCB observations:</u> The above industry and other adjacent pharmaceutical industries have discharged their untreated/partially treated effluent on land as well as contributing to VOC emission in Ambient Air.
<b>Number of days of violation</b>				<b>259</b>	

Based on the above factors, the Environmental Compensation (EC) is estimated as given below:

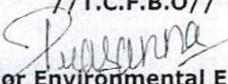
S.No	Name of the industry	Environmental Compensation (EC) $= P_i \times N \times R \times S \times L_f$	Environmental Compensation (EC) is estimated.  (Rs)
1.	M/s. Hazelo Lab Private Limited,	80 x 259 x 250 x 1.5 x 1	<b>77,70,000/-</b>

- 14. **WHEREAS**, vide reference 14<sup>th</sup> cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 13.06.2023. The industry representative attended the meeting. After detailed discussion, duly considering the directions of the Hon'ble NGT Order, ~~The~~ Committee recommended to Levy Environmental Compensation and also issue additional directions to the industry.
- 15. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issues the following additional directions to the industry:**
  - 1. The industry shall maintain sufficient free board to avoid overflows in effluent collection tanks and shall dispose the same as per CFO&HWA conditions.
  - 2. The industry shall not stock the effluents in the collection tanks and shall treat the effluents in ZLD system / send to the CETP to avoid any over flow in view of the rainy season.

16. **WHEREAS**, the Task Force Committee has recommended to levy the Environmental Compensation (EC) of Rs.77,70,000/- as per the Joint Committee recommendations, you are hereby directed to deposit an amount of Rs.77,70,000/- (Rupees Seventy Seven Lakhs Seventy Thousand Only) towards Environmental Compensation within 15 days. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
17. These directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec. 31 (A) of Air (Prevention and Control of Pollution) Amendment Act, 1987.
18. The above mentioned directives shall comply by the industry, failing which legal action will be initiated against your industry under Section 33(A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Section 31(A) of Air (Prevention and Control of Pollution) Amendment Act, 1987 which also includes closure to the industry in the interest of Public Health and Environment, without 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

//T.C.F.B.O//  
  
Senior Environmental Engineer  
(TF, UH-IV)



M. Rahul Kumar  
(M. Rahul Kumar)  
23/06/2023

	<b>TELANGANA STATE POLLUTION CONTROL BOARD</b> <b>PARYAVARAN BHAVAN, A - 3, INDUSTRIAL ESTATE,</b> <b>SANATHNAGAR, HYDERABAD - 500 018.</b>	Phone: 040-23887500 Fax: 040-23815631 Website: tspcb.cgg.gov.in
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**BY REGD. POST WITH ACK. DUE**

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

**Order No. NLG-44/TSPCB/TF/HO/2024- 1459**

**Date: 03.01.2024**

*C. A. R. K.*  
 DESPATCH NO:  
 DATE : 05 JAN 2024

**Sub: TSPCB - 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. CFO&HWA Order dated: 01.09.2022, valid upto 31.03.2027.
  2. Directions Orders issued on 03.02.2022.
  3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
  4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
  5. Directions Orders issued on 06.12.2022.
  6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
  7. EPTRI, Hyderabad Study report dt.24.04.2023.
  8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
  9. Directions Issued on 21.06.2023 for Levying of Environmental Compensation.
  10. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
  11. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
  12. The industry filed a WP No.20623 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
  13. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
  14. Directions issued on 13.09.2023.
  15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
  16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
  17. RO Nalgonda report dated 28.12.2023.
  18. Dothigudem Industrial Association representation dated 03.01.2024.
  19. Hearing held on 03.01.2024

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1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvnagiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> 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.
3. **WHEREAS**, vide reference 2<sup>nd</sup> cited, the Board issued certain directions to the industry on 03.02.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3<sup>rd</sup> cited, CPCB issued following directions to the Board 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.
5. **WHEREAS**, vide reference 4<sup>th</sup> 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.
6. **WHEREAS**, vide reference 5<sup>th</sup> cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 31.10.2022.
  - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
  - iii. The industry shall comply with the following as per the CPCB directions dt:19.09.2022
    - The unit shall augment MEE and RO, so as to achieve ZLD system.
    - The unit shall segregate High TDS and Low TDS effluent and to install online flow-meters at inlet and outlet.
    - The efficiency of the condensers connected to the reactors shall be improved to reduce the VOCs emissions and total cumulative losses of solvent should not be more than 5% of the solvent on annual basis form storage inventory.
    - The unit shall carry Leak Detection and Repair (LDAR) program to assess the solvent losses and shall take appropriate measures to control to arrest the solvent losses and reduce the VOCs in the premises.
    - To ensure that hazardous wastes shall be disposed within 90 days from the date of generation and shall maintain proper records
  - iv. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
  - v. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

7. **WHEREAS**, vide reference 6<sup>th</sup> 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 6<sup>th</sup> 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.
8. **WHEREAS**, vide reference 7<sup>th</sup> cited, EPTRI, Hyderabad has submitted 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 the 8 industries located in the area.
9. **WHEREAS**, vide reference 8<sup>th</sup> cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
10. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions vide reference 9<sup>th</sup> cited.
11. **WHEREAS**, the industry have filed a Writ Petition No.20623 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same
12. **WHEREAS**, vide reference 10<sup>th</sup> cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

1. Coal dust spillages observed on the road as they are transporting crushed coal from crusher to boiler through belt conveyer.
  2. Odour was observed at MEE, ATFD, biological ETP and R&D lab.
  3. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
  4. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
  5. The industry has not provided charcoal bed and sub cooler condensers to the scrubbers connected to production blocks A (extension), D1 & D2, F and H Blocks & ATFD and Stripper, which causes smell nuisance in the surrounding area.
  6. The industry has not provided online TDS meter to the HTDS effluents.
  7. The industry has not maintaining the records pertaining to quantity of first cut rain water collected and treated.
  8. During inspection, leakages/ spillages of effluents were observed near MEE system.
  9. The industry provided IP camera for boiler stack, at storm water drain, at main gate. However, the same is not connected to the Board server.
  10. During inspection the scrubber is not in operation which was connected to HTDS collection tank and not provided online pH meters.
  11. The industry has provided PIION spray system but, the same was not in operation during inspection.
  12. The industry has not submitted latest LDAR study report.
  13. The industry has provided 1 No of VOC analyser and connected the same to the Board's server. The VOC analyser is placed at warehouse block. As per the online data, the values are found to be zero (period verified is from 01.06.2023 to 01.08.2023).
  14. During inspection on 01.08.2023, the reading in VOC analyser was observed 2.80 PPM (photograph enclosed). However, the online data showing zero value
13. **WHEREAS**, vide reference 11<sup>th</sup> cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
14. **WHEREAS**, vide reference 12<sup>th</sup> cited, the industry has filed writ petition no. 20623 of 2023 before the Hon'ble High Court regarding environmental compensation levied by the TSPCB vide order dt.08.08.2023 in WP No.20623 of 2023, disposed the case ordering as follows:
- "Therefore, we are not inclined to entertain this writ petition. However, the petitioner is granted the liberty to take recourse to the remedy of statutory appeal available to him. Needless to state that in case the petitioner files an appeal within a period of two weeks, the National Green Tribunal shall entertain the appeal preferred by the petitioner. Writ petition is accordingly disposed of".*
15. **WHEREAS**, the above industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
16. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided Biological ETP. However, the industry has not developed the bio-culture in the aeration tank of the biological ETP. Clarifier is not in operation. This indicates that biological ETP is not operated effectively.

