

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI

ORIGINAL APPLICATION NO. 97 OF 2021

IN THE MATTER OF:

RAVULA Lingaswami & Others

...Applicants

Versus

Union of India & others

...Respondents

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CHENNAI

DATE: 23/6/21.

T. Hemalatha

ADVOCATE FOR THE RESPONDENT NO.6

①

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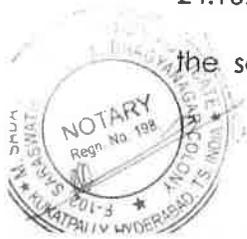
Union of India & others ... Respondents

REPLY FILED ON BEHALF OF THE 6TH RESPONDENT

The 6th Respondent above named respectfully submit as follows:

1. At the outset, it is submitted the present Application has been filed by the Applicants by making baseless and frivolous allegations against the Respondent Company which is operating its unit in full compliance of all statutory rules and regulations. The allegations have been made without verification of any factual aspects regarding functioning of the unit and with an ulterior motive to make unfair gains.

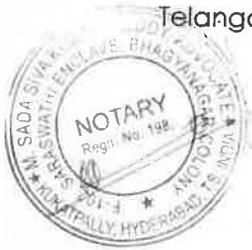
2. It is submitted that the synopsis contained in the Application refers to the orders of this Hon'ble Tribunal dated 24.10.2017 passed in Application Nos. 69-72 of 2013 as though the same is connected with the issue raised in the present



Application. The subject matter of that case relates to pollution caused by the units in Patancheru-Bollaram Industrial area. The 6th Respondent unit is not situated in the said industrial area and the said judgment has no bearing in so far as the functioning of the 6th Respondent Unit is concerned.

3. Likewise the Judgment referred to and passed in O.A.No. 189 of 2019 by the Principal Bench is also not relevant in as much as any findings given on the facts of that case cannot be applied to the present case unless the Applicants are able to establish that the 6th Respondent is guilty of causing any pollution.

4. As regards the allegations made in the preamble of the Application that the Respondent No.6 is operating its unit contrary to the CFO conditions and without obtaining prior Environmental Clearance the same are in totally incorrect and hereby denied. The Respondent No.6 is operating the facility and after obtaining all statutory permits like Environmental Clearance (EC) from MOEF&CC, SEIAA/SEAC, Consent for Establishment (CFE) and Consent for Operation (CFO) from the
Telangana Pollution Control Board.



5. The allegations made in Para No. 1 that the Applicants are aggrieved persons of pollution caused by Respondent No.6 is strongly denied. Similarly, the allegations regarding the problems based by the villagers, due to pollution are purely imaginary and unsubstantiated by any material records. As regards the reference to the stop production orders issued by TSPCB dated 22.06.2019 it is submitted that after the Respondent No.6 complied with all the directions issued by the Board, the TSPCB issued temporary revocation of closure orders on 30.07.2019 and the same is being extended every six months after due compliance of conditions.

6. It is submitted that Respondent No.6 is operating with Zero Liquid Discharge Facility (ZLD) and recycling treated Waste Water for Boiler and Cooling Tower Make-ups. The unit is not discharging any wastewater outside as alleged by the Applicants. The allegations to the contrary are all baseless. Moreover, the unit has generated 30.7 Tons of waste and has disposed of the same to TSDF/Cement Plants. Therefore, there is no deviation from any of the consent conditions.

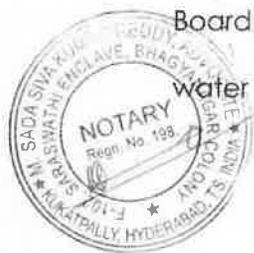
7. As regards the allegations made in Para Nos. 4 & 5 with regard to Crop Damage Compensation, it is submitted



that Respondent No.6 has paid a sum of Rs.11,83,348/- to the District Authorities before the extension of revocation orders were granted to Respondent No.6. Therefore, the Respondent No.6 has been duly complying with all the directions issued by the TSPCB from time to time after periodical inspections.

8. As regards the allegations in Para No. 6 it is submitted that after the unit was issued with stop production orders and also a closure orders after an accident that happened during Nitration reaction, the Respondent No.6 has provided Two stage scrubbers to avoid such incidents in future based upon which the closure orders were revoked. Moreover Respondent No.6 is one among several units being operating in this industrial area. The unit has constructed collection tanks above ground level to avoid /eliminate soil and ground water pollution. The photographs attached to this reply would establish the same.

9. As regards the allegations in Para No. 7 about the scarcity/pollution of drinking water, it is submitted that as per the classification of the area by the Central Ground Water Board (CGWB) the area is a water stressed area. The samples of water tested by the TSPCB does not match the compounds in



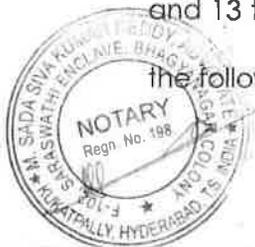
the effluents generated by the Respondent No.6. Therefore, the allegations are totally baseless. On the other hand, as part of the CSR activity, Respondent No.6 has provided RO Plants for the local community in order to provide safe drinking water to the local people.

10. As regards the allegations in Para No. 8 regarding the Air Pollution, the same are totally baseless.

11. As regards the approval of the Panchayat etc as mentioned in Para No. 9, it is submitted that the Respondent No.6 has got approvals from HMDA for construction of new building apart from obtaining Environmental Clearance (EC), Consent for Establishment (CFE) and Consent for Operation (CFO) from the concerned authorities.

12. As regards the allegations in Para No's. 10 & 11 they are merely repetitive and have been already answered.

13. Regarding suggestions of the High Level Committee said to have been appointed as mentioned in Para No's.12 and 13 the unit has been complaining with many conditions in the following manner.

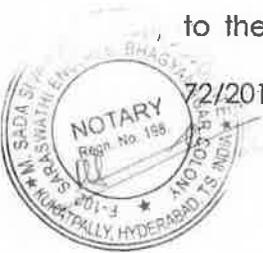


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- a) The unit has established Zero Liquid Discharge Facility (ZLD) in respect of the generation of effluents in their unit.
- b) The unit is disposing of its waste to TSD/Cement industries as per consent conditions.
- c) The unit is storing drums and waste at elevated platforms.
- d) The unit has provided scrubbers that are operated on 24x7 basis.
- e) The unit has provided dome hood for effluent collection tanks.
- f) The unit has provided IP Cameras with 30 days back up facility.
- g) The unit has developed 33% green belt.

Therefore, the unit is in compliance of all rules and regulations.

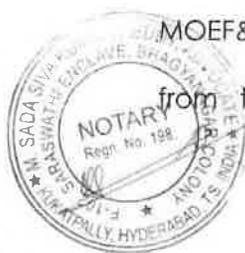
14. It is submitted that the reference made in Para No.14 to the order dated 24.10.2017 passed in Application No. 69-72/2013 in respect of bulk drugs and pharmaceuticals industries



in Patancheru-Bollaram area nor Hyderabad is not relevant for adjudication in the present case in as much as the Respondent No.6 is not situated in this industrial area. Therefore, reference to the same is misleading and mischievous. Likewise, the orders passed in O.A.No.189/2019 are also not relevant in as much as the same was passed on the facts of that case.

15. It is submitted that further averments made in para Nos. 15 & 16 are vague and deliberately intended to disrupt the functioning of genuine industrial units operating in the area with an ulterior motive.

16. The grounds raised in Para No.17 are vague and unsubstantiated. The grounds raised are merely repetitive of orders passed by the Tribunal and the order of the Hon'ble Supreme Court in different cases. It is submitted that they are quoted out of context and unless the Applicants are able to show that the facts of the present case would warrant any interference, the said judgments would have not any application at all in the instant case. Suffice it to state that Respondent No.6 has obtained Environmental Clearance from MOEF&CC, SEIAA/SEAC and is operating with valid consent from the pollution control board and complying with all



VERIFICATION

I, V. Jagadeeswar Rao, son of Ranga Rao, aged 51 years, Authorized Signatory, M/s. Hazelo Lab Private Limited, Hyderabad, Telangana, do hereby solemnly affirm and verify that the contents of the above Reply are true and correct to my knowledge. No part of it is false and nothing material has been concealed there from.

Verified on this day of June 2021 at Hyderabad



6th Respondent



ATTESTED
 M. SADA SIVA KUMAR REDDY, B.Com., B.L.
 ADVOCATE & NOTARY
 Appointed by Govt., India
 G.O. Ms. No. 198, Rev (Regn-II), dt. 11.04.2000
 102, Saraswathi Enclave, Bhagyanagar Colony,
 Xukatpally, Hyderabad, T.S., India, (PH: 96480 44395)



TELANGANA STATE POLLUTION CONTROL BOARD
Paryavarana Bhavan, A-3, Industrial Estate,
Sanathnagar, Hyderabad - 500018

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

CONSENT & HW AUTHORISATION ORDER (Change of Product Mix)

//By Registered Post with Acknowledgement Due//

ConsentOrderNo:TSPCB/RCP/NLG/HO/2017 - 810

Date:30.05.2017

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

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

M/s. Hazelo Lab Pvt. Ltd.,
(Formerly M/s. Venlar Labs (P) Ltd.),
Dhotigudem (V),
Pochampally (M),
Yadadri District.
E-Mail Id: ashokkumar.p@heterodrugs.com

(hereinafter referred to as 'the Applicant') authorized 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	HTDS Effluents: Process	4.52 KLD	<ul style="list-style-type: none">➤ Shall be stripped off for organics recovery.➤ Stripper condensate to distillate for separation of organic compounds followed by disposal to cement plants for co-processing and distilled effluents shall be sent to LTDS treatment system.➤ Stripped effluents for forced evaporation in MEE followed by ATFD.➤ Condensate from MEE & ATFD shall be routed to LTDS treatment system.➤ ATFD salts to TSDF.
2	LTDS Effluents: Washings -1.0 KLD + Boiler blow down - 1.0 KLD + Cooling tower blow down -0.5 KLD + Domestic - 1.0 KLD (Overflow of septic tank)	3.5 KLD	<ul style="list-style-type: none">➤ LTDS effluents along with condensate of MEE & ATFD shall be treated in biological ETP followed by filtration in the RO Plant.➤ RO Permeate to reuse.➤ RO rejects to MEE followed by ATFD.
TOTAL		8.02 KLD	

ii) Emissions from chimneys:

Chimney No.	Description of Chimney	Quantity of Emissions at peak flow (m ³ /hr)
1.	Attached to 2 TPH Water Tube Boiler	--
2.	Attached to Process Emission	--
3.	Attached to 1X250 KVA DG set	--

*The emissions should not contain constituents in excess of the prescribed limits mentioned above.

III) HAZARDOUS WASTE AUTHORISATION (FORM - II) [See Rule 6 (2)] of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 & Amendments thereof):

- Number of Authorization and date of issue - TSPCB/RCP/NLG/HO/2017
Date: 30.05.2017.
- Reference of Application: Reference no. 653893.dt: 16.03.2017.
- M/s. Hazelo Lab Pvt. Ltd, Dhotigudem (V), Pochampally (M), Yadadri 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:

S.No	Name of the Hazardous waste	Stream	Quantity of Hazardous waste	Disposal option
1.	Spent Carbon	28.3 of Schedule - I	33.33 Kg/day	Authorized cement plants for co-processing (or) TSDF, Dundigal for incineration.
2.	Distillation Organic residue	20.3/36.1 of Schedule - I	752.3 Kg/day	
3.	Spent Mixed Solvents	28.6 of Schedule - I	20 KLPM	For recovery & reuse within the plant premises. Excess Spent Solvents for disposal to authorized Cement manufacturing units for Co-processing/ TSDF, Dundigal, RR Dist. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to the traders/recyclers.
4.	MEE Salts	35.3 of Schedule - I	502.4 Kg/day	TSDF, Dundigal, Rangareddy District for secured land filling.
5.	Dilute sulfuric acid	28.1 of Schedule - I	100 KLPM	Sent to cement industries.

➤ HAZARDOUS WASTES WITH RECYCLING OPTION:

S.No	Name of the Hazardous waste	Stream	Quantity of Hazardous waste	Disposal option
1.	Dilute HCl	28.1 of Schedule - I	50 KLPM	Reused within the premises.
2.	Spent solvents	28.6 of Schedule - I	30 KLPM	Recovered within the plant premises & reuse in the process.
3.	Detoxified container & container liners	33.1 of Schedule - I	50 Nos./ month	After complete detoxification, it shall be disposed to the outside agencies.

The industry shall not produce more than one group of products and individual capacities mentioned therein at any given point of time.

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S. No	Product Name	Production per Day (Kg)	No. of Stages	Name of the Starting key Raw Material	Quantity of Raw Material consumption Kgs/day
GROUP- A					
1	N-(2-Methyl-5-aminophenyl)-4-(3-pyridyl)-2-pyrimidine amine	116.7	2	(2-Methyl-5-nitrophenyl)guanidine.	130.7
2	4-[(4-Methylpiperazin-1-yl)methyl]benzoic acid dihydrochloride.	133.3	1	4-Cyanobenzyl bromide	89.3
3	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl] propanamide	61.1	3	2-Methylacrylic acid	102.7
4	Ethyl-N-phthaloyl-p-amino-L-phenyl alaninate Hydrochloride	16.7	3	L-Phenyl alanine	23.3
5	2-Deoxy-2,2-Difluoro-D-Erythro-Pentafuranosulose-3, 5-Dibenzoate	22.2	2	(2R,3R,4S,5S)-Hexane-1,2,3,4,5,6-hexaol	48.9
Total production capacity from Group- A		350 kg/day			
1	Bis-(2-Chloroethyl) Amine Hydrochloride	83.3	1	Di ethanol amine	50.0
2	N-Acetyl Cytosine	41.7	1	Cytosine	30.8
3	Benzonitrile 4-(1h-1,2,4-Triazol-1-yl Methyl)	55.6	1	4-Bromo Methyl benzonitrile	60.6
4	N-Phthaloyl, D,L Glutamic acid anhydride	69.4	2	L-Glutamic acid	69.4
5	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	100.0	5	D-Ribose	165.0
Total production capacity from Group-B		350 kg/day			
Total production capacity on worst combination i.e., for Group-A or Group-B		350 kg/day			

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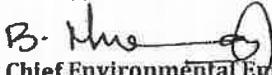
This order is subject to the provisions of 'the Acts' and the Rules' and amendments made there under and further subject to the terms and conditions incorporated in the schedule A, B and C enclosed to this order.

This combined order of Consents and Authorization is valid for a period ending with the 31st day of January, 2022.

Sd/-
MEMBER SECRETARY

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

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

B. Mue 
Joint Chief Environmental Engineer
K

SCHEDULE - A

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1. The applicant shall 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 for obtaining Consent & HW Authorization of the Board. The applicant can also apply for Auto Renewal of the CFO atleast 30 days before the expiry of the Order as per the procedure and eligibility stipulated in the Board Circular dt:19.11.2015 (available in Board's Website: <http://tspcb.cgg.gov.in/Pages/circulars.aspx>).
2. Concealing the factual data or submission of false information/ fabricated data and failure to comply with any of the conditions mentioned in this order may result in withdrawal of this order and attract action under the provisions of relevant pollution control Acts.
3. Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of the Water(Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air(Prevention and Control of Pollution) Act, 1981.
4. The industry may explore the possibility of tapping the solar energy for their energy requirements.
5. All the conditions stipulated in the Schedule - A of the earlier combined CFO & HWA Order No. TSPCB/RCP/NLG/16644/HO/2015-986 Date:14.08.2015 remains same. The industry should ensure consistence compliance of each condition of Schedule-A.
6. The Board reserves its right to modify above conditions or stipulate any further conditions and to take action including revoke of this order in the interest of protection of public health and environment.

SCHEDULE - B

Special Conditions:

1. The industry should take steps to reduce water consumption to the extent possible and consumption should NOT exceed the quantities prescribed below:

S.No.	Purpose	Quantity in KLD
1	Process & washings	8.06
2	Floor washings	1.0
3	Boiler Feed	1.5
4	Cooling tower make-up	2.0
5	Domestic	1.2
	Total:	13.76

2. The industry should file the Water Cess returns in Form-1 as required under section (5) of Water (Prevention and Control of Pollution) Cess Act, 1977 on or before the 5th of every calendar month, showing the quantity of water consumed in the previous month along with water meter readings. The industry should remit water cess as per the assessment orders as and when issued by Board.
3. The emissions should not contain constituents in excess of the prescribed limits mentioned below.

Chimney No.	Parameter	Emission Standards
1 & 2	Particulate Matter	115 mg/Nm ³
3	HCl Acid Vapour & mist	35 mg/Nm ³

4. The industry should 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

should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.

- 5. The industry should comply with ambient air quality standards of PM₁₀ (Particulate Matter size less than 10 µm) - 100 µg/ m³; PM_{2.5} (Particulate Matter size less than 2.5 µm) - 60 µg/ m³; SO₂ - 80 µg/ m³; NO_x - 80 µg/m³, outside the factory premises at the periphery of the industry.

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

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

- 6. The industry shall manufacture only the consented products.
- 7. The industry shall not increase the capacity beyond the permitted capacity, without obtaining CFE & CFO of the Board
- 8. The industry shall operate IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability, along with flow meter, with connection of the same to the website of CPCB & TSPCB.
- 9. The industry shall segregate the HTDS & LTDS effluents.
- 10. The industry shall regularly operate the existing pollution control systems i.e., Stripper, Multiple Effect Evaporator (MEE), ATFD, Biological ETP & RO plant etc. for treatment of HTDS & LTDS effluents.
- 11. The industry shall not discharge any effluents on land within or outside the plant premises.
- 12. The industry shall operate water meters for recording category-wise water consumption viz. Process, Boiler feed, Cooling tower makeup, Domestic etc.
- 13. The industry shall operate digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper/MEE feed; MEE condensate; steam flow to Stripper, MEE & ATFD; inlet & outlet of Biological ETP; RO feed; RO Permeate & RO reject.
- 14. The industry shall use only fresh water for gardening purposes.
- 15. The industry shall install & operate online VOC analyzers for monitoring of VOCs.
- 16. The industry shall operate Multi-stage Scrubbers in the plant for control of process emissions, so as to avoid odour nuisance and maintain records. The industry shall upgrade the single-stage Scrubbers to the Multi-stage as per the requirements, depending upon the generation of Process emissions in the process.
- 17. The industry shall install & operate online pH meters for the Multi-stage scrubbers.
- 18. The industry shall identify the Air Pollution source of generation of odorous compounds from their process activities and shall take the required measures to contain the same to avoid smell nuisance. The industry shall not cause odour nuisance in the surroundings.
- 19. The industry shall transfer the chemicals /effluents/ In-process material in closed conditions to avoid smell nuisance.
- 20. The industry shall maintain separate energy meter for the pollution control systems and maintain the records of the same.
- 21. The industry shall use vent condensers for all the bulk storage tanks, storing highly volatile solvents, wherever required. The industry shall provide & operate Nitrogen blanketing system, wherever required, with required pressure for the Solvents / Chemical/Product etc. storage tanks to avoid vapours escaping into the atmosphere to avoid odour nuisance in the surroundings.

