BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,

Principal Bench, New Delhi

Original Application No. 144 of 2020

Bhaskar Rao Vemuri — Applicant

Vs.

State of Andhra Pradesh & Ors. — Respondent

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1.	**Report of the Joint Committee** in compliance to Hon'ble NGT order dated 02.06.2021 in O.A. No. 144 of 2020, Bhaskar Rao Vemuri Vs. State of Andhra Pradesh & Ors.	
2.	**Annexure-I:** A copy of Hon'ble NGT order dated 02.06.2021.	
3	**Annexure-II:** A copy of Environmental Clearance dated 08.12.2020 issued by the State Level Environment Impact Assessment Authority, Andhra Pradesh.	
4	**Annexure–III:** A copy of Amendment of Environmental Clearance order dated 14.06.2021 issued by the State Level Environment Impact Assessment Authority, Andhra Pradesh.	
5	**Annexure-IV:** A copy of Consent for Establishment Expansion order dated 25.03.2021 issued by Andhra Pradesh Pollution Control Board.	
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4/10/4

(Dinabandhu Gouda)
Scientist-E
Central Pollution Control Board,
Parivesh Bhawan, East Arjun Nagar,
Delhi- 110032.

Dated: 04.10.2021
Place: Delhi

REPORT OF THE JOINT COMMITTEE IN THE MATTER OF OA. NO. 144/2020 SUBMITTED TO HON'BLE NATIONAL GREEN TRIBUNAL, PRINCIPAL BENCH, DELHI IN COMPLIANCE TO HON'BLE NGT ORDER DATED JUNE 02, 2021

SUBMITTED TO

HON'BLE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

September, 2021

I Preamble

M/s Venkata Narayana Active Ingredients Private Limited (formerly M/s., Nutra Specialties Pvt. Ltd.,) is operating a bulk drugs manufacturing industry at SPSR Nellore District. Unit was established in 2007 for proposed tobacco oil extraction but eventually bulk drug unit was commissioned. The grievance in this application is against converting a Tobacco oil extraction factory into a bulk drug chemical unit, purchasing water from agricultural bore-wells and causing air & water pollution in the area. Hon'ble NGT vide order dated 27.11.2020 had sought action taken report from APPCB and District Magistrate, Nellore. APPCB has submitted the report on 25.01.2021. Subsequently an incident occurred in the unit during May, 2021. Hence Hon'ble NGT has sought fresh report from a committee.

II Orders of the Hon'ble Tribunal dated 02.06.2021

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

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

In compliance to Hon'ble NGT order, committee comprising of following members was composed:

1. Sri M.N. Harendhira Prasad, IAS, Joint Collector and Addl. District Magistrate, Nellore

2. Smt. H D Varalaxmi, Regional Director- Chennai, Central Pollution Control Board
3. Sri. K. Srinivasa Rao, Deputy Chief Inspector of Factories
4. Sri Ch. Raja Sekhar, Environmental Engineer, Regional Officer, Nellore, Andhra Pradesh Pollution Control Board

IIIa Scope of Committee

The Committee has been vested with the mandate to visit and inspect the site in question and vested with following scope as per the Order dated 02.06.2021:

1. To verify the compliance status of the industry w.r.t consents under the Water and the Air Acts, Authorization under the Hazardous & other Wastes (Management and Transboundary Movement) Rules, 2016
2. To verify the compliance w.r.t Manufacture, Storage and Import of Hazardous Chemical Rules, 1989 and the Chemical Accidents (Emergency planning, Preparedness and response) Rules, 1996
3. To ascertain damage to the environment and individuals in the incident dated 11.5.2021 and remedial action taken in terms of compensation for restoration of the environment and to the victims

IIIb Site Visit by the Committee

The committee convened a meeting on 16.07.2021 through online and discussed about current status of unit. Subsequently, the committee inspected the unit on 10.08.2021 interacted with unit management, unit personnel who were present during the accident and injured employees & family of deceased. As per the preliminary discussions, the accident occurred on 11.05.2021 at around 08:30 hrs due to which three persons died and three were injured.

IV About M/s Venkata Narayana Active Ingredients Pvt Ltd

IV.a. *General information*: M/s Venkata Narayana Active Ingredients Pvt Ltd is located in Sy.No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District. The unit is spread in an area of 33 acres. The unit was established as M/s Nutra Specialities (P) Ltd. The details of establishment of unit is briefed below:

Table 1: Consents and Clearances obtained by the unit from MOEFCC/ SEIAA-AP/ APPCB

24.05.2006 N-44/PCB/ZO-VJA/CFE/2006-601	→	APPCB issued CFE to M/s Nutra Specialities (P) Ltd to manufacture 100Kgs/ day of Solanesol.