- ii. The industry provided new RO system with higher capacity and same was not in operation (which was not commissioned by the supplier, since they are not meeting the standards of the RO inlet). Hence, the industry is not treating LTDS effluents in Biological ETP followed by RO.
  - iii. Spillages were observed at MEE area and odour was observed. VOC reading at MEE area – 0.762 ppm.
  - iv. The industry has not provided sub cooler condensers to the scrubbers attached 4 Nos. of production blocks and activated charcoal bed to to the scrubbers attached 3 Nos. of production blocks to control process emissions. Thereby causing odour pollution in the surrounding areas.
  - v. The industry has not provided bypass provision for rain water collection tank.
  - vi. They are storing spent acid tanks openly.
  - vii. The odour was observed near production block and MEE area in the premises and VOC readings are 0.196 ppm, 0.214 ppm, 0.355 ppm, 0.411 ppm, 0.407 ppm, 0.419 ppm, 0.334 ppm & 0.207 ppm.
  - viii. The industry is a large scale unit and they are not having dedicated laboratory to measure the parameters of the ETP effluents and not having any environment cell to monitor the operation of the water and air pollution control systems. Most the labours working in the plant are not having PPE's.
  - ix. The committee directed the industry to submit the clarification on the following:
    - x. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
    - xi. The industry has not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023.
17. **WHEREAS**, vide reference 13<sup>th</sup> cited, the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
18. **WHEREAS**, vide reference 14<sup>th</sup> cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the following directions were issued to your industry vide order dt.13.09.2023:
1. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
  2. The industry shall comply with all the conditions stipulated in the directions Order dated: 30.05.2023.
  3. The industry shall pay the Environmental Compensation (EC) of Rs.77,70,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.77,70,000/- (Rupees Seventy Seven Lakhs Seventy Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
  4. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
  5. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.
  6. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.

7. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
  8. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
  9. The industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs
19. **WHEREAS**, the Task Force Committee Members inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
  - ii. As per the CFO, the industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel for boilers.
  - iii. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
  - iv. Odour was observed near ZLD area and the VOC readings were in the range of 0.033 to 0.78 PPM.
  - v. The industry has provided scrubbers and not provided sub cooler condensers / charcoal bed connected to the production block-A (extension) D1 & D2, H-Block, PB-F Block, Stripper & Vacuum Tub, ATFD & Hight TDS collection tank (Single Stage Scrubber only).
  - vi. The odour was observed near production block and MEE area in the premises.
  - vii. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
  - viii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
  - ix. The industry has provided odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment & MEE area to control VOCs. But, odour was observed at MEE area.
  - x. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same. The Dothigudem Industrial Association vide letter dt.04.10.2023 also requested the Board for exemption to submit the BG and its forfeiture, citing lack of product demand, heavy competition in Global market and financial crises.
  - xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 10.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (861 mg/Nm<sup>3</sup> agaisnt 115 mg/Nm<sup>3</sup>) is exceeding the Board standard.
  - xii. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
  - xiii. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
  - xiv. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drain of the industry are very high.

20. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:

1. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
2. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
3. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
4. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
5. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l ) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
6. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l ) and BOD (304 mg/l ) in rain water outlet drian of the industry are very high.
7. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
8. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs.

21. **WHEREAS**, vide reference 16<sup>th</sup> cited, based on the recommendations of committee, the Board issued **SHOWCAUSE NOTICE** to your industry as to why action should not 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) for the following:

1. Violating the Consent conditions & directions of the Board as mentioned above.
2. Non-payment of Environmental Compensation of Rs.77,70,000/- for past violations.
3. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.

22. **WHEREAS**, vide reference 17<sup>th</sup> cited, the RO, Nalgonda submitted the report and following observations were made:

1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the anlysis reports the values of TDS & COD (TDS - 11,260 mg/L ) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
4. The Board Officials collected the samples from production block A cooling tower. As per the anlysis reports the values of TDS & COD (TDS - 4,086 mg/L ) & (COD - 259 mg/L) are high.

5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). it is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
  6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).
  7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
    - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
    - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
  8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1<sup>st</sup> week-end of December.
23. **WHEREAS**, vide reference 18<sup>th</sup> cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
24. **WHEREAS**, vide reference 19<sup>th</sup> cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
  2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
  3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L ) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
  4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L ) & (COD - 259 mg/L) are high.
  5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). it is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
  6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).
  7. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
- II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.

III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special conditions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate ZLD system including biological ETP effectively.
3. The industry shall pay the Environmental Compensation amount within 06 months period.
4. The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

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

27. 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//

*P. Prasadanna*  
**Senior Environmental Engineer  
(Task Force - UH-IV)**



**Letter No.RCP-106/TSPCB/TF/HO/2024-1458**

**Date:03.01.2024**

*C.A.R.*  
 DESPATCH NO:  
 DATE : 05 JAN 2024

**Sub :** TSPCB – M/s. Selmar Lab Pvt. Ltd, Unit-II, (Formerly M/s KRR Drugs & Chemicals Pvt. Ltd.), Sy.No.180/1 to 15, IDA Khazipally, Jinnaram Mandal, Sangareddy District – Non-compliance of the Consent conditions and directions issued by the Board – **Forfeiture of Bank Guarantee of Rs.12.0 Lakhs**- Reg.

- Ref :**
1. Task Force Committee meeting held on 28.08.2023.
  2. Letter No.RCP-106/TSPCB/TF/HO/2023- Date:13.09.2023.
  3. Task Force Committee meeting held on 03.01.2024.
  4. T.O. Lr.No.RCP-106/TSPCB/TF/HO/2024- Dated.03.01.2024.

\* \* \* \* \*

The Compliance status of the Board Directions and CFO&HWA conditions issued to **M/s. Selmar Lab Pvt. Ltd, Unit-II, (Formerly M/s KRR Drugs & Chemicals Pvt. Ltd.), Sy.No.180/1 to 15, IDA Khazipally, Jinnaram Mandal, Sangareddy District** was reviewed in the Task Force Committee meeting held on 28.08.2023. After detailed discussions, the Committee recommended to impose the Bank Guarantee of Rs.12.0 lakhs and forfeit the same.