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22. The industry shall operate Solvent Recovery Plant within the plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The Spent / Mixed Solvents which cannot be reused in the plant, shall be disposed to Authorized Cement manufacturing units for Co-processing/ TSDF, Dundigal, RR Dist. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to the traders/ recyclers.
 23. The industry shall carryout Leak Detection and Repair Study (LDAR) to assess the solvent losses and based on the study, the industry shall take necessary steps to arrest the solvent losses and reduce VOCs in the premises.
 24. The industry shall provide and operate IP cameras with PAN, Zoom, 5x or above focal length, with night vision capability, at main gate entrance & at other gates where there is movement of effluent tankers, Solvent tankers, Chemical tankers, Hazardous Waste carrying vehicles & other material carrying vehicles. These cameras shall be connected to the website of TSPCB, with minimum backup of three months.
 25. The industry shall comply with the stipulations and conditions prescribed in the previous CFO Order.
 26. The industry shall comply with the directions issued by the Task Force from time to time scrupulously.
 27. The industry should develop and maintain green belt all along the boundary of the industry and other vacant places. The industry shall take up extensive plantation under the Haritha Haram program of the State Government.
 28. The industry should maintain log books on the following:
 - a. Hydraulic loads of effluent generation
 - b. Characteristics of effluents
 - c. Quantity of HTDS effluents forced evaporated, condensate generation, LTDS effluents including condensate treated & reused.
 - d. Furnish consolidated daily records on the above periodically once in three months to the RO, Nalgonda.
 29. The industry should ensure detoxification in environmentally sound manner of various drums, liners, containers and other materials that are in contact with bromine compounds and the details should be furnished to the Board.
 30. There should not be any spillages / chemicals / effluents on ground. The drums containing chemicals & wastes should be stored on elevated platform with a provision to collect leachate / spillages in the collection pit. In no case the drums should be stored on the naked open ground. The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.
 31. The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.
 32. The industry should maintain the following records and the same should be made available to the inspection officer.
 - a. Daily production details, RG-I records and Central Excise Returns.
 - b. HTDS & LTDS effluents generated.
 - c. Quantity of HTDS effluents evaporated in the HTDS treatment system.
 - d. Quantity of condensate generation.
 - e. Quantity of LTDS effluents along with condensate in ETP & RO plant solid waste generation & disposal to TSDF & Cement Plants should be submitted to Regional Office, Nalgonda for every month.
 33. Under no circumstances, the effluents should be used for land application.
 34. The industry should maintain records for the performance of solvent recovery system and shall achieve the efficiency of solvent recovery more than 95% for every stream.
 35. The industry should take all safety measures and provide fire fighting equipment in the plant.

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36. The industry should submit mock drill report carried out at least once in six months, as required under the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.
 37. The applicant shall submit Environment Statement in Form V before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments.
 38. All the rules & regulations notified by Ministry of Law and Justice, Government of India regarding Public Liability Insurance Act, 1991, should be followed.
 39. The conditions are without prejudice to the rights and contentions of this Board in any Hon'ble Court of Law.

SCHEDULE - C

[see rule 6(2)]

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

A. General conditions of Authorization:

1. The authorized person shall comply with the provisions of the Environment (Protection) Act 1986, and the rules made there under.
2. The authorization or its renewal shall be produced for inspection at the request of an officer authorized by the State Pollution Control Board.
3. The person authorized shall not rent, lend, sell, transfer or otherwise transport the Hazardous and other wastes except what is permitted through this authorization.
4. Any unauthorized change in personnel, equipment or working conditions as mentioned in the application by the person authorized shall constitute a breach of his authorization.
5. The person authorized shall implement Emergency Response Procedure (ERP) for which this authorization is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc., and their possible impacts and also carryout mock drill in this regard at regular interval of time.
6. The person authorized 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 authorized person to take prior permission of the State Pollution Control Board to close down the facility.
8. The Hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilization of imported Hazardous or other wastes shall be treated and disposed of as per specific conditions of authorization.
9. The importer or exporter shall bear the cost of import or export and mitigation of damages if any.
10. An application for the renewal of an authorization shall be made as laid down under the Rules.
11. 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.
12. Annual return shall be filed by June 30th for the period ensuring 31st March of the year.

B. Specific Conditions:

1. The industry shall give top priority for waste minimization and cleaner production practices.
2. The industry shall not store Hazardous Waste for more than 90 days as per the Hazardous and other Wastes (Management and Transboundary Movement) Rules, 2016 and amendments thereof.
3. The industry shall store Used / Waste Oil and Used Lead Acid Batteries in a secured way in their premises till its disposal.
4. The industry shall not dispose Waste oils to the traders and the same shall be disposed to the authorized Reprocessors/ Recyclers.

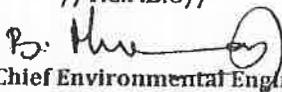
- 18
5. The industry shall dispose Used Lead Acid Batteries to the manufacturers / dealers on buyback basis.
 6. The industry shall not dispose spent solvents / mixed spent solvents to the traders.
 7. The industry shall take necessary practical steps for prevention of oil spillages and carry over of oil from the premises.
 8. The industry shall maintain 6 copy manifest system for transportation of waste generated and a copy shall be submitted to Board Office and concerned Regional Office.
 9. The industry shall maintain good house keeping & maintain proper records for Hazardous Wastes stated in Authorization.
 10. The industry shall maintain proper Records for Hazardous Wastes stated in Authorization in FORM-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc. as per Rule 20(1) and file Annual Returns in Form- 4 as per Rule 20(2) of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and amendments thereof.
 11. The industry shall dispose of e-waste to the authorized recyclers only.
 12. The industry shall submit the condition wise compliance report of the conditions stipulated in Schedule B & C of this Order on half yearly basis to Board Office, Hyderabad and concerned Regional Office.

Sd/-
MEMBER SECRETARY

To

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

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


Joint Chief Environmental Engineer
*c



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By Speed Post/Online

F. No. J-11011/19/2016-IA-II (I)
Government of India
Ministry of Environment, Forest and Climate Change
(IA-II Section)

Indira Paryavaran Bhawan
Jor Bagh Road, N Delhi - 3

Dated: 27th February, 2020

To

M/s Hazelo Lab Pvt Ltd
Village Dothigudem, Mandal Pochampally
District Yadadri Bhuvanagiri (Telangana)

Email: ratnakarreddy@heterodrugs.com

Sub: Expansion of Bulk Drug and Intermediates manufacturing unit from 105 TPA to 5183 TPA at Sy.Nos. 240, 242, 243, 247, 248 & 249, Village Dothigudem, Mandal Pochampally, District Yadadri Bhuvanagiri (Telangana) by M/s Hazelo Lab Pvt Ltd - Environmental Clearance - reg.

Sir,

This has reference to your proposal No. IA/TG/IND2/36540/2015 dated 4th May, 2018 for environmental clearance to the above project.

2. The Ministry of Environment, Forest and Climate Change has examined the proposal for environmental clearance to the project for expansion of Bulk Drug and Intermediates manufacturing unit from 105 TPA to 5183 TPA by M/s Hazelo Lab Pvt Ltd in an area of 33.485 acres located at Sy.Nos. 240, 242, 243, 247, 248 & 249, Village Dothigudem, Mandal Pochampally, District Yadadri Bhuvanagiri (Telangana).

3. The Ministry has earlier granted environmental clearance vide letter dated 23rd November, 2010 to the project for change in product mix from drug intermediate to bulk drug in favour of M/s Venlar Laboratories Pvt Ltd. Further, the Ministry, vide letter dated 18th November, 2019 has transferred the said environmental clearance from M/s Venlar Laboratories Pvt Ltd to M/s Hazelo Lab Pvt Ltd.

4. The details of existing and proposed products are as under:-

S. No.	Existing Product	Quantity (Kg/day)
Group - A		
1	N-(2-Methyl-5-aminophenyl)-4-(3-pyridyl)-2-pyrimidine amine	116.7
2	4-[(4-Methylpiperazin-1-yl) methyl] benzoic acid dihydrochloride	133.3
3	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl] propanamide	61.1
4	Ethyl-N- phthaloyl-p-amino -L- phenyl alaninate Hydrochloride	16.7
5	2-Deoxy- 2,2- Difluoro -D- Erythro- Pentafuranousulose- 3,5- Dibenzoate	22.2
Total Group -A		350

EC for M/s Hazelo Lab Pvt Ltd

Page 1 of 9

Group - B		
1	Bis- (2- Chloroethyl) Amine Hydrochloride	83.3
2	N-Acetyl Cytosine	41.7
3	Benzonitrile 4- (1h- 1,2,4 - Triazol-1-yl Methyl)	55.6
4	N-Phthaloyl,D, L Glutamic Acid anhydride	69.4
5	2', 3' - Di-O-acetyl - 5' - deoxy -5- fluorocytidine	100
	Total Group -B	350
	Total Production (on worst case i.e., for Group - A or Group - B)	340

Manufacturing Capacity– After Expansion

S.No	Product	CAS No.	Capacity (TPD)
1	Amlodipine Besylate	88150-42-9	0.33
2	Bupropion HCl	34841-39-9	0.83
3	Clopidogrel Hydrogen Sulfate	113665-84-2	0.33
4	Desvelofloxin Succinate	386750-22-7	0.17
5	Divolproex Sodium	76584-70-8	0.57
6	Duloxetine HCl	136434-34-9	0.17
7	Esomeprazole Mg Dihydrate	217087-09-7	0.33
8	Glimepiride	93479-97-1	0.17
9	Mesalamine	89-57-6	0.17
10	Metoprolol Succinate	37350-58-6	0.5
11	Pantoprazole Sodium Sesquihydrate	138786-67-1	0.5
12	Pragabalin	148553-50-8	0.5
13	Rosuvastatin Calcium	287714-41-4	0.1
14	Sertraline HCl	79559-97-0	0.33
15	Tramadal	27203-92-5	0.67
16	Valcyclovir Hydrochloride Monohydrate	124832-27-5	0.33
17	4-[4-Chloro-1-oxobutyl]-2,2- dimethyl phenyl acetic acid methyl ester	154477-54-0	0.1
18	N2-(1-(S)-ethoxy carbonyl-3-phenyl propyl-N6-trifluoro acetyl-L-lysine	116169-90-5	0.17
19	2-[2-[3(S)-[3-[2-(7-Chloro-2-Quinolinyloxy)ethoxy]phenyl]-3-hydroxypropyl]phenyl-2-propanol	142569-70-8	0.1
20	2,8-Diazo bicycloNonane	151213-42-2	0.17
21	2,3,4,5-Bis-O- (1- methylethylidene)-b-D-fructopyranose	20880-92-6	0.83
22	2- Acetyl Ethoxy acetyl methoxy ether		1.13
23	N,N-Carbonyl di imidazole	530-62-1	1.67
24	(2S,3S,5S)-2-Amino-3-Hydroxy-5-Tert-Butylcarbonyl Amino 1,6-diohenyl	183388-64-9	0.1
25	Trans-4-(4-chlorophenyl)-cyclohexane carboxylic acid	49708-81-8	0.1
26	Guanine	73-40-5	1.67
27	Poly allyl amine HCl	71550-12-4	0.5
28	Tert-butyl 2-((4R,6S)-6-((E)-2-(4-(4-fluorophenyl)-6-isopropyl-2-(N- methylmethanesulfonamido) Pyrimidin - 5-yl)vinyl)-2,2-dimethyl-1,3-dioxane-4-yl-) acetate		0.17

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29	5-Cyano phthalide	82104-74-3	0.67
30	1,1-Cyclohexanediactic acid	07-11-4335	1.67
31	Carbamyl Methyl-5-Methyl hexanoic Acid	181289-15-6	0.5
32	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	161599-46-8	0.13
33	N-(2-Methyl-5-aminophenyl)-4-(3-pyridyl)-2-pyrimidine amine		0.33
34	4-[(4-Methylpiperazin-1-yl)methyl]benzoic acid dihydrochloride		0.33
35	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl] propanamide		0.17
	Worst Case: 20 products on Campaign basis		14.20

By-Products – After Expansion

S. No	Product	Stage	By-Product	Quantity	
				Kg/day	TPM
1	Clopidogrel hydrogen sulfate	I	p-toluene sulfonic acid	180.8	5.4
2	1,1-Carbonyl diimidazole	I	Trichloromethanol	2782.5	83.5

5. Total land area available for the project is 33.485 acres (existing-4.325 acres & additional -29.16 acres). Industry will develop greenbelt in an area of 11.5 acres covering 34.34% of the project area. The estimated project cost for proposed expansion is Rs.45 crores. Total capital cost earmarked towards environmental pollution control measures is Rs 12.04 crores and the recurring cost (O&M) will be about Rs 15.93 crores per annum. The project will provide employment for 80 persons directly and 20 persons indirectly after expansion.

6. There are no National Parks, Wildlife Sanctuaries, Biosphere Reserves, Tiger/Elephant Reserves and Wildlife Corridors etc within 10 km from the project site. Chinna Musi river flows at 5.8 km in North West.

7. Total water requirement is estimated to be 396.27 cum/day, which includes fresh water requirement of 236.27 cum/day proposed to be met from Mission Bhagiratha (Industrial supply), Government of Telangana. The wastewater generation is estimated to be 172.06 cum/day. High COD/TDS stream of 127.56 cum/day is segregated and shall be send to stripper. Stripper condensate shall be disposed to cement industries for co-processing/TSDF. Stripper bottom is sent to multiple effect evaporators (MEE) and agitated thin film dryer (ATFD). Condensate from MEE and ATFD shall be mixed with low TDS/COD from utility blow downs. Domestic wastewater of 44.5 cum/day shall be send to biological treatment plant followed by Reverse Osmosis. RO rejects shall be send to MEE and permeate shall be reused in cooling towers make-up and scrubbers. There will be no discharge of treated/untreated waste water from the unit, and thus ensuring Zero Liquid Discharge.

Power requirement after expansion will be 2250 kva including existing 250 kva and will be met from TS Transco. Existing unit has a DG set of capacity 1 x 250kva, additionally 2 x 1000kva DG set is proposed as standby during power failure. Stack (height 10 m) will be provided as per CPCB norms to the proposed DG sets.

Existing unit has 1 x 2 TPH coal fired boiler, 1 lakh K.cal.hr thermic fluid heater and 2 x 10 TPH coal fired boilers are proposed as part of expansion. Bag filters and

stack with height of 35 m will be installed to control the particulate emissions within statutory limit of 115 mg/Nm³.

8. The project/activities are covered under category A of item 5(f) 'Synthetic organic chemicals industry' of the Schedule to the Environment Impact Assessment Notification, 2006, and requires appraisal at central level by the sectoral Expert Appraisal Committee (EAC) in the Ministry.

9. The terms of reference (ToR) for the project was granted on 31st March, 2016. Public hearing was conducted by State Pollution Control Board on 12th July, 2017, which was presided over by the Joint Collector & Additional District Magistrate.

10. The proposal was considered by the Expert Appraisal Committee (Industry-2) in its meetings held on 25-27 June 2018, 29-31 July 2019 and 21-23 January 2020, wherein the project proponent and their accredited consultant M/s TEAM Labs and Consultants presented the EIA/EMP report. The Committee found the EIA/EMP report to be satisfactory, complying with the ToR, and recommended the project for grant of environmental clearance.

11. Based on the proposal submitted by the project proponent and recommendations of the EAC (Industry-2), Ministry of Environment, Forest and Climate change hereby accords environmental clearance to the project for **Expansion of Bulk Drug and Intermediates manufacturing unit from 105 TPA to 5183 TPA by M/s Hazelo Lab Pvt Ltd** at Sy.Nos.240, 242, 243, 247, 248 & 249, Village Dothigudem, Mandal Pochampally, District Yadadri Bhuvanagiri (Telangana), under the provisions of the EIA Notification, 2006, subject to the compliance of terms and conditions as below:-

- (i) Necessary permission as mandated under the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981, as applicable from time to time, shall be obtained from the State Pollution Control Board.
- (ii) As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.
- (iii) Necessary authorization required under the Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016, Solid Waste Management Rules, 2016 shall be obtained and the provisions contained in the Rules shall be strictly adhered to.
- (iv) National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R.608(E) dated 21st July, 2010 and amended from time to time shall be followed. Fugitive emissions shall be controlled at 99.98% with effective chillers.
- (v) No raw material/solvent prohibited by the concerned regulatory authorities from time to time, shall be used.
- (vi) To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- (vii) Solvent management shall be carried out as follows:

- (a) Reactor shall be connected to chilled brine condenser system.
 - (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages.
 - (c) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.
 - (d) Solvents shall be stored in a separate space specified with all safety measures.
 - (e) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.
 - (f) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.
 - (g) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
- (viii) Total fresh water requirement shall not exceed 236.27 cum/day proposed to be met from Mission Bhagiratha (Industrial supply), Government of Telangana. Prior permission in this regard shall be obtained from the concerned regulatory authority. No ground water shall be extracted for industrial use.
 - (ix) Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
 - (x) Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm, and solvent transfer through pumps.
 - (xi) Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.
 - (xii) The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.
 - (xiii) Fly ash should be stored separately as per CPCB guidelines so that it may not adversely affect the air quality. Direct exposure of workers to fly ash and dust should be avoided.
 - (xiv) The company shall undertake waste minimization measures as below:-
 - (a) Metering and control of quantities of active ingredients to minimize waste.
 - (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - (c) Use of automated filling to minimize spillage.
 - (d) Use of Close Feed system into batch reactors.
 - (e) Venting equipment through vapour recovery system.
 - (f) Use of high pressure hoses for equipment clearing to reduce wastewater generation.
 - (xv) The green belt of at least 5-10 m width shall be developed in nearly 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per the CPCB guidelines in consultation with the State Forest Department.