<table>
<tr>
<td>14.03.2007
N-44/PCB/ZO-VJA/CFE/2006-3732</td>
<td>→</td>
<td>APPCB issued CFE- expansion to M/s Nutra Specialities (P) Ltd for manufacture of following products
<table>
<tr><th>Sl. No</th><th>Products</th><th>Consented Capacity</th></tr>
<tr><td>1</td><td>Solanesol</td><td>100 kg/Day</td></tr>
<tr><td>2</td><td>Ubequinone</td><td>80 kg/Month</td></tr>
<tr><td>3</td><td>Tetrohydrocur Cumin</td><td>80 kg/Month</td></tr>
<tr><td>4</td><td>Glucosomine</td><td>80 kg/Month</td></tr>
<tr><td>5</td><td>10-DAB-III</td><td>80 kg/Month</td></tr>
<tr><td>6</td><td>Thiocochicoside</td><td>80 kg/Month</td></tr>
<tr><td>7</td><td>Tarcrolimus</td><td>80 kg/Month</td></tr>
<tr><td>8</td><td>Digoxin</td><td>80 kg/Month</td></tr>
<tr><td>9</td><td>Hyoscine Butyl Bromide</td><td>80 kg/Month</td></tr>
</table>
</td>
</tr>
<tr>
<td>02.02.2009
F.No.J-11011/1313/2007-IA II (I)</td>
<td>→</td>
<td>MoEFCC issued EC to the unit for manufacture of following bulk drugs (any three products to be manufactured on campaign basis)
<table>
<tr><th>S.No</th><th>Proposed Product</th><th>Capacity (Kg/month)</th></tr>
<tr><td>1</td><td>Iron Sucrose</td><td>1000</td></tr>
<tr><td>2</td><td>Iron Sorbitol</td><td>1000</td></tr>
<tr><td>3</td><td>Olmesartan Medoxomil</td><td>500</td></tr>
<tr><td>4</td><td>Boswellic Acid</td><td>500</td></tr>
<tr><td>5</td><td>Capacitabine</td><td>100</td></tr>
<tr><td>6</td><td>Tioconozole</td><td>200</td></tr>
<tr><td>7</td><td>Ezitamibe</td><td>200</td></tr>
<tr><td>8</td><td>Sertraline HCL</td><td>500</td></tr>
<tr><td>9</td><td>Moxiflaxacin</td><td>500</td></tr>
<tr><td>10</td><td>Tetracaine Hydrochloride</td><td>500</td></tr>
<tr><td>11</td><td>Nebivllol HCL</td><td>200</td></tr>
<tr><td>12</td><td>Warfarine Sodium</td><td>500</td></tr>
<tr><td>13</td><td>Vitamin K2/4</td><td>100</td></tr>
<tr><td>14</td><td>Policosanol</td><td>500</td></tr>
</table>
</td>
</tr>
</table>

<table>
<tr><td></td><td></td><td>
<table>
<tr><td>15</td><td>Teprenone</td><td>500</td></tr>
<tr><td></td><td>Total</td><td>6800</td></tr>
</table>
</td></tr>
<tr><td>24.04.2010
174/PCB/CFE/RO-NLR/HO/2009</td><td>→</td><td>Unit dropped the proposal of manufacturing products for which CFE was obtained during 2006 & 2007. Unit revised the proposal, carried out public hearing and obtained EC from MOEFCC for manufacture of 6800kg/ month of bulk drugs. APPCB issued CFE to the unit for manufacture of 3000 Kg/month (81.6 TPA)(worst case) of any 4 products out of permitted 15 products.
<table>
<tr><th>Sl.No</th><th>Products</th><th>Capacity</th></tr>
<tr><td>1</td><td>Iron Sucrose</td><td>1000 kg/Month</td></tr>
<tr><td>2</td><td>Iron Sorbitol</td><td>1000 kg/Month</td></tr>
<tr><td>3</td><td>Olmesartan Medoxomil</td><td>500 kg/Month</td></tr>
<tr><td>4</td><td>Boswellic Acid</td><td>500 kg/Month</td></tr>
<tr><td>5</td><td>Capactitabine</td><td>100 kg/Month</td></tr>
<tr><td>6</td><td>Ticonozole</td><td>200 kg/Month</td></tr>
<tr><td>7</td><td>Ezitamibe</td><td>200 kg/Month</td></tr>
<tr><td>8</td><td>Sertraline HCL</td><td>500 kg/Month</td></tr>
<tr><td>9</td><td>Moxiflaxacin</td><td>500 kg/Month</td></tr>
<tr><td>10</td><td>Tetracaine Hydrochloride</td><td>500 kg/Month</td></tr>
<tr><td>11</td><td>Nebivilol HCL</td><td>200 kg/Month</td></tr>
<tr><td>12</td><td>Warfarine Sodium</td><td>500 kg/Month</td></tr>
<tr><td>13</td><td>Vitamin K2/4</td><td>100 kg/Month</td></tr>
<tr><td>14</td><td>Policosanol</td><td>500 kg/Month</td></tr>
<tr><td>15</td><td>Teprenone</td><td>500 kg/Month</td></tr>
<tr><td></td><td>Total (Worst Case scenario)</td><td>3000 kg/Month</td></tr>
</table>
</td></tr>
<tr><td>23.12.2010
APPCB/VJA/NLR174/HO/CFO/2010</td><td>→</td><td>APPCB issued CFO to the unit in line with CFE dated 24.04.2010 for manufacture of any 4 at a time out of 15 consented products with maximum production of 3000 Kgs/month (worst case scenario)</td></tr>
<tr><td>18.02.2012</td><td></td><td>APPCB issued CFE for change of product mix for manufacture of any 4 at a time out of 14 consented products</td></tr>
</table>

APPCB/ VJA/ NLR/174/CFE/HO/2011-3781		with maximum production of 100 Kgs/day (worst case scenario). Subsequently APPCB issued CFO in line with CFE.
01.02.2016 APPCB/ VJA/ NLR/174/CFE/HO/2011	→	APPCB issued CFE for change of product mix to 25 No. of products with maximum production capacity of 395.33 Kg/ day. (142.33 TPA).
28.05.2016 174/APPCB/CFE/RO-NLR/HO/2011	→	APPCB issued CFE for Change of product mix to produce 23 nos of products with a maximum capacity of 395.33 Kg/day. (or 142.32 TPA).
16.06.2016 APPCB/VJA/NLR/10725//HO/CFO/2016	→	APPCB issued CFO to the unit for manufacture of any 4 at a time out of 10 consented products with maximum production of 100 Kgs/day. Though CFE issued for manufacture of 395.33 Kgs/ day but CFO restricted to 100 Kgs/ day.
08.02.2017 174/APPCB/CFE/RO-NLR/HO /2011	→	APPCB issued CFE for change of product mix for production of 29 nos of products with a maximum capacity of 395.31 Kg/day. (or 142.32 TPA). CFO issued on 14.08.2017 in line with CFE
08.02.2018 174/APPCB/CFE/RO-NLR/HO/2011	→	APPCB issued CFE for change of product mix. The unit was consented to manufacture 395.33 kg/ day142.32 TPA of any of the 31 products and 2 by-products as per specified quantity.
08.12.2020 SEIAA/AP/NLR/IND/04/2020/1780/714	→	SEIAA- AP issued Environmental Clearance to the unit for expansion from 142.32 TPA to 500 TPA for 35 products. Copy enclosed as **Annexure-II & III**.
25.03.2021 174/APPCB/CFE/RO-NLR/HO/2011	→	Unit obtained CFE expansion from APPCB for manufacture of 500 TPA of bulk drugs. 35 products along with specified quantity is permitted. Copy enclosed as **Annexure-IV**.
15.06.2021 APPCB/VJA/NLR/10725/HO/CFO/2018	→	Unit obtained CFO from APPCB for manufacture of 500TPA of 35 products as per the specified quantities only. The consent order was valid for 15 days upto 30.06.2021.
31.07.2021 Consent Order No: APPCB/VJA/NLR/1	→	Unit obtained CFO on 31/07/2021 for manufacture of 1393.89 Kgs/ day valid till September 30, 2021. Copy of the order placed as **Annexure- V**

