

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

I.A. NO. 226/ 2021, I.A. NO. 227/2021 AND I.A. NO. 228/2021

IN

O.A. NO. 144 OF 2020

IN THE MATTER OF:

BHASKAR RAO VEMURI

...Applicant

Vs.

STATE OF ANDHRA PRADESH & Ors.

...Respondents

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Filed By:

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Dated: .10.2025

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**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH, NEW DELHI**

I.A. NO. 226/ 2021, I.A. NO. 227/2021 AND I.A. NO. 228/2021

IN

O.A. NO. 144 OF 2020

IN THE MATTER OF:

BHASKAR RAO VEMURI

...Applicant

Vs.

STATE OF ANDHRA PRADESH & Ors.

...Respondents

**REPLY ON BEHALF OF ANDHRA PRADESH POLLUTION
CONTROL BOARD IN I.A.Nos. 226/2021, 227/2021 & 228/2021 IN
O.A.NO. 144 of 2020**

I, S. Sri Saravanan, Son of Shri A. Shanmugam, aged about 51 years, presently working at Vijayawada, do hereby solemnly affirm and state as follows:

1. I, am presently working as Member Secretary, in Andhra Pradesh Pollution Control Board and am duly authorized by the answering respondent. I state that I am fully conversant with the facts of the case to the extent of record maintained by the Respondent and as such competent to depose the correctness or otherwise of the facts stated in the present affidavit.
2. I state that M/s. Venkata Narayana Active Ingredients is operating a bulk drug industry at Chandrapadiya (V), Vinjamur (M), SPSR Nellore District. The Board issued CTO & HWA order to the industry for the production capacity of 500 TPA valid upto 31.03.2026.



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**MEMBER SECRETARY
A.P. Pollution Control Board
VIJAYAWADA-520 007.**

Background of the case:**Fire accident in reactor on July 29, 2020:**

- A. During the early hours around 2:10 AM on 29.07.2020 Methanol vapours accumulated in clean room-2 and while charging chemical powder into reaction vessel fire accident has occurred. Due to fire accident four employees suffered severe burn injuries and two employees Shri. Sd. Hafeez and Shri. N. Rajani Kumar helper died while undergoing treatment in the hospital. Two employees Shri. S. Bhaskar and Shri. B. Ravindra Reddy underwent treatment. The unit borne the expenditure incurred towards treatment of the injured.
- B. The Collector & District Magistrate, SPSR Nellore district constituted a committee consisting of the following officials to enquire into the accident.
1. The Revenue Divisional Officer, Atmakur
 2. The Deputy Chief Inspector of Factories, Factories Department, Nellore
 3. The Deputy Commissioner of Labour, Nellore,
 4. The Deputy Superintendent of Police, Kavali and
 5. The Inspector of Factories, Factories Department, Nellore
 6. The General Manager, District Industries Centre, Nellore
 7. The Environmental Engineer, APPCB, Nellore
- C. The committee conducted enquiry on the accident on 04.08.2020 & 05.08.2020 and submitted a detailed report to the Collector & District Magistrate, SPSR Nellore District. The Committee concluded that the Management has opted unsafe procedures of charging chemicals into reactors which caused fire cloud and then led to an explosion.




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- D. The Inspector of Factories, Nellore issued "Prohibitory Orders" to the unit on 29.07.2020 and subsequently, A.P. Pollution Control Board (APPCB) issued Directions vide order dated 29.07.2020 to the unit to "To Stop the operations of the industry immediately by following the Standard Operating Procedures (SOP's)".
- E. As per the recommendations of the committee, the industry has taken rectification measures and submitted the compliance to the Collector & District Magistrate, SPSR Nellore district. The committee inspected the industry and verified the compliance of the recommendations made. Subsequently, the Factories department revoked the Prohibitory order and thereafter A.P. Pollution Control Board issued revocation of Stop production order.
- F. **Gas leakage occurred on May 11, 2021:** An accident occurred in the unit due to Thionyl Chloride gas leakage from reactor 0101 during manufacture of Vildagliptin. The unit was involved in the manufacture of Vildagliptin (consented product). On May 10, 2021 batch was completed and night shift in-charge loaded mixed liquor generated during production of vildagliptin into GLR reactor 0101. Further the night shift in-charge added caustic lye into reactor 0101 for neutralization. On May 11, 2021 during morning shift, around 8:30 AM, the employees working in production block-II where accident occurred have opened the vent of reactor 0101 soon after which thionyl chloride gas is released and three employees deceased and four employees were exposed to gas. Quantity of mixed liquor present in the reactor and exact causes for accident were not disclosed to the committee.



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G. During the accident three employees working near reactor-0101 died due to inhalation of thionyl chloride gas and other three employees who came for rescue were also affected due to gas inhalation. Due to odour, other employees in the unit have suspected gas leakage and have closed the reactor vent preventing further damage. Soon after the accident, the deceased and injured employees were shifted to hospital. Out of six employees exposed to gas, three of them deceased (declared brought dead in the hospital).

H. **Committee Constituted by the District Administration:** As per the instructions of the Collector & District Magistrate, SPSR Nellore District, the Revenue Divisional Officer, Atmakur, constituted a joint inspection committee comprising with the following officials to enquire the causes of the accident and to submit a detailed report:

1. The Revenue Divisional Officer, Atmakur
2. The Deputy Chief Inspector of Factories, Nellore
3. The Deputy Commissioner of Labour, Nellore
4. The Deputy Superintendent of Police, Kavali
5. The Environmental Engineer, APPCB, Regional Office, Nellore

I. The committee members inspected the industry on 14-05-2021, 19-05-2021 and 31-05-2021 and submitted a report to the Collector & District Magistrate, SPSR Nellore district on 08.06.2021. The report consists of the detailed recommendations in Part A & Part-B with specific timelines for compliance of the recommendations i.e. Part-A-immediate & Part-B- within one month.

J. The APPCB issued "Stop Production Order" on 26.05.2021 to the unit and the unit has approached Hon'ble High Court against APPCB order. The Hon'ble High Court vide order dt: 29.05.2021 set aside the stop production order issued by the APPCB.




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K. The industry vide letter dated.21.06.2021 & 28.06.2021 has submitted compliance report on the Part-A & Part-B recommendations of the Joint committee. The committee has inspected the industry on 02.07.2021 and verified the compliance status of the recommendations & submitted report to the Collector & District Magistrate, SPSR Nellore District.

L. Orders of the Hon'ble National Green Tribunal, Principal Bench, New Delhi

The Hon'ble National Green Tribunal in O.A. No. 144 of 2020, vide order dated 02.06.2021 constituted a joint committee and directed as follows:

"In these circumstances, we consider it necessary to require a fresh report from a joint Committee of the Regional Office, CPCB, Chief Inspector of Factories Andhra Pradesh, Member Secretary, State PCB and the District Magistrate, Nellore. The Report may provide compliance status of the Industry with respect to consents under the Water and the Air Acts, Authorisation under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and clearances under the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and the Chemical Accidents (Emergency planning, Preparedness and response) Rules, 1996. The Committee may also ascertain the extent of damage to the environment and individuals in the incident dated 11.5.2021 and remedial action taken in terms of compensation for restoration of the environment and to the victims. The Committee will be free to interact with the stake holders and visit the site and take assistance from such other expert/agency as required. CPCB will steer the proceedings which will be facilitated by the State PCB and the District Magistrate. It may give its report to this Tribunal within three months by e-mail at judicialngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF".



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A copy of the Hon'ble NGT (PB) order dt.02.06.2021 is enclosed as **Annexure-I.**

- M. In compliance to Hon'ble NGT order, committee comprising of following members was composed:
1. Sri M.N. Harendhira Prasad, IAS, Joint Collector and Addl. District Magistrate, Nellore
 2. Smt. H D Varalaxmi, Regional Director- Chennai, Central Pollution Control Board
 3. Sri. K. Srinivasa Rao, Deputy Chief Inspector of Factories
 4. Sri Ch. Rajasekhar, Environmental Engineer, Regional Officer, Nellore, Andhra Pradesh Pollution Control Board
- N. During inspection, the NGT committee interacted with injured employees and families of the deceased. The NGT committee inspected the industry in detail and submitted report to the Hon'ble NGT during 10.08.2021. The Hon'ble NGT heard the case on 07.12.2021 and directed that the industry shall deposit compensation of Rs. 7.5 Crores with State Pollution Control Board within 3 months.
- O. Further, it was directed that the amount may be utilized for restoration/ improvement of the environment in the area by preparing an action plan by a five-member expert committee comprising of MoEF&CC, CPCB, State PCB, Prof. P. Jagannadha Rao, Dept. of Chemical Engineering, Andhra University, Vishakhapatnam and District Magistrate, Nellore.
- P. Accordingly, the A.P. Pollution Control Board vide order dated. 16.12.2021 directed the industry to deposit Rs.7.5 Crores to A.P. Pollution Control Board within 3 months.




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Q. The industry filed review Application No. 03 of 2022 before the Hon'ble NGT (PB), wherein, the applicant stated that its turnover has dropped for the last two years due to Covid – 19 and it was not heard. The compensation is excessive. The Principal Bench has no territorial jurisdiction to deal with violations taking place in Andhra. The Hon'ble NGT (PB) vide its order dt. 17.02.2022 while disposing the review application no. 03 of 2022, the following order issued:

“..... 6. We do not find any merit in the Review Application. The review applicant has not disputed the violations found by the Committee to environment safety norms. Once it is so, the review applicant is governed by principle of Absolute Liability and when harm is caused to human lives and to the environment, its liability remains undisputed. It is further undisputed that the review applicant was duly associated by the joint Committee in terms of order of the Tribunal dated 02.06.2021. Though formal notice may not have been given, the Applicant did enter appearance through counsel S. Bhartari, as shown by the order itself and placed its version and documents on record by way of IAs 226-228/2021 which were duly considered and dealt with as shown by the para 7 of the order. There is thus no violation of principles of natural justice which govern the proceedings. The turnover figure has been taken from the documents of the review applicant itself i.e. the insurance policy dated 10.08.2021 which remains undisputed. Contentions in the review application that Principal Bench has no territorial jurisdiction is also untenable in view of National Green Tribunal (Practices and Procedure) Rules, 2011. Distribution of business among the ordinary place or places of sitting of the Tribunal is in the purview of the Chairperson. There is no bar to Principal Bench considering an issue in respect of ordinary territorial jurisdiction of any other Bench. If the plea of the review applicant is to be accepted, the environmental violations, even resulting in loss of lives and damage to the environment will remain unaddressed, contrary to the object of



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constitution of this Tribunal mentioned in the Preamble to the National Green Tribunal Act, 2010 to achieve Sustainable Development and enforcement of legal rights relating to environment and matters connected thereto, in pursuance of decision of the UN Conference at Stockholm and at Rio De Janeiro.

In view of the above, we do not find any merit in the review application which is dismissed. All pending I.A.s/ M.A.s also stand disposed of.”

A Copy of the Hon'ble NGT (PB) order dt.17.02.2022 is enclosed as **Annexure- II.**

- R. Subsequently, the industry filed appeal before the Hon'ble Supreme court of India against orders of Hon'ble NGT(PB) dated 07.12.2021. The Hon'ble Supreme court of India vide order dated. 09.03.2022 issued stay of the direction of the Hon'ble NGT in the impugned order dated 07.12.2021 insofar as the deposit of the compensation of Rs 7.50 crores is concerned. Further directed that, no coercive steps shall be taken against the appellant on the basis of the direction for the deposit of the compensation of Rs 7.50 crores. Copies of the Hon'ble Supreme court of India order dt.09.03.2022 is enclosed as **Annexure-III.**

3. I state that that the industry obtained EC for expansion on 08.12.2020 and CTE expansion on 25.03.2021. However, the industry taken up the works pertaining to expansion without obtaining EC & CTE. The then, EE, APPCB Regional office, Nellore inspected the unit on 29.05.2020 and issued Showcause notice to the industry on 30.05.2020 for non-compliance of the consent conditions and carryout expansion activities without prior Environmental clearance & CTE. Further, the then, EE, APPCB submitted



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a report to the Member Secretary, APPCB, Board office, Vijayawada on 30.05.2020 for undertaking of expansion activities without EC from MoEF&CC, GoI and CTE from APPCB for taking necessary action duly enclosing the photographic evidence of the construction of new production block, installation of new reactors, storage tanks.

4. I state that, the industry had taken up the expansion activities without obtaining prior EC & CTE, which is non-compliance to the conditions stipulated in the CTO order issued by the APPCB. Copies of the Showcause notice, Report submitted to the Member secretary, APPCB with photographic evidence are enclosed for ready reference as **Annexure -IV.**

5. I state that as per instructions issued by the (then) EE, APPCB, RO, Nellore during the inspection on 29.05.2020, the industry vide Ir.dated. 20.06.2020 furnished the records pertaining to disposal of Hazardous Waste during the period from January,2019 to May,2020. As per the records furnished by the industry during this period the industry disposed 1335.57 Tons of hazardous waste against the consented capacity of 1003 Tons. Out of 1335.57 Tons, the industry disposed 968.81 Tons without Board notice as mandated as per rule 19 of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 & amendments thereof (*See rule 19(2) - the sender shall forward copy 1 (white) to the State Pollution Control Board, and in case the hazardous or other wastes is likely to be transported through any transit State, the sender shall intimate State Pollution Control Boards of transit States about the movement of the waste.*)

6. I state that the industry generated excess Hazardous waste and disposed illegally without following Manifesto system, which is violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 & amendments thereof. Copies of the Hazardous Waste disposal details furnished by the industry and the report dated. 20.06.2020 submitted to




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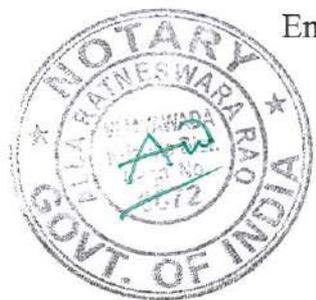
11.I state that the contents of para 7 are denied. It is stated that the industry obtained EC for expansion on 08.12.2020 and CTE expansion on 25.03.2021. However, the industry taken up the works pertaining to expansion without obtaining EC & CTE. The then, EE, APPCB Regional office, Nellore inspected the unit on 29.05.2020 and issued Showcause notice to the industry on 30.05.2020 for non-compliance of the consent conditions and carryout expansion activities without prior Environmental clearance & CTE. Further, the then, EE, APPCB submitted a report to the Member Secretary, APPCB, Board office, Vijayawada on 30.05.2020 for undertaking of expansion activities without EC from MoEF&CC, GoI and CTE from APPCB for taking necessary action duly enclosing the photographic evidence of the construction of new production block, installation of new reactors, storage tanks.It is further stated that, the industry had taken up the expansion activities without obtaining prior EC & CTE, which is non-compliance to the conditions stipulated in the CTO order issued by the APPCB. Copies of the Showcause notice, Report submitted to the Member secretary, APPCB with photographic evidence are enclosed for ready reference as Annexure –IV.

12.I state that contents of para 8 to 12 does not merit any reply.

13.I state that contents of para 13 are denied herein toto. I state that as per the compliance report of the Factories department, the industry had not been complied with 18 Safety measures out of 23 safety measures stipulated by the Factories department. Thus, the industry carried out un-safe practices leading to two accidents on 29.07.2020 & 11.05.2021.

14.I state the contents of para 14 to para 20 does not merit any reply.