- (xvi) All the commitments made to the public during public consultation/hearing shall be satisfactorily implemented.
- (xvii) At least 1% of the total project cost shall be allocated for Corporate Environment Responsibility (CER) and item-wise details along with time bound action plan shall be prepared and submitted to the Ministry's Regional Office.
- (xviii) For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- (xix) The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.
- (xx) Occupational health surveillance including dental check up of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- (xxi) Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.

11.1. The grant of environmental clearance is further subject to compliance of other general conditions as under:-

- (i) The Project Proponent shall obtain all other statutory/necessary permissions/recommendations/NOCs prior to start of construction/operation of the project, which *inter alia* include, permission/approvals under the Forest (Conservation) Act, 1980; the Wildlife (Protection) Act, 1972; the Coastal Regulation Zone Notification, 2019, as amended from time to time, and other Office Memoranda/Circular issued by the Ministry of Environment, Forest and Climate Change from time to time, as applicable to the project.
- (ii) The project proponent shall ensure compliance of 'National Emission Standards', as applicable to the project, issued by the Ministry from time to time. The project proponent shall also abide by the rules/regulations issued by the CPCB/SPCB for control/abatement of pollution.
- (iii) The project authorities shall adhere to the stipulations made by the State Pollution Control Board/Committee, Central Pollution Control Board, State Government and any other statutory authority.
- (iv) The project proponent shall prepare a site specific conservation plan and wildlife management plan in case of the presence of Schedule-1 species in the study area, as applicable to the project, and submit to Chief Wildlife Warden for approval. The recommendations shall be implemented in consultation with the State Forest/Wildlife Department in a time bound manner.
- (v) No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change. In case of deviations or alterations in the project proposal from those submitted to this

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- Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
- (vi) The energy source for lighting purpose shall be preferably LED based, or advance having preference in energy conservation and environment betterment.
 - (vii) The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one station each is installed in the upwind and downwind direction as well as where maximum ground level concentrations are anticipated.
 - (viii) The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be followed.
 - (ix) The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
 - (x) The Company shall harvest rainwater from the roof tops of the buildings and storm water drains to recharge the ground water and to utilize the same for process requirements.
 - (xi) Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
 - (xii) The company shall also comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.
 - (xiii) The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented.
 - (xiv) The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
 - (xv) A separate Environmental Management Cell (having qualified person with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions.
 - (xvi) The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein.

The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.

- (xvii) A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
- (xviii) The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e-mail) to the respective Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
- (xix) The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEF&CC by e-mail.
- (xx) The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at <https://parivesh.nic.in/>. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
- (xxi) The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
- (xxii) This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.

12. The Ministry reserves the right to stipulate additional conditions, if found necessary at subsequent stages and the project proponent shall implement all the said conditions in a time bound manner. The Ministry may revoke or suspend the environmental clearance, if implementation of any of the above conditions is not found satisfactory.

13. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.

14. Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

15. The above conditions will be enforced, *inter alia* under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Water Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and rules.
16. This issues with approval of the competent authority.

(Dr. R. B. Lal)
 (डा. आर. बी. लाल)
 (Dr. R. B. LAL)
 वैज्ञानिक 'ई' / Scientist 'E'
 पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
 Min. of Environment, Forest and Climate Change
 भारत सरकार, नई दिल्ली
 Govt. of India, New Delhi

Copy to:-

1. The Deputy DGF (C), MoEF&CC Regional Office (SEZ), 1st and 11nd Floor, Handloom Export Promotion Council, 34, Cathedral Garden Road, Nungambakkam, Chennai - 34
2. The Secretary, Department of Environment, Forests, Science and Technology, Government of Telangana, Hyderabad (Telangana)
3. The Member Secretary, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi - 32
4. The Member Secretary, Telangana State Pollution Control Board, Plot No A 3, Paryavaran Bhawan, Sanath Nagar, Hyderabad (Telangana) - 18
5. The Member Secretary, Central Ground Water Authority, 18/11, Jamnagar House, Mansingh Road, New Delhi - 11
6. The District Collector, District Yadadri Bhuvanagiri (Telangana)
7. Guard File/Monitoring File/Website/Record File

(Dr. R. B. Lal)
 Scientist E



CONSENT ORDER FOR ESTABLISHMENT (EXPANSION) – RED CATEGORY

Order No.03/TSPCB/CFE/YDR/RO-NLG/HO/2020

Dt: 07.05.2020

Sub: PCB - CFE - M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District – Consent for Establishment of the Board for Expansion under Sec.25 of Water (P & C of P) Act, 1974 and Under Sec.21 of Air (P&C of P) Act, 1981 - Issued - Reg.

Ref: 1. CFO Order No. TSPCB/RCP/NLG/HO/2017 - 810, dt.30.05.2017.
2. EC Order No. F. No. J-11011/19/2016-IA-II (I), dt.27.02.2020.
3. Industry's CFE application received under TS-iPASS dt: 13.03.2020.
4. Decision of the CFE Committee dt: 07.05.2020.

1. M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District has obtained CFO (change of product mix) of the Board vide reference 1st cited with validity up to 31.01.2022. The industry obtained EC for Expansion from MoEF & CC, Gol, vide reference 2nd cited.
2. The industry vide reference 3rd cited has applied for CFE for Expansion as per EC. The details of the existing and proposed products after expansion are as follows:

A: Existing as per CFO:

S. No	Product Name	Production (kg/day)	No. of Stages	Name of Starting key Raw Material	Quantity (kg/day)
GROUP- A					
1	N-(2-Methyl-5-amino phenyl)-4-(3-pyridyl)-2-pyrimidine amine	116.7	2	(2-Methyl-5-nitrophenyl)guanidine.	130.7
2	4-[(4-Methylpiperazin-1-yl)methyl]benzoic acid dihydrochloride	133.3	1	4-Cyanobenzyl bromide	89.3
3	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoro methyl) phenyl] propanamide	61.1	3	2-Methylacrylic acid	102.7
4	Ethyl-N-phthaloyl-p-amino-L-phenyl alaninate Hydrochloride	16.7	3	L-Phenyl alanine	23.3
5	2-Deoxy-2,2-Difluoro-D-Erythro-Pentafurano usulose-3,5-Dibenzoate	22.2	2	(2R,3R,4S,5S)-Hexane-1,2,3,4,5,6-hexaol	48.9
Total of Group- A		350 kg/day			
Group-B					
1	Bis-(2-Chloroethyl) Amine Hydrochloride	83.3	1	Di ethanol amine	50.0
2	N-Acetyl Cytosine	41.7	1	Cytosine	30.8

3	Benzonitrile 4-(1h-1,2,4-Triazol-1-yl Methyl)	55.6	1	4-Bromo Methyl benzonitrile	60.6
4	N-Phthaloyl, D,L Glutamic acid anhydride	69.4	2	L-Glutamic acid	69.4
5	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	100.0	5	D-Ribose	165.0
Total of Group- B		350 kg/day			
Industry shall manufacture only one group at a time.					

B. Proposed after Expansion (as per EC dt. 27.02.2020)

S. No	Name of the Product	Quantity as per EC (TPD)	No of Stages	Name of Starting key Raw Material	Quantity (TPD)
1	Amlodipine Besylate	0.33	1	Phthalimido Amlodipine	0.425
2	Bupropion HCl	0.83	2	m-Chloropiophenone	0.6171
3	Clopidogrel Hydrogen Sulfate	0.33	2	Methyl(+)-alpha-amino(2-chlorophenyl) acetate tartaric acid salt	0.4214
4	Desvelofloxin Succinate	0.17	2	1-[2-Amino-1-(4-benzyl oxyphenyl) ethyl] cyclohexanol	0.1885
5	Divolproex Sodium	0.57	2	2,2-Dipropylmalonic acid	0.7787
6	Dulaxetine HCl	0.17	1	(S)-N-Methyl-N-phenyl oxycarbonyl-3-(1-naphthoxy)-3-(2-thienyl) propylamine	0.2427
7	Esomeprazole Dihydrate Mg	0.33	1	(±) Omeprazole	0.3212
8	Glimepiride	0.17	1	4-[2-(3-ethyl-4-methyl-2-oxo-3-pyrroline-1-carboxamido) ethyl] benzene sulfonamide	0.1458
9	Mesalamine	0.17	1	Aniline	0.129
10	Metaprolol Succinate	0.5	3	4-(2-Methoxy-ethyl)-phenol	0.2676
11	Pantoprazole Sodium Sesquihydrate	0.5	1	5-(Difluoromethoxy)-2-[[3,4-dimethoxy-2-pyridinyl)methyl]thio]-1H - benzimidazole	0.4592
12	Pragabalin	0.5	1	3-(Carbamoylmethyl)-5-methylhexanoic acid	0.8179
13	Rosuvastatin Calcium	0.1	1	(R)-7-[4-(4-Fluoro phenyl)-6-(1-methyl ethyl) -2-[methyl (methyl sulfonyl) amino]-5-pyrimidinyl]-5-pyrimidinyl]-3-hydroxy-5-oxo-6-heptenoic acid methyl ester	0.1147
14	Sertraline HCl	0.33	1	4-(3,4-Dichlorophenyl)-3,4-dihydro-N-methyl-1(2H)-Naphthalenimine	0.3788
15	Tramadal	0.67	1	2-[(N,N-Dimethylamino) methyl] cyclohexanone	0.4619

16	Valcyclovir Hydrochloride Monohydrate	0.33	2	2-(Acetylamino)-1,9-dihydro-9-[[2-(acetyl oxy) ethoxy] methyl]-6H-purin-6-one	0.4944
17	4-[4-Chloro-1-oxobutyl]-2,2- dimethyl phenyl acetic acid methyl ester	0.1	3	2-methyl-2-phenyl propan-1-ol	0.1226
18	N2-(1-(S)-ethoxy carbonyl-3-phenyl propyl-N6-trifluoro acetyl-L-lysine	0.17	2	L-Lysine	0.3195
19	2-[2-[3(S)-[3-[2-(7-Chloro-2-Quinoliny)-ethenyl] phenyl]-3-hydroxypropyl] phenyl-2-propanol	0.1	2	3-[2-(7-chloro-2-quinoliny) ethenyl]-alpha-[2-(methoxy carbonyl-phenyl) methyl] -beta-oxo-benzenepropanoic acid methyl ester	0.1462
20	2,8-Diazo bicyclo Nonane	0.17	4	2,3-Pyridine Dicarboxylic acid	0.3092
21	2,3,4,5-Bis-O- (1- methyl ethylidene)-b-D-fructopyranose	0.83	1	D-(-)-Fructose	0.646
22	2- Acetyl Ethoxy acetyl methoxy ether	1.13	1	Acetic anhydride	0.8965
23	N,N-Carbonyl di imidazole	1.67	1	1H Imidazole	2.0431
24	(2S,3S,5S)-2-Amino-3-Hydroxy-5-Tert-Butyl carbonyl Amino 1,6-diohenyl	0.1	3	Phenyl alanine	0.0624
25	Trans-4-(4-chlorophenyl)-cyclohexane carboxylic acid	0.1	2	Tetrahydrobenzene	0.041
26	Guanine	1.67	1	2,5,6-Triamino-3H-pyrimidin-4-one	2.299
27	Poly allyl amine HCl	0.5	1	Polyallylamine	0.355
28	Tert-butyl 2-((4R,6S)-6-((E)-2-(4-(4-fluorophenyl)-6-isopropyl-2-(N-methyl methane sulfonamido) Pyrimidin - 5-yl)vinyl)-2,2-dimethyl-1,3-dioxane-4-yl) acetate	0.17	3	Tert-Butyl-2((4R,6S)-6-(acetyloxy)methyl-2,2-dimethyl-1,3-dioxan-4-yl) acetate	0.1456
29	5-Cyano phthalide	0.67	3	5-Carboxy Phthalide	1.6364
30	1,1-Cyclohexanediactic acid	1.67	1	Cyclohexanone	0.9891
31	Carbamyl Methyl-5-Methyl hexanoic Acid	0.5	1	Isovaleraldehyde	0.2855
32	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	0.13	2	Methyl-2,3-O-isopropyl idene-5-deoxy-D-ribofuranoside	0.1051
33	N-(2-Methyl-5-amino phenyl)-4-(3-pyridyl)-2-pyrimidine amine	0.33	2	(2-Methyl-5-nitrophenyl) guanidine.	0.3702
34	4-[(4-Methylpiperazin-1-yl) methyl] benzoic acid dihydrochloride	0.33	1	4-Cyanobenzyl bromide	0.2975
35	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl] propanamide	0.17	3	2-Methylacrylic acid	0.0929
Worst Case 20 products on Campaign basis with maximum quantity of production:					14.20 TPD

By Products:

S.N	Name of the product	Stage	Name of By-product	Quantity (kg/day)
1	Clopidogrel Hydrogen Sulfate	I	p- toluene sulfonic acid	180.8
2	1,1-Carbonyl diimidazole	I	Trichloromethanol	2782.5

3. As per the application, the proposed expansion is to be carried out in the existing premises located at M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District in area of 33.485 Acres (Existing – 4.325 Acres Expansion – 29.16 Acres).
4. The above site was inspected by the Asst. Environmental Engineer, Regional Office, Nalgonda, T.S. Pollution Control Board and observed that the site is surrounded by

 North – M/s. Sensational Agri inputs;
 South – Open lands & Agricultural lands;
 East – M/s. Optimus Drugs, M/s. SVR Labs & M/s. VJ Sai Chem;
 West – Open lands & Agricultural lands
5. The Board, after careful scrutiny of the application, EC order dt. 27.02.2020 and after examining by the CFE Committee hereby issues CONSENT FOR ESTABLISHMENT FOR EXPANSION to your unit Under Section 25 of Water (Prevention & Control of Pollution) Act 1974 and Section 21 of Air (Prevention & Control of Pollution) Act, 1981 and the rules made there under. This order is issued to manufacture the products and capacities as mentioned at para (2) (B) only.
6. This Consent Order now issued is subject to the conditions mentioned in Schedule 'A' and Schedule 'B'.
7. This order is issued from pollution control point of view only. Zoning and other regulations are not considered.

Encl: Schedule 'A'
 Schedule 'B'

Sd/-
MEMBER SECRETARY

To,
 M/s. Hazelo Lab Pvt Ltd.,
 (Formerly M/s Venlar Labs (P) Ltd.),
 Sy.Nos. 240, 242, 243, 247, 248 & 249,
 Dhotigudem (V), Pochampally (M),
 Yadadri Bhuvanagiri District.

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

K. Sreedh
 Senior Environmental Engineer

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SCHEDULE - A

1. Progress on implementation of the project shall be reported to the concerned Regional Office, T.S. Pollution Control Board once in six months.
2. Separate energy meters shall be provided for Effluent Treatment Plant (ETP) and Air pollution Control equipments to record energy consumed.
3. The proponent shall obtain Consent for Operation (CFO) from TSPCB, as required Under Sec.25/26 of the Water (Prevention and Control of Pollution) Act, 1974 and under sec. 21/22 of the Air (Prevention and Control of Pollution) Act, 1981, before commencement of the activity.
4. Notwithstanding anything contained in this conditional letter or consent, the Board hereby reserves its right and power Under Sec.27(2) of Water (Prevention and Control of Pollution) Act, 1974 and Under Sec.21(4) of Air (Prevention and Control of Pollution) Act, 1981 to review any or all the conditions imposed herein and to make such alternation as deemed fit and stipulate any additional conditions by the Board.
5. The consent of the Board shall be exhibited in the factory premises at a conspicuous place for information of the inspecting officers of different departments.
6. Compensation is to be paid for any environmental damage caused by it, as fixed by the Collector and District Magistrate as civil liability.
7. 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. The industry shall maintain a good housekeeping. All pipe valves, sewers, drains shall be leak proof. Dyke walls shall be constructed around storage of chemicals.
8. The rules and regulations notified by Ministry of Law and Justice, GOI, regarding the Public Liability Insurance Act, 1991 shall be followed.
9. This order is valid for period of 5 years from the date of issue.

SCHEDULE - B

Water:

1. The source of water is industrial supply (Mission Bhagiratha). The maximum total water consumption after expansion shall not exceed 396.27 KLD. The industry shall comply with the following:

S. No	Purpose	Quantity	
		Fresh	Recycled
1	Process & washings	91.27 KLD	--
2	Floor washings	5.0 KLD	--
3	Scrubber	--	10.0 KLD
4	Boiler Feed	70.0 KLD	--
5	Cooling tower make-up	42.0 KLD	150.0 KLD
6	DM plant/Regeneration	10.0 KLD	--
7	Domestic	10.0 KLD	--
8	Greenbelt	8.0 KLD	--
	Total	396.27 (Fresh -236.27 KLD + Recycled - 160 KLD)	

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2. The maximum Waste Water Generation after expansion shall not exceed the following:

S. N	Source	Quantity
1	Process	102.56 KLD
2	Washings	5 KLD
3	Scrubber Effluent	10 KLD
4	RO/DM plant Rejects	10 KLD
5	Boiler blow down	10 KLD
6	Cooling tower blow down	26 KLD
7	Domestic	8.5 KLD
Total:		172.06 KLD

3. Effluent Treatment & Disposal:

Source of Effluent	Quantity	Treatment & disposal
HTDS Effluents: (Process – 102.56 KLD + Washings – 5 KLD + RO/DM plant Rejects - 10 KLD + Scrubber effluent – 10 KLD)	127.56 KLD	<ul style="list-style-type: none"> ➤ Shall be stripped off for organics recovery. ➤ Stripper condensate to distillate for separation of organic compounds followed by disposal to cement plants for co-processing and distilled effluents shall be sent to LTDS treatment system. ➤ Stripped effluents for forced evaporation in MEE followed by ATFD. ➤ Condensate from MEE & ATFD shall be routed to LTDS treatment system. ➤ ATFD salts to TSDF.
LTDS Effluents: Cooling bleed off – 26 KLD + Boiler blow down – 10 KLD + Domestic effluents – 8.5 KLD	44.5 KLD	<ul style="list-style-type: none"> ➤ LTDS effluents along with condensate of MEE & ATFD shall be treated in biological ETP followed by filtration in the RO Plant. ➤ RO Permeate to reuse. ➤ RO rejects to MEE followed by ATFD.
Total:	172.06 KLD	

4. The industry shall establish ZLD system of capacity 200 KLD consisting of Stripper (135 KLD), MEE (200 KLD), ATFD (50 KLD), Biological ETP followed by RO Plant (250 KLD+70 KLD) as proposed. All the units of the ZLD system shall be impervious.
5. All the units of ZLD system shall be constructed above the ground level to avoid ground water pollution.
6. Industry shall not use ground water as stipulated in EC order.
7. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
8. During transfer of materials, spillages shall be avoided and garland drains shall be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.