0725/HO/CFO/2018- 31/07/2021		

The unit has around 33 acres of land out of which 11 acres is green belt. There are 400 regular employees and 160 contractual workers. The unit has two production blocks which are fully operational and a new production block as part of expansion is established.

Satellite image of the unit during 2018

IV.b Status of latest Consent for operation

The unit has obtained CFO from APPCB vide order No. APPCB/VJA/NLR/10725/HO/CFO/2018 dated 31/07/2021 which is valid upto 30.09.2021 and is permitted to manufacture 500 TPA of 35 consented products as per the quantities specified.

IV.c. Present compliance status of the industry w.r.t consents under the Water and the Air Acts, Authorization under the Hazardous & other Wastes (Management and Transboundary Movement) Rules, 2016.

On the day of inspection committee observed that the new production block (expansion unit) was in operation. The unit has obtained EC clearance from MOEFCC, CFE and CFO from APPCB for the expansion of unit. However, no licence from the Department of factories for operation in new production block.

Sl. No	**Consent condition as per APPCB consent order 15.6.2021**	**Actual status**	**Compliance status as on date of committee inspection 10.08.2021**
1	The unit is presently operating at full capacity 1393.89 Kg/ day (worst case scenario) of 35 products and 227.23 Kg/day of by-products.	APPCB has issued Consent for operation to unit valid till 30.09.2021 for expansion. Unit is manufacturing consented products.	**Partially Complying** License from Inspectorate of Factories for expansion unit is yet to be obtained
2	Water consumption The unit is permitted to utilize 173.80 KLD. Source of water is ground water. Separate meters with necessary pipe-line shall be maintained for assessing the quantity of water used for each of the purposes mentioned above. The industry shall provide magnetic digital flow meters with totalizers at the inlet and	The unit is utilizing ground water (two bore wells). The total water consumption before expansion was 173.80 KLD against production capacity of 142.32 TPA. Though after expansion to 500 TPA, APPCB has restricted water consumption to 173.80 KLD. in consent order. APPCB may assess the actual water consumption.	**Partially Complying**. The unit has installed flow meters only at raw water inlet, MEE feed, LTDS inlet, inlet & outlet of stripper, boiler feed, cooling tower but not connected to the APPCB server. Hence water consumed in various stages cannot be quantified. The unit shall install flow meters at MEE condensate, ETP outlet, RO feed, RO reject and RO permeate.

<table>
<tr>
<td></td>
<td>outlet of Stripper, MEE, ETP and RO and maintain the records of effluents generated,
treated, reused, etc.
<table>
<tr><th>Sl. No</th><th>Purpose</th><th>Quantity KLD</th></tr>
<tr><td>1</td><td>Processing</td><td>13.80 KLD</td></tr>
<tr><td>2</td><td>Industrial Cooling</td><td>100 KLD</td></tr>
<tr><td>3</td><td>Boiler feed</td><td>42</td></tr>
<tr><td>4</td><td>Domestic</td><td>8</td></tr>
<tr><td>5</td><td>Gardening purposes</td><td>10</td></tr>
<tr><td colspan="2">Total</td><td>173.80 KLD</td></tr>
</table>
</td>
<td></td>
<td>The committee submits to Hon’ble NGT to direct APPCB to ascertain actual water consumption during full production and to connect all water meters to the APPCB server to get the live data</td>
</tr>
<tr>
<td>3</td>
<td>HTDS effluent→14.23 KLD
HTDS effluent shall be stripped off for organics
recovery.
Stripper distillate for separation of organic compounds followed by disposal</td>
<td>Reported that actual effluent generation is 35 KLD. The unit vide letter dated 24.08.2021 requested APPCB to amend CFO in line with CFE and to permit quantity of effluent generation to 35 KLD.
HTDS effluent is stripped in two stripper column of capacity 1 KL/hr. stripped effluent is treated in MEE of capacity 3 KL/hr followed by 0.5 KL/hr. ZLD system is present</td>
<td>Since flow meters were not installed at MEE outlet, the quantity of effluent generation could not be ascertained</td>
</tr>
</table>

	to Cement Plants for coprocessing & distilled effluents shall be recycled. Stripped effluents for forced evaporation in MEE followed by ATFD. Condensate from MEE & ATFD shall be recycled after treatment in ETP along with other LTDS effluents. ATFD salts to TSDF.	MEE condensate is taken to biological ETP. ATFD salts is sent to TSDF	
4	LTDS effluents (Boiler Blow Down – 11.8 KLD + Cooling Tower Blow Down – 35 KLD	Reported that unit is generating 61.8 KLD LTDS effluent→ 61.8 KLD is treated in ETP of 100 KL comprising of flocculation tank, primary clarifier, aeration, secondary clarifier, sand filters RO of capacity 7 KL/hr. The committee observed that ETP is not adequate to treat the effluent generated. Effluent was overflowing from the tanks. This implies that effluent generation is more than consented quantity. Moreover the unit was neutralizing the effluent in the reactors itself.	Since flow meters were not installed, the quantity of effluent generation could not be ascertained