15.I state that contents of para 21 are denied herein toto. I state that the Joint Committee constituted by the Hon'ble NGT recommended payment of Environmental Compensation of Rs.73.50 lakhs for non-compliances of odour



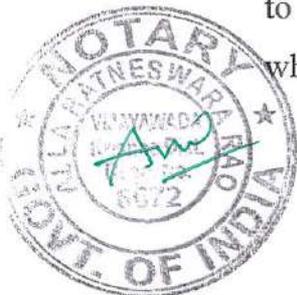

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nuisance and irregularities in disposal of Hazardous waste, Partial compliance of non-connection of flow meters to APPCB server for quantification of water consumption and not complying with 18 Safety measures out of 23 safety measures stipulated by the Factories department. This clearly indicates that safety lapses may be one major cause for accidents.

16. I state that contents of para 22 are denied herein to. I state that the industry vide Ir.dated. 21.06.2021 & 28.06.2021 submitted compliance report to the Collector & District magistrate, SPSR Nellore District for Part-A & Part-B recommendations of the Joint committee constituted by the District Collector, Nellore stating that they have been complying with all the recommendations including odour control measures and green belt development. However, during the inspection by the Joint Committee constituted by the Hon'ble NGT on 10.08.2021 verified the compliance submitted by the industry for Part-A & Part-B recommendations of the Joint committee constituted by the District Collector, Nellore and conducted VOC monitoring and concluded that ***"the value indicates there is odour nuisance to the surroundings"***. (Page.No.13 of Joint Committee of Hon'ble NGT). And also violated CTO condition that ***"the proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings"***. While granting renewal of CTO & HWA order to the industry on 12.09.2022, the APPCB stipulated a condition that ***"Green belt shall be developed in remaining area of 5 acres with tall growing trees with good canopy so that it shall not be less than 33% of the total area."*** And the industry has not disputed with the condition implying that the observations made by the joint committee are true.

17. I state that the contents of para 23 to para 25 does not merit any reply.

18. I state that contents of para 26 are denied herein to. The industry not informed to the APPCB regarding dismantling and shifting of GLR reactor (0101) in which accident occurred on 11.05.2021.




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19. I state that the contents of para 27 to para 30 does not merit any reply.

20. I state that the contents of para 31 are denied. I state that the Joint Committee constituted by the Hon'ble NGT was correctly assessed the non-compliances and environmental compensation based on CPCB guidelines. The Applicant's assertions regarding alleged misinterpretation of production figures, expansion without prior EC/CFE, hazardous waste storage, and stormwater drain observations are untenable. It is further stated that reply to every averment made by the applicant is here as under:

- a. The industry obtained EC for expansion on 08.12.2020 and CTE expansion on 25.03.2021. However, the industry taken up the works pertaining to expansion without obtaining EC & CTE. The then, EE, APPCB Regional office, Nellore inspected the unit on 29.05.2020 and issued Showcause notice to the industry on 30.05.2020 for non-compliance of the consent conditions and carryout expansion activities without prior Environmental clearance & CTE. Further, the then, EE, APPCB submitted a report to the Member Secretary, APPCB, Board office, Vijayawada on 30.05.2020 for undertaking of expansion activities without EC from MoEF&CC, GoI and CTE from APPCB for taking necessary action duly enclosing the photographic evidence of the construction of new production block, installation of new reactors, storage tanks. It is clearly evident that, the industry had taken up the expansion activities without obtaining prior EC & CTE, which is non-compliance to the conditions stipulated in the CTO order issued by the APPCB.
- b. As per instructions issued by the (then) EE, APPCB, RO, Nellore during the inspection on 29.05.2020, the industry vide Ir.dated. 20.06.2020 furnished the records pertaining to disposal of Hazardous




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Waste during the period from January,2019 to May,2020. As per the records furnished by the industry during this period the industry disposed 1335.57 Tons of hazardous waste against the consented capacity of 1003 Tons. Out of 1335.57 Tons, the industry disposed 968.81 Tons without Board notice as mandated as per rule 19 of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 & amendments thereof (*See rule 19(2) - the sender shall forward copy 1 (white) to the State Pollution Control Board, and in case the hazardous or other wastes is likely to be transported through any transit State, the sender shall intimate State Pollution Control Boards of transit States about the movement of the waste*). It is clearly evident that the industry generated excess Hazardous waste and disposed illegally without following Manifesto system, which is violation of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 & amendments thereof. Copies of the Hazardous Waste disposal details furnished by the industry and the report dated. 20.06.2020 submitted to the Member Secretary, APPCB Board Office, Vijayawada by the EE, RO, Nellore for taking necessary action is enclosed for ready reference as Annexure -V

- c. The industry not informed to the APPCB regarding dismantling and shifting of GLR reactor (0101) in which accident occurred on 11.05.2021.
- d. While granting renewal of CTO & HWA order to the industry on 12.09.2022, the APPCB stipulated a condition that ***“Green belt shall be developed in remaining area of 5 acres with tall growing trees with good canopy so that it shall not be less than 33% of the total area.”*** And the industry has not disputed with the condition implying that the observations made by the joint committee are true.




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- e. During the inspection by the Joint Committee constituted by the Hon'ble NGT on 10.08.2021 and conducted VOC monitoring and concluded that *"the value indicates there is odour nuisance to the surroundings"*. (Page.No.13 of Joint Committee of Hon'ble NGT). And also violated CTO condition that *"the proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings"*.

21. That the contents of para 32 are denied. I state that the Joint committee constituted by the Hon'ble NGT assessed the Environmental Compensation (EC) as per CPCB formula from the date of revocation of stop production order i.e. 08.09.2020 to 11.05.2021 (date of second accident occurred) -245 days for non-compliance of conditions given by APPCB and Inspector of factories in the CFO order and revocation orders respectively.

22. That the contents of para no. 33 to para 37 does not merit any reply.

By considering the above facts, the Hon'ble Tribunal may pass appropriate orders(s)/ direction(s) as deemed fit.


DEPONENT

MEMBER SECRETARY
A.P. Pollution Control Board
VIJAYAWADA-520 007.

VERIFICATION:

I, the deponent above named, do verify that the contents of the above affidavit are true, no part of it is false and nothing material has been concealed there from.

Verified at Vijayawada on this day of October 2025.


DEPONENT

MEMBER SECRETARY
A.P. Pollution Control Board
VIJAYAWADA-520 007.



Amw
15/10/2025
Alla Rameswara Rao
B.Com., LL.B
ADVOCATE - NOTARY
Appointed by Central Govt.
VIJAYAWADA, Krishna Dt., A.P.

Item No. 03

Court No. 1

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI**

(By Video Conferencing)

Original Application No. 144/2020

(With report dated 25.01.2021)

Bhaskar Rao Vemuri

Applicant

Versus

State of Andhra Pradesh

Respondent

Date of hearing: 02.06.2021

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE SUDHIR AGARWAL, JUDICIAL MEMBER
HON'BLE MR. JUSTICE M. SATHYANARAYANAN, JUDICIAL MEMBER
HON'BLE MR. JUSTICE BRIJESH SETHI, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER**

Respondent: Mr. TVS Raghavendra Sreyas, Advocate for AP PCB

ORDER

1. Grievance in this application is against converting a Tobacco oil extraction factory into a bulk drug chemical unit near Chandrapid Village, Vinjamur Mandal, Nellore District, Andhra Pradesh. The unit is purchasing water from agricultural bore-wells. The farmers get electricity free of cost from AP Govt. but sell water for commercial purposes. This activity is in violation of environmental norms resulting in fast depletion of ground water. There is violation of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as the unit is being operated without the requisite consent under the said Acts. The unit is causing water and air pollution.

2. Vide order dated 27.11.2020, an action taken report was sought from the State PCB and the District Magistrate, Nellore.

3. Accordingly, a report has been filed by the Andhra Pradesh State PCB on 25.01.2021 inter-alia stating as follows:-

"During inspection, it was observed and ascertained the following :

1. *M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s., Nutra Specialties Pvt. Ltd.,) is operating a bulk drugs manufacturing industry situated at Sy.No.69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District.*
2. *The Chandrapadiya village is existing at a distance of about 300 mtrs from the industry.*
3. *The officials of Ground Water department have inventoried a total of 7 bore wells, including 2 bore wells belongs to the industry and 3 agricultural bore wells of Sri Vemuru Bhaskar Rao and 2 bore wells of Sri Nageswara Rao. The total depth of the bore wells ranges from 70 to 90 mtrs, and the present depth of water levels ranges from 7.43 to 11.65 mtrs below ground level.*
4. *A pumping test was conducted for 180 minutes (3 hours) by choosing the bore wells of the industry as pumping wells, and the surrounding agriculture wells as observation wells. The change in the depth of water level (drawdown) in the agricultural bore wells of Sri Vemuri Bhaskar Rao and Nageswara Rao in response to the pumping of bore wells in the industry is measured throughout the pumping period to know the impact. The static water levels in the observation wells before pumping are in the range of 7.43 mtrs to 11.65 mtrs after 180 minutes of pumping the water levels in the observation wells remained almost constant without any abrupt decrease, which indicates that the influence is negligible or nil.*
5. *No pipeline arrangement was observed from the industry to nearby agricultural bore wells for supply of water for industrial usage. The industry is drawing water from their own bore wells (Two) located within the premises and the industry is not purchasing water from outside.*
6. *The committee contacted the petitioner Sri Vemuru Bhaskar Rao over telephone and he informed that he is residing at Hyderabad and having about Ac.9.0 of agricultural lands towards North Side of the industry on his wife name. He also informed that at present they are getting sufficient water from their agriculture borewells due to the recent heavy rains in that area and the industry is not purchasing water from outside agricultural bore wells.*
7. **ECs & Consent status : Consent obtained under the provisions of of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 from Pollution Control Board and from the MoEF&CC, GOI under Environment (P) Act,1984**

- The industry obtained Consent for establishment (CFE) in name of M/s. Nutra Specialities Pvt. Ltd., from the Board vide order dt. 24.05.2006 to manufacture Solanesol-100 Kgs/month.
- The industry obtained CFE for expansion from the Board vide order dt.14.03.2007 for manufacturing of additional 8 Nos. of products.
- The industry obtained Environmental Clearance from the Ministry of Environment, Forest & Climate Change, Govt. of India vide EC order dated 02.02.2009 for expansion of bulk drug manufacturing unit with production capacity from 62 TPA to 142.32 TPA.
- The industry obtained CFE for expansion from the Board vide order dt.24.04.2010 to produce 15 Nos. of bulk drug products with a total production capacity of 36 TPA.
- The industry obtained CFE vide order dated 18.02.2012 for change of product mix without increase in pollution load and no increase in production capacity to produce 14 nos of bulk drug products with a total production capacity of 36 TPA.
- The industry obtained CFE vide order dated 08.02.2017 to manufacture various bulk drugs of 142.32 TPA.
- The industry obtained CFE for change of product mix vide order dt.08.02.2018 to manufacture 31 Nos. of bulk drugs with total production capacity of 395.25 Kgs/day or 142.32 Tons per Annum.
- The name of the industry has been changed from M/s. Nutra Specialities Pvt. Ltd to M/s. Venkata Narayana Active Ingredients Private Limited in the month of August, 2018.
- The industry obtained CFE for change of product mix vide order dt.17.09.2018 to manufacture 35 Nos. of bulk drugs with total production capacity 395.25 Kgs/day or 142.32 Tons per Annum.
- The industry obtained CFE vide order dt.27.09.2019 for change of product mix by arranging the products in Group A & Group B. The Group A will be remain same with existing 35 products and in Group B, 12 products will be existing products and added three more products without any increase in overall consented production capacity of 395.29 Kgs./day or 142.32 TPA. As per CFE order, the industry shall produce any one group either Group A or Group B at any point of time. But, the industry is not yet started operations of this product mix.
- Subsequently, the industry obtained CFO for expansion / change of product mix.
- The industry obtained Consent for Operation (CFO) vide order dt.14.12.2018, for which the industry obtained CFE for change of product mix vide order dt.17.09.2018 to manufacture 35 Nos. of

bulk drugs with total production capacity 395.25 Kgs/day or 142.32 Tons per Annum with validity up to 31.03.2021.

- Recently, M/s. Venkata Narayana Active Ingredients Private Limited has obtained Environmental Clearance from State level Environment Impact Assessment Authority (SEIAA), AP vide order dated 08.12.2020 for the expansion of the production capacity from 142.32 Tons per Annum to 500 Tons per Annum.

8. Manufacturing process: The process involves synthesis of various raw materials followed by multiple process operations such as extraction, distillation, centrifuging/ filtration, drying etc. At present, the factory is producing 11 Nos. of products out of total consented products Viz., (1) Allyl Isopropyl Acetyl Urea, (2) Tetracaine Hydrochloride, (3) Levetiracetam (4) Risperidone, (5) Lacosamide, (6) Vildagliptin, (7) Moxifloxacin Hydrochloride, (8) Voglibose, (9) Olmesartan Medoxomil, (10) Linagliptin & (11) Warfarin Sodium. As per the records, during last six months i.e. from July 2020 to December 2020, the industry manufactured 11 Nos. of consented products and the industry manufactured an average of 185.76 Kg/day against the permitted capacity of 395.29 Kgs./day. The production quantity was within the permitted capacity.

9. Water Consumption:

The source of water for the industry is Ground water i.e., borewells within the premises. The permitted water consumption details as per Consent order is as follows:

S.No.	Purpose	Quantity
1	Processing, whereby water gets polluted and the pollutants are not easily bio-degradable	13.80 KLD
2	Industrial Cooling	100.0 KLD
3	Boiler Feed	42.0 KLD
4	Domestic	8.0 KLD
5	Gardening purpose	10.0 KLD
	Total	173.80 KLD

The industry is drawing water from their Two bore wells located within the premises.

10. Waste water generation & treatment :

The industry is segregating effluents into Low TDS Process Effluent & High TDS Process Effluent and treating the two streams separately.

Treatment of low TDS Process Effluents (46.8 KLD) (i.e Boiler blow down —11.8 KLD, Cooling Tower Blow down — 35 KLD)

The low TDS effluents is being treated in ETP of capacity 100 KLD consisting of collection tank -1 &2, flocculation tank, primary clarifier, aeration tank, secondary clarifier, buffer tank, lamella clarifier, sand filters, storage tank. The treated effluents are being

further treated in the RO Plant of capacity 7 KL/hr. RO permeate is being recycled and RO rejects is being sent to MEE.

Treatment of High TDS Process Effluents (14.23 KLD) (i.e. process & washings):

The High TDS effluent is being sent to stripper (2 x 1KUh) for organics recovery. The stripped effluents further sent to MEE of capacity 3 KUh for evaporation. The condensate from MEE is being sent to ETP for further treatment and the concentrate is being sent to ATFD (500 ltrs/hr). **The ATFD salts are being sent to TSDf.**

The industry provided flow meter & web camera at the inlet of MEE & ETP and connected to APPCB & CPCB website.

Domestic Effluents (6.0 KLD): The industry has constructed STP of 60 KLD consisting of collection tank, primary clarifier, aeration tank, sludge settling tank, secondary clarifier, multi-grade filter, activated carbon filter, lamella clarifier, sand filters, storage tank. The treated effluents are being further treated in the RO Plant of capacity 7 KL/hr. RO permeate is being recycled and RO rejects is being sent to MEE.

The industry has installed new Effluent Treatment Facility with mechanical vapor recompression system followed by salt generation system of 8 KL/hr capacity. The trial run of the new Effluent Treatment Facility is under progress

During inspection, no effluent discharges were observed outside the industry premises.

11. Air Pollution:

The industry is having Two Nos. of 4.0 TPH capacity boilers each and is using Biomass briquettes as a fuel to the boilers. The industry has provided dust collector to one boiler and bag filter to the another boiler as air pollution control equipment and provide common stack of height 30 mtrs.