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9. Separate meters with necessary pipe-line shall be provided for assessing the quantity of water used for each of the purposes mentioned below.
 - a) Industrial cooling, boiler feed.
 - b) Domestic purposes.
 - c) Processing, whereby water gets polluted and pollutants are easily bio-degradable.
 - d) Processing, whereby water gets polluted and the pollutants are not easily bio-degradable.
 10. The industry shall provide digital flow meters with totalisers with recording facility at inlet of collection tank, Stripper feed, MEE feed, MEE condensate, ATFD condensate, inlet of biological ETP, RO feed, RO permeate and RO rejects separately for measuring effluent generation, treatment and recycling. The industry shall provide steam flow meter to the inlet collection line of MEE.
 11. The industry shall provide IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability at HTDS & LTDS effluent collection system as per the CPCB norms & connect the same to CPCB & TSPCB servers.

Air Pollution:

12. The industry shall comply with the following after expansion.

S.N.	Source	Capacity	Stack height	Control system
1	Coal fired Boiler (existing)	2 TPH	30 m	Mechanical dust collector
2	Thermic fluid heater (existing)	1 Lakh K cal/hr	15 m	--
3	Coal fired Boiler (Proposed)	2 X 10 TPH	35 m	Dust collectors followed by bag filter
4	DG Sets (existing)	1x250KVA	16 ft	Acoustic enclosures
5	DG Sets (Proposed)	2x1000KVA	10 m	Acoustic enclosures
6	Process emissions (existing & proposed)	--	--	Scrubbers with online pH meters

13. The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoE&F, GoI vide notification No. GSR 826(E), dated. 16.11.2009 during construction and regular operational phase of the project.
14. A sampling port with removable dummy of not less than 15 cm diameter shall be provided in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bends etc. A platform with suitable ladder shall be provided below 1 meter of sampling port to accommodate three persons with instruments. A 15 AMP 250 V plug point shall be provided on the platform.
15. The industry shall install multi-stage scrubbers for control of process emissions. The scrubbed solutions shall be reused to the possible extent. The industry shall keep the record of disposal of all such by-products and shall submit the record to concerned Regional Officer. The industry shall install online pH meters to all the scrubbers.
16. Industry shall use dedicated multi-stage scrubbers with online pH meters to control process emissions.
17. Industry shall provide enclosures with scrubbers to HTDS effluent collection and storage tanks to minimize odour in the surrounding areas.

18. Industry shall take necessary measures to control spreading of foam from aeration tank into atmosphere and submit action taken report to the Regional Office within one month.
19. Vent condensers shall be provided to the solvent storage tanks and receivers.
20. The industry shall provide online VOC meters and connect to TSPCB server.
21. The proponent shall not use odour causing substances or Mercaptans and cause odour nuisance in the surroundings.
22. The evaporation losses in solvents shall be controlled by taking the following measures:
 - i) Chilled brine circulation shall be carried out to effectively reduce solvent losses into atmosphere.
 - ii) The vents of the reactors shall be connected to primary & secondary condensers with chilled brine circulation.
 - iii) The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.
 - iv) Transfer of solvents shall be done by using pumps instead of manual handling.
 - v) Reactors and solvent handling pumps shall have mechanical seals to prevent leakages.
 - vi) Closed centrifuges shall be used to reduce solvent losses.
 - vii) All the solvent storage tanks and receivers shall be connected with vent condensers with chilled brine circulation.

Solid Waste:

23. The proponent shall comply with the following after expansion:

Sl. No	Name of the Hazardous Waste	Quantity	Method of Disposal
1)	Spent Carbon	368 Kg/day	Authorized cement plants for co-processing (or) TSDF, Dundigal for incineration
2)	Process Organic residue	9.12 TPD	
3)	Solvent Residue	3.58 TPD	
4)	Stripper distillate	3.4 TPD	
5)	MEE Salts	11.92 TPD	TSDF, Dundigal for secured land filling.
6)	Inorganic residue	3.77 TPD	
7)	ETP sludge	0.65 TPD	
8)	Spent solvents	126.4 KLD	For recovery & reuse within the plant premises. Excess Spent Solvents for disposal to authorized Cement manufacturing units for Co-processing/ TSDF, Dundigal. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to traders/ recyclers.
9)	Spent Mixed Solvents	14 KLD	
10)	Detoxified container & container liners	650 Nos./ month	After detoxification, it should be disposed to the outside agencies.
11)	Hyflow	78 Kg/day	To TSDF
12)	Catalyst	200 Kg/day	To TSDF
13)	Ash from Boiler	40 TPD	Sold to bricks manufacturers
14)	Waste oil	5.88 KLPA	Disposed to authorized recycling units
15)	Used Batteries	20 Nos /yr	

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24. The spent solvents shall be recovered in the proposed solvent recovery unit. **Excess Spent Solvents shall be disposed to authorized Cement manufacturing units for Co-processing/ TSDf, Dundigal.** Industry shall not dispose spent solvents to solvent recovery units.
 25. Industry shall provide closed shed with impervious lining and platform with dyke wall and leachate collection system for storage of hazardous waste.
 26. The drums containing chemicals, intermediates, hazardous wastes shall be stored on the impervious platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system under shed.
 27. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to ETP.
 28. The hazardous waste stored in the industry premises shall be disposed as per stipulated conditions on priority.
 29. The industry shall not store hazardous waste more than 90 days in their premises, as stipulated in HWM Rules.
 30. The industry shall submit quantity of hazardous wastes sent to TSDf and to cement industries for co-processing to RO-II, RC Puram on monthly basis.
 31. The following rules and regulations notified by the MOE&F, GOI shall be implemented.
 - a) Hazardous waste and other wastes (Management and Transboundary movement), Rules, 2016.
 - b) Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.
 - c) Batteries (Management & Handling) Rules, 2001 and its Amendment Rules, 2010
 - d) E-Waste (Management) Rules, 2016 and its Amendment Rules, 2018.
 - e) The Plastic Waste Management Rules, 2016.
 - f) Bio-Medical Waste Management Rules, 2016 and its Amendment Rules, 2018.
 - g) Solid Waste Management Rules, 2016.
 - h) Construction and Demolition Waste Management Rules, 2016.

Other Conditions:

32. Industry shall submit the Bank Guarantee of Rs. 4 lakhs as directed by the Board immediately.
33. Industry shall connect IP camera provided at main gate to the Board website immediately.
34. Industry shall develop greenbelt in an area of 11.5 acres as stipulated in EC mainly along the boundary of the industry with a width of 5 -10 m.
35. Industry shall communicate EC order to the concerned and to publish the same in the local news papers as stipulated in EC order.
36. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to RO, every month along with invoice copies of the starting raw materials outsourced.
37. The industry shall implement the odour control measures at source of generation and from ETP and shall ensure to maintain the same effectively to control odour problems.

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38. System of leak detection and repair of pump / pipeline shall be installed in the plant and immediate response team shall be identified for preventive maintenance.
39. The proponent shall ensure that there shall not be any change in the process technology and scope of working without prior approval from the Board.
40. The industry shall comply with all the directions issued by the Board from time to time.
41. Concealing the factual data or submission of false information / fabricated data and failure to comply with any of the conditions mentioned in this order may result in withdrawal of this order and attract action under the provisions of relevant pollution control Acts.
42. The Board reserves its right to modify above conditions or stipulate new / additional conditions and to take action including revoke of this order in the interest of environment protection.

Sd/-
MEMBER SECRETARY

To,

M/s. Hazelo Lab Pvt Ltd.,
(Formerly M/s Venlar Labs (P) Ltd.),
Sy.Nos. 240, 242, 243, 247, 248 & 249,
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

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

K. S. Reddy
Senior Environmental Engineer

(K)

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State Level Environment Impact Assessment Authority (SEIAA)
Telangana State
Government of India
Ministry of Environment, Forests & Climate Change
 A-3, Industrial Estate, Sanathnagar, Hyderabad - 500 018.

REGD.POST WITH ACK.DUE

Order No. SEIAA/TS/OL/YDR-44/2020- 503

Dt:13.11.2020.

Sub: SEIAA, TS – M/s. Hazelo Lab Pvt. Ltd., Survey No. 240, 242, 247, 248 and 249, Dothigudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District – Environmental Clearance (Expansion) - Issued - Reg.

Ref: EC order dt.23.11.2010 issued by MoE&F, Gol.

1. Earlier, vide reference cited above the industry obtained EC from MoE&F, Gol, in the name of M/s. Velnar Labs (P) Ltd. Now, this has reference to your application uploaded online on 02.06.2020 (proposal no. SIA/TG/IND2/155662/2020) received on 18.07.2020 seeking Environmental Clearance for, the proposed expansion of **Active Pharma Ingredients (Bulk Drug and Intermediates)** under **Synthetic Organic Chemicals manufacturing unit** in the name of **M/s. Hazelo Lab Pvt. Ltd., Survey No. 240, 242, 247, 248 and 249, Dothigudem Village, Pochampally Mandal, Yadadri-Bhuvanagiri District.** The nearest human habitation viz., Antammagudem (V) exists at a distance of 0.65 km from the project site. It was reported that nearest water body is Chinna Musi River exists at a distance of 5.8 km; Lakkaram RF exists at a distance of 1.2 km and several other RF's exists within 10 km radius from the project site. The total area of the site is 20 Acres; Out of that, area earmarked for development of Green belt is 7 Acres (35%). The total cost of the project for expansion is Rs. 45.0 Crores and the production capacity of the project after expansion is as following:

List of Products:

S.No	Name of Product	Capacity (TPD)
1	Amlodipine Besylate	0.83
2	Bupropion HCl	1.83
3	Clopidogrel Hydrogen Sulfate	0.33
4	Desvelofloxin Succinate	0.17
5	Divolproex Sodium	1.57
6	Duloxetine HCl	0.17
7	Esomeprazole Mg Dihydrate	0.33
8	Glimepiride	0.17
9	Mesalamine	0.17
10	Metoprolol Succinate	1
11	Pantoprazole Sodium Sesquihydrate	1
12	Pragabalin	1
13	Rosuvastatin Calcium	0.1
14	Sertraline HCl	0.33
15	Tramadal	1.17
16	Valcyclovir Hydrochloride Monohydrate	0.33
17	4-[4-Chloro-1-oxobutyl]-2,2- dimethyl phenyl acetic acid methyl ester	0.1
18	N2-(1-(S)-ethoxy carbonyl-3-phenyl propyl-N6-trifluoro acetyl-L-lysine	0.17
19	2-[2-[3(S)-[3-[2-(7-Chloro-2-Quinoliny)]-ethenyl]phenyl]-3-hydroxypropyl]phenyl-2-propanol	0.1
20	2,8-Dinzo bicyclo Nonane	0.17
21	2,3,4,5-Bis-O- (1- methylethylidene)-b-D-fructopyranose	0.83
22	2- Acetyl Ethoxy acetyl methoxy ether	1.63
23	N,N-Carbonyl di imidazole	2.17
24	(2S,3S,5S)-2-Amino-3-Hydroxy-5-Tert-Butylcarbonyl Amino 1,6-diohenyl	0.1
25	Trans-4-(4-chlorophenyl)-cyclohexane carboxylic acid	0.1

26	Guanine	1.98
27	Poly allyl amine HCl	0.5
28	Tert-butyl 2-((4R,6S)-6-((E)-2-(4-(4-fluorophenyl)-6-isopropyl-2-(N-methylmethane sulfonamido) Pyrimidin - 5-yl)vinyl)-2,2-dimethyl-1,3-dioxane-4-yl-) acetate	0.17
29	5-Cyano phthalide	0.67
30	1,1-Cyclohexanediactic acid	1.67
31	Carbamyl Methyl-5-Methyl hexanoic Acid	0.50
32	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	0.13
33	N-(2-Methyl-5-aminophenyl)-4-(3-pyridyl)-2-pyrimidine amine	0.33
34	4-[(4-Methylpiperazin-1-yl) methyl] benzoic acid dihydrochloride	0.33
35	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoromethyl) phenyl] propanamide	0.17
Worst Case: 20 products on Campaign basis		20
Co- Generation Power Plant		1 x 2 MW

List of By-Products:

S.No	Name of Product	Stage	Name of By-Product	Quantity	
				Kg/day	TPM
1	Clopidogrel hydrogen sulfate	I	p-toluene sulfonic acid	180.8	5.4
2	1,1-Carbonyl diimidazole	I	Trichloromethanol	3622.7	108.7

- II. In the process, synthetic organic chemicals are produced by using various chemicals, solvents, etc.,
- III. The proposal has been examined and processed in accordance with EIA Notification, 2006 and its amendments thereof. The State Level Expert Appraisal Committee (SEAC) examined the proposal in its meetings held on 31.07.2020 & 10.09.2020. The Sub-Committee constituted by the SEAC in its meeting held on 31.07.2020 inspected the site on 09.08.2020 and submitted the report. Based on the information furnished, presentation made by the proponent and the consultant M/s. Team Labs & Consultants, Hyderabad; Report of the Sub-Committee; G.O.Ms. No. 95, dt. 21.09.2007 of the EFS&T Dept., GoAP; G.O.Ms. No. 64, dt. 25.07.2013 of the EFS&T Dept., G.O. Ms. No. 24, dt. 24.04.2019 of the EFS&T Dept.; S.O.1223 (E), dt.27.03.2020 of MoEF&CC, GoI; The Committee considered the project proposal and recommended for issue of Environmental Clearance. The State Level Environment Impact Assessment Authority (SEIAA) in its meeting held on 13.10.2020 examined the proposal and recommendations of SEAC for issue of Environmental Clearance. Accordingly, after discussions in the matter and considering the recommendations of the SEAC, the SEIAA, Telangana hereby accords Environmental Clearance to the project for Expansion as mentioned at Para no. 1 under the provisions of the EIA Notification 2006 and its subsequent amendments issued under Environment (Protection) Act, 1986 subject to implementation of the following specific and general conditions:

A. Specific Conditions:

i. Air pollution:

- i The emissions from the proposed Coal fired Boilers of capacity-1 x 20 TPH & 1 x 12 TPH, shall be routed through APCE i.e., Bag filter and disposed through separate Stacks of height 40m & 35m respectively. The concentration of particulates in the emission shall not exceed 115 mg/Nm³. Thermic fluid heaters of 1 x 1 lakh kcal/hr (Existing) & 1 x 2 lakh kcal/hr (Proposed) shall be provided with a stack of height 15m each. Sampling Port with removable dummy of not less than 15m diameter in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bonds etc., shall be provided to monitor stack emissions. Stack of adequate height shall be provided for D.G. Sets of capacity-1 x 250 kVA (Existing) and 2 x 1500 kVA (Proposed) installed with Acoustic Enclosures & Silencers as per CPCB norms.
- ii The process emissions containing Hydrogen Bromide, Sulphur Dioxide, Hydrogen Chloride & Ammonia are to be routed through Multi Stage Scrubber system. This system

emissions containing derivatives of Carbon dioxide shall be safely dispersed into the atmosphere. Further, the process emissions containing derivatives of Hydrogen are to be safely dispersed into the atmosphere through water column. The industry shall also provide online pH monitoring system for scrubber. The industry shall meet the emission standards notified by the MoEF&CC.

- iii National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended time to time shall be followed by the unit.
- iv Necessary measures shall be taken to control odour as far as possible. Chillers (brine solution) shall be installed to reduce solvent evaporation losses into the atmosphere. All the solvent storage tanks shall be connected to vent condensers. Regular monitoring of the VOCs shall be carried out using sensors.
- v The solvents shall be recovered by installing fractional distillation columns. The recovered solvents shall be reused in the process or sold to recyclers authorized by TSPCB. The volatile vapours generated during process shall be routed through condensers and the condensate shall be reused in the plant.
- vi As proposed, greenbelt of Ac. 7.0 (35%) shall be developed within plant premises with at least 10 meter wide green belt on all sides along the periphery of the project area, in downward direction and along the road sides etc., Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO.
- vii Raw materials shall be transported in covered trucks. Raw materials shall be stored under sheds. All the belt conveyors shall be covered with G.I. sheets. Appropriate dust suppression system shall be provided all around the stockpiles and conveyor system. All the roads in the plant area shall be asphalted / concreted and water shall be sprinkled to suppress the dust.
- viii The industry shall monitor VOCs in ambient air with online VOC analyzer and connect the data to the server of SPCB.
- ix The project proponent shall install 24x7 continuous emission monitoring system at stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to SPCB & CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.
- x The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.
- xi To control source and the fugitive emission suitable pollution control devices shall be installed to meet the prescribed norms and / or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- xii Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.
- xiii Acoustic enclosure shall be provided to DG set for controlling the noise pollution.
- xiv The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc., on all sources of noise generation.
- xv The ambient noise levels should conform to the standards prescribed under E(P)Act, 1986 viz., 75 dB(A) during day time and 70 dB(A) during night time.
- xvi The Industry shall provide energy sources for lighting purpose shall preferably be LED based.