	  **Effluent treatment plant**		
5	One 4 TPH boiler and one 3 TPH boiler→ PM 10-115 mg/Nm3	The industry is having two Nos of boilers using Biomass briquettes as a fuel. The industry has provided dust collector to 3.0 TPH boiler and bag filter to 4TPH boiler as air pollution control equipment and provide common stack of height 30 m.	**Complying** Stack of height 30m is installed. As per stack monitoring conducted by dated 29.06.2021, particulate matter is 102mg/Nm3 and found complying with APPCB stipulated standards of 115 mg/ Nm3.
6	Odour nuisance	The industry has provided Two Nos. of double stage scrubbers for control of process emissions and provided online pH meter with data logger in each production block. The online pH indicator were not	**Not complying**

properly working. The committee monitored VOC concentration using hand held VOC meter and following values were recorded:

Cooling tower, utility building→ 13ppm to 20 ppm

Utility block entrance→ 8 ppm to 13 ppm

Production block II→ 8 ppm to 10 ppm

Inside production block-II→ 23ppm to 40 ppm

VOC scrubber→ 2ppm

ETP→ upto 5ppm

New production block→ 2ppm to 3 ppm

Spent solvent storage room→3 ppm

Hazardous waste storage shed→ 13 ppm

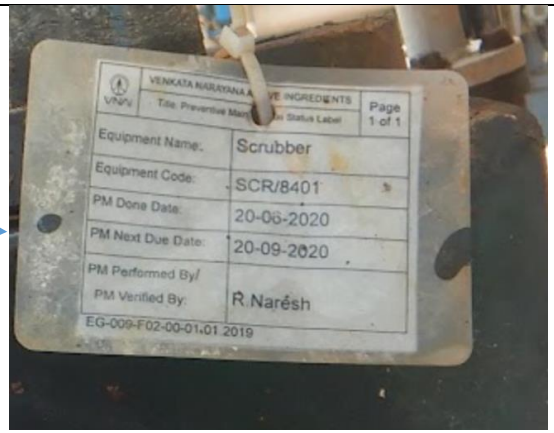
The industry has provided 2 nos. of VOC analysers in the plant premises i.e. near main gate towards village and near engineering department. Further, the industry installed an online VOC analyzer at Panchayath office of Chandrapadiya (V), Vinjamur (M), SPSR Nellore District and connected the same to the APPCB server. The average VOC values recorded is submitted below:

Sl No.	**Date**	**Near Main gate**	**Near Engineering Dept**	**Village Panchayat Office**

				towards village	**towards village**	
			1	2021-08-01	0.94	4.67	0
			2	2021-08-02	0.94	4.76	0.04
			3	2021-08-03	0.94	4.87	0
			4	2021-08-04	0.97	4.95	0
			5	2021-08-05	0.96	4.95	0.02
			6	2021-08-06	0.94	4.79	0.02
			7	2021-08-07	0.98	5.14	0.04
			8	2021-08-08	1	5.12	0.01
			9	2021-08-09	1.01	4.89	0
			10	2021-08-10	0.89	4.24	0
		The above value indicates that there is odour nuisance to the surroundings.					

Scrubber system

caustic lye used for neutralization



preventive maintenance of scrubber not carried out since20.09.2020

7	Hazardous wastes **Sl. No.** / **Name of Hazardous Waste** / **Stream** / **Quantity** / **Method of disposal** 1. Solid Waste from process and solvent & organic residue — 28.1 of Schedule -I — 6134.17 Kg/day 2. ETP Sludge — 35.3 of Schedule of -I — 25 Kg/da 3. Salts from Forced Evaporation system — - — 2101.94 Kg/day Method of disposal: Shall be routed through APEMC so as to dispose to TSDF Parawada for secured land filling (as landfillable waste	Though unit has provided separate shed for storing hazardous wastes, but all category of wastes are dumped without any segregation. There is no provision for leachate collection.	**Not complying**

	4.	Carbon Waste	28.3 of Schedule – I	49.4 Kg/day	Shall be routed through APEMC so as to dispose to pre-processors/to authorised Cement industries for co-process(as utilizable waste)			
	5.	Stripper distillate	---	4144.2 Kg/day				
	6.	Used Oil	5.1 of Schedule - I	500 LPA	Shall be routed through APEMC so as to dispose to APPCB authorised agencies for reprocessing (as recyclable waste)			
	7.	Mixed Solvents	--	45 TPM	Shall be routed through APEMC so as to dispose to pre-processors/to authorised Cement industries for co-process(as utilizable waste)			
	8.	Container and container liners of hazardous chemicals (after detoxification)	33.1 of Schedule -I	60 no./month	After complete detoxification, shall be routed through APEMC so as send back to supplier/APPCB authorised parties (as recyclable waste)			

From the above it is concluded that the unit is not complying with two conditions of CFO, partially complying with two conditions of CFO issued by APPCB.

V Compliance Status of Safety Provisions under Factories Act 1948 and MSIHC Rules 1989 and the Chemical Accidents (Emergency planning, Preparedness and response) Rules, 1996

Sl.No	Observations	Status of Compliance as given by Inspector of factories
1	Submission of HARA and HAZOP reports for the manufacturing process of Vildagliption drug	Complied, Reported that unit submitted HARA and HAZOP submitted on 31.08.2020 to Inspector of Factories
2	The manual charging of chemicals into the reactors shall be replaced with powder transfer system / auto transfer system.	Complied
3	Industry shall provide proper training to regular and contract workers on SOP's. They shall display at work place	Not complied.
4	The industry shall provide oxygen analyzers, multi gas detectors, hydrocarbon detectors , Volatile organic compound (VOC) detectors, smoke detectors in a strategic places and connected withaudio and visual alarm so as toalert the workers whenever solvent vapors or toxic gases or smoke were observed in working areas.	Not provided at solvent storage area and solvent recovery plant area.
5	The industry shall provide sufficient number of SCBA, Canister masks, chemical cartridges, fire suits and chemical suits etc. in the factory at very short distance from working area and provideeffective training to the workers on its usage.	Not complied
6	The industry should issue the suitable personal protective equipment (PPE) to all the employees being engaged in hazardous operations and get train them in proper usage of suitable PPE at workplace.	Not complied.