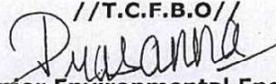
Vide reference 2<sup>nd</sup> cited, the EE, RO, RC Puram was directed to obtain a fresh B.G. of Rs.12.0 Lakhs and address a letter to the Bank authorities to forfeit Bank Guarantee amount of Rs.12.0 Lakhs for non-compliance of the directions and obtain the forfeited amount by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" and submit to Board office.

Vide reference 3<sup>rd</sup> cited, the industry was again reviewed in the Task Force Committee meeting held on 03.01.2024. After detailed discussions, the Committee recommended to forfeit the Bank Guarantee of Rs.12.0 lakhs.

In view of the above, the EE, RO, RC Puram is hereby directed once again to obtain a fresh B.G. of Rs.12.0 Lakhs and address a letter to the Bank authorities to forfeit Bank Guarantee amount of Rs.12.0 Lakhs within one month for non-compliance of the directions and obtain the forfeited amount by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" and submit to Board office.

**Sd/-**  
**MEMBER SECRETARY**

**To**  
**The Environmental Engineer,**  
**T.S.Pollution Control Board,**  
**Regional Office,**  
**RC Puram.**

//T.C.F.B.O//  
  
**Senior Environmental Engineer**  
**(Task Force - UH-IV)**





**TELANGANA STATE 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**

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

**Order No.NLG-44/TSPCB/TF/HO/2024- 1460**

**Date:03.01.2024**

**Sub: TSPCB - 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.**

*can*  
 DESPATCH NO:

DATE : 05 JAN 2024

**Ref:**

1. CFO&HWA Order dated: 01.09.2022, valid upto 31.03.2027.
2. Directions Orders issued on 03.02.2022.
3. CPCB Letter No.F.No.B-29016/04/06/IPC-I/438, Dt.19.09.2022, received on 13.10.2022 /28.10.2022.
4. Hon'ble NGT, (SZ), Chennai Orders dated 31.10.2022 in O.A.No.97 of 2021.
5. Directions Orders issued on 06.12.2022.
6. The Hon'ble NGT, Chennai has issued directions vide Order dated: 17.01.2023.
7. EPTRI, Hyderabad Study report dt.24.04.2023.
8. The Board issued show cause notice to the industry on levy of Environmental Compensation (EC) on 22.05.2023.
9. Directions issued on 21.06.2023 for Levying of Environmental Compensation.
10. The Rolling Task Force team inspected the industry on 17.06.2023 & 01.07.2023. The RO-Nalgonda Officials inspected the industry on 28.07.2023.
11. The Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023.
12. The industry filed a WP No.20623 of 2023 before Hon'ble High Court regarding Environmental Compensation Levied by the TSPCB.
13. Hon'ble NGT, (SZ), Chennai Orders dated 24.08.2023 in O.A.No.97 of 2021.
14. Directions issued on 13.09.2023.
15. The Hon'ble High Court vide order dt.01.11.2023 in W.P.No30282 of 2023.
16. Show Cause Notice No. NLG-85/TSPCB/UH-II/2023, Date: 05.12.2023.
17. RO Nalgonda report dated 28.12.2023.
18. Dhotigudem Industrial Association representation dated 03.01.2024.
19. Hearing held on 03.01.2024

\* \* \*

1. **WHEREAS**, you are operating Bulk Drugs manufacturing unit located at Sy.No.238, Dhotigudem (V), Pochampally (M), Yadadri Bhuvnagiri District.
2. **WHEREAS**, vide reference 1<sup>st</sup> 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.
3. **WHEREAS**, vide reference 2<sup>nd</sup> cited, the Board issued certain directions to the industry on 03.02.2022 based on the complaints received by the Board.
4. **WHEREAS**, vide reference 3<sup>rd</sup> cited, CPCB issued following directions to the Board 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.
5. **WHEREAS**, vide reference 4<sup>th</sup> 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.
6. **WHEREAS**, vide reference 5<sup>th</sup> cited, the Board issued further following additional directions to the industry on 06.12.2022 based on the observation made in the CPCB report.
- i. The industry shall comply with the directions issued vide order dt: 31.10.2022.
  - ii. The industry shall submit time bound action plan within 3 days for decontamination of soil, control of odour nuisance and VOC emission and achievement of ZLD as per the CPCB directions dt 19.09.2022.
  - iii. The industry shall comply with the following as per the CPCB directions dt:19.09.2022
    - The unit shall augment MEE and RO, so as to achieve ZLD system.
    - The unit shall segregate High TDS and Low TDS effluent and to install online flow-meters at inlet and outlet.
    - The efficiency of the condensers connected to the reactors shall be improved to reduce the VOCs emissions and total cumulative losses of solvent should not be more than 5% of the solvent on annual basis form storage inventory.
    - The unit shall carry Leak Detection and Repair (LDAR) program to assess the solvent losses and shall take appropriate measures to control to arrest the solvent losses and reduce the VOCs in the premises.
    - To ensure that hazardous wastes shall be disposed within 90 days from the date of generation and shall maintain proper records
  - iv. The industry shall provide IP cameras within one month to focus the entire premises duly covering ZLD area, boiler stack and entire boundary of the plant in consultation with RO, Nalgonda.
  - v. The Board will forfeit the Bank Guarantee of Rs.2.0 Lakhs.

7. **WHEREAS**, vide reference 6<sup>th</sup> 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 6<sup>th</sup> 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.
8. **WHEREAS**, vide reference 7<sup>th</sup> cited, EPTRI, Hyderabad has submitted 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 the 8 industries located in the area.
9. **WHEREAS**, vide reference 8<sup>th</sup> cited, the Board issued show cause notice to the industry on levy of Environmental Compensation (EC) for violations and non-compliances.
10. **WHEREAS**, the industry was reviewed in the Task Force Committee meeting held on 13.06.2023. The representative of the industry and the RO-Nalgonda have attended the meeting. Based on the recommendations of the Committee, the Board issued directions dt.21.06.2023 for levying Environmental Compensation (EC) of Rs. **77,70,000/-** along with other directions vide reference 9<sup>th</sup> cited.
11. **WHEREAS**, the industry have filed a Writ Petition No.20623 of 2023 before Hon'ble High Court of Telangana praying the Hon'ble High Court to declare the orders issued by the Respondent Board directing the petitioner industry to deposit an amount towards Environmental Compensation without giving any notice as arbitrary and irregular, contrary to law, without power and jurisdiction and set aside the same.
12. **WHEREAS**, vide reference 10<sup>th</sup> cited, the Rolling Task Force Team inspected the industry on 17.06.2023 & 01.07.2023 and certain observations were made and the RO-Nalgonda Officials inspected the industry on 28.07.2023 and the following non-compliances were observed:

1. Coal dust spillages observed on the road as they are transporting crushed coal from crusher to boiler through belt conveyer.
  2. Odour was observed at MEE, ATFD, biological ETP and R&D lab.
  3. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
  4. The industry representative has informed that the association has lifted the contaminated waste water to PETL. However soil details has not submitted.
  5. The industry has not provided charcoal bed and sub cooler condensers to the scrubbers connected to production blocks A (extension), D1 & D2, F and H Blocks & ATFD and Stripper, which causes smell nuisance in the surrounding area.
  6. The industry has not provided online TDS meter to the HTDS effluents.
  7. The industry has not maintaining the records pertaining to quantity of first cut rain water collected and treated.
  8. During inspection, leakages/ spillages of effluents were observed near MEE system.
  9. The industry provided IP camera for boiler stack, at storm water drain, at main gate. However, the same is not connected to the Board server.
  10. During inspection the scrubber is not in operation which was connected to HTDS collection tank and not provided online pH meters.
  11. The industry has provided PIION spray system but, the same was not in operation during inspection.
  12. The industry has not submitted latest LDAR study report.
  13. The industry has provided 1 No of VOC analyser and connected the same to the Board's server. The VOC analyser is placed at warehouse block. As per the online data, the values are found to be zero (period verified is from 01.06.2023 to 01.08.2023).
  14. During inspection on 01.08.2023, the reading in VOC analyser was observed 2.80 PPM (photograph enclosed). However, the online data showing zero value
13. **WHEREAS**, vide reference 11<sup>th</sup> cited, the Board received a complaint on twitter by Sri Panduchoppari@panduchoppari on 31.07.2023 regarding coloured water stagnation in the Dothigudem area. The Board also received the same complaint by Sri Panduchoppari regarding coloured water stagnation in the Dothigudem area forwarded by the District Collector, Yadadri-Bhuvanagiri District.
14. **WHEREAS**, vide reference 12<sup>th</sup> cited, the industry has filed writ petition no. 20623 of 2023 before the Hon'ble High Court regarding environmental compensation levied by the TSPCB vide order dt.08.08.2023 in WP No.20623 of 2023, disposed the case ordering as follows:
- "Therefore, we are not inclined to entertain this writ petition. However, the petitioner is granted the liberty to take recourse to the remedy of statutory appeal available to him. Needless to state that in case the petitioner files an appeal within a period of two weeks, the National Green Tribunal shall entertain the appeal preferred by the petitioner. Writ petition is accordingly disposed of".*
15. **WHEREAS**, the above industry was reviewed in the Task Force Committee meeting held on 07.08.2023. After detailed discussion, the Committee recommended to inspect the industry by the Task Force Committee Members and submit the status report to the Board.
16. **WHEREAS**, the Task Force Committee Members inspected the industry on 10.08.2023 & 11.08.2023 and the following non-compliances were observed:
- i. The industry has provided Biological ETP. However, the industry has not developed the bio-culture in the aeration tank of the biological ETP. Clarifier is not in operation. This indicates that biological ETP is not operated effectively.

- ii. The industry provided new RO system with higher capacity and same was not in operation (which was not commissioned by the supplier, since they are not meeting the standards of the RO inlet). Hence, the industry is not treating LTDS effluents in Biological ETP followed by RO.
- iii. Spillages were observed at MEE area and odour was observed. VOC reading at MEE area - 0.762 ppm.
- iv. The industry has not provided sub cooler condensers to the scrubbers attached 4 Nos. of production blocks and activated charcoal bed to to the scrubbers attached 3 Nos. of production blocks to control process emissions. Thereby causing odour pollution in the surrounding areas.
- v. The industry has not provided bypass provision for rain water collection tank.
- vi. They are storing spent acid tanks openly.
- vii. The odour was observed near production block and MEE area in the premises and VOC readings are 0.196 ppm, 0.214 ppm, 0.355 ppm, 0.411 ppm, 0.407 ppm, 0.419 ppm, 0.334 ppm & 0.207 ppm.
- viii. The industry is a large scale unit and they are not having dedicated laboratory to measure the parameters of the ETP effluents and not having any environment cell to monitor the operation of the water and air pollution control systems. Most the labours working in the plant are not having PPE's.
- ix. The committee directed the industry to submit the clarification on the following:
- x. As per the consolidated statement submitted by the industry and generated about 66.3 KLD of LTDS effluents against consented capacity 29.5 KLD during the period from December 2022 to May 2023.
- xi. The industry has not complied with the observations made by the RO as mentioned in TF agenda dated:07.08.2023.

17. **WHEREAS**, vide reference 13<sup>th</sup> cited, the Hon'ble NGT stated that pursuant to the order of the Hon'ble High Court which has remitted the matter to the TSPCB, fresh notice and enquiry is to be conducted and accordingly, the learned counsel seeks further time. Let the matter be listed for completion of the said exercise.
18. **WHEREAS**, vide reference 14<sup>th</sup> cited, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 28.08.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. Based on the recommendations of the committee, the following directions were issued to your industry vide order dt.13.09.2023:
- i. The industry shall comply with all conditions stipulated in the CFO&HWA order issued by the Board scrupulously.
  - ii. The industry shall comply with all the conditions stipulated in the directions Order dated: 30.05.2023.
  - iii. The industry shall pay the Environmental Compensation (EC) of Rs.77,70,000/- as per the Hon'ble NGT Orders vide order dated:21.06.2023, you are hereby directed to deposit an amount of Rs.77,70,000/- (Rupees Seventy Seven Lakhs Seventy Thousand Only) towards Environmental Compensation. The amount shall be deposited by way of D.D drawn in favour of "Member Secretary, T.S Pollution Control Board" payable at Hyderabad.
  - iv. The industry shall continuously operate ZLD system so as to treat all the effluent and shall reuse all the treated effluent for plant needs and shall maintain the records.
  - v. The industry shall maintain adequate bio-culture / MLSS in the aeration tank to operate biological ETP effectively thereby reduce load on the RO.