- xvii Ambient air quality including ambient noise levels must not exceed the standards stipulated under Notification dt. 16.11.2009 issued by the MoEF&CC, GoI. Monitoring of ambient air quality and stack emissions shall be carried out regularly in consultation with TSPCB.

b) Water Pollution:

- i The source of water is from Ground Water/Mission Bhagiratha. The total water requirement after expansion shall not exceed 696.3 KLD (i.e., Fresh Water of 451.3 KLD & Recycled treated water of 245.0 KLD). Quantity of water used for: Process is 111.3 KLD; Washings is 10.0 KLD; Boiler make-up is 175.0 KLD; Cooling tower makeup is 345.0 KLD; Scrubber is 15.0 KLD RO/DM Rejects is 20.0 KLD; and Domestic purposes is 10.00 KLD & Gardening is 10.00 KLD.
- ii The total waste water generated after expansion shall not exceed 254.8 KLD. Out of that, 170.8 KLD (HTDS) & 84.0 KLD (LTDS); 125.8 KLD are from Process; 10.0 KLD is from Washings; 15.0 KLD is from Boiler blow down; 20.0 KLD is from RO/DM Plant Rejects 60.0 KLD is from cooling tower bleed of; 15.0 KLD is from Scrubber; 9.0 KLD is from Domestic section.
- iii The high TDS and low TDS effluents generated from the process are to be separated and treated separately. The high TDS effluents shall be disposed into stripper followed by MEE and ATFD. The condensate shall be reused in cooling towers after necessary treatment. The LTDS effluents shall be treated in Biological ETP followed by RO system. The permeate is to be re-used in the plant and rejects are to be sent to MEE system. The treated effluents shall be recycled completely. The project proponent shall achieve **Zero Liquid Discharge** and in no case the effluent shall be discharged outside the factory premises. The volatile organics shall be sent to recyclers authorized by SPCB.
- iv The effluent discharged shall conform to the standards prescribed under Environment (Protection) Rules, 1986 or as specified by the SPCB while granting Consent under the Air/Water Act, whichever is more stringent.
- v The effluent generated from the unit processes and operations shall be treated in proposed MEE followed by ETP. The treated effluent shall be recycled / reused within the plant. The effluent generated from the domestic section shall be disposed to septic tank followed by Soak Pit.
- vi The proponent shall provide separate storm water drains and harvest the rainwater from the rooftops to recharge the ground water.
- vii The industry shall install & maintain separate water meters for recording water consumption for various purposes and also maintain daily records.
- viii Automatic / online monitoring system (24 x 7 monitoring devices) for flow measurement and relevant pollutants in the treatment system to be installed. The data to be made available to the SPCB and in the Industry's website.
- ix The industry shall install IP Camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability and flow meters in the channel / drain provided for carrying the effluent within the premises of the unit.
- x Permission from the competent authority should be obtained for drawl of ground water, if any, required for this project.
- xi Regular monitoring of ground water level and quality should be carried out by establishing a network of existing wells by the project proponent in and around project area in consultation with Regional Director, CGWB, Southern Region, Hyderabad. Data thus collected should be sent at regular interval to MoEF, CGWA and CGWB, Southern Region, Hyderabad.
- xii Suitable conservation measures to augment groundwater resources in the area shall be planned and implemented in consultation with Regional Director, CGWB, Southern Region, Hyderabad. Suitable measures should be taken for rainwater harvesting.

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c) Solid Waste :

- i. Hazardous waste generated from the industry such as waste oils, used oils etc., shall be disposed as per the Hazardous Waste (Management, Handling, and Transboundary Movement) Rules, 2016, to the recyclers authorized by TSPCB.
- ii. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All Transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.
- iii. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc., Flame arresters shall be provided on tank farm and the solvent transfer through pumps.
- iv. The company shall undertake waste minimization measures as: Metering and control of quantities of active ingredients to minimize waste; Reuse of by-products from the process as raw materials or as raw material substitutes in other processes; Use of automated filling to minimize spillage; Venting equipment through vapour recovery system; and Use of high pressure hoses for equipment clearing to reduce wastewater generation.
- v. The proponent shall comply with the following w.r.t. solid waste generated:

S.No	Description	Quantity	Mode of Treatment/Disposal
1	Solvent residue	4.35 TPD	Sent to TDSF/Cement Plants for Co-incineration
2	Organic residue	10.88 TPD	
3	Stripper Distillate	4.2 KLD	
4	Spent Carbon	508 Kg/day	Recovered within the plant premises.
5	Spent Solvents	160 KLD	
6	Spent Mixed Solvents	18 KLD	Sent to authorized recovery units/Cement plants for co-incineration
7	Inorganic residue	4.5 TPD	Sent to TSDF
8	Hyflow	78 Kg/day	
9	Catalyst	200 Kg/day	
10	Evaporation salts	13.7 TPD	
11	ETP Sludge	3.11 TPD	
12	Ash from Boiler	10.9 TPD	Sold to Brick manufactures
13	Detoxified containers	8000 No.s/month	Sold to authorized vendors
14	Waste oil	5.36 KLPA	Sent to Authorized Recyclers
15	Used batteries	700 No.s/Yr	

B. General Conditions:

- i. This order is valid for a period of 7 years.
- ii. "Consent for Establishment" shall be obtained from Telangana State Pollution Control Board under Air and Water Act before the start of any activity / construction work at site and also obtain CFO before commencing operations.
- iii. The industry shall not manufacture any other products and exceeding capacities except those mentioned in this order, without permission.
- iv. Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as safe drinking water, fuel for cooking, mobile toilets, mobile STP, medical health care, crèche etc., The housing may be in the form of temporary structures to be removed after the completion of the project. The safe disposal of wastewater and solid wastes generated during the construction phase should be ensured.
- v. No change in the process technology and scope of working should be made without prior approval of the SEIAA, TS. No further expansion or modifications in the plant shall be carried out without prior approval of the SEIAA, TS/ MoEF&CC, Gov, New Delhi, as applicable.

- vi The environment safeguards contained in the EIA Report should be implemented in letter and spirit. The responsibility of implementation of environmental safeguards rests fully with the proponent i.e., **M/s. Hazelo Lab Pvt. Ltd.,**
- vii The project proponent shall abide by all commitments and recommendations made in the EIA/EMP report, commitment made during their presentation to the Expert Appraisal Committee.
- viii All the conditions, liabilities and legal provisions contained in the EC shall be equally applicable to the successor management of the project in the event of project proponent transferring the ownership, maintenance of management of the project to any other entity.
- ix The proponent shall submit half-yearly compliance reports in respect of the terms and conditions stipulated in this order in hard and soft copies to the SEIAA; and CCF, Regional office of MoEF&CC, GoI, Chennai on 1st June and 1st December of each calendar year.
- x Four ambient air quality-monitoring stations should be established in the core zone as well as in the buffer zone for RSPM, SPM, PM₁₀, PM_{2.5}, SO₂, NO_x monitoring. Location of the stations should be decided based on the meteorological data, topographical features and environmentally and ecologically sensitive targets and frequency of monitoring should be undertaken in consultation with the State Pollution Control Board.
- xi Data on ambient air quality (PM₁₀, PM_{2.5}, SO₂, NO₂) should be regularly submitted to the Ministry including its Regional Office located at Chennai and the State Pollution Control Board/ Central Pollution Control Board once in six months.
- xii Usage of Personnel Protection Equipments by all employees / workers shall be ensured.
- xiii Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
- xiv Occupational health surveillance program of the workers should be undertaken periodically to observe any contractions due to exposure to dust and take corrective measures, if needed.
- xv Emergency preparedness plan based on the Hazardous identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- xvi The Industry shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- xvii A separate environmental management cell with suitable qualified personnel should be set-up under the control of a Senior Executive, who will report directly to the Head of the Organization.
- xviii The funds earmarked for environmental protection measures (Capital cost of Rs. 12.43 Crores and Recurring cost of Rs. 16.63 Crores/annum); Budget for CER to be spent is Rs.55.0 lakhs within 5 years and also the funds earmarked for Corporate Social Responsibility (CSR) activities, should be kept in separate account and should not be diverted for other purpose. The budget allocated for the EMP shall be subsequently increased if the project cost increases at the time of CFO. Year wise expenditure should be reported to the SEIAA, Ministry and its Regional Office located at Chennai.
- xix The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No.22-65/2017-IA.III, dt.01.05.2018, as applicable regarding Corporate Environment Responsibility (CER).
- xx The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned SPCB as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and put on the website of the company.

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- xxi Officials from the TSPCB and Regional Office of MoEF&CC, GoI, Chennai who would be monitoring the compliance of the stipulated conditions and implementation of environmental safeguards should be given full co-operation, facilities and documents/data by the project proponents during their inspection. A complete set of all the documents shall be submitted to the CCF, Regional Office to MoEF&CC, GoI, Chennai.
- xxii The project proponent shall submit the copies of environmental clearance to the Heads of local bodies, Panchayats and Municipal Bodies in addition to the relevant offices of the Government who in turn has to display the same for 30 days from the date of receipt.
- xxiii The project authorities should advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and SEIAA, Telangana. This order shall be displayed in the website of the project proponent.
- xxiv Any appeal against this Environmental Clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
- xxv The company shall undertake eco-development measures including community welfare measures in the project area.
- xxvi The proponent shall obtain all other mandatory clearances from respective departments.
- xxvii Concealing the factual data or failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.
- xxviii The SEIAA may revoke or suspend the order, if implementation of any of the above conditions is not satisfactory. The SEIAA reserves the right to alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
- xxix The above conditions will be enforced inter-alia, under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and the Public Liability Insurance Act, 1991 along with their amendments and rules.
- xxx Grant of EC is also subject to circulars issued under the EIA Notifications 2006, which are available on the MoEF&CC website: www.parivesh.nic.in

Sd/-
MEMBER SECRETARY
SEIAA, T.S.

Sd/-
MEMBER
SEIAA, T.S.

Sd/-
CHAIRMAN,
SEIAA, T.S.

To

Sri J. Sambhi Reddy, Director,
M/s. Hazelo Lab Pvt. Ltd.,
Plot no.7-2-A2, Hetero Corp, Industrial Estates,
Sanathnagar, Hyderabad – 500 018
Ph.No. 9100133693
Email.id: vasudevareddy_m@heterodrugs.com

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


 Joint Chief Environmental Engineer



TELANGANA STATE POLLUTION CONTROL BOARD

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

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BY REGD. POST WITH ACK. DUE

Order No. NLG-44/TSPCB/UH-V/TF/2016 - 134B

Dt: 04.12.2020

Sub : TSPCB - M/s. Hazelo Lab Private Limited, (Formerly M/s.Venlar Labs (P) Ltd) Dhotigudem (V), Pochampally (M), Yadadri Bhuvangiri District - Water (Prevention and Control of Pollution) Amendment Act, 1988 - Air (Prevention and Control of Pollution) Amendment Act, 1987 - Extension of Temporary Revocation of Closure Order for a period of Six Months - Orders Issued - Reg.

- Ref :**
1. Consent Order No. TSPCB/RCP/NLG/16644/HO/2015-986, dt.30.05.2017.
 2. Closure Order No.NLG-44/TSPCB/U-II/TF/2016 -789, dt. 01.07.2019.
 3. Temporary Revocation of Closure Order No.NLG-44/TSPCB/UH-II/2016-1066, dt.30.07.2019 for a period Three Months.
 4. Additional Directions Order No. No.NLG-44/TSPCB/UH-V/TF/2016-1685, dt.16.10.2019 in connection with payment of Crop damage compensation.
 5. Extension of Temporary Revocation of Closure Order No. NLG-44/TSPCB/UH-V/TF/2016-2551, ddt.04.03.2020.
 6. Telephonic complaints received from Sri Damodar Reddy, R. Srisailam, V Kumar and B. Kistaiah villagers of Anthammagudem, Pochampally (M), Yadadri Bhuvanagiri district regarding odour nuisance in the surrounding area.
 7. Inspection of the industry by the Board officials on 15.09.2020.
 8. Hearing held on 20.11.2020

* * * * *

1. **WHEREAS**, you are operating the industry located at Dhothigudem (V), Pochampally (M), Yadadri Bhuvangiri District.
2. **WHEREAS**, vide reference 1st cited, the Board issued CFO & HWA to your industry with a validity period upto 31.01.2022.
3. **WHEREAS**, vide reference 2nd cited, the Board issued closure orders to the industry on 01.07.2019 for operating the industry against stop production orders issued to the industry by the Board.
4. **WHEREAS**, vide reference 3rd cited, the Board reviewed in the Task Force Committee meeting held on 22.07.2019 and issued Temporary Revocation of Closure order dated 30.07.2019 for a period of Three Months in connection with the industry's representation dt.03.07.2019.
5. **WHEREAS**, vide reference 4th cited, the Board again reviewed in the Task Force Committee meeting held on 23.09.2019 in connection with Rolling Task Force Team-III officials observations & with payment of Crop damage compensation and issued Additional Directions to your industry to pay Crop Damage Compensation of Rs.11,83,348/- for the affected farmers through District Collector.
6. **WHEREAS**, vide reference 5th cited, the Board issued Extension of Temporary Revocation of Closure order dated 04.03.2020 for a period of Three Months.
7. **WHEREAS**, vide reference 6th cited, a telephonic complaints received from Sri Damodar Reddy, R. Srisailam, V Kumar and B. Kistaiah villagers of Anthammagudem, Pochampally (M), Yadadri Bhuvanagiri district against the industry regarding odour nuisance in the surrounding area.
8. **WHEREAS**, vide reference 7th cited, the Board officials inspected the industry on 15.09.2020. During the inspection, the Board officials contacted the complainants Sri Damodar Reddy, R. Srisailam, V Kumar and B. Kistaiah over Telephone to accompany. But, the industry has not allowed the complainants in to the industry and the details of the inspection are as follows:

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• **Compliance of the industry on the directions issued in the extension of temporary revocation of closure orders dated 04.03.2020.**

Sl. No	Direction	Status
1	The Industry shall not operate without valid Consent of the Board.	The industry has obtained CFO (change of product mix) of the Board vide order dt: 30.05.2017 and valid up to 31.01.2022.
2	The industry shall comply with CFO&HWA conditions scrupulously.	Submitted below.
3	The industry shall not manufacture any new products / un-consented products without CFE & CFO of the Board.	Complied
4	The industry shall restrict the quantities of production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities as mentioned in the CFO&HWA order and shall maintain the records separately.	Complied
5	The industry shall maintain and operate digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper / MEE feed; condensate of MEE & ATFD; steam flow to Stripper, MEE & ATFD; RO feed; RO Permeate & RO rejects.	The Industry has provided digital flow meters at HTDS & LTDS effluents collection line, MEE feed, ATFD feed, MEE condensate, RO inlet, RO permeate & RO rejects. The industry has not provided Steam flow meter for MEE system.
6	The industry shall ensure continuous operation of the ZLD system and air pollution control system.	During the inspection, ZLD system was under operation.
7	The industry shall provide separate energy meter for ZLD system and air pollution control systems and maintain the records of the same.	The industry has provided separate energy meter for ZLD System only. But, not maintaining proper records of the same. The industry has not provided separate energy meter for scrubbing system.
8	The industry shall submit afresh Bank Guarantee of Rs.4 lakhs and extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.	Not submitted

• **Compliance of the industry on CFO schedule - B conditions: CFO Order No. TSPCB/RCP/NLG/HO/2017 - 810, dt.30.05.2017:**

S. No.	Condition	Compliance																					
1	The industry should take steps to reduce water consumption to the extent possible and consumption should NOT exceed the quantities prescribed below.	As per the records, during the last 6 months period of March' 2020 to August'2020, the water consumption is 11.08 KLD (avg.) as against consented 13.76 KLD, effluents generation is 3.9 KLD (avg) against the consented - 8.02 KLD.																					
	<table border="1"> <thead> <tr> <th>S.No</th> <th>Purpose</th> <th>Quantity in KLD</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Process & washings</td> <td>8.06</td> </tr> <tr> <td>2</td> <td>Floor washings</td> <td>1.0</td> </tr> <tr> <td>3</td> <td>Boiler Feed</td> <td>1.5</td> </tr> <tr> <td>4</td> <td>Cooling tower make-up</td> <td>2.0</td> </tr> <tr> <td>5</td> <td>Domestic</td> <td>1.2</td> </tr> <tr> <td colspan="2">Total:</td> <td>13.76</td> </tr> </tbody> </table>	S.No	Purpose	Quantity in KLD	1	Process & washings	8.06	2	Floor washings	1.0	3	Boiler Feed	1.5	4	Cooling tower make-up	2.0	5	Domestic	1.2	Total:		13.76	
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Total:		13.76																					

2	<p>The Industry shall file the water cess returns in Form-I as required under section (5) of Water (Prevention and Control of Pollution) Cess Act, 1977 on or before the 5th of every calendar month, showing the quantity of water consumed in the previous month along with water meter readings. The industry shall remit water cess as per the assessment orders as and when issued by Board. The industry shall provide separate water meters for recording category-wise water consumption, with necessary pipeline for assessing the quantity of water used for each of the purposes as per Cess Form-I.</p>	--									
3	<p>The emissions shall not contain constituents in excess of the prescribed limits mentioned below.</p> <table border="1" data-bbox="396 720 992 835"> <thead> <tr> <th>Chimney No.</th> <th>Parameter</th> <th>Emission Standards</th> </tr> </thead> <tbody> <tr> <td>1 to 5</td> <td>Particulate Matter</td> <td>115 mg/Nm³</td> </tr> <tr> <td>6</td> <td>HCl Acid Vapour & Mist</td> <td>35 mg/Nm³</td> </tr> </tbody> </table>	Chimney No.	Parameter	Emission Standards	1 to 5	Particulate Matter	115 mg/Nm ³	6	HCl Acid Vapour & Mist	35 mg/Nm ³	--
Chimney No.	Parameter	Emission Standards									
1 to 5	Particulate Matter	115 mg/Nm ³									
6	HCl Acid Vapour & Mist	35 mg/Nm ³									
4	<p>The industry should 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 should comply with emission limits as per the Notification G.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.</p>	Complied									
5	<p>The industry shall comply with ambient air quality standards of PM₁₀(Particulate Matter size less than 10µm) - 100 µg/ m³; PM_{2.5}(Particulate Matter size less than 2.5 µm) -60 µg/ m³; SO₂ - 80 µg/ m³; NO_x - 80 µg/m³, outside the factory premises at the periphery of the industry. Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009 Noise Levels: Day time (6 AM to 10 PM) - 75 dB (A) Night time (10 PM to 6 AM) - 70 dB (A).</p>	--									
6	<p>The industry shall manufacture only the consented products.</p>	<p>As per the records, during the last 6 months period of March' 2020 to August'2020, the industry has manufactured 4 Consented products and quantity manufactured is 245.27 Kg/day (avg) as against consented 350 Kg/day.</p>									
7	<p>The industry shall not increase the capacity beyond the permitted capacity, without obtaining CFE & CFO of the Board.</p>										
8	<p>The industry shall operate IP camera with PAN, TILT Zoom, 5x or above focal length, with night vision capability, along with flow meter, with connection of the same to the website of CPCB & TSPCB.</p>	<p>The industry has provided IP camera along with digital flow meters at RO permeate and connected the same to TSPCB website. But, whereas in the TSPCB web portal it is showing as HTDS. Hence, the same has to be rectified.</p>									
9	<p>The industry shall segregate the HTDS & LTDS effluents.</p>	Complied									

10	The industry shall regularly operate the existing pollution control systems i.e., Stripper, Multiple Effect Evaporator (MEE), ATFD, Biological ETP & RO plant etc. for treatment of HTDS & LTDS effluents.	Complied
11	The industry shall not discharge any effluents on land within or outside the plant premises.	During inspection, no effluents discharge was observed.
12	The industry shall operate water meters for recording category-wise water consumption viz. Process, Boiler feed, Cooling tower makeup, Domestic etc.	Provided mechanical water meters at Raw water, process and digital flow meter at Boiler feed.
13	The industry shall operate digital flow meters for recording waste water generation at inlet of various effluent streams of HTDS & LTDS, viz., Stripper/MEE feed; MEE condensate; steam flow to Stripper, MEE & ATFD; inlet & outlet of Biological ETP; RO feed; RO Permeate & RO reject.	The industry has provided digital flow meters at HTDS & LTDS effluents collection lines, MEE feed, ATFD feed, MEE condensate, and RO feed, RO permeate & RO rejects. The industry has not provided Steam flow meter to MEE system. During the inspection, it was observed that digital flow meters provided for HTDS & LTDS effluents was not functioning.
14	The industry shall use only fresh water for gardening purposes.	Complied
15	The industry shall install & operate online VOC analyzers for monitoring of VOCs.	The industry has provided VOC's analyzer for monitoring of VOCs, but not connected to the TSPCB website.
16	The industry shall operate Multi-stage Scrubbers in the plant for control of process emissions, so as to avoid odour nuisance and maintain records. The industry shall upgrade the single-stage Scrubbers to the Multi-stage as per the requirements, depending upon the generation of Process emissions in the process.	The industry has provided 3 numbers of two stage scrubbers with PH meters to control process emissions.
17	The industry shall install & operate online pH meters for the Multi-stage scrubbers.	
18	The industry shall identify the Air Pollution source of generation of odorous compounds from their process activities and shall take the required measures to contain the same to avoid smell nuisance. The industry shall not cause odour nuisance in the surroundings.	The industry has provided 3 number of two stage scrubbers with PH meters to control process emissions. The industry has provided Nitrogen Blanketing system, Breather valves and Vent condensers are provided to Bulk solvent storage tanks.
19	The industry shall transfer the chemicals /effluents/ In-process material in closed conditions to avoid smell nuisance.	Complied
20	The industry shall maintain separate energy meter for the pollution control systems and maintain the records of the same.	Provided for ZLD system. But, not provided separate energy meters to Scrubbing system.
21	The industry shall use vent condensers for all the bulk storage tanks, storing highly volatile solvents, wherever required. The industry shall provide & operate Nitrogen blanketing system, wherever required, with required pressure for the Solvents / Chemical/Product etc. storage tanks to avoid vapours escaping into the atmosphere to avoid odour nuisance in the surroundings.	The industry has provided Nitrogen Blanketing system, Breather valves and Vent condensers are provided to Bulk solvent storage tanks.