7	The management should ensure availability of antidote in Occupational Health Centre (OHC) for each harmful chemicals handling inside the factory	Complied.
8	Unskilled and untrained workers shall not be employed in hazardous operations	Not complied
9	The management should extend the atmospheric vent pipe line of all reactors to the scrubber system	Not complied
10	The management should ensure adequate/effective ventilation at work place bycirculation of fresh air and also ensure theproper/required air changes in all production blocks and clean rooms	Not working
11	Industry shall arrange to conduct safety audit	Complied.
12	Not obtained license from the Department of factories for operations in New production block.	Not complied.
13	The industry shall ensure the transfer of solvents by using pumps and closed conveyance instead of manual handling.	Not complied.
14	Industry shall provide Colour coding and flow directions to the pipe lines carrying chemicals	Not complied
15	Industry shall prepare on-site emergency plan	Complied.
16	The industry shall provide automatic steam cutoff valve in the old production block	Not complied.
17	Water seepage observed in Raw material storage shed	Not complied
18	Industry shall provide a dump tank at outlet end of the reactors	Not complied
19	The industry shall provide dedicated stainless steel pipes for transfer of solvents in place HDPE pipes	Not complied
20	There is no proper means of access on the west side of old production block	Not complied
21	Earth continuity jumpers shall be provided to the flanges of the all solvent carrying pipelines	Not complied

21	The industry shall Display SOP's for all critical operations	Not complied
22	The minutes of safety committee meetings , mock drill reports shall be communicated to the factories inspectorate	Not complied
23	Working hours' notice form no-11 is not displayed in the factory premises. The working hours is not approved by the inspector of factories	Not complied

As per the reports of Inspector of factories, the unit is not complying with 18 Safety measures out of 23 safety measures stipulated by the department. This clearly indicates that safety lapses may be one major cause for accidents.

VI **Damage assessment to the environment and individuals in the incident dated 11.5.2021 and remedial action taken in terms of compensation for restoration of the environment and to the victims**

Accidents that have occurred at M/s Venkata Narayana Active Ingredients Pvt Ltd during 01.01.2020 to 10.08.2021 (till the date of committee inspection):

VI.a Fire accident in reactor on July 29, 2020: During the early hours around 2:10 AM on 29.07.2020 Methanol vapours accumulated in clean room-2 and while charging chemical powder into reaction vessel fire accident has occurred. Due to fire accident four employees suffered severe burn injuries and two employees Sh. Sd Hafeez and Sh. N. Rajani Kumar helper died while undergoing treatment in the hospital. Two employees Sh. S. Bhaskar and Sh. B. Ravindra Reddy underwent treatment. It was reported by the unit that the unit borne the expenditure incurred towards treatment of the injured.

Soon after receiving the information on the accident, officials from APPCB and Inspectorate of Factories have visited the accident site. District Collector cum District Magistrate, Nellore constituted a committee consisting of 1. Inspector of Factories, Nellore, 2. Deputy Chief Inspector of Factories, Nellore, 3. General Manager, District Industries Center, Nellore, 4. Deputy Commissioner of Labour, Nellore, 5. Revenue Divisional Officer, Atmakur, 6.

Deputy Superintendent of Police, Kavali and 7. Environmental Engineer, APPCB, Nellore to enquire into the accident. The committee constituted by District Magistrate conducted enquiry of the accident on 04.08.2020 to 05.08.2020 and submitted a detailed report to the District Magistrate and concluded that since the Management has opted unsafe procedures of charging chemicals into reactors which caused fire cloud and then led to an explosion. APPCB issued Directions vide order dated 29.07.2020 to the unit to "To Stop the operations of the industry immediately by following the Standard Operating Procedures (SOP's) ". Inspector of Factories, Nellore issued "Prohibitory Orders" to the unit on 29.07.2020. As a corrective measure the unit has stopped manual charging of chemicals into the reactor and replaced with powder charging or auto transfer of chemicals.

As informed by the unit to the committee members, for the deceased families the unit offered Rs.30.00 lacs compensation & job offer for dependent family member or one-time compensation of Rs.36.00 lacs. Accordingly, the unit has paid compensation of Rs. 30.00 lacs to the family of Late Sh. Sd Hafeez and offered job to his dependent family member. To other deceased employee Late Sh. Rajani Kumar the unit has paid compensation of Rs.36.00 lacs. For the injured employees, the unit informed to the committee that it has borne the cost of treatment and reported to have given paid leave till the employees recover and they are yet to join duty. Further, the unit reported that unit has paid compensation of Rs.7.00 lacs each to the injured employees. During committee visit, the committee could not interact with injured employees or family of deceased of the first accident.

VI.b Gas leakage on May 11, 2021: Accident occurred due to thionyl chloride gas leakage from reactor 0101 during manufacture of Vildagliptin.

- The unit was involved in the manufacture of Vildagliptin (consented product).
- On May 10, 2021 batch was completed and night shift incharge loaded mixed liquor generated during production of vildagliptin into GLR reactor 0101. Further the night shift incharge added caustic lye into reactor 0101 for neutralization.
- On May 11, 2021 during morning shift, around 8:30 AM, the employees working in production block-II where accident occurred have opened the vent of reactor 0101 soon after which thionyl chloride gas is released and three employees deceased and four employees were exposed to gas.

- Quantity of mixed liquor present in the reactor and exact causes for accident were not disclosed to the committee.
- During the accident three employees working near reactor-0101 died due to inhalation of thionyl chloride gas and other three employees who came for rescue were also affected due to gas inhalation. Due to odour, other employees in the unit have suspected gas leakage and have closed the reactor vent preventing further damage.
- Soon after the accident, the deceased and injured employees were shifted to hospital. Out of six employees exposed to gas, three of them deceased (declared brought dead in the hospital).