The industry has provided Two Nos. of double stage scrubbers for control of process emissions and provided online PH meter with data logger. The industry provided online VOC analyzer and connected to APPCB & CPCB websites

The industry has provided Two Nos. of Continuous Ambient Air Quality Monitoring (CAAQM) stations to monitor Ambient Air Quality parameters such as Particulate Matter, SO₂ & NO_x and connected to APPCB website. **As per the monitoring data, there is no exceedance of standards were observed for the last six months as per norms stipulated.**

12. Solid Waste :

The industry is disposing ETP sludge & MEE salts to TSDf for land fill. The Spent carbon, Stripper distillate, mixed solvents, solvent residues & organic residues are hazardous wastes, which are disposing to cement plants for co-processing through preprocessor.

Action taken by the APPCB (Board):

Earlier, the industry was reviewed before the Task Force at Board Office, Vijayawada for non-compliance of the Board's directions and issued certain directions to the industry vide order dated 03.01.2017. The Board issued Stop production order to the industry on 18.08.2020 for non-compliance of CFO conditions. Subsequently, the Board office has issued revocation of Stop production order to the industry on 08.09.2020 duly stipulating certain directions for compliance.

Conclusions:

1. *The industry is not receiving water from outside agriculture bore wells and drawing water from their Two bore wells located within the premises.*
2. *No depletion of ground water and influence to the nearby agriculture bore wells were observed due to drawing of water by the industry from their bore wells located in the industry premises.*
3. *The committee contacted the petitioner Sri Vemuru Bhaskar Rao over telephone and he informed that at present they are getting sufficient water from their agriculture borewells due to the recent heavy rains in that area and the industry is not purchasing water from outside agricultural bore wells.*
4. *Provided Zero Liquid Discharge system for treatment of effluents and no effluent discharges were observed outside the industry premises.*
5. *As per the records, during last six months i.e. from July 2020 to December 2020, the industry manufactured 11 Nos. of consented products and the industry manufactured an average of 185.76 Kg/day against the permitted capacity of 395.29 Kgs/day. The production quantity was within the permitted capacity.*
6. *The industry has obtained Environmental Clearance from State level Environment Impact Assessment Authority (SEIAA), AP vide order dated 08.12.2020 for the expansion of the production capacity from 142.32 Tons per Annum to 500 Tons per Annum.*
7. *The industry obtained CFE & CFOs from the A.P. Pollution Control Board for manufacturing of bulk drugs under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981."*

4. We have considered the matter. No doubt from the above, it appears that the complainant has withdrawn on account of heavy rains and availability of water. However, withdrawal by the complainant does not absolve the statutory authorities of duty to ensure rule of law. The fact remains that the Bulk Drug Manufacturing Industry uses huge quantity

of water. The observation that the source of water is from the borewell in the premises itself and there are other compliances may require cross-checking. Further, conclusion that there is no depletion of ground water also needs to be independently verified. Regretfully, it appears that the report is not holistic. It has not been mentioned by the State PCB that compensation of Rs. 37.20 lacs has been required to be paid by the unit for violation of environmental norms by the State PCB itself which has been upheld by the South Bench of this Tribunal vide order dated 28.8.2020 in Appeal No. 21/2019. Further, as per media reports an incident is reported to have taken place in the premises of the unit on 11.5.2021 resulting in loss of lives possibly for violation of environmental norms which needs to be enquired into.¹

5. In these circumstances, we consider it necessary to require a fresh report from a joint Committee of the Regional Office, CPCB, Chief Inspector of Factories Andhra Pradesh, Member Secretary, State PCB and the District Magistrate, Nellore. The Report may provide compliance status of the Industry with respect to consents under the Water and the Air Acts, Authorisation under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and clearances under the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and the Chemical Accidents (Emergency planning, Preparedness and response) Rules, 1996. The Committee may also ascertain the extent of damage to the environment and individuals in the incident dated 11.5.2021 and remedial action taken in terms of compensation for restoration of the

¹ The New Indian Express dated 11.05.2021 titled "Three workers die after toxic gas leak in Nellore's chemical factory" <https://www.newindianexpress.com/states/andhra-pradesh/2021/may/11/three-workers-die-after-toxic-gas-leak-in-nellores-chemical-factory-2301185.html>.

The Hans India dated 11.05.2021 titled "Four died in gas leak incident at a Chemical factory in Nellore" <https://www.thehansindia.com/andhra-pradesh/four-die-in-gas-leak-incident-at-a-chemical-factory-in-nellore-685842>.

environment and to the victims. The Committee will be free to interact with the stake holders and visit the site and take assistance from such other expert/agency as required. CPCB will steer the proceedings which will be facilitated by the State PCB and the District Magistrate. It may give its report to this Tribunal within three months by e-mail at judicial-ngt@gov.in preferably in the form of searchable PDF/ OCR Support PDF and not in the form of Image PDF.

List for further consideration on 06.10.2021.

A copy of this order be forwarded to the Regional Office, CPCB, Chief Inspector of Factories, Andhra Pradesh, Member Secretary, State PCB and the District Magistrate, Nellore by e-mail for compliance.

Adarsh Kumar Goel, CP

Sudhir Agarwal, JM

M. Sathyanarayanan, JM

Brijesh Sethi, JM

Dr. Nagin Nanda, EM



True Copy

June 02, 2021
Original Application No. 144/2020
SN

Item No. 01

(Court No. 1)

**BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DEHI**

Review Application No. 03/2022 In
Original Application No. 144/2020
(I.A. No. 38/2022 & I.A. No. 39/2022)

Bhaskar Rao Vemuri

Applicant

Versus

State of Andhra Pradesh

Respondent

Venkata Narayana Active Ingredients Pvt. Ltd.

Review Applicant

Date of hearing: 17.02.2022

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE SUDHIR AGARWAL, JUDICIAL MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER**

IN CHAMBER BY CIRCULATION

ORDER

1. This application has been filed by M/s Venkata Narayana Active Ingredients Pvt Ltd., Nellore District, Andhra Pradesh the project proponent (PP) for review of order of this Tribunal dated 07.12.2021. Grounds of review are that the review applicant was not formally impleaded as party though its Advocate had entered appearance and argued the matter and had placed its version by way of IAs 226-228/2021 and that it does not have adequate financial capacity. We do not find any merit in the grounds of review for the reasons to be stated.
2. By the order sought to be reviewed, the Tribunal dealt with violation of environmental safety norms by the PP resulting in two fatal accidents

on 29.07.2020 and 11.05.2021, resulting in 5 deaths. The Tribunal constituted a joint Committee to ascertain status of compliance of consents under the Water and the Air Acts, Authorization under the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and clearances under the Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and the Chemical Accidents (Emergency planning, Preparedness and response) Rules, 1996 and extent of damage caused to environment and individuals.

Report of the Fact-finding Committee constituted by the Tribunal

3. The Committee gave its report on 04.10.2021 pointing out the violations and recommending compensation. It was found that there were no VOC sensors with alarm in the production block to alert the employees against high VOC concentration. There was no vapour absorption system to route the escaping vapours into the atmosphere. Safety guidelines were not being followed. Odour control measures were inadequate. There was lack of comprehensive standard operative procedure. Concluding remarks of the Committee are reproduced below for ready reference:-

“IX Concluding remarks

1. *Two major accidents occurred in M/s Venkata Narayana Active Ingredients Pvt Ltd on 29.07.2021 and 11.05.2021. During accident on 11.05.2021, three employees deceased due to thionyl chloride gas leakage.*
2. *There was no VOC sensor with alarm in the production block which could have alerted the employees of possibly high VOC concentration. There was no vapour absorption system/ suction system to route the escaping vapours/ gases into atmosphere through scrubber. Treating effluent in the reactor instead of ETP, lack of automation, Lack of comprehensive standard operating procedure, lack of training & ignorance of employees, not carrying out HARA and HAZOP study for neutralisation aqueous layer of Vildagliptin in reactor, absence of VOC sensors/ alarm system in the reactor to alert the personnel, lack of emergency preparedness are all the causes of accident. Immediate trigger was opening of atmospheric vent of reactor 0101*

instead of opening scrubber vent which resulted in sudden release of unreacted Thionyl Chloride gas from reactor 0101.

3. **The unit is continuing to operate at full capacity of 500 TPA. As per Inspectorate of Factories the unit is not complying with safety guidelines. The committee submits to Hon'ble NGT to direct Inspector of Factories to direct the unit to stop the operations and to safely shutdown the unit till the unit ensures compliance with revocation order issued by Inspector of Factories.**
4. **APPCB issued CFO- expansion to the unit for manufacture of 500 TPA of consented 35 products. APPCB shall ascertain the actual water consumption, wastewater generation, hazardous waste generation during full production. APPCB shall also assess the adequacy of ETP and air pollution control devices installed in the unit. The committee submits to Hon'ble NGT to direct APPCB to renew CFO only after ensuring that ETP and APCD's are adequate and working properly.**
5. **The committee constituted by the District Collector, SPSR Nellore district shall inspect the industry once in six months for minimum period of two years to verify the compliance status of the industry and to issue necessary directions as and when required.**
6. **The VOC values indicate that the odour control measures taken by the industry are inadequate and the industry need to take immediate measures to bring down the VOC levels to control odour nuisance to the surroundings."**

Finding in the order sought to be reviewed

4. Considering the above, the Tribunal found it necessary to require the industrial unit to pay compensation to the families to the deceased as well as for damage to the environment. Operative part of the order is reproduced below:-

"1to3....xxx.....xxx.....xxx"

4. **From the above, it is seen that apart from illegality in ground water extraction beyond permission, including not installing proper flow meter at MEE condensate, ETP outlet, RO feed, RO reject and RO permeate, in absence of which the effluent generation could not be ascertained, there are other violations - non working of online pH indicator, dumping of waste without segregation in violation of Hazardous Waste Management Rules, 2016. Further, there is violation of safety norms like proper training to regular and contract staff, providing solvent storage area and solvent recovery plant area,**

safety equipment, PPE kits, employing unskilled staff, absence of atmospheric vent pipe line of reactors to the scrubber system, working of ventilation in the production blocks, license from the Factories Department, transfer of solvents using closed conveyance, color coding and flow directions to the pipelines, steam cut of wall, raw material shed, dump tank at the outlet, absence of dedicated stainless steel pipes for transfer of solvents, absence of means of access west side of old production block, absence of earth continuity jumpers to the flanges of the all solvent carrying pipelines, SOPs not displayed, safety committee meetings minutes not drawn up, working hours not displayed nor approved by the Inspector of Factories.

5. Such failures have resulted in two fatal incidents on 29.07.2020 in which two workers died and two received burn injuries and incident dated 11.05.2021 wherein three employees died due to inhalation of thionyl chloride gas and other three other were affected. The District Magistrate conducted an enquiry about the first incident and concluded that procedures followed by the management were not safe. State PCB issued directions on 29.07.2020 to stop operations of the unit. The unit offered compensation to the families of the deceased victims of incident dated 29.07.2020. The said incident was also on account of failure of the unit to adopt safety norms. The unit has paid compensation of Rs. 10 Lakh each to the families of the deceased. Further Compensation of Rs. 40 lakh each has been announced but not yet paid. Additional compensation proposed to be paid to the family members of the deceased is as follows:

- 1. Late Sh. P. Thirupataiah Rs. 30.00 lacs*
- 2. Late Sh. V Thirupataiah Rs. 30.00 lacs*
- 3. Late Sh. Bellamkonda Srinu Rs. 40,55,240/-*

6. In pursuance of order dated 28.08.2020 in Appeal No. 21 of 2019 the unit has paid environmental compensation of Rs. 37.20 lacs to the CPCB. The Committee has assessed additional compensation of Rs. 73,50,000/- for damage to the environment. The Committee has concluded that the measures taken by the unit were not adequate.

7. The industrial unit in question has filed I.A No. 226, 227 and 228 of 2021 for impleadment, directions and exemptions from filing fair copies of the documents. The stand in the said applications is that compensation for damage to the environment needs to be reduced and the two incidents resulting in death of the workers are due to human error. The unit has now taken steps for compliance.

8. Principles for determining environmental compensation are well known and are based on restitution principle with deterrent element, as per financial capacity of the unit. While

floor level compensation may be calculated on adhoc basis using rule of thumb, the same cannot have universal application, without considering the cost of remediation and financial capacity of the unit. In this regard, reference is made to law laid down in MC Mehta v. Union of India, (1987)1 SCC 395, pr 31, Indian Council for Enviro Legal Action Sterlite Industries (India) Ltd. v. Union of India (1996) 3 SCC 212 Pr 12,13,60,67, Uphaar Cinema, (2011) 14 SCC 481 Pr 101-108, Strerlite (2013) 4 SCC 575, pr 45-47, Goel Ganga Developers v. Union of India & Ors. (2018) 18 SCC 257 and MC Mehta, (2018) 18 SCC 397, pr 134. In the present case, the Committee has found serious violations resulting in damage to the environment spread over for long period. There is still failure to take remedial measures. There is loss of five lives within one year, apart from injuries to others. The turnover of the unit is 150 crores, as shown from the document filed by the unit itself (page 360 of the paper book), which is insurance policy dated 10.08.2021 issued by the Future Generali. Premium for the insurance policy is Rs. 1,04, 13, 307/- from 01.07.2021 to 30.06.2022. Having regard to serious continuous violations and financial capacity of the unit, compensation has to be atleast 5% of the annual turnover i.e. 7.5 crore, under the head of loss to the environment. We assess the same accordingly. There is no scope of reduction of compensation as sought. The compensation already assessed under the said head may be excluded from the said amount. The amount may be deposited by the unit with the State PCB within three months, failing which State PCB may take coercive measures, including closure of the unit, till compliance by disconnecting the electricity. The amount may be utilized for restoration/improvement of the environment in the area by preparing an action plan by a five-member expert committee comprising of MoEF&CC, CPCB, State PCB, Prof. P. Jagannadha Rao, Dept. of Chemical Engineering, Andhra University, Vishakhapatnam and District Magistrate, Nellore with State PCB as the nodal agency for coordination and compliance. The execution of the action plan may also be overseen by the same Committee through an appropriate agency. The Committee may meet within two weeks, verify remedial steps taken to prevent any future incident compliance of environmental norms, including those claimed by the unit. The Committee may interact with the stake holders, including the management, staff and representatives of public. Proceedings may be conducted online, whenever considered necessary, except the site visit. Execution may be completed as far as possible within six months. Proposed compensation may be paid to the victims as early as possible.”

Plea of Review Applicant

5. We have perused the review application. As stated earlier in para 1 above, the applicant has stated that its turnover has dropped for the last two years due to Covid – 19 and it was not heard. The compensation is

excessive. The Principal Bench has no territorial jurisdiction to deal with violations taking place in Andhra.

Reasons and finding

6. We do not find any merit in the Review Application. The review applicant has not disputed the violations found by the Committee to environment safety norms. Once it is so, the review applicant is governed by principle of Absolute Liability and when harm is caused to human lives and to the environment, its liability remains undisputed. It is further undisputed that the review applicant was duly associated by the joint Committee in terms of order of the Tribunal dated 02.06.2021. Though formal notice may not have been given, the Applicant did enter appearance through counsel S. Bhartari, as shown by the order itself and placed its version and documents on record by way of IAs 226-228/2021 which were duly considered and dealt with as shown by the para 7 of the order. There is thus no violation of principles of natural justice which govern the proceedings. The turnover figure has been taken from the documents of the review applicant itself i.e. the insurance policy dated 10.08.2021 which remains undisputed. Contentions in the review application that Principal Bench has no territorial jurisdiction is also untenable in view of National Green Tribunal (Practices and Procedure) Rules, 2011. Distribution of business among the ordinary place or places of sitting of the Tribunal is in the purview of the Chairperson. There is no bar to Principal Bench considering an issue in respect of ordinary territorial jurisdiction of any other Bench. If the plea of the review applicant is to be accepted, the environmental violations, even resulting in loss of lives and damage to the environment will remain unaddressed, contrary to the object of constitution of this Tribunal mentioned in the Preamble to the National

Green Tribunal Act, 2010 to achieve Sustainable Development and enforcement of legal rights relating to environment and matters connected thereto, in pursuance of decision of the UN Conference at Stockholm and at Rio De Janeiro.