22	The industry shall operate Solvent Recovery Plant within the plant premises. Solvents shall be recovered to the maximum extent possible and shall be reused. The Spent / Mixed Solvents which cannot be reused in the plant, shall be disposed to Authorized Cement manufacturing units for Co-processing/ TSD, Dundigal, RR Dist. The industry shall not dispose Spent Solvents / Mixed Spent Solvents to the traders/ recyclers.	The industry is not having solvent recovery plant. The industry has started construction works of solvent recovery columns as a part of expansion.
23	The industry shall carryout Leak Detection and Repair Study (LDAR) to assess the solvent losses and based on the study, the industry shall take necessary steps to arrest the solvent losses and reduce VOCs in the premises.	Complied The industry has submitted LDAR test reports.
24	The industry shall provide and operate IP cameras with PAN, Zoom, 5x or above focal length, with night vision capability, at main gate entrance & at other gates where there is movement of effluent tankers, Solvent tankers, Chemical tankers, Hazardous Waste carrying vehicles & other material carrying vehicles. These cameras shall be connected to the website of TSPCB, with minimum backup of three months.	The industry has provided IP camera at main gate entrance and connected the same to TSPCB server.
25	The industry shall comply with the stipulations and conditions prescribed in the previous CFO Order.	--
26	The industry shall comply with the directions issued by the Task Force from time to time scrupulously.	Submitted above
27	The industry should develop and maintain green belt all along the boundary of the industry and other vacant places. The industry shall take up extensive plantation under the Haritha Haram program of the State Government.	The industry has developed greenbelt in an area of about 15 Acres.
28	The industry should maintain log books on the following. a. Hydraulic loads of effluent generation b. Characteristics of effluents c. Quantity of HTDS effluents forced evaporated, condensate generation, LTDS effluents including condensate treated & reused. d. Furnish consolidated daily records on the above periodically once in three months to the RO, Nalgonda.	Complied
29	The industry should ensure detoxification in environmentally sound manner of various drums, liners, containers and other materials that are in contact with bromine compounds and the details should be furnished to the Board.	Complied
30	There should not be any spillages / chemicals / effluents on ground. The drums containing chemicals & wastes should be stored on elevated platform with a provision to collect leachate / spillages in the collection pit. In no case the drums should be stored on the naked open ground. The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.	During the inspection, no spillages were observed.
31	The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.	The industry has provided impervious lining in and around ZLD system.

32	The Industry shall maintain the following records and the same shall be made available to the Board Officials during the inspection. a. Daily production details, RG-1 records and Central Excise Returns. b. Quantity of Effluents generated, force evaporated, condensate generated & treated, RO feed, RO permeate reused. c. Log Books for pollution control systems. d. Daily solid waste generated and disposed to TSDF and Cement plants.	The industry has provided separate energy meter for ZLD System only. But, not maintaining proper records of the same. The industry has not provided separate energy meters for scrubbing system. During the inspection, it was observed that digital flow meters provided for HTDS & LTDS effluents were not functioning.
33	Under no circumstances, the effluents should be used for land application.	Complied
34	The Industry should maintain records for the performance of solvent recovery system and shall achieve the efficiency of solvent recovery more than 95% for every stream.	The industry is not having solvent recovery plant.
35	The industry should take all safety measures and provide firefighting equipment in the plant.	Complied
36	The industry should submit mock drill report carried out at least once in six months, as required under the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.	Complied
37	The applicant shall submit Environment Statement in Form V before 30th September of every year as per Rule No.14 of E(P) Rules, 1986 & amendments.	Submitted
38	All the rules & regulations notified by Ministry of Law and Justice, Government of India regarding Public Liability Insurance Act, 1991, should be followed.	--
39	The conditions are without prejudice to the rights and contentions of this Board in any Hon'ble Court of Law.	--

Remarks:

1. M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District and engaged in manufacturing of Bulk Drugs Intermediates.
2. The Industry has obtained CFO (change of product mix) of the Board vide order dt: 30.05.2017 and valid up to 31.01.2022.
3. The industry obtained EC for Expansion vide order No. F. No. J-11011/19/2016 - IA II (I), dt.27.02.2020 for manufacture of 35 products with Worst Case 20 products on Campaign basis With maximum quantity of production - 14.2 TPD and applied for CFE Expansion through TS-IPASS on 13.03.2020 for the EC products and capacities. This office submitted report submitted to CFE section Board office.
4. Earlier, complaints received from villagers of Dhotigudem & Anthammagudem. The Board issued closure orders to the industry vide orders dt: 01.07.2019. Subsequently, the Board issued Temporary Revocation of Closure Order to the industry with certain directions to comply. Again, the industry was reviewed along with other industries in Dhotigudem area in the Task Force Committee meeting of the Board held on 07.02.2020 in connection with the complaint regarding the Ground water contamination and colored water from the Bore well located in the nearby Agricultural Land. The Board issued Extension of Temporary Revocation of Closure Order to the industry for a period of Three Months with certain directions to comply, vide order dated 04.03.2020 and also forfeited BG of Rs.4.0 Lakhs.
5. The industry has provided MEE System for treatment of HTDS effluents consisting of Stripper (10 KLD), MEE -10 KLD (3 stage), ATFD (5 KLD). The MEE condensate sent to Biological ETP for treatment along with other LTDS effluents followed by RO plant. The industry is having Biological ETP of capacity - 25 KLD consisting of Pre Aeration tanks of capacity - 80 KL and Extended Aeration tanks of capacity - 80 KL, Sand filter, Carbon filter followed by RO plant of capacity - 20 KLD (1 KL/hr) and treated effluent holding tank. The RO permeate is used for cooling make up / boiler & RO rejects is sent to MEE.

6. During inspection, Gland leaks were observed in the MEE pumps.
 7. The industry has provided digital flow meters at HTDS & LTDS effluents collection lines, MEE feed, ATFD feed, MEE condensate, and RO feed, RO permeate & RO rejects. The industry has not provided Steam flow meter to MEE system. During the inspection, it was observed that digital flow meters provided for HTDS & LTDS effluents were not functioning.
 8. The industry has provided the IP camera along with digital flow meter at RO permeate and connected the same to TSPCB website. But, in the TSPCB website it is showing as HTDS effluents. Hence, the same has to be renamed. The IP cameras provided at RO permeate & Main gate entrance and connected the same to TSPCB server.
 9. The industry has provided 3 number of two stage scrubbers with PH meters to control process emissions.
 10. The industry has covered the HTDS effluent storage tanks – 3x50 KL with FRP sheets and provided with extraction system and provided common single stage scrubber to ATFD and HTDS effluent storage tanks covered with FRP sheets.
 11. The industry is having coal fired boiler of capacity 2 TPH provided with Mechanical dust collector as APCE followed by chimney of height 30 mtrs. The industry is having DG set of capacity 250 KVA provided with acoustic enclosure.
 12. The industry has provided VOC's analyzer for monitoring of VOCs, but not connected to the TSPCB website.
 13. During the inspection, construction works of new blocks and Solvent recovery column were under process (for the proposed expansion).
 14. The industry has provided separate energy meter for ZLD System only. The industry has not provided separate energy meters for scrubbing system.
 15. It is to submit that, Sri P. Lakshmi Narsimha Rao, S/o. P. Venkateshwar Rao, Environmental Social Worker, R/o.H.No.1-43, Lingojigudem Village, Choutuppall Mandal, Yadadri Bhuvanagiri District, Telangana State, PIN: 508252 has filed WP (PIL) No. -- of 2020 in the Hon'ble High Court against the issue of Environmental Clearance for expansion of M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District, vide EC order No. F. No. J-11011/19/2016 – IA II (I), dated.27.02.2020. This office submitted report to Legal Cell, Board office.
 16. As per the records, during the last 6 months period of March' 2020 to August'2020, the industry has manufactured 4 Consented products and quantity manufactured is 245.27 Kg/day (avg) as against consented 350 Kg/day.
 17. As per the records, during the last 6 months period of March' 2020 to August'2020, the water consumption is 11.08 KLD (avg.) as against consented 13.76 KLD, effluents generation is 3.9 KLD (avg) against the consented – 8.02 KLD.
 18. As per the records, during the last 6 months period of March' 2020 to August'2020, the industry has disposed inorganic salts /MEE salts – 308.44 Kg/day (avg) as against 502.4 Kg/day to M/s. TSDF & Cement industries and Organic waste – 566.5 Kg/day (avg) as against 752.3 Kg/day to Cements industries for co-processing. During the inspection, MEE salts stock of about 4 tons in separate room and 30 drums of organic waste stock under the shed was observed.
9. **WHEREAS**, vide reference 8th cited, you were given an opportunity for hearing before the Task Force Committee of the Board on 20.11.2020.

The industry representatives attended the virtual meeting. The complainants have not attended the meeting.

The Committee noted that complaints were received on the odour nuisance caused by the industry.

The Committee noted that the industry has not connected VOC analyser to the TSPCB website, not provided separate energy meters for scrubbing system, Gland leaks were observed in the MEE pumps.

The Committee opined that major sources of odour may be due to VOC emissions and usage of solvents like DMSO and Amines.

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The industry representative informed that they are not using solvents like DMSO and Amines. They have connected VOC analyser to TSPCB website, steam flow meters were installed, provided separate energy meters for scrubbing system.

After detailed discussion, the Committee recommended to issue extension of temporary revocation of closure orders for a period of six months with certain conditions to comply with.

10. **WHEREAS**, after careful consideration of the material facts of the case, **the Board hereby issue Extension of Temporary Revocation of Closure Order to your industry for a period of Six Months with the following directions to comply with:**
1. The industry shall not operate without valid Consent of the Board.
 2. The industry shall comply with CFO&HWA conditions scrupulously.
 3. The industry shall not manufacture any new products / un-consented products without CFE & CFO of the Board.
 4. The industry shall restrict the quantities of production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities as mentioned in the CFO&HWA order and shall maintain the records separately.
 5. The industry shall maintain PH in the scrubbers and ensure that they are regularly maintained. The industry shall maintain the log records separately for each scrubber duly showing the hours of operation, maintenance taken up, quantity of scrubber liquid used, maintain of pH levels etc.,
 6. All the process and vacuum leak sources shall be collected through fume extraction system connected to a Double stage condensation followed by activated charcoal bed.
 7. The industry shall regularly carryout leak detection and repair study. All the fugitive leak sources shall be monitored and arrested so as to reduce the VOCs concentration in the both work place as well as ambient atmosphere.
 8. There should not be any spillages / chemicals / effluents on ground. The drums containing chemicals & wastes should be stored on elevated platform with a provision to collect leachate / spillages in the collection pit. In no case the drums should be stored on the naked open ground. The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.
 9. The industry shall extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.
11. **WHEREAS**, the TSSPDC., Ltd., has been directed to restore the power supply to your industry for a period of Six Months from the date of this order.
12. **WHEREAS**, these directions are issued under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and section 31(A) of the Air (Prevention and Control of pollution) Amendment act, 1987.

13. **WHEREAS**, you are hereby directed to note that, should you misuse these orders to operate the unit violating any of the conditions mentioned above, your unit will be closed under section 33(A) of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and section 31(A) of the Air (Prevention and Control of Pollution) Amendment Act, 1987 and you will also be liable for prosecution in the court of Metropolitan Magistrate or Judicial Magistrate of the first class under section 41(2) of the Water (Prevention and Control of Pollution) Amendment Act, 1988 and under section 37(1) of the Air (Prevention and Control of Pollution) Amendment Act, 1987 the punishment for which includes imprisonment for a term which shall not be less than one year six months and which may be extended to six years with fine.

Sd/-
MEMBER SECRETARY

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

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


Senior Environmental Engineer (FAC)
(UH-V)

Hazelo Lab

Hazelo Lab Private Limited

Regd Office & Factory at

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

Dothigudem Village, Jiblakpally,

B. Pochampally Mandal, Yadadri Bhongir District,

Telangana, India - 508284

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

CIN : U24110TG2015PTC098450

GST IN : 36AADCH5946A1ZS

To

THE DIRECTOR
MINISTRY OF ENVIRONMENT AND FOREST
AND CLIMATE CHANGE
GOVERNMENT OF INDIA
(IA-II SECTION), JORBAGH ROAD
NEW DELHI – 110003.

Respected sir,

Sub: Intimation for surrender of Environmental Clearance – Reg.
Ref: F.NO. J-11011/19/2016-IA-II (I) Dated: 27th Feb 2020.

We wish to inform you that M/s.Hazelo Lab Pvt Ltd obtained expansion Environmental Clearance from Ministry of Environment Forest & Climate, New Delhi on 27th February 2020 to manufacture Bulk Drug & Intermediate products with a production capacity of 5183 TPA situated at Sy.nos.240,242,243,247,248 & 249, Dothigudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District., in area of 33.485 Acres with project cost of 45 Crores.

Subsequently, our management of Hazelo Lab Pvt Ltd has taken a decision to apply for fresh Environmental Clearance under B2 category for existing Bulk Drug & Intermediate Products to manufacture with a production capacity of 600 T/Month situated at Sy.Nos.240,242,247,248 & 249, Dothigudem village, pochampally Mandal, Yadadri Bhuvanagiri District., with Land area of 20 Acres and same has been applied to SEACC and obtained Environmental Clearance from SEIAA on 13.11.2020 vide EC No: SEIAA/TS/OL/YDR-44/2020.

Further we bring to your kind notice that as suggested by TSPCB our management has decided to surrender the above Environmental Clearance received from MoEF & CC, New Delhi by M/s.Hazelo Lab Pvt Ltd.

Hence please receive and acknowledge the same

Thanking you

For HAZELO LAB PRIVATE LIMITED



Dr.M.VASUDEVA REDDY

SENIOR GENERAL MANAGER & HEAD-EHS.CORP

Encl: Environmental Clearance F.NO. J-11011/19/2016-IA-II (I) Dated: 27th Feb 2020.

Date: 8th March 2021

EN01673327DN IVR:6978401673327

SP SANATHNAGAR I E S.O <5000181818>

Counter No:1,08/03/2021,11:00

To:THE DIRECTOR,H

PIN:110003, Lodi Road HD

From:HAZELO LAB,H

Wt:30gms

Amr:41.30(Cash)Tax:6.30

<Track on www.indiapost.gov.in>

<Dial 18002666868> <Wear Masks, Stay Safe>



Hazelo Lab

Hazelo Lab Private Limited

Regd Office & Factory at

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

Dothigudem Village, Jiblakpally,

B. Pochampally Mandal, Yadadri Bhongir District,

Telangana, India - 508284

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

CIN : U24110TG2015PTC098450

GST IN : 36AADCH5946A1ZS

To
The Member Secretary,
Telangana State Pollution Control Board,
Paryavaran Bhavan, Sanathnagar,
Hyderabad – 500 018.

Date: 15th March 2021

Sir,

Sub: Intimation regarding surrendering of Consent for Establishment (CFE) subsequent to EC obtained earlier -Reg.

Ref: 1. F.NO.J-11011/19/2016-IA-II(I) Dated: 27th February 2020

2. CFE & CFO Technical Committee meeting held on 08/02/2021.

3. CFE & CFO Technical Committee meeting held on 12/03/2021.

With reference to the above mentioned subject, we wish to inform you that M/s.Hazelo Lab Pvt Ltd obtained Environmental Clearance to the proposed expansion from Ministry of Environment Forest & Climate, New Delhi on 27th February 2020 to manufacture Bulk Drug & Intermediate products with a production capacity of 5183 TPA situated at Sy.nos.240,242,243,247,248 & 249, Dothigudem Village, Pochampally Mandal, Yadadri Bhuvanagiri District., in an area of 33.485 Acres with project cost of 45 Crores and subsequently for the same EC Hazelo Lab Pvt Ltd has obtained CFE through TSiPASS on 07.05.2020 vide Order No.03/TSPCB/CFE/YDR/RO/NLG/HO/2020.

During the CFE technical committee meeting held on 08th February 2020, a query was raised w.r.t surrendering of EC obtained by Hazelo Lab Pvt Ltd from MOEF &CC with a production capacity of 5183 MT/Annum. So that there will not be any land issues further between the two adjacent units i.e Hazelo Lab and Anasia Lab.