VI.b.i *Sequence of Events and Causes of Accident*

10.05.2021 21:00 hrs	:	Vildagliptin batch completed. Mother liquor or aqueous layer transferred to reactor GLR 0101
11.05.2021 5:15 hrs to 6:00 hrs		Caustic lye added to reactor 0101 for neutralization. Shift change at 6:00 AM. Transferring of neutralized Vildagliptin aqeous layer was still pending.
11.05.2021 7:00 hrs	:	Workers were experiencing odour problem. Generally the employees are facing odour issues due to which the employees could not understand that gas leakage was taking place from reactor 0101.
11.05.2021 8:00 hrs	:	Workers left to canteen to have breakfast. six workers stayed back in production block-II. Since the transfer pump was under repair, transfer of aqeous layer to ETP was not undertaken.
11.05.2021 8:15 hrs	:	Sh. Shareefuddin, shift supervisor instructed Sh. Bellamkonda Srinu to transfer the partially neutralized 3200 liters of Vildagliptin aqeous layer to ETP under nitrogen pressure.
11.05.2021 8:30 hrs	:	Due to partial neutralization of aqueous layer nitrogen purging may have trigerred exothermic reaction leading to increase in temperature and pressure inside the reactor. At this time, Sh, Srinu may have opened atmospheric vent which lead to sudden release of harmful gases and immediately three workers present in production block have fallen unconscious on the floor and other three workers who came to rescue fell

		on the stairs. Due to high concentration of thionyl chloride, three employees near the reactor have immediately died.
11:05.2021 8:35 hrs	:	Other workers have entered production block-II by wearing safety masks and shifted the affected employees from production block-II to safe zone.
11:05.2021 8:45 hrs	:	Reactor vent closed. There was severe odour nuisance but till this time, the gas was not identified.
11.05.2021 9:00 hrs	:	Affected workers shifted to ambulance. Safety persons were called for and based on the smell & irritation caused to nose & throat, safety persons suspected that the accident has taken place due to thionyl chloride. Reported that previously also during Vildagliptin manufacture similar odour issue was experienced due to thionyl chloride gas leakage was experienced in the unit (especially during neutralization) based on which it was concluded that the accident is due thionyl chloride.
11.05.2021 10:00 hrs	:	Workers shifted to hospital. Three workers declared brought dead. Safety personnel from the unit administered an antidote Sulbutamol sulphate+ asthaline hydrocartezone along with oxygen was to affected employees and within 30 mins, two employees recovered and became normal while one employee recovered in a day. All three affected employees have joined duty. Parallely, the unit has transferred the contents of reactor 0101 to the ETP and washed the reactor. The unit has not informed to any Regulatory Authorities regarding the accident till 10.30 AM.
11.05.2021 11:45 hrs	:	The villagers have informed the news channel about the accident and officials from APPCB, Inspectorate of Factories, representatives from District Collectorate, Nellore inspected the unit. But by the time the officials have visited the unit, reactor 0101 was completely cleaned due to which APPCB could not collect samples.

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VI.b.ii *Possible causes for accident on May 11, 2021 as per committee constituted by District Magistrate*

1. Suction and dump tanks are not provided.

2. Fumes/ dust suction or vapour absorption system was not in operation. Strong smell was noticed by the employees in the production block but it was ignored and no immediate measures were taken.
3. The mother liquor generated during the production process has to be treated in ETP but instead the unit was neutralizing the same in the reactor itself. The mother liquor was neutralized by addition of caustic lye and retention time of 8hrs to 12 hrs was allowed. The neutralized effluent from reactor was directly taken for aeration tank of ETP. It was learnt from the discussions that the unit was directly neutralizing the effluent in reactor since April, 2021 onwards.
4. On May 11, 2021, the workers in the morning shift experienced odour nuisance from reactor 0101 and workers near the reactor have opened the reactor vent and the toxic gases from the reactor have vented into production block and workers are exposed to toxic gases.
5. Batch manufacturing records, batch sheets and reactor labels are not maintained. At the time of shift change, batch information or data sheets was not exchanged between the shift incharges.
6. Personnel protective equipment like safety goggles gloves face masks is not provided to employees.
7. There was no VOC sensor with alarm in the production block which could have alerted the employees of possibly high VOC concentration. There was no vapour absorption system/ suction system to route the escaping vapours/ gases into atmosphere through scrubber. Treating effluent in the reactor instead of ETP, lack of automation, Lack of comprehensive standard operating procedure, lack of training & ignorance of employees, not carrying out HARA and HAZOP study for production block, absence of VOC sensors/ alarm system in the reactor to alert the personnel, lack emergency of preparedness are all the causes of accident. Immediate trigger was opening of atmospheric vent of reactor 0101 instead of opening scrubber vent which resulted in sudden release of unreacted thionyl chloride gas from reactor 0101.
8. During the NGT committee visit, it was observed that the unit has dismantled GLR reactor 0101 and replaced it with SLR reactor. Reported that GLR reactor 0101 is sent to Hyderabad. The unit has not obtained permission for shifting the reactor to Hyderabad and also information was not communicated to any of the regulatory Authorities.

VII Damage Assessment and Calculation of Compensation

The committee learnt that the unit had cleaned the reactor & its surroundings by the time, the Authorities have reached the accident spot and it was very difficult for the Authorities to ascertain the root cause of the accident and to assess total extent of damage. By the time of NGT committee visit, the GLR reactor-0101 was shifted outside the unit premises.

VII.a. *Loss of life and status of award of compensation*:

Accident on May 11, 2021: Out of six employees present in production block, three employees deceased and three were affected & recovered within a day. During inspection, the committee interacted with injured employees and families of the deceased.

VII.a.i Late Sh. P. Thirupataiah studied upto 5th grade aged 62 years contractual labour working in the unit since 11 years. The employee was drawing Rs.13,500/- per month salary. The unit has paid compensation of Rs.10.00 lacs to the family of the deceased.

VII.a.ii Late Sh. V. Thirupataiah studied upto 3rd grade aged 64 years contractual labour working in the unit since 11 years. The employee was drawing Rs.12,000/- per month salary. The unit has paid compensation of Rs.10.00 lacs to the family of the deceased.

VII.a.iii Late Sh. B. Srinu studied upto M.Sc aged 27 years contractual labour working in the unit since 1 ½ years. The employee was drawing Rs.37,000/- per month salary. The unit has paid compensation of Rs.10.00 lacs to the family of the deceased.