In view of the above, we do not find any merit in the review application which is dismissed. All pending I.A.s/ M.A.s also stand disposed of.

Adarsh Kumar Goel, CP

True Copy



Sudhir Agarwal, JM

Dr. Nagin Nanda, EM

February 17, 2022
Review Application No. 03/2022 In
Original Application No. 144/2020
(I.A. No. 38/2022 & I.A. No. 39/2022)
A

CAD.6850/2022

1

ITEM NO.16

COURT NO.4

SECTION XVII

S U P R E M E C O U R T O F I N D I A
R E C O R D O F P R O C E E D I N G S

CIVIL APPEAL Diary No.6850/2022

(Arising out of impugned final judgment and order dated 07-12-2021 in OA No.144/2020 17-02-2022 in RA No.03/2022 passed by the National Green Tribunal)

VENKATA NARAYANA ACTIVE INGREDIENTS PVT. LTD. Petitioner(s)

VERSUS

THE STATE OF ANDHRA PRADESH & ORS. Respondent(s)

(With appln.(s) for IA No.32436/2022-EXEMPTION FROM FILING C/C OF THE IMPUGNED JUDGMENT and IA No.32437/2022-EX-PARTE STAY and IA No.32434/2022-PERMISSION TO FILE APPEAL and IA No.32439/2022-PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES)

Date : 09-03-2022 This appeal was called on for hearing today.

CORAM :

HON'BLE DR. JUSTICE D.Y. CHANDRACHUD
HON'BLE MR. JUSTICE SURYA KANT
HON'BLE MR. JUSTICE VIKRAM NATH

For Petitioner(s) Mr. K.V. Vishwanathan, Sr. Adv.
 Mr. Vishnu Mohan, Adv.
 Mr. Ravi Raghunath, Adv.
 Ms. Aakash Lodha, Adv.
 Mr. Sanyat Lodha, AOR

For Respondent(s)

UPON hearing the counsel the Court made the following
O R D E R

1 Permission to file the appeal is granted.

CAD.6850/2022

2

- 2 Mr K V Vishwanathan, learned senior counsel appearing on behalf of the appellant submits that:
- (i) A Joint Committee was appointed by the National Green Tribunal¹ on 2 June 2021;
 - (ii) The Joint Committee did not hear the objections of the appellant or its claim of compliance with environmental requirements before a report was submitted on 4 October 2021, though an inspection of the premises was carried out;
 - (iii) The Joint Committee recommended environmental compensation in the amount of Rs 73.50 lakhs;
 - (iv) The appellant had submitted a tabulated chart of objections to the report of the Joint Committee before the NGT;
 - (v) The objections of the appellant have not been considered by the NGT;
 - (vi) The penalty of Rs 73.50 lakhs which was proposed by the Joint Committee (on which the appellant had independent objections) has been enhanced to Rs 7.50 crores purely on the basis of the turnover of the appellant as set out in the insurance form without any cogent reasoning or rationale.
- 2 As regards the compensation payable to the heirs of the deceased workmen/employees, the appellant undertakes to pay over the compensation and disbursement is awaiting the production of heirship certificates.
- 3 Issue notice, returnable in eight weeks.
- 4 Dasti, in addition, is permitted.

1 "NGT"

CAD.6850/2022

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- 5 In the meantime, there shall be a stay of the direction of the NGT in the impugned order dated 7 December 2021 insofar as the deposit of the compensation of Rs 7.50 crores is concerned. Consequently, no coercive steps shall be taken against the appellant on the basis of the direction for the deposit of the compensation of Rs 7.50 crores.
- 6 The issue as to whether the appellant should deposit any part of the compensation of Rs 73.50 lakhs at this stage, shall be considered on the next date of listing.
- 7 List the Civil Appeals on 11 May 2022.

(CHETAN KUMAR)
A.R. -cum-P.S.

(SAROJ KUMARI GAUR)
Court Master

True Copy





**ANDHRA PRADESH POLLUTION CONTROL BOARD
REGIONAL OFFICE: NELLORE**

1st Floor, A.P.S.F.C BUILDING, A.K.NAGAR, NELLORE - 524 004

M. Pramod Kumar Reddy
ENVIRONMENTAL ENGINEER

e-mail: ronlr-ee1@appcb.gov.in
Phone : +91- 861- 2329730

Notice. No. N- 686 /PCB/RO-NLR/2020- 105

Date: 30.05.2020

SHOW CAUSE NOTICE

By RPAD

Sub :- APPCB-RO, Nellore – M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd,) Sy. No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District – Non compliance of the conditions stipulated by the Board - **SHOW CAUSE NOTICE Issued** – Reg.

- Ref :-
1. EC Order No.J-11011/1313/2007-IA.II(I) Dt.02.02.2009 issued by MoEF&CC, GOI (Expansion of Bulk drugs unit from 60.72 TPA to 142.32 TPA)
 2. CFO Order No. APPCB/VJA/NLR/10725/HO/CFO/2018 Dt.14.12.2018, which is valid up to 31.03.2021.
 3. T.O. Notice No: N-686PCB/RO-NLR/2019-648 dt.06.08.2019
 4. T.O. Notice No: N-686PCB/RO-NLR/2019-1300 dt.26.11.2019
 5. Board officials inspection on 29.05.2020

WHEREAS you are operating a bulk drug industry at Sy. No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District in the name and style of M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd).

WHEREAS the Board has issued Consent for Operation (CFO) to your industry which is valid up to 31.03.2021, subject to compliance of conditions stipulated therein.

WHEREAS this office has issued notice to your industry for non-compliance of Board CFO Conditions vide notices dated.06.08.2019 & 26.11.2019.

WHEREAS the Board has received complaints from the villagers of Chandrapadia & Dhubagunta regarding odour nuisance and causing health problems.

WHEREAS the Board officials have inspected the industry on 29.05.2020 and observed the following non-compliance:-

1. A new production block of 5 stairs building was constructed towards North Side of the existing production block as a part of under expansion.
2. Installation of 12 nos of reactors of 7 to 10 KL , 3 nos of ATFD , 3 nos of Centrifuges and the machinery erection works are in full- swing as a part of under expansion without obtaining EC from MoEF &C, GoI and CFE from APPCB.
3. Erection works pertaining to new Utilities block and Clean room with 2 nos of SS reactors are under final stage which are as a part of expansion project.

4. 8 nos of new solvent storage tanks of about 20 KL capacity installed and provision made for installation of additional storage tanks.
5. Established solar power plant of 0.9MW at the industry premises.
6. The industry has stored raw material containing drums openly.
7. Mixed liquid solvents containing drums were stored beside the production blocks openly.
8. About 200 nos of Solvent residue drums were stored West side of the industry and spillages were observed from the drums, thereby violating consent condition 18 of schedule-B of the CFO order dt 14.12.2018.
9. Odour nuisance was observed around the industry premises thereby violating consent condition 13 of schedule-B of the CFO order dt. 14.12.2018.
10. The industry has operating new Boiler of 4 TPH capacity without obtaining CFO of the Board, which was installed in place of existing boiler of 3.0 TPH capacity in addition to the consented 4.0 TPH Boiler.
11. Bag filter was not provided to the 4TPH boiler thereby violating consent condition 19 of schedule-B of the CFO order dt 14.12.2018. Thick smoke was observed from the 4 TPH Boiler.
12. The MEE salts were stored in HDPE bags were kept openly towards south side of the industry. Leachate was observed from the bags.
13. The industry has not provided auto recording facility to the pH meter provided to the Scrubber.
14. The VOC meter provided by the industry is not in operation.
15. The Ammonia cylinder stored openly without any precautionary measures and loading the gas into the reactors.
16. During the inspection, Board officials have contacted the villagers of Chandrapadiya, Dhubagunta and they have informed that they are facing severe smell nuisance during night times which is unbearable and also getting eye irritation.

WHEREAS as per the above observations, it is clearly evident that your industry is carrying construction and erection of new machinery pertaining to expansion of the industry without obtaining EC from Ministry of Environment, Forest & Climate Change, Govt. of India and Consent for Establishment from the Board.

WHEREAS your industry is not complying with the consent conditions of the Board.

In view of the above, you are hereby **directed to immediately stop construction and erection works of the new machinery pertaining to the expansion of your industry** and report the compliance with photographic evidence to this office **within 3 days** from the date of receipt of this notice. Should you fail to comply with the above and / or failed to furnish your reply within time, the Board will be constrained to initiate further action against your unit under Section 33 (A) of Water (Prevention & Control of Pollution) Act, 1974 & amendments and under Section 31 (A) of the Air (Prevention & Control of Pollution) Act, 1981 & amendments thereof for non compliance of the Board directions & consent conditions and in the interest of safe guarding Public Health & Environment.


ENVIRONMENTAL ENGINEER

To
M/s. Venkata Narayana Active Ingredients Private Limited
(formerly M/s. Nutra Specialties Pvt. Ltd.),
Sy. No.69, Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District.



ANDHRA PRADESH POLLUTION CONTROL BOARD
REGIONAL OFFICE :: NELLORE

Lr.No.N-686/PCB/RO-NLR/2020- 106

Dt. 30.05.2020

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

Sir,

Sub: APPCB- RO, Nellore – M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd.,) Sy. No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District – Undertaking of Expansion activities of the industry without EC of MoEF &CC and CFE of APPCB - Non compliance of Board conditions- Submission of inspection report – Action requested -Reg.

- Ref:**
1. EC Order No. J-11011/1313/2007-IA.II(I) Dt.02.02.2009 issued by MoEF&CC, GOI (Expansion of Bulk drugs unit from 60.72 TPA to 142.32 TPA)
 2. CFO Order No. APPCB/VJA/NLR/10725/HO/CFO/2018 Dt.14.12.2018, which is valid up to 31.03.2021.
 3. T.O. Notice No. N- /PCB/RO-NLR/2019-648 dt.06.08.2019.
 4. T.O. Lr. No. N-686/ PCB/RO/NLR/2019-710 dt.20.08.2019
 5. Board officials inspection dated.29.05.2020.
 6. T.O. Notice No. N-686/PCB/RO-NLR/2020 - 105 dated.30.05.2020.

It is to submit that M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd.,) is operating a bulk drugs manufacturing industry at Sy.No.69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District.

The MoEF & CC, GoI has issued Environmental clearance to M/s. Nutra Specialties Pvt. Ltd on 02.02.2009 for expansion of the production capacity of the industry from 60.72 TPA to 142.32 TPA. The Board has issued CFE to the industry for change of product mix vide order dt.17.09.2018 and CFO vide order dt.14.12.2018, which is valid up to 31.03.2021 for the production capacity of 395.25 Kgs/day or 142.32 Tons per Annum. Copy of CFO order enclosed.

Subsequently, the industry obtained CFE for change of product mix to produce products by arranging in two different Groups (Group A & Group B). The Group A will remain same with existing 35 products and in Group B, 12 products will be existing products and added three more products without any increase in overall consented production capacity of 395.29 Kgs/day or 142.32 TPA. The industry will produce any one group either Group A and Group B. Copy of CFE order is herewith enclosed for kind perusal.

Water consumption & Waste water generation:

Source	Water Consumption (In KLD)	Waste water generation (In KLD)
Process	13.80 KLD	14.23 KLD (HTDS)
Cooling	100 KLD	46.8 KLD (LTDS)
Boiler	42 KLD	
Domestic	6.0 KLD	6.0 KLD
Gardening	10 KLD	---

The industry has constructed ETP consists of collection tank, equalization tank, flash mixer, aeration tank, secondary settling tank, sand filter, UV purifier, sludge tank, filter press for treating the waste water (MEE condensate & LTDS effluents) before sending to RO plant. Then RO rejects along with HTDS effluents are sending to MEE followed by ATFD to meet ZLD. The industry is operating two strippers of capacity 1 KL/hr each to recover solvents from the effluents. The RO permeate utilized for cooling tower make up & green belt development and RO rejects sending to MEE.

The industry generates ETP sludge & MEE salts which are disposing to TSDF for land fill. The Spent carbon, Stripper distillate, mixed solvents, solvent residues & organic residues as hazardous wastes which are disposing to Cement plants for co-processing.

Earlier, the Board officials have inspected the industry on 01.08.2019 & 02.08.2019 in connection with the public complaints received from the villagers of Chandrapadiya on odour nuisance. During inspection, installation of new equipments, boiler and non-compliance were observed and issued a notice to the industry on 06.08.2019. Subsequently, this office has requested the Head office, Vijayawada to initiate necessary action against the industry after reviewing in the Task force committee meeting in view of the non-compliance to the Board stipulated conditions vide T.O.Lr.dated.20.08.2019. Copies of the notice & report are herewith enclosed.

The Central Pollution Control Board (CPCB) has issued directions under section 5 of the E(P) Act, 1986 to close down operation of the industry with immediate effect until to install online effluent monitoring systems for effluent outlets (flow meter & web cameras) for Zero Liquid Discharge units vide Lr. No.B-29016/04/06/PC1-1/7063 dated 27.07.2016.

The CPCB vide letter dated 09.04.2019 has issued directions to M/s. Venkatanarayana Active Ingredients Private Limited (formerly Nutra Specialties Pvt. Ltd.) to pay Rs.85.5 lakhs towards Environmental compensation charges for non-compliance period from 24th August 2016 to 4th June 2017 for operating the industry during in force of close down operation directions issued by CPCB vide letter dated 27.07.2016. Subsequently, the industry has requested the CPCB the present proceeding for levying the Environmental Compensation of Rs.85.50 lakhs initiated vide CPCB notice dated 09.04.2019 may be dropped pursuant to the pending proceedings of OA No.256/2017 before the Hon'ble NGT, Chennai vide letter dated 27.04.2019.

The Central Pollution Control Board (CPCB) vide its notice dated.11.11.2019 has issued revised Environmental Compensation charges of Rs.37.20 Lakhs to be paid to CPCB. Later, the industry has filed a case before the Hon'ble National Green Tribunal (NGT), SZ, Chennai vide Appeal No.21/2019. As per the Hon'ble NGT directions, the industry has deposited an amount of Rs.18.60 Lakhs (being 50 %of the Environmental Compensation) to CPCB subjected to the final outcome of the said appeal. The case is pending.

The Board officials again inspected the industry on 29.05.2020 in view of the public complaints on odour nuisance from nearby villagers. The following observations recorded:

- The industry has operating new Boiler of 4 TPH capacity without obtaining CFO of the Board, which was installed in place of existing boiler of 3.0 TPH capacity in addition to the consented 4.0 TPH Boiler.
- A new production block of 5 stairs building was constructed towards North Side of the existing production block as a part of the expansion.
- Undertaken Installation of 12 Nos of reactors of 7 to 10 KL, 3 Nos of ATFD, 3 Nos of Centrifuges and the machinery erection works are in full- swing as a part of the expansion without obtaining EC from MoEF &C, Gol and CFE from APPCB.
- Erection works pertaining to new Utilities block and Clean room with 2 nos of SS reactors are under final stage which are as a part of the expansion project.
- 8 Nos of new solvent storage tanks of about 20 KL capacity installed and provision made for installation of additional storage tanks.
- Established solar power plant of 0.9MW at the industry premises.