As suggested by CFE committee, our management has surrendered EC of M/s.Hazelo Lab Pvt Ltd, issued by MoEF&CC, New Delhi dated 27th Feb 2020 and same has been intimated on 08th March 2021 to The Director, MoEF & CC, New Delhi along with covering letter. Enclosed Covering letter & Speed post ack. copy for your reference.

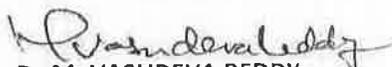
Subsequently during CFE technical committee meeting held on 12th March 2020. The Technical committee members has suggested to surrender earlier CFE dated 07.05.2020 vide Order No.03/TSPCB/CFE/YDR/RO/NLG/HO/2020 before issuance of new CFE for proposed new project (Anasia Lab Pvt Ltd).

Hence we are herewith surrendering CFE Order obtained earlier and request you to issue CFE w.r.t Anasia Lab Pvt Limited at the earliest.

Thanking you

Yours faithfully

For HAZELO LAB PRIVATE LIMITED



Dr.M. VASUDEVA REDDY

SENIOR GENERAL MANAGER & HEAD-CORP.EHS



C.C to The Environmental Engineer, TSPCB, Regional Office, Nalgonda Dist.



CONSENT ORDER FOR ESTABLISHMENT – RED CATEGORY (EXPANSION)

Order No. 26/TSPCB/CFE/YDR/RO-NLG/HO/2021

Dt: 29.05.2021

Sub:	TSPCB – CFE - M/s. Hazelo Lab Pvt. Ltd., (Formerly M/s. Venlar Labs (P) Ltd.), Sy. Nos. 240, 242, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District – Consent for Establishment of the Board for expansion under Sec.25 of Water (Prevention & Control of Pollution) Act, 1974 and under Sec.21 of Air (Prevention & Control of Pollution) Act, 1981 - Issued - Reg.
Ref:	1) CFO order dt. 30.05.2017. 2) EC expansion Order dt. 13.11.2020 issued by SEIAA. 3) Industry's CFE application dt: 05.04.2021(Application No. 2950695) 4) R.O's verification report dt. 30.04.2021. 5) CFE-CFO Committee meeting held on 21.05.2021.

1. M/s. Hazelo Lab Pvt. Ltd., (Formerly M/s. Venlar Labs (P) Ltd.), obtained EC expansion order dt.13.11.2020 from SEIAA vide reference 2nd cited for expansion of Bulk Drugs manufacturing unit at Sy. Nos. 240, 242, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District.
2. The industry, vide reference 3rd cited, submitted application to the Board seeking Consent for Establishment (CFE) for expansion for the above project with a project cost of Rs. 45.0 Crore (Expansion), for manufacturing following products and capacities as per EC expansion order:

S. No	Products / Line of Activity	Capacity (kg/day)	No of Stages	Starting Raw Material	Quantity (TPD)
1	Amlodipine Besylate	830	1	Phthalimido Amlodipine	1.058
2	Bupropion HCl	1830	2	m-Chloropiophenone	1.3552
3	Clopidogrel Hydrogen Sulfate	330	2	Methyl(+)-alpha-amino (2-chlorophenyl) acetate tartaric acid salt	0.4214
4	Desvelofloxin Succinate	170	2	1-[2-Amino-1-(4-benzyl oxyphenyl) ethyl] cyclohexanol	0.1885
5	Divolproex Sodium	1570	2	2,2-Dipropylmalonic acid	2.1573
6	Dulaxetine HCl	170	1	(S)-N-Methyl-N-phenyl oxycarbonyl-3-(1-naphthoxy)-3-(2-thienyl) propylamine	0.2427
7	Esomeprazole Dihydrate Mg	330	1	(±) Omeprazole	0.3212
8	Glimepiride	170	1	4-[2-(3-ethyl-4-methyl-2-oxo-3-pyrroline-1-carboxamido) ethyl] benzene sulfonamide	0.1458
9	Mesalamine	170	1	Aniline	0.129
10	Metaprolol Succinate	1000	3	4-(2-Methoxy-ethyl)-phenol	0.5353
11	Pantoprazole Sodium Sesquihydrate	1000	1	5-(Difluoromethoxy)-2-[[3,4-dimethoxy-2-pyridinyl) methyl]thio]-1H-benzimidazole	0.9184

12	Pragabalin	1000	1	3-(Carbamoylmethyl)-5-methylhexanoic acid	1.6357
13	Rosuvastatin Calcium	100	1	(R)-7-[4-(4-Fluorophenyl)-6-(1-methylethyl)-2-[methyl(methylsulfonyl)amino]-5-pyrimidinyl]-5-pyrimidinyl]-3-hydroxy-5-oxo-6-heptenoic acid methyl ester	0.1147
14	Sertraline HCl	330	1	4-(3,4-Dichlorophenyl)-3,4-dihydro-N-methyl-1(2H)-Naphthalenimine	0.3788
15	Tramadal	1170	1	2-[(N,N-Dimethylamino)methyl] cyclohexanone	0.8106
16	Valcyclovir Hydrochloride Monohydrate	330	2	2-(Acetylamino)-1,9-dihydro-9-[[2-(acetyloxy)ethoxy] methyl]-6H-purin-6-one	0.4944
17	4-[4-Chloro-1-oxobutyl]-2,2-dimethyl phenyl acetic acid methyl ester	100	3	2-methyl-2-phenyl propan-1-ol	0.1226
18	N2-(1-(S)-ethoxy carbonyl-3-phenyl propyl-N6-trifluoro acetyl-L-lysine	170	2	L-Lysine	0.3195
19	2-[2-[3(S)-[3-[2-(7-Chloro-2-Quinolinyloxy)phenyl]-3-hydroxypropyl]phenyl]-2-propanol	100	2	3-[2-(7-chloro-2-quinolinyloxy)phenyl]-alpha-[2-(methoxy carbonylphenyl)methyl] -beta-oxobenzenepropanoic acid methyl ester	0.1462
20	2,8-Diazo bicyclo Nonane	170	4	2,3-Pyridine Dicarboxylic acid	0.3092
21	2,3,4,5-Bis-O-(1-methyl ethylidene)-b-D-fructo pyranose	830	1	D-(-)-Fructose	0.646
22	2-Acetyl Ethoxy acetyl methoxy ether	1630	1	Acetic anhydride	1.290
23	N,N-Carbonyl di imidazole	2170	1	1H Imidazole	2.6601
24	(2S,3S,5S)-2-Amino-3-Hydroxy-5-Tert-Butyl carbonyl Amino 1,6-diohenyl	100	3	Phenyl alanine	0.0624
25	Trans-4-(4-chlorophenyl)-cyclohexane carboxylic acid	100	2	Tetrahydrobenzene	0.041
26	Guanine	1980	1	2,5,6-Triamino-3H-pyrimidin-4-one	2.731
27	Poly allyl amine HCl	500	1	Polyallylamine	0.355
28	Tert-butyl 2-((4R,6S)-6-((E)-2-(4-(4-fluro phenyl)-6-isopropyl-2-(N-methyl methane sulfonamido) Pyrimidin-5-yl)vinyl)-2,2-dimethyl-1,3-dioxane-4-yl)-acetate	170	3	Tert-Butyl-2((4R,6S)-6-(acetyloxy)methyl-2,2-dimethyl-1,3-dioxan-4-yl) acetate	0.1456
29	5-Cyano phthalide	670	3	5-Carboxy Phthalide	1.6364
30	1,1-Cyclohexane diacetic acid	1670	1	Cyclohexanone	0.9891

31	Carbamyl Methyl-5-Methyl hexanoic Acid	500	1	Isovalaraldehyde	0.2855
32	2',3'-Di-O-acetyl-5'-deoxy-5-fluorocytidine	130	2	Methyl-2,3-O-isopropylidene-5-deoxy-D-ribofuranoside	0.1051
33	N-(2-Methyl-5-amino phenyl)-4-(3-pyridyl)-2-pyrimidine amine	330	2	(2-Methyl-5-nitrophenyl) guanidine.	0.3702
34	4-[(4-Methylpiperazin-1-yl) methyl] benzoic acid dihydrochloride	330	1	4-Cyanobenzyl bromide	0.2975
35	2, 3-Epoxy-2-methyl-N-[4-cyano-3-(trifluoro methyl) phenyl] propanamide	170	3	2-Methylacrylic acid	0.0929
	Total (worst case 20 products on campaign basis at any given point of time)	20,000 kg/day (20 TPD)			

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By Products:

S. N	Name of the By-product	Product from which generated	Stage	Quantity (kg/day)
1	p- toluene sulfonic acid	Clopidogrel Hydrogen Sulfate	1	180.8
2	Trichloromethanol	1,1-diimidazole Carbonyl	1	3622.7

- As per the application, the proposed project is to be located at Sy.Nos. 240, 242, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District in area of 20 Acres.
- The above site was inspected by the Environmental Engineer, Regional Office, Nalgonda, T.S. Pollution Control Board on 07.04.2021 & 27.04.2021 and observed that the site is surrounded by:
 - North – M/s. Anasia Lab Pvt. Ltd. (proposed unit);
 - South – Open lands & Agricultural lands;
 - East – M/s. Optimus Drugs, M/s. SVR Labs & M/s. VJ Sai Chem;
 - West – Open lands & Agricultural lands.
- The Board, after careful scrutiny of the application, verification report of the Regional Officer, EC order dt. 13.11.2020 and after examining the application in the CFE-CFO Committee meeting held on 21.05.2021, hereby issues CONSENT FOR ESTABLISHMENT for Expansion to your unit under Section 25 of Water (Prevention & Control of Pollution) Act 1974 and under Section 21 of Air (Prevention & Control of Pollution) Act, 1981 and the rules made there under. This order is issued to manufacture the products and capacities as mentioned at para (2) only.

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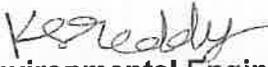
6. This Consent Order now issued is subject to the conditions mentioned in Schedule 'A' and Schedule 'B'.
7. This order is issued from pollution control point of view only. Zoning and other regulations are not considered.

Encl: Schedule 'A'
Schedule 'B'

Sd/-
MEMBER SECRETARY

To,
M/s. Hazelo Lab Pvt. Ltd.,
(Formerly M/s. Venlar Labs (P) Ltd.),
Sy. Nos. 240, 242, 247, 248 & 249,
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

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


Senior Environmental Engineer,
TSPCB, HO, Hyderabad.

SCHEDULE - A

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1. Progress on implementation of the project shall be reported to the concerned Regional Office, T.S. Pollution Control Board once in six months.
2. Separate energy meters shall be provided for Zero Liquid Discharge (ZLD) system and Air pollution Control equipments to record energy consumed.
3. The proponent shall obtain Consent for Operation (CFO) from TSPCB, as required Under Sec.25/26 of the Water (Prevention and Control of Pollution) Act, 1974 and under sec. 21/22 of the Air (Prevention and Control of Pollution) Act, 1981, before commencement of the activity.
4. Notwithstanding anything contained in this conditional letter or consent, the Board hereby reserves its right and power Under Sec.27(2) of Water (Prevention and Control of Pollution) Act, 1974 and Under Sec.21(4) of Air (Prevention and Control of Pollution) Act, 1981 to review any or all the conditions imposed herein and to make such alternation as deemed fit and stipulate any additional conditions by the Board.
5. The consent of the Board shall be exhibited in the factory premises at a conspicuous place for information of the inspecting officers of different departments.
6. Compensation is to be paid for any environmental damage caused by it, as fixed by the Collector and District Magistrate as civil liability.
7. 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. The industry shall maintain a good housekeeping. All pipe valves, sewers, drains shall be leak proof. Dyke walls shall be constructed around storage of chemicals.
8. The rules and regulations notified by Ministry of Law and Justice, GOI, regarding the Public Liability Insurance Act, 1991 shall be followed.
9. **This order is valid for a period of 5 years from the date of issue.**

SCHEDULE - B

Water:

1. The source of water is Ground Water/Mission Bhagiradha. The maximum water consumption after expansion shall not exceed 696.3 KLD. The industry shall comply with the following:

S. No	Purpose	Quantity (KLD)
1	Process	111.3
2	Washings	10.0
3	Scrubber	15.0
4	Boiler Feed	175.0
5	Cooling tower make-up	345.0
6	RO/DM rejects	20.0
7	Domestic	10.0
8	Gardening	10.0
	Total	696.3 KLD (Fresh -451.3 KLD + Recycled – 245 KLD)

2. The maximum Waste Water Generation after expansion shall not exceed the following:

S. No	Source	Quantity (KLD)
1	Process	125.8
2	Washings	10.0
3	Scrubber Effluent	15.0
4	RO/DM plant Rejects	20.0
5	Boiler blow down	15.0
6	Cooling tower bleed off	60.0
7	Domestic	9.0
	Total:	254.8 KLD

3. **Effluent Treatment & Disposal:**

Industry shall comply with the following for treatment and disposal of effluents:

Source	Quantity	Method of treatment & disposal
HTDS Effluents: (Process – 125.8 KLD + Washings – 10.0 KLD + RO/DM plant Rejects - 20 KLD + Scrubber effluent – 15 KLD)	170.8 KLD	<ul style="list-style-type: none"> • Shall be stripped off for organics recovery. • Stripper condensate to distillate for separation of organic compounds followed by disposal to cement plants for co-processing & distilled effluents shall be routed to LTDS treatment system. • Stripped effluents for forced evaporation in MEE followed by ATFD • Condensate from MEE & ATFD shall be routed to LTDS treatment system. • ATFD Salts to TSDF.
LTDS Effluents: (Cooling bleed off – 60.0 KLD + Boiler blow down – 15 KLD + Domestic effluents – 9 KLD)	84.0 KLD	<ul style="list-style-type: none"> • LTDS effluents along with condensate of MEE & ATFD shall be treated in Biological ETP followed by filtration in RO Plant. • RO Permeate water to boiler/cooling tower makeup • RO Rejects to MEE
Total:	254.8 KLD	

4. The industry shall establish ZLD system consisting of Stripper (250 KLD), MEE (250 KLD) and ATFD (40 KLD), Biological ETP of capacity 350 KLD and RO plant – I (350 KLD) & RO plant – II (150 KLD). All the units of the ZLD system shall be impervious and above ground level to prevent ground water pollution.
5. The industry shall strictly maintain ZLD system in closed circuit system. There shall not be any discharge / spillages of effluent within or outside the premises.
6. The industry shall not use any flexible pipelines within the premises for transfer of effluents / wastewater. All the effluent conveying pipe lines shall be fixed.
7. During transfer of materials, spillages shall be avoided and garland drains shall be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.

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8. Separate meters with necessary pipe-line shall be provided for assessing the quantity of water used for each of the purposes mentioned below:
 - a) Industrial cooling, boiler feed.
 - b) Domestic purposes
 - c) Processing, whereby water gets polluted and pollutants are easily bio-degradable.
 - d) Processing, whereby water gets polluted and the pollutants are not easily bio-degradable.
 9. The industry shall operate and maintain separate digital flow meters with totalisers with recording facility at inlet of effluent collection tank, Stripper feed, MEE feed, MEE & ATFD condensate, ETP inlet, RO feed, RO rejects and RO permeate for measuring effluent generation, treatment and recycling, and the steam flow meter to the inlet line of MEE and ATFD.
 10. The industry shall operate and maintain IP camera with PAN, TILT, Zoom, 5x or above focal length, with night vision capability at HTDS & LTDS effluent collection system and digital flow meter with totaliser to the RO permeate as per the CPCB norms & connect the same to CPCB & TSPCB servers.
 11. The industry shall operate and maintain IP cameras with PAN, Zoom, 5x or above focal length, with night vision capability, at main gate entrance & at other gates where there is movement of effluent tankers, Solvent tankers, Chemical tankers, Hazardous Waste carrying vehicles & other material carrying vehicles. These cameras shall be connected to the website of TSPCB, with minimum backup of three months.

Air Pollution:

12. Industry shall comply with the following to control air pollution:

S.No	Source	Control Equipment
1.	Coal fired boiler – 1 X 2 TPH	Mechanical dust collector
2.	Coal fired boiler – 1 X 20 TPH	Dust collector followed by bag filters
3.	Coal fired boiler – 1 X 12 TPH	Dust collector followed by bag filters
4.	Thermic Fluid Heater – 1 x 1 Lakh Kcal/hr.	Stack of 15 m height.
5.	Thermic Fluid Heater - 1 x 2 Lakh Kcal/hr.	Stack of 15 m height.
6.	DG set – 1 x 250 kVA & 2 x 1500 KVA	Acoustic enclosure
7.	Process emissions	Multi-stage Scrubbers with online pH meters

13. A sampling port with removable dummy of not less than 15 cm diameter shall be provided in the stack at a distance of 8 times the diameter of the stack from the nearest constraint such as bends etc. A platform with suitable ladder shall be provided below 1 meter of sampling port to accommodate three persons with instruments. A 15 AMP 250 V plug point shall be provided on the platform.
14. The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoE&F, GoI vide notification No. GSR 826(E), dated. 16.11.2009 during construction and regular operational phase of the project.

15. Industry shall provide dedicated multistage scrubbers with online pH meters to control process emissions of HCl, HBr, SO₂ and NH₃.
16. The industry shall provide 24x7 continuous Online monitoring system at stacks emission and connect the same to SPCB & CPCB online servers, as stipulated in EC expansion order.
17. Four ambient Air quality monitoring stations shall be established in the core zone as well as in the buffer zone for RSPM, SPM, PM10, PM2.5, SO₂ and NO_x, as stipulated in EC expansion order.
18. Sulphur content in the coal used for coal fired boilers shall not exceed 0.5% to control emissions, as stipulated in EC expansion order.
19. The industry shall connect the VOC analyzer for monitoring of VOCs to the Board server.
20. Vent condensers provided to the solvent storage tanks and receivers shall be maintained.
21. The proponent shall not use odour causing substances or Mercaptans and cause odour nuisance in the surroundings.
22. The evaporation losses in solvents shall be controlled by taking the following measures:
 - i) Chilled brine circulation shall be carried out to effectively reduce the solvent losses into the atmosphere.
 - ii) Transfer of solvents shall be done by using pumps instead of manual handling.
 - iii) Reactors and solvent handling pumps shall have mechanical seals to prevent leakages.
 - iv) Closed centrifuges shall be used due to which solvent losses will be reduced drastically.
 - v) The reactor vents shall be connected with primary & secondary condensers to catch the solvent vapours.
 - vi) The condensers shall be provide with sufficient HTA and residence time so as to achieve more than 95% recovery.
 - vii) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation to prevent solvent vapours.
23. The industry shall regularly carryout Leak Detection and Repair Study (LDAR) to assess the solvent losses and based on the study the industry shall take necessary steps to arrest the solvent losses and reduce VOCs in the premises.