The unit has announced to pay compensation of Rs.40.00 lacs to the family of the deceased. To ascertain the adequacy of compensation announced, the committee has calculated compensation by two methods: 1. As per the Judgement dated 16th August 2019 of Hon'ble Supreme Court of India in civil appeal No. 6339 of 2019 and judgement in the matter of Sunita Tokas vs New India Insurance Co. Ltd**.** & civil appeal No.3483 of 2008 and as per Employee Compensation Act, 1923. Out of the three, the committee has considered the highest amount to be paid as compensation to the family of the deceased. calculation of compensation is explained in table 1 and table 2.

Table 1: Assessment of compensation

Name of the deceased	**A*** Amount of compensation in INR as per Hon'ble Supreme Court Judgement in civil appeal No. 6339 of 2019 and civil appeal No.3483 of 2008	**B** As per Employee / Workmen Compensation Act, 1923 Compensation= fifty percent of the monthly wages of the deceased x relevant factor	Compensation announced by the unit
P. Thirupatiaih	Rs. 10,93,800/-	Rs. 7,43,445/-	Rs. 40.00 lacs
Sh. V. Thirupataiah	Rs. 10,05,600/-	Rs. 6,17,580/-	Rs. 40.00 lacs
Sh. Srinu	Rs. 50,55,240/-	Rs. 16,01,775/-	Rs. 40.00 lacs

* A→ calculation is explained in table-2.

&→ As per EC Act, 1923 the Central Government has specified Rs.15,000/- as monthly wages with effect from 03.01.2020. The relevant factor as per EC Act, 1923 is (the completed years of age on the last birthday of the workman immediately preceding the date on which the compensation fell due).

Considering the points in table1, the compensation amount of Rs.40.00 lacs announced by the unit is adequate to the family of Late Sh. P. Thirupataih and Late Sh. V. Thirupatiah while the unit shall pay Rs. 15, 55, 240/- in addition to Rs.40.00 lacs to the family of B. Srinu. The health conditions of the affected employees shall be monitored for minimum period of two years.

Table 2: A→ Amount of compensation in INR as per Hon'ble Supreme Court Judgement in civil appeal No. 6339 of 2019 and civil appeal No.3483 of 2008

Name	DOB & Age at the time of death	Qualification & Designation	Salary per month for contractual labours	Future prospects (40% of the income)	Deduction towards personal expenses	Loss of monthly income to the dependents	Annual income	loss of future income	Expenses for shifting mortal remains and Loss of estate & funeral expenses(app. cost)	Loss of Love and affection	Compensation	As per Workmen compensation Act
				B*	C=50% of B	D=B-C	E=D*12	F[#]	G[$]	H[&]	I=F+G+H	Compensation= fifty percent of the monthly wages of the deceased x relevant factor
P. Thirupatiaih	62	5th Standard	13500	18900.0	9450.0	9450	113400	793800	100000	200000	1093800	743445

V. thirupataiah	64	3rd standard	12000.0	16800.0	8400	8400	100800	705600	100000	200000	1005600	617580
Srinu	27	MSc Chemistry	37000.0	46620.0	23310	23310	279720	4755240	100000	200000	5055240	1601775
* tax if any is deducted @ of 10%												
As per Employee Compensation Act minimum wages fixed by Government is Rs. 15,000 per month. For permanent employee Srinu Employee Compensation Act is applicable while other two were contractual labours for whom workmen compensation Act is applicable.												

Depending on the age, the relevant factor is fixed. 17 for age group 26-30 years and 7 for age group 61 to 65 years

VII.b. ***Environmental Compensation on account of non-compliances:*** From the available records the following non-compliances are observed:

1. In the matter of Appeal No. 21 of 2019 in Honble NGT (SZ), the unit paid Environmental Compensation of Rs. 37.20 lacs to CPCB as per Hon'ble NGT order dated 28.08.2020. Environmental compensation was levied by CPCB from the appellant unit mainly for the reason for violation of closure directions issued by CPCB during 2017.
2. The unit had undertaken expansion activities without obtaining prior EC clearance and CFE from APPCB. EC was accorded to unit by SEIAA on 08.12.2020 by which expansion activities were in progress.
3. From available records it is observed that during the annual production during 2018-19 is 131.247 TPA and 2019-20 is 146.985 TPA against the consent quantity of 142.32 TPA. Due to excess production excess hazardous waste is generated. During 2019-20 the unit has generated double the consented quantity of hazardous wastes and disposed to cement industries for co-processing without informing to APPCB.
4. Storm water drains were filled with effluent near scrubber section.
5. During committee inspection it was observed that hazardous wastes such as ETP sludge and ATFD salts were dumped in the shed and there was no provision for leachate collection.
6. Reactor 0101 where accident occurred on May 11, 2021 was dismantled and shifted outside the unit without informing to any Regulatory Authorities.
7. The total area of the unit is 33 acres and one of the EC condition was develop green belt in 11 acres (33 % of total plant area) but as on date unit has developed green belt in 6.0 acres and green belt under development in another 5 acres.
8. The unit has installed flow meters at MEE feed, LTDS inlet, inlet & outlet of stripper, boiler feed, cooling tower but not connected to the APPCB server to get live data. Hence water consumed in various stages cannot be quantified.
9. The industry has provided 2 nos. of VOC analyzers in the plant premises i.e. near main gate towards village and near engineering department. Further, the industry installed an online VOC analyzer at Panchayath office of Chandrapadiya (V), Vinjamur (M), SPSR Nellore District and connected the same to the APPCB server. The average VOC values recorded is submitted below:

Sl No.	Date	Near Main gate towards village	Near Engineering Dept towards village	Village Panchayat Office
1	2021-08-01	0.94	4.67	0
2	2021-08-02	0.94	4.76	0.04
3	2021-08-03	0.94	4.87	0
4	2021-08-04	0.97	4.95	0
5	2021-08-05	0.96	4.95	0.02
6	2021-08-06	0.94	4.79	0.02
7	2021-08-07	0.98	5.14	0.04
8	2021-08-08	1	5.12	0.01
9	2021-08-09	1.01	4.89	0
10	2021-08-10	0.89	4.24	0

The above VOC values indicates that persistence of odour nuisance to the surroundings. The nearest habitation is at a distance of 300m from the unit. As per wind direction, the surrounding village are susceptible to odour nuisance.