During inspection, it was also observed the following:

- The industry has stocked raw material containing drums openly.
- Mixed liquid solvents containing drums are stored beside the production blocks openly.
- About 200 nos of Solvent residue drums are stored West side of the industry and spillages are observed from the drums, thereby violating consent condition 18 of schedule-B of the CFO order dt 14.12.2018.
- Odour nuisance was observed around the industry premises thereby violating consent condition 13 of schedule-B of the CFO order dt. 14.12.2018.
- Bag filter was not provided to the existing 4TPH boiler thereby violating consent condition 19 of schedule-B of the CFO order dt 14.12.2018. Dense smoke was observed from the 4 TPH Boiler.
- The MEE salts were stored in HDPE bags and are kept openly towards south side of the industry. Leachate was observed from the bags.
- The industry has not provided auto recording facility to the pH meter provided to the Scrubber.
- The VOC meter provided by the industry is not in operation.

- The Ammonia cylinder stored openly without any precautionary measures and loading the gas into the reactors indiscriminate manner.
- The Bio briquettes which is a fuel for the boilers is fully stored (about 100 Tons) in the boiler shed which may lead fire hazard.

The above observations are clearly indicating that the industry is carrying erection works pertaining to expansion of the existing industry without obtaining Environmental Clearance (EC) from MoEF&CC, GoI and without CFE of the Board and also not complying the conditions / directions issued by the Board.

The representative of the industry has informed that they have applied for EC for expansion of the existing industry from 142.32 Tons per annum to 500 Tons per annum. The MoEF&CC, GoI, New Delhi has issued TOR to the industry on 16.09.2019. He also informed that as per MoEF&CC, GoI letter F.No.22-25/2020-IA. III dated.15.05.2020 they have applied for EC to SEIAA, AP for expansion under B2 category project which is under process.

The industry has submitted a Bank Guarantee of Rs.8.0 Lakhs towards compliance on the conditions stipulated by the Board vide CFO order dated.14.12.2018. The BG is valid upto 23.10.2020.

During the inspection, the Board officials have contacted the villagers of Chandrapadiya, Dhubagunta and they have informed that now they are facing severe smell nuisance during night times and getting unbearable smell and also eye irritation. The Chandrapadiya village is the nearest habitation to the industry which is located at a distance of about 300 mtrs towards North Side.

This office has issued a show cause notice to the industry for continuous non-compliance observed and new construction works being taken up by the industry under expansion project without obtaining EC from MoEF&CC, GoI & CFE of the Board vide T.O. notice dated.30.05.2020. Copy enclosed herewith.

Hence, it is requested the Board to initiate necessary action against the industry as the industry has been undertaken the expansion works such the installation of new production block, equipments, solvent storages etc without obtaining Environmental Clearance (EC) from MoEF&CC, GoI and CFE from the Board and also non-compliance of the CFO conditions of the Board.


Signature of the Inspecting Officer
AEE, RO: Nellore

In view of the above, it is requested the Board to initiate necessary action against the industry, as the industry has undertaken the expansion project works such as installation of new production block, equipments, solvent storages etc without obtaining Environmental Clearance (EC) from MoEF&CC, Gol and CFE from the Board. Further, it is also requested the Board to address a letter to SEIAA, A.P to consider this case as violation case since the industry has already undertaken expansion project works without EC and also to review on applicability of undertaking of huge expansion in view of the proximity of Chandrapadiya village existing at a distance of about 300 mtrs from the industry.

Submitted for favour of information and necessary action.

Yours faithfully,

Encl: A/a


ENVIRONMENTAL ENGINEER

Copy submitted to the JCEE (Unit-III), EC section, APPCB Board office, Vijayawada for favour of information and for taking necessary action.

Copy submitted to the JCEE (Unit-II), APPCB Board office, Vijayawada for favour of information and taking further necessary action.



Reactor and ATFD in the Clean room



Ammonia filling to the Reactor



Spent Solvent Storage Drums



Spent Solvent Storage Drums



Spent Solvent Storage Drums



Spent Solvent Storage Drums



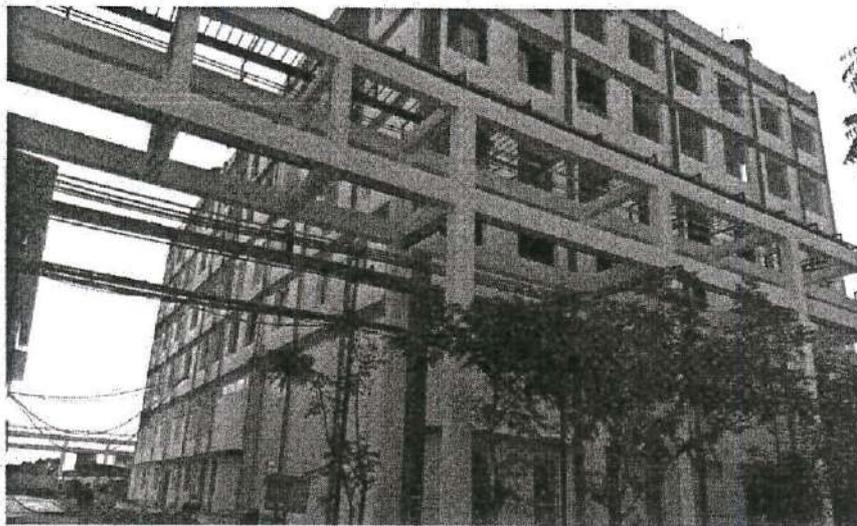
New Solvent Storage tanks



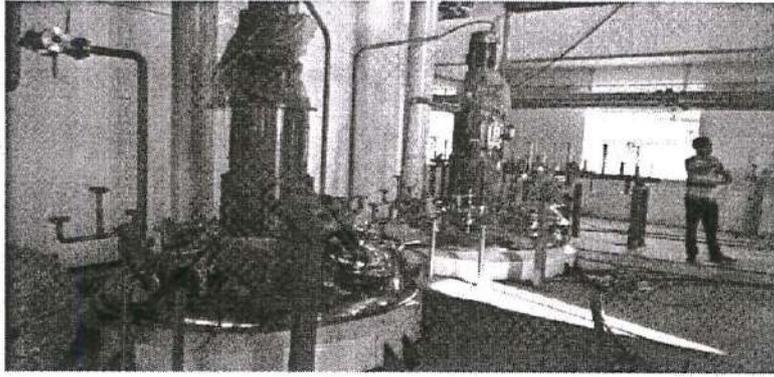
Installation of New Reactors



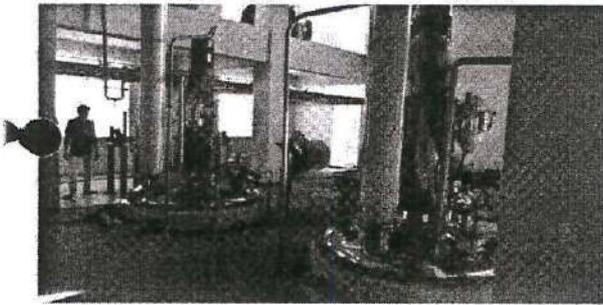
Installation of New reactors



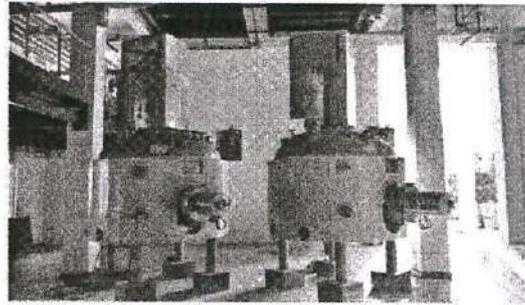
New Production block



Process reactors in the new production block



Process reactors in the new production block



Centrifuges in New production block



New Boiler of 4.0 TPH capacity

True Copy



Venkata Narayana Active Ingredients Private Limited
(Formerly Nutra Specialities Private Limited)

Date: 30.06.2020

To
The Environmental Engineer,
Pollution Control Board,
SPSR-Nellore,
Andhra Pradesh

Sir,

Sub: Hazardous waste disposal details of M/s. Venkata Narayana Active Ingredients Private Limited-Reg.

As per PCB-Nellore officials inspected our factory on 15.06.2020 and instructed to submit the Hazardous waste disposal details.

With reference to the above we are submitting the Hazardous waste disposal details from January-2019 to May-2020.

As per the above, Hazardous waste (Organic and Inorganic waste) disposal quantity an average 88.64 tons per month (As per CFO limit is 86 tons per month) only.

The disposed organic waste average quantity is 78.56 tons per month instead of 58.728 tones and Inorganic waste 10.08 tons per month instead of 27.254 tones as per CFO.

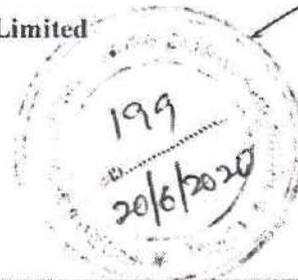
There is increasing in organic waste quantity only than the CFO limits. Due to plant shut down for maintenance works and while customer audit times we have cleaned the all equipment's with different solvents, due to this excess quantity of mixed spent waste generated.

In this regards, kindly excuse and consider the little extra quantity of organic waste disposal due to equipment's cleanings.

Enclosers: Hazardous Waste disposal details and manifest photocopies.

Thanking You,
Yours faithfully,
M/s. Venkata Narayana Active Ingredients Private Limited
(For M/s. Nutra Specialities Private Limited)

Dr. S. Ramakrishna Reddy
(Director)



Regd. Office : Venkata Narayana Towers, 3rd Floor, New No.60, Old No.35, Venkatanarayana Road, T.Nagar, Chennai - 600017. Tamil Nadu. Phone : +91-44-42984141.

Factory : Sy. No.69, Chandrapadiya Village, Vinjamur Mandal, S.P.S.R. Nellore District - 524 228. Andhra Pradesh. Phone : +91-8627-300100

Web: www.vnai.in / CIN: U24231TN2005PTC057504

Hazardous Waste Disposal Data (01.01.2019 to 31.05.2020)								
S.No	Date of Disposal	Manifest No.	Name of the hazardous waste	Quantity (MT)	Vehicle No.	Name of the Transporter	Disposed to	Remarks
1	08-01-2019	80	Organic Waste	25.94	AP37 TA3949	Sun Eco Services	JSW Cements	-
2	25-01-2019	82	Organic Waste	26.175	AP27 TU4599	Sun Eco Services	Zuari Cements	-
3	15-02-2019	83	Organic Waste	21.27	AP37 TA3949	Sun Eco Services	JSW Cements	-
4	24-02-2019	64	Inorganic Waste	21.725	AP07 TJ2677	Ramky Transport	CWMP	-
5	27-03-2019	86	Organic Waste	23.1	AP21 TY7227	Sreenivasa Enterprises	JSW Cements	-
6	05-04-2019	75	Organic Waste	18.1	AP26 TA3737	Sreenivasa Enterprises	JSW Cements	-
7	11-05-2019	17	Inorganic Waste	19.7	AP07 TJ2677	Ramky Transport	CWMP	-
8	05-06-2019	27	Organic waste	25.72	AP21 TE2198	Sreenivasa Enterprises	JSW Cements	-
9	16-07-2019	35	Organic waste	26.135	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
10	21-07-2019	88	Organic waste	22.58	AP37 TA0469	Sun Eco Services	Zuari Cements	-
11	13-08-2019	505	Inorganic waste	20.335	AP07 TJ2677	Ramky Transport	CWMP	-
12	06-09-2019	121	Organic waste	22.775	AP37 TA2269	Sun Eco Services	Zuari Cements	-
13	09-09-2019	127	Organic waste	24.475	AP37 TA0469	Sun Eco Services	Zuari Cements	-
14	16-09-2019	128	Organic Residue	22.94	AP16 TB4289	Sun Eco Services	Zuari Cements	-
15	23-09-2019	125	Organic waste	22.5	AP31 TB3565	RRS services	JSW Cements	-
16	28-09-2019	130	Organic waste	23.98	AP31 TB3565	RRS services	JSW Cements	-
17	04-10-2019	658	Inorganic Salts	25.835	AP07 TJ1623	Ramky Transport	CWMP	-
18	08-10-2019	136	Organic waste	23.98	AP31 TB3565	RRS services	JSW Cements	-
19	14-10-2019	130	Organic Waste	23.11	AP35 V4455	Sun Eco Services	Zuari Cements	-
20	18-10-2019	140	Organic Waste	21.08	AP28 TA6026	Sun Eco Services	Zuari Cements	-
21	24-10-2019	141	Organic Waste	23.505	AP28 TB8595	Sun Eco Services	Zuari Cements	-
22	02-11-2019	142	Organic Waste	24.835	KA02 AA9315	Sun Eco Services	Zuari Cements	-
23	08-11-2019	144	Organic waste	19.045	AP21 X0234	Sreenivasa Enterprises	JSW Cements	-
24	20-11-2019	151	Organic waste	23.46	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
25	28-11-2019	153	Mixed Spent	25.67	AP37 TF 1125	GM Eco Services	GM Eco Services	-
26	30-11-2019	154	Organic waste	20.655	AP16 TC0339	Sun Eco Services	Zuari Cements	-
27	01-12-2019	152	Organic waste	18.49	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
28	01-12-2019	12	Organic Waste	25.715	AP37 TF1125	GM Eco Services	GM Eco Services	-
29	04-12-2019	155	Organic Waste	22.68	AP28 TB8595	Sun Eco Services	Zuari Cements	-
30	05-12-2019	156	Mixed Spent	23.5	AP37 TF1125	GM Eco Services	GM Eco Services	-
31	17-12-2019	887	Inorganic Residue	24.925	AP07 TJ1623	Ramky Transport	CWMP	-
32	24-12-2019	159	Organic Waste	26.17	KA02 AA9054	Sun Eco Services	Zuari Cements	-