- vi. The industry shall provide/maintain operate digital flow meters with IP cameras to ZLD system & provide/ maintain IP camera at main gate entrance. The industry shall provide / maintain PTZ camera to cover ZLD & boiler area. All the cameras shall be connected to the TSPCB Server.
  - vii. The industry shall provide first runoff of rainwater & seepage collection pit with proper bypass arrangement for free flow of subsequent rain water (24 kL/acre). The collected contaminated rain water shall be pumped and stored in above ground level tank of adequate capacity and the same shall be treated within the premises or send to CETP for further treatment and disposal.
  - viii. The industry shall provide digital flow meter for the first run off water and shall treat in their ZLD / dispose to CETP for further treatment.
  - ix. The Industry shall submit a fresh Bank Guarantee of Rs.24.0 Lakhs
19. **WHEREAS**, the Task Force Committee Members Inspected the industry on 04.11.2023 along with RO-Nalgonda and the following non-compliances were observed:
- i. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
  - ii. As per the CFO, the industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel for boilers.
  - iii. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
  - iv. Odour was observed near ZLD area and the VOC readings were in the range of 0.033 to 0.78 PPM.
  - v. The industry has provided scrubbers and not provided sub cooler condensers / charcoal bed connected to the production block-A (extension) D1 & D2, H-Block, PB-F Block, Stripper & Vacuum Tub, ATFD & Hight TDS collection tank (Single Stage Scrubber only).
  - vi. The odour was observed near production block and MEE area in the premises.
  - vii. The industry is one of major Industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
  - viii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
  - ix. The industry has provided odour suppressant mist spray / sprinkle "PIION" liquid at effluent treatment & MEE area to control VOCs. But, odour was observed at MEE area.
  - x. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs to forfeit the same. The Dothigudem Industrial Association vide letter dt.04.10.2023 also requested the Board for exemption to submit the BG and its forfeiture, citing lack of product demand, heavy competition in Global market and financial crises.
  - xi. The Board Officials conducted stack & Ambient Air Quality Monitoring on 10.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (861 mg/Nm<sup>3</sup> against 115 mg/Nm<sup>3</sup>) is exceeding the Board standard.
  - xii. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.

- xiii. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
- xiv. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drain of the industry are very high.
20. **WHEREAS**, you were given an opportunity of hearing before the Task Force Committee during the meeting held on 29.11.2023. The complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting. During the review following non-compliances were observed:
- i. The ZLD system (i.e., MEE, ATFD, Biological ETP and RO plant) is in operation. But, the biological ETP is not functioning properly as there is no adequate bio culture in the ETP. It was just 20 (SVI) supposed to be more than 100. The operator was saying that the bio-culture is growing, the operator does not know about the aerobic process (in aerobic process the bio culture will exponentially within few hours). He was saying that the bio-culture was growing from last 45 days. That shows that ETP is not functioning properly.
  - ii. The industry is one of major industry the Dothigudem area. However, the industry is not having EHS dept persons to monitor the environmental compliances. The plant head Sri Srikanth garu, and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.
  - iii. The industry has not closed hazardous waste storage area and not handling the HW properly during loading operations and spillages were observed.
  - iv. As per analysis reports the value of TDS is 30,580 mg/l in LTDS collection tank. It indicates the industry is not segregating the HTDS & LTDS separately and the value of TDS (17,185 mg/l & 13,394 mg/l) and COD (21,545 mg/l & 3,984 mg/l) in aeration tanks I & II are very high.
  - v. As per analysis reports the value of TDS (51,416 mg/l) and COD (18,185 mg/l) in MEE cooling tower are very high and the value of COD (1,423 mg/l) in production block cooling tower is high.
  - vi. As per analysis reports the value of TDS (10,133 mg/l), COD (2,154 mg/l) and BOD (304 mg/l) in rain water outlet drian of the industry are very high.
  - vii. The industry has not paid Environmental Compensation of Rs.77,70,000/ vide order dated 21.06.2023 & 13.09.2023.
  - viii. The industry has not submitted Bank Guarantee of Rs.24.0 Lakhs.
21. **WHEREAS**, vide reference 16<sup>th</sup> cited, based on the recommendations of committee, the Board issued **SHOWCAUSE NOTICE** to your industry as to why action should not 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) for the following:
- i. Violating the Consent conditions & directions of the Board as mentioned above.
  - ii. Non-payment of Environmental Compensation of Rs.77,70,000/- for past violations.
  - iii. Non-submission of Bank guarantee of Rs.24 lakhs towards non-compliance of Board conditions / directions.
22. **WHEREAS**, vide reference 17<sup>th</sup> cited, the RO, Nalgonda submitted the report and following observations were made:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
  2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.

3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
  4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.
  5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). It is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
  6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).
  7. The Board received a complaint dated: 15.12.2023 from Sri Ravula Linga Swamy (petitioner in OA No.97 of 2021) through mail alleging illegal discharges from industries located in the Dothigudem area. The details of the complaint is as given below:
    - i. The complainant challenged the report dt.22.11.2023 submitted by the Board before the Hon'ble NGT with observations stating that "During inspection, no discharges were observed from the private respondent industries".
    - ii. The complainant enclosed some pictures taken on 11.12.2023 of the area showing water stagnation, wetness etc.,.
  8. Accordingly, the Board Officials inspected the area on 19.12.2023 and observed no discharges from the industries. Photographs submitted below. The water stagnation / wetness shown in the pictures attached to the complaint might be due to the rains in the area due to Michaung cyclone during the period 1<sup>st</sup> week-end of December.
23. **WHEREAS**, vide reference 18<sup>th</sup> cited, Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.
24. **WHEREAS**, vide reference 19<sup>th</sup> cited, you were given an opportunity for hearing before the Task Force Committee of the Board during the meeting held on 03.01.2024. The Complainants & industry representatives (Virtually), RO-Nalgonda have attended the meeting.
- I. The Committee noted the following non-compliances:
1. Part payment towards 25% of actual Environmental compensation levied i.e., an amount of Rs. 19,45,000/-
  2. Not submitted the Bank Guarantee of Rs. 24 lakhs to forfeit the same as per the Board direction dt: 13.09.2023.
  3. The Board Officials collected the samples from MEE cooling tower and production block D, C, F cooling tower. As per the analysis reports the values of TDS & COD (TDS - 11,260 mg/L) & (COD - 10,202 mg/L & 1,012 mg/L) are high.
  4. The Board Officials collected the samples from production block A cooling tower. As per the analysis reports the values of TDS & COD (TDS - 4,086 mg/L) & (COD - 259 mg/L) are high.
  5. The Board Officials collected samples from the Borewell at Northwest direction within the industry premises. As per the analysis reports, the value of TDS is exceeding (6563 mg/l) against the prescribed standard (2000 mg/l). It is also having high EC and COD values i.e., EC - 7,510 mg/l and COD - 291 mg/l
  6. The Board Officials conducted the Stack & AAQ Monitoring. As per the analysis reports, the SPM value (558 mg/Nm<sup>3</sup>) in stack is exceeding as per the CFO standard (i.e., 115 mg/Nm<sup>3</sup>).

7. Dothigudem Industrial Association has submitted representation stating that the BG amount will be submitted to the Board along with the next payment of Environmental Compensation.

II. During the meeting, the complainants informed that, smell nuisance and water pollution from the industries located in Dothigudem area.

III. The industry informed that, they have paid part of the EC amount as first installment and remaining EC amount will be paid in three installments. They will submit the bank guarantee along with next installment payment of EC. The industry requested the Board not to forfeit the bank guarantee as they have complied with the directions/conditions of the Board.

After detailed discussions, the committee recommended to consider the request of the industry to exempt forfeiture of bank guarantee as most of the conditions are complied. However, in case of further violation by the industry the Board may be forfeit the bank guarantee. The committee also recommended to issue direction orders with following special conditions:

- The industry shall pay the remaining Environmental Compensation amount within 06 months period.
- The industry shall submit the BG of Rs.24.0 Lakhs within 2 months.

25. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue directions to comply within one month period:**

1. The industry shall comply with the directions issued by the Board including the conditions stipulated in the CFO & HWA order.
2. The industry shall operate all air pollution control equipments effectively to control air pollution and odour nuisance to the surroundings.

26. 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).

27. 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)



# Hazelo Lab

## Hazelo Lab Private Limited

Reg. Off: H. No. 8-3-166/7/1,  
3rd Floor, A Wing, Erragadda,  
Hyderabad, Telangana - 500 018.  
Tel: +91-40-23710405, Fax: +91-40-23700405  
CIN: U24110TG2015PTC098450

To

The Member Secretary,  
Telangana State Pollution Control Board,  
Paryavaran Bhavan, A-3 Industrial Estates,  
Sanathnagar,  
Hyderabad - 500018,

Date: 17/02/2024

17 FEB 2024



Respected Sir,

**Sub:** Submission of part payment of environmental compensation (25%) req.-Reg.

- Ref: 1) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1207-Dated: 05.12.2023
- 2) Show cause notice No.NLG-85/TSPCB/UH-II/2023-1208-Dated: 05.12.2023.
- 3) Task Force technical committee meeting held on dated: 03.01.2024

With reference to the above-mentioned subject, we are herewith submitting part payment of environmental compensation (25%) details as enclosed below.

S.No	UTR DETAILS & DATE	AMOUNT IN RS.
01	INDBR32024021600466107 Date: 16/02/2024	19,45,000.00

Further, we wish to inform you that, we have paid totally 50% of Environmental Compensation and the balance amount will be made by industry subjected to outcome of the Hon'ble NGT Judgement of O.A.No.97 of 2021.

Kindly acknowledge the receipt of the same.

Thanking you,

Yours faithfully,  
M/s. HAZELO LAB PRIVATE LIMITED

  
V.JAGADEESWAR  
DEPUTY GENERAL MANAGER – CORP. EHS.

CC to: To the Environmental Engineer, TSPCB, Regional Office, Nalgonda Dist.



**Hazelo Lab Private Limited**

**Regd Office & Factory at**

H.No.4-166, Survey No. 242, 247, 248 & 249,

Dothigudem Village, Jiblakpally,

B. Pochampally Mandal, Yadadri Bhongir District,

Telangana, India - 508284

Mobile : +91 9989867941, E-mail : info@hazelolab.com

CIN : U24110TG2015PTC098450

GST IN : 36AADCH5946A1ZS

To

Date: 08.07.2024

The Member Secretary,  
Telangana Pollution Control Board,  
Paryavaran Bhavan,  
Santhnagar,  
Hyderabad – 500 018.

Respected Sir,

**Sub:** Submission of point wise Task-force Agenda Compliance Status Report – Reg.

**Ref:** Task-force Technical Committee meeting held on 04.07.2024.

With reference to the above-mentioned subject, we are herewith submitting point wise Task-force Agenda compliance report for your kind perusal.

S. No	Agenda Point	Our submission
1	<p>Telephonic complaint received from Sri Laxma Reddy (9010538999), R/o. Dothigudem (early hours) regarding effluent discharge by the industry</p> <ul style="list-style-type: none"><li>The discharge incident occurred near boiler area at newly constructed wall. The industry has capped the discharge area with fresh soil to conceal the discharges.</li><li>However, small stagnations were still observed and accordingly samples were collected. As per the physical observation, the samples from discharge site were coloured and odorous.</li></ul>	<p>We have used Ro reject water for curing of our newly constructed wall near the boiler area.</p> <p>Fresh soil capping was done near boiler area as a part of our regular activity to make that area for plantation.</p> <p>Colour and odorous of the collected samples from the small stagnations were due to mixing of ash and soil with the stagnated water.</p> <p>Moreover, this water was flowed from MS Tank, rust might have the reason to form colour on the stagnated water samples.</p> <p>According to the board analysis results the parameters of the stagnated water samples were meeting RO Reject water only. It indicates that we have not done any effluent discharge on ground.</p>
2	<p>The industry has paid Rs. 38,90,000/- i.e., 50 % of the actual Environmental Compensation (EC) levied by the Respondent Board. The industry has to pay the balance EC amount on or before 02.07.2024.</p>	<p>We have submitted our representation to TGPCB that the balance amount will be paid based on the outcome of NGT Judgement.</p>

4.2

		However, we will discuss with our top management for paying the balance EC amount at the earliest.
3	As per the CFO, the industry is permitted to use coal as fuel to the boilers. However, during inspection, it was observed that the industry is using Husk as fuel to the boilers. Earlier, the Board Officials conducted stack Monitoring on 10.11.2023. As per the analysis reports, the value of Suspended Particulate Matter (SPM) (861 mg/Nm <sup>3</sup> against 115 mg/Nm <sup>3</sup> ) is exceeded the Board standard.	Due to scarcity of coal, we are mixing Husk with coal and consuming as fuel in our boiler. In this regard, we have Submitted our request letter on 08/04/24 to board office for CFO amendment for the same. Enclosed ack. copy as <b>Annexure-I</b> Due to damage of Bags in Bag-filter, SPM value exceeds the Board standard during stack monitoring conducted by Board Officials on 10.11.2023. Replaced filter bags and same has been informed to R.O office. Enclosed Bag filters installation Certificate as <b>Annexure-II</b> for your reference.
4	The industry is one of major industry in the Dothigudem area and under closely monitored by Hon'ble NGT. However, the industry is not having EHS dept to monitor the environmental compliances since last more than a year. The plant head and Sri Upender garu, Hr Manager/Liaison Officer were looking after the systems.	We have Operational Staff in EHS department to Operate ZLD Operations. EHS dept. staff is reporting to Plant Head. We have issued offer letter for Sr. Position to monitor Environment Compliances. He will Join in July 2024.
5	The industry has installed additional cameras at main gate, for stack view and entire plant view and connected the same the TSPCB server. However, the camera installed to view entire plant is showing totally blurred view.	The camera view of entire plant is not clear due to accumulation of dust on the lens. We have cleaned the lens and rectified the problem. The same was communicated to Board office vide our letter dated 10.05.2024. Enclosed Photograph as <b>Annexure-III</b> .
6	The industry is storing about 500 nos. of drums openly on naked ground. The industry vide mail dated submitted that all these drums are related to product named Guanine. Diluted Aqueous HCl is generating in this process and planning to extract product again with this Aqueous layer by doing work up as part of Re-process. so that they have stored this Aqueous layer in drums and kept them in designated area. The storage and	We have cleared all the drums observed by board officials during inspection. We also inform you that, we are following safety standards while handling chemical drums in the plant to avoid untoward incidents.