Solid Waste:

24. Industry shall comply with the following hazardous waste generation and disposal:

S. No	Name of the Hazardous Waste	Quantity	Mode of Disposal
1	Solvent Residue	4.35 TPD	Shall be sent to TSDF / Cement plants for co- incineration
2	Organic Residue	10.88 TPD	
3	Stripper Distillate	4.2 KLD	
4	Spent Carbon	508 Kg/day	
5	Spent solvents	160 KLD	Shall be recovered within the plant premises.
6	Spent Mixed Solvents	18 KLD	Shall be sent to authorized recovery units / Cement plants for co-incineration.

7	Inorganic residue	4.5 TPD	Shall be sent to TSDF.
8	Hyflow	78 Kg/day	
9	Catalyst	200 Kg/day	
10	Evaporation salts	13.7 TPD	
11	ETP sludge	3.11 TPD	
12	Ash from Boiler	10.9 TPD	Shall be sold to bricks manufacturers
13	Detoxified containers	8000 NPM	Shall be sold to authorized vendors, after detoxification
14	Waste oil	5.36 KLPA	Shall be sent to authorized recyclers
15	Used Batteries	700 NPA	Sent to suppliers on buy-back basis.

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25. There shall not be any new / additional pollution load from collection, handling and disposal of by-products. The industry shall maintain records of by-products generation and disposal.
26. The industry shall provide closed shed with impervious platform and spillage collection pit for storage of hazardous waste.
27. The proponent shall provide closed shed with impervious platform and spillage collection pit for storage of drums containing chemicals / intermediates.
28. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to ETP / Stripper.
29. The industry shall not store hazardous waste more than 90 days in their premises, as stipulated in Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016.
30. The following rules and regulations notified by the MOE&F, GOI shall be implemented.
- Hazardous waste and other wastes (Management and Transboundary movement), Rules, 2016.
 - Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989.
 - Batteries (Management & Handling) Rules, 2001 and its Amendment Rules, 2010.
 - E-Waste (Management) Rules, 2016 and its Amendment Rules, 2018.
 - The Plastic Waste Management Rules, 2016.
 - Bio-Medical Waste Management Rules, 2016 and its Amendment Rules, 2018.
 - Solid Waste Management Rules, 2016.
 - Construction and Demolition Waste Management Rules, 2016.

Other Conditions:

31. The CFE expansion order dt. 07.05.2020 issued earlier to M/s. Hazelo Lab Pvt Ltd., (Formerly M/s Venlar Labs (P) Ltd.), Sy.Nos. 240, 242, 243, 247, 248 & 249, Dhotigudem (V), Pochampally (M), Yadadri Bhuvanagiri District is hereby revoked as the industry has surrendered the EC expansion order dt. 27.02.2020 obtained from MoEF&CC, GoI.
32. The industry shall develop greenbelt of 7 acres (35%) with at least 10 m width, on all sides along the plant periphery in downward direction and along the road sides etc., as stipulated in EC expansion Order.

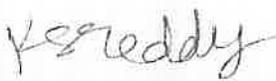
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33. The industry shall undertake following waste minimization measures as stipulated in EC expansion Order:
- Metering and control of quantities of active ingredients to minimize waste.
 - Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - Use of automated filling to minimize spillage.
 - Use of closed feed system into batch reactors.
 - Venting equipment through vapour recovery system.
 - Use of high pressure hoses for equipment clearing / cleaning to reduce wastewater generation.
34. The industry shall provide separate energy meter for the pollution control systems.
35. The industry shall implement the odour control measures at source of generation, hazardous waste storage area and ETP.
36. System of leak detection and repair of pump / pipeline shall be installed in the plant and immediate response team shall be identified for preventive maintenance.
37. The industry shall maintain records on source of starting raw material / Intermediates for each product-wise and the consolidated records shall be submitted to the concerned RO every month along with invoice copies of the starting raw materials outsourced.
38. The proponent shall ensure that there shall not be any change in the process technology and scope of working without prior approval from the Board.
39. The industry shall comply with all the directions issued by the Board from time to time.
40. Concealing the factual data or submission of false information / fabricated data and failure to comply with any of the conditions mentioned in this order may result in withdrawal of this order and attract action under the provisions of relevant pollution control Acts.
41. The Board reserves its right to modify above conditions or stipulate new / additional conditions and to take action including revoke of this order in the interest of environment protection.
42. 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 the State Water Rules, 1976 and Air Rules, 1982, to such authority (hereinafter referred to as the Appellate Authority) constituted under Section 28 of Water (Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.

Sd/-
MEMBER SECRETARY

To,
M/s. Hazelo Lab Pvt. Ltd.,
(Formerly M/s. Venlar Labs (P) Ltd.),
Sy. Nos. 240, 242, 247, 248 & 249,
Dhotigudem (V), Pochampally (M),
Yadadri Bhuvanagiri District.

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


Senior Environmental Engineer,
TSPCB, HO, Hyderabad.

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Hazelo Lab

Hazelo Lab Private Limited

Reg. Off: H. No. 8-3-168/7/1,
3rd Floor, A Wing, Erragadda,
Hyderabad, Telangana - 500 018.
Tel: +91-40-23710405, Fax: +91-40-23700405
CIN: U24110TG2015PTC098450

Date: 16th June 2021

To
The Member Secretary,
Telangana State Pollution Control Board,
Paryavaran Bhavan,
Sanathnagar,
Hyderabad – 500 018.

Respected Madam,

Sub: Submission of condition wise compliance to the directions issued after issuing temporary revocation - Reg.
Ref: Order No. NLG-44/TSPCB/VH-V/TF/2016-1348 Dated: 04/12/2020.

With reference to the above mentioned subject, we are herewith submitting condition wise compliance w.r.t directions issued by the task-force earlier.

S. No.	Directions	Compliance reply
1	The Industry shall not operate without valid consent of the Board.	The Industry is operating with valid consent of the Board. Enclosed CFO copy which is valid up to 31 st January 2022 as Annexure-I for your reference.
2	The Industry shall comply with CFO & HWA conditions scrupulously.	The industry is complying to all the CFO & HWA conditions mentioned in the schedules of the issued consent.
3	The Industry shall not manufacture any new products / un-consented products without CFE & CFO of the Board.	As directed by the board, the industry is manufacturing consent products only.
	The industry shall restrict the quantities or production, products, water consumptions including the recycled water, waste water generation & disposal, hazardous waste generation & disposal etc., within the permitted quantities as mentioned in the CFO & HWA Order and shall maintain the records separately.	The industry is manufacturing within the permitted production quantity. And consumption of water including recycled water, wastewater generation and disposal, Hazardous waste generation and disposal etc., are within the permitted quantities only as mentioned in the CFO & HWA Order and also maintaining the records separately. All the records can be verified at any point of time.



Factory : H.No.4-166, Survey No. 242, 247, 248 & 249, Dhothigudem Village, Jibiakpally, B, Pochampally Mandal, Yadadri Bhongir District, Telangana-508284, INDIA. Mobile : 9989867941

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Hazelo Lab

Hazelo Lab Private Limited

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

5	The industry shall maintain PH in the scrubbers and ensure that they are regularly maintained. The industry shall maintain the log records separately for each scrubber duly showing the hours of operation, maintenance taken up, quantity of scrubber liquid used, maintain of PH levels etc.,	3 No's of Double stage scrubbers are installed with online pH meter to control the process emissions. Enclosed as Annexure-II Log record for scrubber was maintained in the plant.
6	All the process and vacuum leak sources shall be collected through fume extraction system connected to a Double stage condensation followed by activate charcoal bed.	Will comply
7	The industry shall regularly carryout leak detection and repair study. All the fugitive leak sources shall be monitored and arrested so as to reduce the VOCs concentration in the both work-place as well as ambient atmosphere.	Leak detection and repair study was performed and the reports. Enclosed as Annexure-III.
8	There should not be any spillages / chemicals/ effluents on ground. The drums containing chemicals & wastes should be stored on elevated platform with a provision to collect leachate /spillages in the collection pit. In no case the drums should be stored on the naked open ground. The industry should ensure the treatment facilities should be impervious to prevent ground water pollution.	The industry has constructed storage shed along with elevated platform for storage of chemical and hazardous waste drums with a provision of collection pit to collect leachate / spillages in the collection pit to prevent ground water pollution.
9	The industry shall extend the validity of Bank Guarantee submitted to the Board from time to time before expiry, till further orders of the Board.	Noted: The industry has submitted fresh Bank Guarantee for Rs.4 Lakhs on 20 th October 2020 which is valid from 17 th October 2020 to 16 th October 2021. Enclosed B.G submission acknowledgement copy as Annexure - IV for your reference.

Hence we request your good selves to issue permanent revocation against temporary revocation order issued earlier.

Thanking you

Yours faithfully

For HAZELO LAB PRIVATE LIMITED

AUTHORISED SIGNATORY.

CC: The environmental engineer, regional office, Nalgonda.

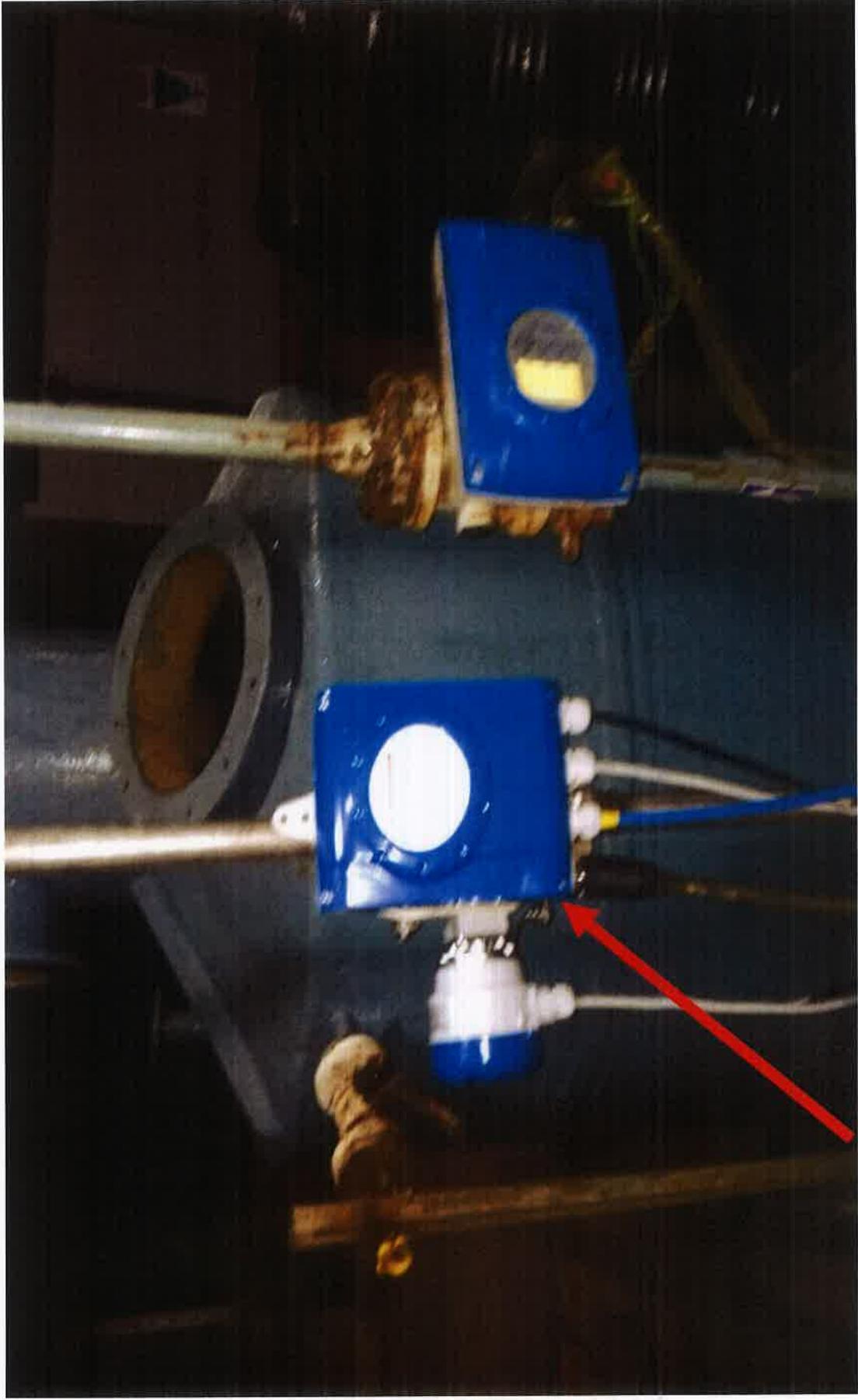
Factory : H.No.4-166, Survey No. 242, 247, 248 & 249, Dhothigudem Village, Jiblakpally, B. Pochampally Mandal, Yadadri Bhongir District, Telangana-508284, INDIA. Mobile : 9989867941

HAZELO LAB PRIVATE LIMITED



PTZ IP Camera and Flow meter provided at RO Permeate and connected to CPCB,TSPCB Server for online monitoring.

HAZELO LAB PRIVATE LIMITED



Flow meter connected at MEE condensate line, RO permeate flow meter and MEE condensate flow meters are visible in TSPCB portal through the existing IP camera itself.

HAZELO LAB PRIVATE LIMITED



Adequate shed provided over the MEE plant to avoid contamination of rain water.

HAZELO LAB PRIVATE LIMITED



Double stage scrubbers provided at production blocks with online PH meters.

HAZELO LAB PRIVATE LIMITED



Storage shed provided for solvent drums and in process drums with elevated platform

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HAZELO LAB PRIVATE LIMITED



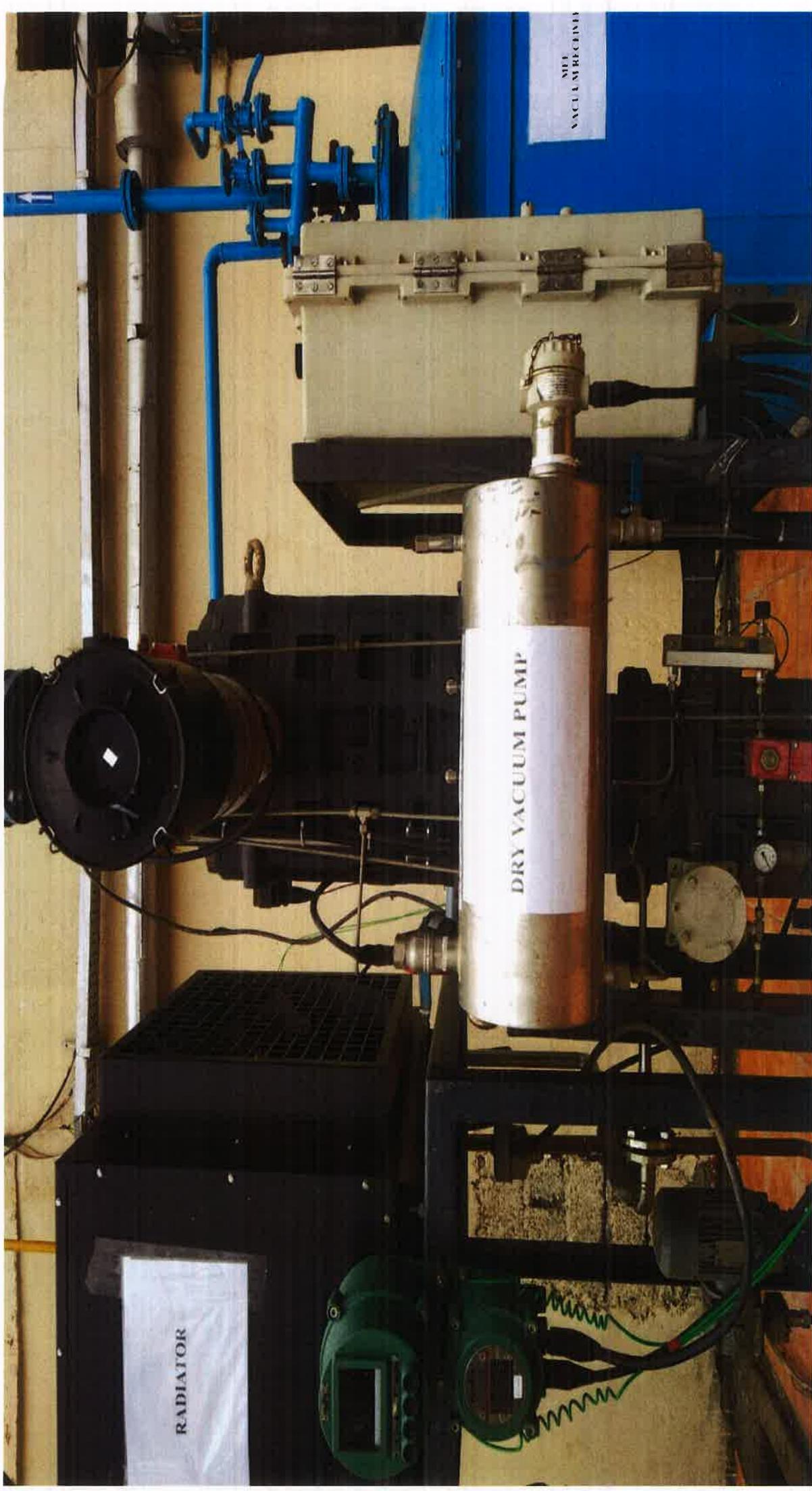
Effluent storage tanks covered sheet and connected to Scrubber

HAZELO LAB PRIVATE LIMITED



Coal Storage Shed

HAZELO LAB PRIVATE LIMITED



Dry Vacuum Pump

HAZELO LAB PRIVATE LIMITED



Online VOC Meter

HAZELO LAB PRIVATE LIMITED



HAZELO LAB PRIVATE LIMITED



GREEN BELT

HAZELO LAB PRIVATE LIMITED



GREEN BELT

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, CHENNAI

ORIGINAL APPLICATION NO. 97 OF 2021

IN THE MATTER OF:

RAVULA Lingaswami & Others

...Applicants

Versus

Union of India & others

...Respondents

**REPLY AFFIDAVIT FILED BY 6TH RESPONDENT ALONG WITH
DOCUMENTS**

**M/S. K.S. VISWANATHAN, T.HEMALATHA & S.RATHI
COUNSEL FOR 6TH RESPONDENT**