33	24-12-2019	170	Mixed Spent	25.97	AP37 TF1125	GM Eco Services	GM Eco Services	-
34	24-12-2019	160	Organic waste	25.72	AP27 TU4599	Sun Eco Services	JSW Cements	-
35	27-12-2019	893	Inorganic Residue	22.42	AP07 TJ1623	Ramky Transport	CWMP	-
36	30-12-2019	162	Organic Residue	23.8	AP16 TC8609	Sun Eco Services	Zuari Cements	-
37	03-01-2020	165	Mixed Spent	25.325	AP37 TF1125	GM Eco Services	GM Eco Services	-
38	10-01-2020	169	Mixed Spent	25.095	AP37 TF1126	GM Eco Services	GM Eco Services	-
39	28-01-2020	176	Organic Waste	29.18	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
40	30-01-2020	182	Organic Residue	23.04	AP31 TB3565	RRS services	JSW Cements	-
41	03-02-2020	187	Mixed Spent	25.555	AP37 TF1125	GM Eco Services	GM Eco Services	-
42	03-02-2020	189	Organic Waste	25.035	AP27 X5025	Sun Eco Services	Zuari Cements	-
43	05-02-2020	79	Organic Waste	29.725	AP07 TF3610	Sun Eco Services	Zuari Cements	-
44	08-02-2020	90	Organic Waste	31.4	AP07 TF3610	Sun Eco Services	Zuari Cements	-
45	08-02-2020	91	Organic Waste	25.015	AP37 TA3949	Sun Eco Services	Zuari Cements	-
46	18-02-2020	81	Organic Waste	22.4	AP28 TA6026	Sun Eco Services	Zuari Cements	-
47	25-02-2020	84	Organic Waste	23.715	AP35 V4455	Sun Eco Services	Zuari Cements	-
48	25-02-2020	1059	Inorganic Waste	17.12	AP27 W6586	Ramky Transport	CWMP	-
49	02-03-2020	105	Organic Waste	23.81	AP31 TB3565	RRS services	JSW Cements	-
50	02-03-2020	86	Organic Waste	24.645	AP16 TD3436	Mohan priya Transports	Zuari Cements	-
51	03-03-2020	87	Organic Waste	28.875	AP16 TJ1737	Sun Eco Services	Zuari Cements	-
52	06-03-2020	255	Mixed Spent	24.755	TS08 UF4536	GM Eco Services	GM Eco Services	-
53	09-03-2020	88	Organic Waste	25.315	AP16 TD3436	Mohan priya Transports	Zuari Cements	-
54	11-03-2020	89	Organic waste	19.97	AP35V 4455	Sun Eco Services	Zuari Cements	-
55	13-03-2020	107	Organic waste	24.735	AP31 TB3565	RRS services	JSW Cements	-
56	13-03-2020	108	Organic waste	19.935	AP27 TA2233	Sun Eco Services	Orient Cements	-
57	17-03-2020	109	Organic waste	28.865	AP21 TY5917	Srinivasa Enterprises	JSW Cements	-
58	19-03-2020	265	Organic Waste	25.98	TS08 UF4536	GM Eco Services	GM Eco Services	-
59	27-04-2020	114	Mixed Spent	29.39	AP39 TF1116	GM Eco Services	GM Eco Services	-
60	11-05-2020	2696	Organic Waste	21.82	AP16 TB4289	Sun Corporation	Zuari Cements	-
61	12-05-2020	2736	Inorganic Waste	19.24	AP07 TJ2677	Ramky Transport	CWMP	-
62	21-05-2020	3021	Organic Residue	29.96	AP07 TF3610	Sun Corporation	Zuari Cements	-
63	26-05-2020	120	Organic Waste	19.095	AP04 X8812	GM Eco Services	GM Eco Services	-
Total (MT)				1506.95				
Avg Per Month				88.64				

Andhra Pradesh Pollution Control Board

 20/6/2020

Hazardous Waste Disposal To CWMP (01.01.2019 to 31.05.2020)								
S.No	Date of Disposal	Manifest No.	Name of the hazardous waste	Quantity (MT)	Vehicle No.	Name of the Transporter	Disposed to	Remarks
1	24-02-2019	64	Inorganic Waste	21.725	AP07 TJ2677	Ramky Transport	CWMP	-
2	11-05-2019	17	Inorganic Waste	19.7	AP07 TJ2677	Ramky Transport	CWMP	-
3	13-08-2019	505	Inorganic waste	20.335	AP07 TJ2677	Ramky Transport	CWMP	-
4	04-10-2019	658	Inorganic Salts	25.835	AP07 TJ1623	Ramky Transport	CWMP	-
5	17-12-2019	887	Inorganic Residue	24.925	AP07 TJ1623	Ramky Transport	CWMP	-
6	27-12-2019	893	Inorganic Residue	22.42	AP07 TJ1623	Ramky Transport	CWMP	-
7	25-02-2020	1059	Inorganic Waste	17.12	AP27 W6586	Ramky Transport	CWMP	-
8	12-05-2020	2736	Inorganic Waste	19.24	AP07 TJ2677	Ramky Transport	CWMP	-
Total(MT)				171.3				
Average(MT)				10.08				



Hazardous Waste Disposal to Zuari Cements (01.01.2019 to 31.05.2020)								
S.No	Date of Disposal	Manifest No.	Name of the hazardous waste	Quantity (MT)	Vehicle No.	Name of the Transporter	Disposed to	Remarks
1	25-01-2019	82	Organic Waste	26.175	AP27 TU4599	Sun Eco Services	Zuari Cements	-
2	21-07-2019	88	Organic waste	22.58	AP37 TA0469	Sun Eco Services	Zuari Cements	-
3	06-09-2019	121	Organic waste	22.775	AP37 TA2269	Sun Eco Services	Zuari Cements	-
4	09-09-2019	127	Organic waste	24.475	AP37 TA0469	Sun Eco Services	Zuari Cements	-
5	16-09-2019	128	Organic Residue	22.94	AP16 TB4289	Sun Eco Services	Zuari Cements	-
6	14-10-2019	130	Organic Waste	23.11	AP35 V4455	Sun Eco Services	Zuari Cements	-
7	18-10-2019	140	Organic Waste	21.08	AP28 TA6026	Sun Eco Services	Zuari Cements	-
8	24-10-2019	141	Organic Waste	23.505	AP28 TB8595	Sun Eco Services	Zuari Cements	-
9	02-11-2019	142	Organic Waste	24.835	KA02 AA9315	Sun Eco Services	Zuari Cements	-
10	30-11-2019	154	Organic waste	20.655	AP16 TC0339	Sun Eco Services	Zuari Cements	-
11	04-12-2019	155	Organic Waste	22.68	AP28 TB8595	Sun Eco Services	Zuari Cements	-
12	24-12-2019	159	Organic Waste	26.17	KA02 AA9054	Sun Eco Services	Zuari Cements	-
13	30-12-2019	162	Organic Residue	23.8	AP16 TC8609	Sun Eco Services	Zuari Cements	-
14	03-02-2020	189	Organic Waste	25.035	AP27 X5025	Sun Eco Services	Zuari Cements	-
15	05-02-2020	79	Organic Waste	29.725	AP07 TF3610	Sun Eco Services	Zuari Cements	-
16	08-02-2020	90	Organic Waste	31.4	AP07 TF3610	Sun Eco Services	Zuari Cements	-
17	08-02-2020	91	Organic Waste	25.015	AP37 TA3949	Sun Eco Services	Zuari Cements	-
18	18-02-2020	81	Organic Waste	22.4	AP28 TA6026	Sun Eco Services	Zuari Cements	-
19	25-02-2020	84	Organic Waste	23.715	AP35 V4455	Sun Eco Services	Zuari Cements	-
20	02-03-2020	86	Organic Waste	24.645	AP16 TD3436	Mohan priya Transports	Zuari Cements	-
21	03-03-2020	87	Organic Waste	28.875	AP16 TJ1737	Sun Eco Services	Zuari Cements	-
22	09-03-2020	88	Organic Waste	25.315	AP16 TD3436	Mohan priya Transports	Zuari Cements	-
23	11-03-2020	89	Organic waste	19.97	AP35V 4455	Sun Eco Services	Zuari Cements	-
24	11-05-2020	2696	Organic Waste	21.82	AP16 TB4289	Sun Corporation	Zuari Cements	-
25	21-05-2020	3021	Organic Residue	29.96	AP07 TF3610	Sun Corporation	Zuari Cements	-
Total (MT)				612.655				



Hazardous Waste Disposal to JSW Cements (01.01.2019 to 31.05.2020)								
S.No	Date of Disposal	Manifest No.	Name of the hazardous waste	Quantity (MT)	Vehicle No.	Name of the Transporter	Disposed to	Remarks
1	08-01-2019	80	Organic Waste	25.94	AP37 TA3949	Sun Eco Services	JSW Cements	-
2	15-02-2019	83	Organic Waste	21.27	AP37 TA3949	Sun Eco Services	JSW Cements	-
3	27-03-2019	86	Organic Waste	23.1	AP21 TY7227	Sreenivasa Enterprises	JSW Cements	-
4	05-04-2019	75	Organic Waste	18.1	AP26 TA3737	Sreenivasa Enterprises	JSW Cements	-
5	05-06-2019	27	Organic waste	25.72	AP21 TE2198	Sreenivasa Enterprises	JSW Cements	-
6	16-07-2019	35	Organic waste	26.135	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
7	23-09-2019	125	Organic waste	22.5	AP31 TB3565	RRS services	JSW Cements	-
8	28-09-2019	130	Organic waste	23.98	AP31 TB3565	RRS services	JSW Cements	-
9	08-10-2019	126	Organic waste	23.98	AP31 TB3565	RRS services	JSW Cements	-
10	08-11-2019	144	Organic waste	19.045	AP21 X0234	Sreenivasa Enterprises	JSW Cements	-
11	20-11-2019	151	Organic waste	23.46	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
12	01-12-2019	152	Organic waste	18.49	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
13	24-12-2019	160	Organic waste	25.72	AP27 TU4599	Sun Eco Services	JSW Cements	-
14	28-01-2020	176	Organic Waste	29.18	AP27 TW6786	Sreenivasa Enterprises	JSW Cements	-
15	30-01-2020	182	Organic Residue	23.04	AP31 TB3565	RRS services	JSW Cements	-
16	02-03-2020	105	Organic Waste	23.81	AP31 TB3565	RRS services	JSW Cements	-
17	13-03-2020	107	Organic waste	24.735	AP31 TB3565	RRS services	JSW Cements	-
18	17-03-2020	109	Organic waste	28.865	AP21 TY5917	Srinivasa Enterprises	JSW Cements	-
19	13-03-2020	108	Organic waste	19.935	AP27 TA2233	Sun Eco Services	Orient Cements	
Total (MT)				447.005				

Government of Andhra Pradesh
 Department of Environment and Forests
 29/05/2020

Hazardous Waste Disposal to GM Eco Sevices (01.01.2019 to 31.05.2020)								
S.No	Date of Disposal	Manifest No.	Name of the hazardous waste	Quantity (MT)	Vehicle No.	Name of the Transporter	Disposed to	Remaks
1	28-11-2019	153	Mixed Spent	25.67	AP37 TF 1125	GM Eco Services	GM Eco Services	-
2	01-12-2019	12	Organic Waste	25.715	AP37 TF1125	GM Eco Services	GM Eco Services	-
3	05-12-2019	156	Mixed Spent	23.5	AP37 TF1125	GM Eco Services	GM Eco Services	-
4	24-12-2019	170	Mixed Spent	25.97	AP37 TF1125	GM Eco Services	GM Eco Services	-
5	03-01-2020	165	Mixed Spent	25.325	AP37 TF1125	GM Eco Services	GM Eco Services	-
6	10-01-2020	169	Mixed Spent	25.035	AP37 TF1126	GM Eco Services	GM Eco Services	-
7	03-02-2020	187	Mixed Spent	25.555	AP37 TF1125	GM Eco Services	GM Eco Services	-
8	06-03-2020	255	Mixed Spent	24.755	TS08 UF4536	GM Eco Services	GM Eco Services	-
9	19-03-2020	265	Organic Waste	25.98	TS08 UF4536	GM Eco Services	GM Eco Services	-
10	27-04-2020	114	Mixed Spent	29.39	AP39 TF1116	GM Eco Services	GM Eco Services	-
11	26-05-2020	120	Organic Waste	19.095	AP04 X8812	GM Eco Services	GM Eco Services	-
Total (MT)				275.99				



 20/05/2020

M/s JSW Cement Ltd.

Bilakalagudur(Vill) | Gadivemula (Mandal) | 518508 |Kurnool (Dist), AP |

Month	Industry Name	Waste Description	Quantity(MT)	Manifest No
Jan-19	M/s.Venkata Narayana Active Ingredients (P) Ltd,Nellore,A.P	Organic Residue	25.94	80
Feb-19	M/s.Venkata Narayana Active Ingredients (P) Ltd,Nellore,A.P	Organic Residue	21.27	83
Mar-19	M/s.Venkata Narayana Active Ingredients (P) Ltd,Nellore,A.P	Organic Residue	23.1	86
April --2019	M/s.Venkata Narayana Active Ingredients (P) Ltd,Nellore,A.P	Organic Residue	18.1	87
Jun-19	M/s.Venkatnarayana Active Inggredients (P) Ltd,SPSR Nellor Dist ,A.P	Organic residue	25.72	86
Jul-19	M/s.Venkatnarayana Active Inggredients (P) Ltd,SPSR Nellor Dist ,A.P	Organic residue	26.135	99
Sep-19	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Oraganic Waste	46.48	128,,130
Oct-19	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Oraganic Waste	23.98	130
Nov-19	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Oraganic Waste	42.5	144,,151
Dec-19	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Oraganic Waste	44.21	152,,160
Jan --20	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Organic Residue	29.18	176
Feb--20	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Organic Residue	23.04	178
March --20	M/s.Venkatanarayana Active Ingredients (P) Ltd , Sy no:69 SPSR Nellore (Dist),A.P 524228	Organic Residue	77.36	105,,89,,91
		Total	427 MT	



ANDHRA PRADESH POLLUTION CONTROL BOARD
REGIONAL OFFICE :: NELLORE

Lr.No.N-686/PCB/RO-NLR/2020- 186

Dt.20.06.2020

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

Sir,

Sub: APPCB- RO, Nellore – M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd.,) Sy. No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District – Irregularities in Hazardous Waste disposal – submitted for taking necessary action - Reg.

Ref: 1. CFO Order No. APPCB/ VJA/ NLR/ 10725 /HO/ CFO/ 2018 Dt.14.12.2018, which is valid up to 31.03.2021.
2. T.O. Lr. No.N-686/PCB/RO-NLR/2020-106 dated 30.05.2020.
3. Board officials inspection dated.15.06.2020.
4. Industry letter dated 20.06.2020.

With references to the above, it is to submit that M/s. Venkata Narayana Active Ingredients Private Limited (formerly M/s. Nutra Specialties Pvt. Ltd.,) is operating a bulk drugs manufacturing industry at Sy.No.69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District.

The Board has issued CFE to the industry for change of product mix vide order dt.17.09.2018 and CFO vide order dt.14.12.2018, which is valid up to 31.03.2021 for the production capacity of 395.25 Kgs/day or 142.32 Tons per Annum. Copy of CFO order enclosed.

Water consumption & Waste water generation:

Source	Water Consumption	Waste water generation
Process	13.80 KLD	14.23 KLD (HTDS)
Cooling	100 KLD	46.8 KLD (LTDS)
Boiler	42 KLD	
Domestic	6.0 KLD	6.0 KLD
Gardening	10 KLD	---

The industry has constructed ETP consists of collection tank, equalization tank, flash mixer, aeration tank, secondary settling tank, sand filter, UV purifier, sludge tank, filter press for treating the waste water (MEE condensate & LTDS effluents) before sending to RO plant. Then RO rejects along with HTDS effluents are sending to MEE followed by ATFD to meet ZLD. The industry is operating two strippers of capacity 1 KL/hr each to recover solvents from the effluents. The RO permeate utilized for cooling tower make up & green belt development and RO rejects sending to MEE.

Details of Hazardous Waste and mode of disposal as per CFO order :

S. No	Name of Hazardous Waste	Stream	Quantity	Method of disposal
1.	Solid Waste from process	28.1 of Schedule - I	740.82 Kg/day	To TSDF for secured land fill
2.	ETP Sludge	35.3 of Schedule - I	10.32 Kg/day	
3.	Salts from Forced Evaporation system	--	135.48 Kg/day	
4.	Carbon Waste	28.3 of Schedule - I	21.85 Kg/day	To TSDF for incineration / cement industries for co-processing
5.	Solvent residue & Organic residue	20.3 of Schedule - I	218.7 Kg/day	
6.	Stripper distillate	--	238.9 Kg/day	
7.	Used Oil	5.1 of Schedule - I	120 LPA	Authorised reprocessors
8.	Mixed Solvents	--	45 TPM	To authorized recyclers / cement plants
9.	Container and container liners of hazardous chemicals (after detoxification)	33.1 of Schedule - I	30 Nos./ Month	To Recyclers after complete detoxification

The industry is disposing inorganic salts to TSDF which contains ETP sludge, MEE salts and solid waste (Salts) from the process. The Organic salts including Carbon waste, Solvent residue & Organic residue and Stripper distillate ,spent solvents are disposing to Cement industries for co- processing.