	<p>handling of industrial chemicals are prone to accidents particularly in summer with high temperatures. The industry is in cluster of other bulk drug industries and near to human habitation (Anthammagudem and Dothigudem villages), if any mischief by the industry may lead to havoc in the area. The industry may be directed to clear the storage on war-foot basis.</p>	
7	<p>As per records (During the period Oct' 23 to Mar' 24), the industry has manufactured Guanine – 990 Kg/day, against consented capacity of 693 Kg/day and AME (e-acetyl Ethoxy acetyl methyl ether) – 1313 Kg/day, against consented capacity of 570.5 Kg/day. The industry has exceeded individual permitted quantities of both the products. However, on an average, the industry has manufactured 2303 Kg/day, within the total permitted quantity of 7000 Kg/day.</p>	<p>We have not exceeded the consent quantity as permitted by the TGPCB. Now our production level is 32% only.</p> <p>We would like to inform you that, we are applying for change of product mix to avoid the deviations in the quantities further.</p>
8	<p>The industry has not provided activated charcoal bed to the double stage scrubbers connected to production block A. The industry has not provided activated charcoal bed and sub cooler condenser to the double stage scrubber connected to production block D1, D2 &amp; production block G.</p>	<p>The provision of activated charcoal bed to the vents of scrubbing system technically and safety point of view is not feasible. We have connected process vents to primary and secondary condensing system with chilled Brine and RT water as media and the condenser vent is connected to scrubbing systems to combat VOC emissions.</p>
9	<p>The industry has not provided sub cooler condensers and charcoal bed to the double stage scrubbers connected to the production block F, H, G and HTDS collection tank and stripper feed tank.</p>	<p>Hood and Scrubbing System is provided for HTDS Collection tank and Stripper feed tank.</p> <p>Further we bring to your notice that as a safety point of view, installation of charcoal bed to double stage scrubbers is not feasible and the same has been informed to board officials in previous task-force meetings as a group concern.</p>
10	<p>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.</p>	<p>We have connected ATFD vent to sub cooling condenser and the condenser vent is connected to two stage scrubbing system to control VOC emissions.</p>

(Lp L1)

11	The industry provided hood with extraction systems to the HTDS collection tanks and connected to the scrubbers to control the odor problem. However, manhole covers of the hoods kept open, which will defeat the purpose of the system	To check the level of effluents in the storage tanks, the operator opened the manhole covers of hood system and it was closed on the next day of Board official inspection. Enclosed Photograph as <u>Annexure-IV</u> .
12	As per the data obtained from Real Time Monitoring System (TSPCB server) for the period 01.03.2024 to 12.04.2024 with time interval as 1 minute, the data availability is only 1.83%. The industry is not streaming/sending the data to the TGPCB server.	Due to technical issues in the server the data was not streamed. We have rectified the technical issues and the data is streaming regularly to TGPCB.  The Shifting of VOC analyser from QC building to ZLD area will be discussed with our IT technical team to check the feasibility of the same.
13	In view of the regular complaints from the Villagers the industry may be shift the VOC analyser from QC Building to ZLD area towards village side.	
14	The Board Officials collected the samples from MEE & ATFD condensate. As per the analysis reports the values of TDS & COD (TDS – 6,228 mg/L in ATFD condensate) & (COD – 8,119 mg/L & 8,894 mg/L in MEE & ATFD condensate) are high.	Due to some operational mistakes in MEE operations, the parameters (TDS and COD values) would exceed in MEE condensate few times. However, we have trained our operational team for verifying the colour and conductivity of the condensate generated in MEE & ATFD during evaporation of effluent. If they found abnormal, it will be taken back to MEE for reprocessing to avoid abnormal parameters in MEE and ATFD condensate.
15	The Board Officials collected the samples from LTDS collection tank. As per the analysis reports the values of TDS & COD (TDS – 10,492 mg/L) & (COD – 9,221 mg/L), it indicates that they are not segregating the effluents in to HTDS & LTDS separately as TDS should be less than 5,000 mg/L to consider as LTDS and to treat in Bio ETP.	We are improving our effluent segregation and operational systems stringently to maintain TDS<5000 mg/l for low TDS effluent for effective treatment in Bio ETP.
16	During inspection, odour was observed in the ZLD area and the colour of the water in the MEE cooling tower was observed in dark brown. The officials collected samples of the	The reason for colour was insufficient bleed off from cooling tower at MEE and at process cooling towers.

same to assess the quality/contamination. This is one of the source for odour nuisance in the areas. As per the analysis reports the values of TDS, COD & BOD in production blocks cooling towers (TDS – 5,306 mg/L & 6,705 mg/L), (COD – 4,692 mg/L & 2,122 mg/L) & (BOD – 678 mg/L & 317 mg/L) are high.	Due to this reason, TDS and COD values were increased in the CT water samples, which are collected by Board Officials. We have increased the bleed off quantity from Cooling towers to maintain water quality in good condition for avoiding odour nuisance and the same communicated to Board office vide our letter dated 10.05.2024. enclosed Photograph as <b>Annexure-V</b> .
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We have complied all the above Task-force Agenda points, hence don't initiate any action against our unit.

Thanking you

**Yours faithfully**  
**For HAZELO LAB PRIVATE LIMITED**

  
**V.JAGADEESWAR**  
**DEPUTY GENERAL MANAGER – CORP.EHS.**

CC: To the Environmental Engineer, TSPCB, Regional Office, Nalgonda District.

# Hazelo Lab

LPB  
etc

Annexure - I (1/2)

## Hazelo Lab Private Limited

Reg. Off: H. No. 8-3-166/7/1,  
3rd Floor, A Wing, Erragadda,  
Hyderabad, Telangana - 500 018.  
Tel: +91-40-23710405, Fax: +91-40-23700405  
CIN: U24110TG2015PTC098450

To

Date: 08/04/2024

The Environmental Engineer,  
Telangana State Pollution Control Board,  
Regional Office,  
Nalgonda District.

Sir,

Sub: Hazelo Lab Private Limited - Dotigudem (V), Pochampally Mandal, Yadadri Bhuvangiri District - Request letter for Amendment in the existing CFO - for utilization of Rice Husk as fuel in coal-fired boiler – reg.

Ref: Our submission letter dated: 22/08/2022

In continuation to our letter dated 22/08/2022, regarding trial runs using rice husk as fuel in our coal fired boiler to generate steam which is required for our plant operations, we are herewith submitting the following technical information for your kind perusal for amendment in our existing CFO with respect to fuel usage in coal fired boilers.