The industry is submitting the Hazardous waste disposal details to the Board every month and also submitted annual returns in FORM-IV to the Regional office, Nellore.

Further, according to the information furnished by the industry, the manifestos wise hazardous waste disposed to TSDF for secured landfill from January,2019 to May,2020 is tabulated below:

Date of disposal	Manifesto Number	Quantity (in M. Tons)	Transporter
24.02.2019	64	21.725	The vehicle belongs to M/s. Coastal Waste Management Ltd (unit-II), Raviguntapalem (V), Rapur (M), SPSR Nellore district
13-05-2019	17	19.7	
14-08-2019	505	20.335	
05-10-2019	658	25.835	
18-12-2019	887	24.925	
28-12-2019	893	22.42	
28-02-2020	1059	17.12	
13-05-2020	2736	19.24	
Total		171.3 Tons	

As per the month wise Hazardous waste disposal details submitted by the industry, the organic waste sent to cement plants for co-processing from January 2019 to June,2020 is furnished below :

Date	Manifes to number	Transporter	Vehicle number	Type of Haz. Waste	Qty. in Tons	Sent to Cement plants for co-processing
15.02.2019	83	M/s. Suneco services, Tadepalligudem	AP37 TA3949	Organic waste	21.270	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa District
27.03.2019	86	M/s. Srinivasa Enterprises, Atmakur, Kurnool district	AP21 TY7227	Organic waste	23.10	M/s. JSW Cements Pvt Ltd, Kurnool district
05.04.2019	Nil	M/s. Srinivasa Enterprises, Atmakur, Kurnool district	AP26 TA3737	Organic waste	18.2	
16.07.2019	99	M/s. Srinivasa Enterprises, Atmakur, Kurnool district	AP27 TW6786	Organic waste	26.135	
23.09.2019	129	M/s. RRS Services, Miyapur, Hyderabad	AP31 TB3565	Organic waste	22.5	
24.10.2019	141	M/s. Suneco services, Tadepalligudem	AP28 TB8595	Organic waste	23.5	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
20.11.2019	151	M/s. Srinivasa Enterprises, Atmakur, Kurnool district	AP27 TW6786	Organic waste	23.46	M/s. JSW Cements Pvt Ltd, Kurnool district
04.12.2019	155	M/s. Suneco services, Tadepalligudem	AP28 TB8595	Organic residue waste	22.68	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
24.12.2019	159	M/s. Suneco services, Tadepalligudem	KA02 AA9054	Organic residue waste	26.17	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
04.01.2020	166	M/s. Suneco services, Tadepalligudem	AP16 TC0339	Organic residue waste	21.04	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
25.02.2020	84	M/s. Suneco services, Tadepalligudem	AP35 V 4455	Organic residue waste	23.715	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
11.03.2020	89	M/s. Suneco services, Tadepalligudem	AP35 V 4455	Organic residue waste	19.970	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
13.03.2020	15	M/s. Suneco services, Tadepalligudem	AP37 TA2233	Organic residue waste	19.935	M/s. Orient Cement Ltd, Chittapur, Karnataka
13.05.2020	2696 (Online)	M/s. Sun Corporation, Tadepalligudem	AP16 TB 4289	Organic residue waste	21.82	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
23.05.2020	3021 (Online)	M/s. Sun Corporation, Tadepalligudem	AP07 TF 3610	Organic residue waste	29.96	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa Dist.
04.06.2020	3485 (Online)	M/s. Sun Corporation, Tadepalligudem	AP16 TC 8609	Organic residue waste	23.30	M/s. Zuari Cement Ltd, Yerraguntla, Kadapa District
Total					366.755 tons	

As per the HWM Annual returns in Form -IV submitted by the industry, Organic waste of 55.2 Tons disposed to TSDF and 82.89 Tons to cement plants from April 2018 to March-2019. The industry has started disposing of hazardous wastes through online manifesto system from May 2020 onwards.

During inspection on 15.06.2020, the Board officials of this office has asked the details of Hazardous waste disposed to the Cement Plants for co-processing and to the preprocessing units. The details furnished by the industry representative are not satisfactory. Hence, this office sought information directly from Cement Units viz., M/s. Zuari Cement Ltd, Yerraguntla, Kadapa District and M/s. JSW Cements Pvt Ltd, Kurnool district.

It is further submitted that as per the information gathered from the above said cement units, it was noticed that from January 2019 to May, 2020 at about **612.65 Tons** of organic residue/waste was disposed to M/s. Zuari Cement Ltd, Yerraguntla, Kadapa District and about **427 tons** to M/s. JSW Cements Pvt. Limited, Kurnool District received from M/s. Venkata Narayana Active Ingredients Private Ltd. It was also observed that the industry also disposed about **19.935 Tons** of organic residue/ waste to M/s. Orient Cement Ltd, Chittapur and about **275.99 Tons** to M/s. GM eco services, Peddadudyala Village, Muddanur Mandal, Y.S.R Kadapa District, which is a Hazardous Waste preprocessing unit against the permitted quantity of Mixed solvents, Solvent & organic residue and stripper distillation of about 59 Tons/Month (or) 708 TPA (Solvent residue & Organic residue – 218.7 Kgs/day, Stripper distillate – 238.9 kgs/day, carbon waste – 21.85 Kgs/day & Mixed solvents – 45 TPM).

Whereas as per the Manifestos furnished by the industry, at about 366.755 Tons of Organic residue was sent to Cement Plants Viz.. M/s. Zuari Cement Limited, M/s. JSW Cements Pvt. Ltd and M/s. Orient Cement Ltd from January,2019 to May,2020.

Organic Waste / residue sent to	January, 2019 to May,2020 (17 months)	Board Permitted quantity for disposal of Organic waste (59 TPM x 17 months)	Excess Quantity disposed by the Industry	For the quantity to which manifesto submitted to the Board	For the quantity to which manifesto not submitted to the Board
M/s. Zuari Cement Limited	612.65 Tons	1003 Tons	332.57Tons	366.755 Tons	968.81 Tons
M/s. JSW Cements Pvt. Limited	427 Tons				
M/s. Orient Cement Ltd	19.935 Tons				
M/s. GM Eco Services	275.99 Tons				
Total	1335.57 Tons	1003 Tons	332.57 Tons	366.755 Tons	968.81 Tons

From the above, it was revealed that the industry has hide the factual data with regard to disposal of Hazardous waste to cement plants to the notice of the Board and also generating the Organic residue/waste more than the Board's permitted quantity, which clearly indicates that the industry is not complying the Board's conditions.

It may be noted that the industry has disposed double (about 120 TPM) the permitted quantity of the organic wastes/ residue to the cement plants and preprocessing units in the last Five months.

Further, it is to submit that the EE, RO, Nellore discussed about the irregularities in disposal of organic waste to the Cement Units for co-processing with the industry representatives. The industry representative committed that there was lack in producing the actual information to the notice of the Board and to that extent an explanation was furnished to this office along with necessary enclosures vide industry letter dated 20.06.2020, which is clearly indicates that the industry is generating the solvent & organic residue, Mixed solvents are more than the Board's permitted capacity. Copy of the same is herewith enclosed for kind perusal.

It is further pertinent to submit that during earlier inspection, the Board officials observed that the industry has undertaken the project expansion related activities in connection to the enhancement of production capacities from 142.32 TPA to 500 TPA, for which the industry obtained only TOR from the SEIAA, AP under B2 category. In this regard, this office has submitted a detailed report to the Board office with a request to initiate action against the industry for undertaking expansion works vide this office letter dated 30.05.2020. Copy of the same is herewith enclosed for ready reference.

In view of the above, it is requested the Board to review M/s. Venkata Narayana Active Ingredients Private Limited before Task Force Committee and to issue closure/ stop production orders under Sec. 33 (A) of Water (Prevention & Control of Pollution) Act, 1974 and its amendments thereof and under Sec. 31 (A) of the Air (Prevention & Control of Pollution) Act, 1981 and its amendments thereof duly forfeiting the bank Guarantee of Rs.8.0 Lakhs submitted by the industry for non-compliance of the Board's conditions.

Submitted for favour of information and necessary action.

Yours faithfully,

Encl: A/a


ENVIRONMENTAL ENGINEER

Copy submitted to the JCEE (Unit-II), APPCB Board office, Vijayawada for favour of information and taking further necessary action.

True Copy





ANDHRA PRADESH POLLUTION CONTROL BOARD
D.No.33-26-14D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Chalamalavari Street, Kasturibaipet, Vijayawada – 520 010
Phone. No.0866-2463200, Website : <https://pcb.ap.gov.in/>

**RED CATEGORY
CONSENT & AUTHORIZATION ORDER**

Consent Order No: APPCB/VJA/NLR/10725/HO/CFO/2018

12/09/2022

CONSENT is hereby granted for Operation under section 25/26 of the Water (Prevention & Control of Pollution) Act, 1974 and under section 21/22 of Air (Prevention & Control of Pollution) Act 1981 and amendments thereof and Authorisation under Rule 6 of the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 & Amendments thereof and the rules and orders made there under (hereinafter referred to as 'the Acts', 'the Rules') to:

**M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialities Pvt. Ltd.,)
Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District – 524 228, A.P.
Email: ramakrishna@vnai.in**

(Hereinafter referred to as 'the Applicant') authorizing to operate the industrial plant to discharge the effluents from the outlets and the quantity of emissions per hour from the chimneys as detailed below:

i. Outlets for discharge of effluents:

Outlet No.	Outlet Description	Max Daily Discharge (KLD)	Point of Disposal
1.	Process effluents (HTDS)	35.0	<p>Shall be treated in neutralization tank, stripper, MEE, ATFD & Biological ETP followed by RO Plant.</p> <ul style="list-style-type: none"> • Stripper distillate shall be routed through M/s. APEMC so as to send to cement units for co-processing / TSDF for incineration • Stripper concentrate along with regeneration and blow downs for forced evaporation in MEE • MEE condensate shall be sent to ETP for biological treatment • MEE concentrate shall be disposed in ATFD • ATFD salts shall be routed through M/s. APEMC so as to dispose to TSDF, Nellore • ATFD condensate shall be sent to ETP

			for biological treatment After treatment in ETP, the treated effluents shall be further treated in the RO Plant along with LTDS effluents and Domestic wastewater. <ul style="list-style-type: none"> • RO permeate shall be recycled into process. • RO rejects shall be sent to the MEE for treatment. Thus maintain ZLD system
2.	LTDS Effluents	61.8	After treatment in ETP, the treated effluents shall be further treated in the RO Plant along with
3.	Domestic wastewater	16.0	HTDS effluents. <ul style="list-style-type: none"> • RO permeate shall be recycled into process. • RO rejects shall be sent to the MEE for treatment. Thus maintain ZLD system

ii. Emissions from chimneys:

Chimney No.	Description of Chimney	Quantity of Emissions at peak flow (m ³ /hr)
1.	Common Stack Attached to 2 x 4.0 TPH Bio Briquettes Boiler	---
2.	Stack Attached to 1 x 725 KVA D.G. Set	---
3.	Stack Attached to 1 x 1250 KVA D.G. Set	---

(iii) Hazardous Waste Authorisation (Form – II) [See Rule 6 (2)]:

M/s. Venkata Narayana Active Ingredients Private Limited, SPSR Nellore District is hereby granted an authorization to operate a facility for collection, reception, storage, treatment, transport and disposal of Hazardous Wastes namely:

• Hazardous Wastes with Disposal Option:

Sl. No.	Name of the Hazardous Waste	Stream	Quantity	Method of disposal
1.	Solid Waste from process and solvent & organic residue	28.1 of Schedule - I	6134.17 Kg/day	Shall be routed through APEMC to TSDF, Nellore for secured land filling (as land fillable waste).
2.	ETP Sludge	35.3 of Schedule-I	25 Kg/day	
3.	Salts from Forced Evaporation system	---	2101.94 Kg/day	Shall be routed through APEMC to pre-processors / to authorized Cement industries for co-processing (as utilizable waste)
4.	Carbon Waste	28.3 of Schedule - I	49.4 Kg/day	
5.	Stripper distillate	---	4144.2 Kg/day	

• Hazardous Wastes with Recycling Option:

Sl. No.	Name of the Hazardous Waste	Stream	Quantity	Method of disposal
1.	Used oils	5.1 of Schedule-I	500 LPA	Shall be routed through APEMC to APPCB authorized agencies for reprocessing (as recyclable waste)
2.	Mixed Solvents	28.6 of Schedule-1	45 TPM	Shall be routed through APEMC to preprocessors / authorized Cement industries for co- processing (as utilizable waste).
3.	Container and container liners of hazardous chemicals (after detoxification)	33.1 of Schedule - I	60 Nos./month	After complete detoxification, shall be routed through APEMC to send back to suppliers APPCB authorized parties (as recyclable waste)

This consent order is valid to manufacture the following products along with quantities only:

S. No	Product	Quantity (Kg/day)	Starting Raw Material	Quantity (Kg/day)
1.	Sitagliptin phosphate	66.67	2,4,5 tri fluoro phenylacetic acid	62.37
2.	Levetiracetam	466.67	(s)-2-amino butyramideHCl	466.67
3.	Lacosamide	66.67	D-Serine	47.621
4.	Risperidone	7.5	Rose 1	6.410
5.	Diacerine	8.33	Aloe emodine	6.576
6.	Vildagliptin	70	L-proline	30.434
7.	Policosanol	3.33	Extracted crude	24.975
8.	Warfarine sodium	20	4-hydroxyl cumarin	9.83
9.	Tetracaine hydrochloride	25	4-amino benzoic acid	13.157
10.	Olmisartanmedoxomil	110	DL-Tartaric acid	97.05
11.	Boswellic acid	3.33	Boswelliaserata gum	6.66
12.	Moxifloxacin hydrochloride	16.67	Gati Acid	13.336
13.	Linagliptin	6.67	Xanthan moiety	6.292
14.	Voglibose	1.67	Voglibose Crude	1.770
15.	Teneligliptin	16.67	4-oxopyrrolidine carboxylic acid	5.244
16.	Sevelamer Carbonate	8.33	Allyamine	3.165
17.	Pregabalin	8.33	Ter-butyl-3-(hydroxyl methyl)-5-methy hexanoate	13.015
18.	Colistimide	8.33	2-methyl imidazole	4.165
19.	Gabapantine	8.33	Gabapentine tech	8.768
20.	Methylcobalamin	3.33	Cyanocobaltamin	3.996
21.	L-MethylfolateCalsium	3.33	Folic acid	3.885
22.	Ferric Citrate	3.33	Ferric chloride	3.297

23.	Chlorozoxazone	8.33	4-chloro-2-aminophanol	5.206
24.	Nitrofurantoin Monohydrate	8.33	Urea	2.335
25.	Cinacalcet Hydrochloride	8.33	3-(3-rifluoromethyl- phenyl)-propionaldehyde	6.941
26.	Sucroferic Oxyhydroxide	8.33	Ferric chloride	3.01
27.	Dimethyl Fumarate	3.33	Fumaric acid	2.973
28.	Atovaquone	3.33	Intermediate-1	1.665
29.	Droxidopa	3.33	Intermediate-1	5.994
30.	Allyl Isopropyl Acetyl Urea	166.67	Dimethyl malonate	166.67
31.	Fexofenadine HCl	33.37	FexofenadineHCl Crude	35.3722
32.	Loxoprofen	200	2-Phenyl propanoic acid	142.857
33.	Loratadine	8.33	Loratadine crude	8.5
34.	Bepotastin	8.33	Bepotastin crude	8.5
35.	Azilsartan Medoxomil	1.39	Benzo carboxylate	1.112
	Total	1393.89 kg/day (or) 500 TPA		

By- Products :

Sl. No.	By product	Products from which by product are generated	After expansion	
			Kgs./day	Kgs./month
1	Olmesartan Medoxomil	NaBr	40.08	1202.4
2	Teracaine Hydrochloride	NaBr	9.77	293.1

This order is subject to the provisions of 'the Acts' and the Rules' and orders made there under and further subject to the terms and conditions incorporated in the schedule A, B & C enclosed to this order.

This combined order of consent & Hazardous Waste Authorization shall be valid for a period ending with the **31st March, 2026.**

VIJAY KUMAR GSRKR IAS, MEMBER SECY(GSRKRVK), O/o MEMBER SECRETARY-APPCB

To

**M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialities Pvt. Ltd.,)
Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District – 524 228, A.P.
Email: ramakrishna@vnai.inm**

Copy to:

1. The JCEE, Zonal Office, Vijayawada for information and necessary action.
2. The EE, Regional Office, Nellore for information and necessary action.

SCHEDULE - A

1. Any up-set condition in any industrial plant / activity of the industry, which result in, increased effluent / emission discharge and/ or violation of standards stipulated in this order shall be informed to this Board, under intimation to the Collector and District Magistrate and take immediate action to bring down the discharge / emission below the limits.
2. The industry should carryout analysis of waste water discharges or emissions through chimneys for the parameters mentioned in this order on quarterly basis and submit to the Board.
3. All the rules & regulations notified by Ministry of Law and Justice, Government of India regarding Public Liability Insurance Act, 1991 should be followed as applicable.
4. Notwithstanding anything contained in this consent order, the Board hereby reserves the right and powers to review / revoke any and/or all the conditions imposed herein above and to make such variations as deemed fit for the purpose of the Acts by the Board.
5. The industry shall ensure that there shall not be any change in the process technology, source & composition of raw materials and scope of working without prior approval from the Board.
6. The applicant shall submit Environment statement in Form V before 30th September every year as per Rule No.14 of E (P) Rules, 1986 & amendments thereof.
7. The applicant should make applications through Online for renewal of Consent (under Water and Air Acts) and Authorization under HWM Rules at least 120 days before the date of expiry of this order, along with prescribed fee under Water and Air Acts and detailed compliance of CFO conditions for obtaining Consent & HW Authorization of the Board.
8. The industry should immediately submit the revised application for consent to this Board in the event of any change in the raw material used, processes employed, quantity of trade effluents & quantity of emissions. Any change in the management shall be informed to the Board. The person authorized should not let out the premises / lend / sell / transfer their industrial premises without obtaining prior permission of the State Pollution Control Board.
9. Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to Appellate authority constituted under Section 28 of the Water(Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air(Prevention and Control of Pollution) Act, 1981.
10. The conditions stipulated are without prejudice to the rights and contentions of this Board in any Hon'ble court of law.
11. The industry shall be liable to pay Environmental Compensation / Other Environmental Taxes, if any environmental damage caused to the surroundings, as fixed by the Collector & District Magistrate or any other competent authority as per the Rules in vogue.
12. The industry may explore the possibility of tapping the solar energy for their energy requirements.
13. The industry should educate the workers and nearby public of possible accidents and

remedial measures.

SCHEDULE-B

1. **The industry shall comply the task force directions dt. 14.05.2022 issued by the Board as committed in undertaking dt. 30.07.2022 on Rs. 100 non-judicial stamp paper and submit the compliance to the RO, Nellore.**
2. **The industry shall comply with the following conditions as committed in undertaking dt. 30.07.2022**
 - a. The industry shall commission the new MEE system by 23.11.2022.
 - b. The industry shall provide online pH monitoring system along with data logger within a month.

Water:

2. The source of water supply Ground water. The following is the permitted water consumption:

S. No.	Purpose	Quantity (KLD)
1.	Processing, whereby water gets polluted and the pollutants are not easily bio-degradable	34.4
2.	Cooling Tower	180.0
3.	Boiler Feed	68.0
4.	Gardening Purposes	20.0
5.	Domestic	18.0
Total		320.4

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

3. **The industry shall connect the digital flow meters installed at inlet & outlets of stripper, MEE, ATFD, ETP & RO plant to the APPCB website within a month, so as to verify the operation status of treatment units online.**
4. All the units of ZLD system consisting of stripper, MEE, ATFD system with condenser, Biological ETP and RO plant shall operated properly. All the units of the ZLD system shall be impervious to prevent ground water pollution. Effluents shall not be discharged on land or into any water bodies or aquifers under any circumstances.
5. Floor washing shall be admitted into the effluent collection system only and shall not be allowed to find their way in storm drains or open areas. All pipe valves, sewers, drains shall be leak proof.

Air:

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

Chimney No.	Parameter	Emission Standards
1	Particulate matter	115 mg/Nm ³

7. The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 10mm) - 100 mg/ m³; PM2.5 (Particulate Matter size less than 2.5 mm) - 60 mg/ m³; SO₂ - 80 mg/ m³; NO_x - 80 mg/m³, outside the factory premises at the periphery of the industry.

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

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

Night time (10 PM to 6 AM) - 70 dB (A)

8. The industry shall comply with emission limits for DG sets of capacity upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets of capacity more than 800 KW shall comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.
9. The industry shall properly maintain & operate the monitoring system to all the stacks / vents in the plant. Regular monitoring shall be carried out and report shall be submitted to the Regional office.
10. The industry shall properly maintain & operate multi-stage scrubbers to the process vents to control the process emissions. The industry shall provide online pH measuring facility with auto recording system to the scrubbers provided to treat the process emissions.
11. The industry shall properly maintain & operate VOC monitoring system with auto recording facility.
12. The industry shall implement adequate measures to control all fugitive emissions from the plant.
13. The proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings.
14. The industry shall send the used / spent solvents to the recyclers (or) process them at their own solvent recovery facility within the premises.
15. The evaporation losses in solvents shall be controlled by taking the following measures:
 - a. Chilled brine circulation shall be carried out to effectively reduce the solvent losses into the atmosphere.
 - b. Transfer of solvents shall be done by using pumps instead of manual handling.
 - c. Closed centrifuges shall be used to reduced solvent losses.
 - d. All the solvent storage tanks shall be connected with vent condensers to prevent solvent vapours.
 - e. The reactor vents shall be connected with primary & secondary condensers to prevent escaping of solvent vapour emissions into atmosphere.

Solid Waste:

16. The industry shall dispose solid waste (NON HAZARDOUS) as follows:

Sl. No.	Name of the Solid Waste	Quantity	Disposal
1.	Boiler Ash	5.0 TPD	To Brick Manufacturers

General:

17. The proponent shall place the chemical drums and / or any drums in a shed provided with concrete platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system. The industry shall provide containers detoxification facility. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to low TDS collection tank.
18. Separate Bag filters shall be install and maintain for each boiler.
19. The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board:
 - a. Daily production details (ER-1 Central Excise Returns).
 - b. Quantity of Effluents generated, treated, force evaporated, condensate generated and

recycled/reused

- c. Log Books for pollution control systems.
 - d. Characteristics of effluents, Ambient air quality and emissions.
 - e. Hazardous/non hazardous solid waste generated and disposed.
 - f. Inspection book.
 - g. Manifest copies of hazardous waste.
20. Green belt shall be developed in remaining area of 5 acres with tall growing trees with good canopy so that it shall not be less than 33% of the total area.
 21. The industry shall install online monitoring systems and connect and maintain monitoring system to APPCB/CPCB websites as per CPCB directions dated 05.02.2014 & 02.03.2015 and guidelines issued regarding online monitoring systems from time to time.
 22. The industry shall submit a copy of policy of Public Liability Insurance (PLI) duly indicating the amount contributed towards Environmental Relief Fund (ERF) to the RO once in six months.
 23. The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Regional Office and Zonal Office of the Board.
 24. The industry shall comply with standards and directions issued by APPCB / CPCB / MoEF & CC as and when notifications are issued.
 25. The industry shall submit compliance reports on the conditions mentioned, safety audit reports, Fire NOC, Onsite / Offsite emergency plans (modifications if any), every six months i.e., on 1st of January and July of every year to the Regional Office/ Zonal Office.
 26. The industry shall comply with the tolerance limits mentioned in MoEF notification dated 09.07.2009 prescribed for Pharmaceutical (Manufacturing and Formulation) industry.
 27. The industry shall take necessary action to comply with MoEF & CC notification vide G.S.R. 541(E) dt. 06.08.2021 for Bulk Drug and Formulation (Pharmaceutical) and submit action plan for compliance within one month to concerned Regional Office.
 28. The industry shall provide separate energy meters for Effluent Treatment Plant (ETP) and Air pollution Control equipments to record energy consumed. An alternative electric power source sufficient to operate all pollution control systems shall be provided.
 29. The industry should maintain good housekeeping within the plant premises.
 30. The industry shall comply with SoPs issued by CPCB time to time for all the wastes.
 31. The industry shall comply with the Standard Operating Procedure (SoP) and Checklist of Minimal Requisite Facilities for Utilization of Spent Solvent for Recovery of Solvent specified for Solvent Recovery Units issued by CPCB from time to time. The total cumulative losses of solvents shall not be more than 5% of the solvent on annual basis from storage inventory.
 32. The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Regional Office and Zonal Office of the Board.
 33. The industry shall comply with the Regulation of Persistent Organic Pollutants Rules, 2018 notified by the MoEF & CC Notification vide G.S.R. 207 (E) dated 30.05.2018. As per the notification, the following 7 chemicals are prohibited to manufacturer, trade, use, import and export:
 - a. Chlordecone,
 - b. Hexabromobiphenyl,
 - c. Hexabromodiphenyl ether and heptabromodiphenyl ether (commercial octa-BDE),

- d. Tetrabromodiphenyl ether and pentabromodiphenyl ether (commercial penta-BDE),
 - e. Pentachlorobenzene,
 - f. Hexabromocyclododecane and
 - g. Hexachlorobutadine.
34. The industry shall install digital display boards at publicly visible places at the main gate indicating the products manufactured Vs permitted quantities, Treated effluent concentrations Vs discharge standards, Stack emission & AAQ concentrations Vs standards, hazardous waste generation, disposed, stock Vs permitted quantities and validity of CFO; and exhibit the CFO order at a prominent place in the factory premises, as per Hon'ble Supreme Court order.
35. The industry shall submit Half yearly compliance reports to all the stipulated conditions in Environmental Clearance (EC), Consent for Establishment (CFE) and Consent for Operation (CFO) through website i.e., <https://pcb.ap.gov.in> by 1st of January and 1st July of every year. The first half yearly compliance reports shall be furnished by the industry and second half yearly compliance reports shall be the audited through MoEF&CC recognized and National Accreditation Board for Laboratory Testing (NABL) accredited third party.

Special Conditions:

36. The industry shall possess valid NOC issued by the Andhra Pradesh State Disaster Response and Fire Service Dept., (APSDRFSD) and submit a copy at concerned Regional Office, APPCB.
37. The industry shall prepare a safety report and carry out an independent safety audit report of the respective industrial activities including chemical storages / isolated storages by an expert not associated with such industrial activity as required under Rule 10 of MSIHC Rules, 1989 and get it approved by the Factories Dept., and submit the compliance along with copy of the safety report, safety audit report and safety certificate at concerned Regional Office, APPCB.
38. The industry shall extend training to the working personnel for the prevention of accidents and necessary antidotes to ensure safety, as per the MSIHC Rules, 1989.
39. The industry shall carryout calibration of safety equipment and leak detection systems at regular intervals and shall certify the same with the Factories Department. That certified copy shall be submitted to the APPCB, Regional Office.
40. The industry shall install fluorescent Wind Vane at the highest point in the industry premises.
41. The industry shall submit Risk analysis and risk assessment covering worst scenario clearly describing impact within the industry premises and outside the industry premises and emergency response system.
42. The industry shall submit the copy of the safety audit report and On-Site / Off Site Emergency Plans as applicable after being certified by the Factories Department to the APPCB, Regional Office from time to time, if the storage quantity of hazardous chemicals is equal to or, in excess of the threshold quantities specified in schedule 2 & 3 of MSIHC Rules, 1989.
43. The industry shall possess valid PESO license.

SCHEDULE - C

[See rule 6]

**[CONDITIONS OF AUTHORISATION FOR OCCUPIER OR OPERATOR
HANDLING HAZARDOUS WASTES]**

1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.

2. The authorisation or its renewal shall be produced for inspection at the request of an officer authorised by the State Pollution Control Board.
3. The person authorised shall not rent, lend, sell, transfer or otherwise transport the Hazardous and other wastes except what is permitted through this authorisation.
4. Any unauthorised change in personnel, equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of his authorisation.
5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
6. The person authorised shall comply with the provisions outlined in the Central Pollution Control Board guidelines on "Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty".
7. It is the duty of the authorised person to take prior permission of the State Pollution Control Board to close down the facility.
8. An application for the renewal of an authorisation shall be made as laid down under these Rules.
9. Any other conditions for compliance as per the Guidelines issued by the Ministry of Environment, Forest and Climate Change or Central Pollution Control Board from time to time.

Specific Conditions:

10. The industry shall comply with the provisions of HWM Rules, 2016 in terms of interstate transport of Hazardous Waste and manifest document prescribed Under Rule 18 and 19 of the HWM Rules, 2016.
11. The industry shall not store hazardous waste for more than 90 days as per the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.
12. The industry shall store Used / Waste Oil and Used Lead Acid Batteries in a secured way in their premises till its disposal to the manufacturers / dealers on buyback basis.
13. The industry shall transport the hazardous waste to cement industries only through vehicle fitted with GPS tracking system.
14. The industry shall maintain 7 copy manifest system for transportation of waste generated and a copy shall be submitted to concerned Regional Office of APPCB. The driver who transports Hazardous Waste should be well acquainted about the procedure to be followed in case of an emergency during transit. The transporter should carry a Transport Emergency (TREM) Card.
15. The industry shall maintain proper records for Hazardous and Other Wastes stated in Authorisation in Form-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc., and file annual returns in Form-4 as per Rule 20 (2) of the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.
16. Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

**VIJAY KUMAR GSRKR IAS, MEMBER SECY(GSRKRVK), O/o MEMBER
SECRETARY-APPCB**

To

**M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialities Pvt. Ltd.),
Chandrapadiya (V), Vinjamur (M),**

SPSR Nellore District – 524 228, A.P.
Email: ramakrishna@vnai.in

True Copy





Raghavendra Sreyas TVS <raghavendrasreyas.office@gmail.com>

I.A. No. 226/ 2021 , 227/2021 & 228/2021 in O.A. No. 144/2020(PB)

1 message

Chamber of TVS Raghavendra Sreyas, AoR, Supreme Court of India

16 October 2025 at

<raghavendrasreyas.office@gmail.com>

14:37

To: kumaresan@shrivastavalaw.com, anshuman@shrivastavalaw.com

Cc: Raghavendra Sreyas TVS <sreyas.tvsr@gmail.com>

Sir,

Please find attached herewith the Reply to be filed in the Above captioned matter on behalf of the APPCB.

Kindly treat this email as advance service of the same. Kindly acknowledge the receipt of the same.

Regards,
Siddharth Vasudev,
Advocate

--

TVS Raghavendra Sreyas
Advocate on Record
Supreme Court of IndiaOffice:
House No. 24, First Floor,
Ashoka Enclave Extension III,
Sector 35, Faridabad-121003
HaryanaTel(Off): 0129-4172324
Mob: 9810753194Vishnu Kumar Pathak (Regd Clerk): 9821136653
(*All physical correspondence may be sent to above address.*)

 **APPCB Report in IA No. 226 of 2021 in OA No. 144 of 2020_PB.pdf**

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