- Our trial runs using rice husk as fuel in coal-fired boiler to generate steam are being succeeded. We have provided the following technical and dust control systems to utilise Rice Husk as fuel in our coal fired boiler system.
  - Belt conveyor System provided for transferring husk from husk yard to Bunker.
  - Provided Bin Vent Filter & Bag Filter System at Bunker to control dust emission during husk usage.
  - Increased size of screw feeder system for effective transferring of husk from bunker to furnace area.
  - Provided Cyclone Separator followed by Bag Filter System to control dust emissions (360 No's of bags are provided - bag size: 150 mm X 3650 mm).
  - Closed Ash handling system from Settling Chamber, Air preheater (APH), Water preheater (WPH), Cyclone Separator and Bag filter for transferring generated ash to Silo system (Pneumatic operation with PLC) to control dust emission in flue gas.
  - Provided Ferrule system for safety of tubes at boiler drum, water preheater (WPH) and air preheater (APH).
- Gross Calorific Value and ultimate analysis of fuels:

S. No	Parameter	Rice Husk	Coal
1	Gross Calorific Value (Kcal/kg)	3275	3800
2	Carbon (C) %	36.7	49.0
3	Hydrogen (H) %	3.0	4.25
4	Nitrogen (N) %	1.0	1.12
5	Sulphur (S)%	0.03	0.9



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(2/2)

6	Oxygen (O) %	31.2	12.0
7	Moisture (M) %	9.4	8.0
8	Ash (A) (%)	15	20

- Advantage of using Rice Husk as fuel are:
  1. Rice husk is a carbon-neutral and renewal source of energy. Hence the emission of greenhouse gases will be reduced.
  2. Results in reduction of sulfur emissions and other pollutants associated with the use of fossil fuels.
  3. Low Maintenance Cost
  4. Eco-friendly
  5. Surplus Availability & low cost of raw material compared with coal.

Hence, we request your good selves to amend the existing CFO as follow:

**To utilize Coal/Rice Husk/Mixed Fuel (mixture of rice husk and coal) as fuel in boilers.**

Thanking you

**Yours faithfully**  
**For HAZELO LAB PRIVATE LIMITED**

  
**AUTHORIZED SIGNATORY.**

Cc to: The Member Secretary, TSPCB, Paryavaran Bhavan, Sanathnagar, Hyderabad-18.

Annexure-II



**GLOBAL**  
ENVIRO AIR SYSTEMS (P) LTD.

DT.15/04/2024

### INSTALLATION CERTIFICATE

**CUSTOMER'S NAME** : M/s. HAZELO LAB PRIVATE LIMITED  
**ITEMS NAME** : FILTER BAG RYTON PPS 150X3650MM 550GSM  
**QUANTITY** : 364 NOS  
**CUSTOMER PO NO& PO Date** : REF.P.O. HZL25B50-3 DATE: 06/04/2024

This is to certify that we are Supplied & Installed 364 Nos RYTON PPS FILTER BAGS vide our supply Invoice no. SIV - GEHY -28. Dt.12/04/2024.

Filter bags installation completed on dtd .13/04/2024

For **GLOBAL ENVIRO AIR SYSTEMS (P) LTD.**

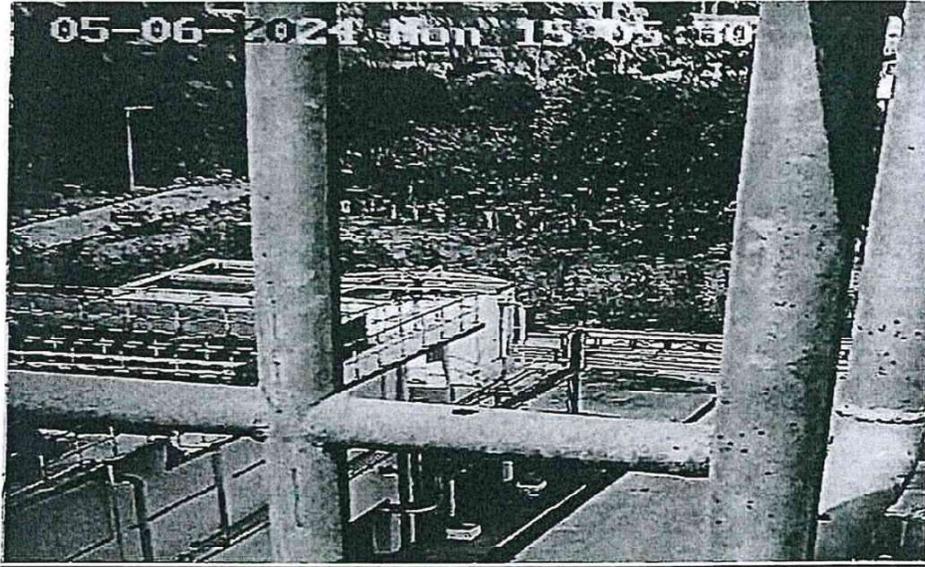
  
AUTHORIZED SIGNATURE

Servey No. 163/A (Part) Gagillapur (Vill.), Gandimaisamma Dundigal (Mdl.), M.M. Dist. Hyderabad-500 043. TELANGANA  
Ph : 08418-257264, 65, 66, Telefax : 08418-257267, Mobile : 98480 31866, 96666 69922, 23, 35  
E-mail : globaleas@rediffmail.com, ksr@globalenviro.in, Web. www.globalenviro.in

Designers, Mfrs. of Pollution Control, Clean Room Projects & Equipments  
**KEEP THE ENVIRONMENT CLEAN**  
CIN : U31900TG2007PTC056001

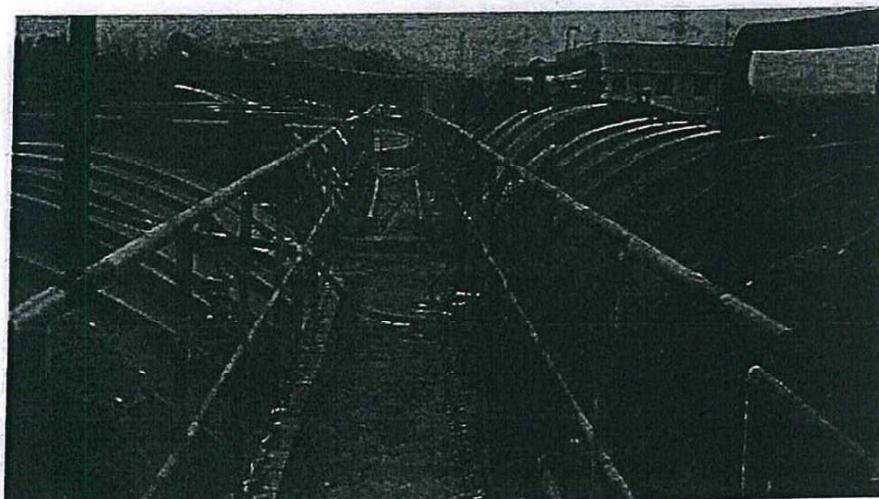
Camera View

Annexure-III



Annexure-IV

Manhole Covers to Hood with Extraction System



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Cooling Tower

1/20/2011