10. APPCB issued "Stop Production Order" to the unit vide order dated 18.08.2020 and subsequently issued revocation order on 08.09.2020 with certain conditions and copy of order is placed as **Annexure-VI**. APPCB again issued "Stop Production Order" on 26.05.2021 to the unit and the unit has approached Hon'ble High Court against APPCB order. The Hon'ble High Court set aside the stop production order issued by the APPCB. APCCB issued CFO to the unit with certain conditions and to ensure compliance of those conditions.
11. Though unit has obtained Consent for operation for 35 products from APPCB. The unit has carried out HARA and HAZOP study for only 12 products and Inspectorate of Factories has granted permission for only 12 products. Inspectorate of Factories issued Prohibitory orders to the unit on 29.07.2020 wherein the unit was directed "*the manufacturing process of products 1) Allyl Isopropyl acetyl urea 2) Tetracaine*

hydrochloride 3) Levetiracetam 4) Risperidone 5) Lacosamide 6) Vildagliptin 7) Moxifloxacin hydrochloride 8) Loxoprofen sodium hydrate 9) Voglibose 10)Olmesartan medoxomil 11) Linagliptin 12) Warfarin sodium shall not be carried on unless HARA and HAZOP study report covering this products are prepared and submitted in this office along with the compliance of recommendations if any in the reports". Accident occurred on 11.05.2021 due to thionyl chloride gas leakage while neutralizing mother liquor generated from Vildagliptin manufacture violating the directions of Inspectorate of Factories. Inspector of Factories revoked the Prohibitory orders vide order 04.09.2020 with a condition that " *the operations/ processes pertaining to 12 products for which the HARA and HAZOP reports submitted now are only permitted*". Copy of the revocation order is placed as **Annexure-VII**.

The unit has failed to comply with the conditions given by APPCB and Inspector of factories in the CFO order and revocation orders respectively. Hence the committee has calculated EC as per CPCB formula

EC=PI x N x R x S x LF

Where,

EC = Environmental Compensation in INR

PI = Pollution Index of industrial sector (Red-80)

N = Number of days of violation took place (start of unit operation to date of accident)→08.09.2020 to 11.05.2021 (till the date of accident)→ 245 days

R = A factor in Rupees for EC (Rs. 250/-)

S = Factor for scale of operation (large -1.5)

LF = Location factor (the unit is located in Chandrapadiya village at a distance of about 16 Km and hence LF will be 1.0)

Total EC= 80 x 1.5 x 1 x 250 x 245

Total EC for violations= 73,50,000/-

Rupees Seventy three lakhs fifty thousand only

VII.d. *Total Compensation M/s Venkata Narayana Industries Pvt Ltd liable to Pay*

a. The unit has already paid Rs. 10.00 lacs to the family of each deceased. (Total Rs.30.00 lacs paid towards Compensation to the deceased persons). In addition the unit shall pay compensation of:

Sl. No	Name	Compensation paid	Additional amount liable to be paid by the unit as per the calculation made by committee
1	Late Sh. P. Thirupataiah	Rs. 10.00 lacs	**Rs.30.00 lacs**
2.	Late Sh. V Thirupataiah	Rs. 10.00 lacs	**Rs. 30.00 lacs**
3.	Late Sh. Bellamkonda Srinu	Rs.10.00 lacs	**Rs. 40,55,240/-**

b. **The unit shall pay Environmental Compensation to CPCB for non-compliances resulting in three major accidents. → Rs. 73,50,000/- to CPCB**.

IX Concluding remarks

1. Two major accidents occurred in M/s Venkata Narayana Active Ingredients Pvt Ltd on 29.07.2021 and 11.05.2021. During accident on 11.05.2021, three employees deceased due to thionyl chloride gas leakage.

2. There was no VOC sensor with alarm in the production block which could have alerted the employees of possibly high VOC concentration. There was no vapour absorption system/ suction system to route the escaping vapours/ gases into atmosphere through scrubber. Treating effluent in the reactor instead of ETP, lack of automation, Lack of comprehensive standard operating procedure, lack of training & ignorance of employees, not carrying out HARA and HAZOP study for neutralisation aqueous layer of Vildagliptin in reactor, absence of VOC sensors/ alarm system in the reactor to alert the personnel, lack emergency of preparedness are all the causes of accident. Immediate trigger was opening of atmospheric vent of reactor 0101 instead of opening scrubber vent which resulted in sudden release of unreacted Thionyl Chloride gas from reactor 0101.

3. The unit is continuing to operate at full capacity of 500 TPA. As per Inspectorate of Facrtories the unit is not complying with safety guidelines. The committee submits to Hon'ble NGT to direct Inspector of Factories to direct the unit to stop the operations and to safely shutdown the unit till the unit ensures compliance with revocation order issued by Inspector of Factories.

4. APPCB issued CFO- expansion to the unit for manufacture of 500 TPA of consented 35 products. APPCB shall ascertain the actual water consumption, wastewater generation, hazardous waste generation during full production. APPCB shall also assess the adequacy of ETP and air pollution control devices installed in the unit. The committee submits to Hon'ble NGT to direct APPCB to renew CFO only after ensuring that ETP and APCD's are adequate and working properly.

5. The committee constituted by the District Collector, SPSR Nellore district shall inspect the industry once in six months for minimum period of two years to verify the compliance status of the industry and to issue necessary directions as and when required.

6. The VOC values indicate that the odour control measures taken by the industry are inadequate and the industry need to take immediate measures to bring down the VOC levels to control odour nuisance to the surroundings.

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

M.N. Harendhira Prasad, IAS
Joint Collector and Addl. District Magistrate,
Nellore

K. Srinivasa Rao
Deputy Chief Inspector of Factories

Ch. RajaSekhar, Environmental Engineer
Regional Officer, Nellore, Andhra Pradesh
Pollution Control Board

H D Varalaxmi
Regional Director- Chennai,
Central Pollution Control Board

Annexure - I

Item No. 03 Court No. 1

BEFORE THE NATIONAL GREEN TRIBUNAL
PRINCIPAL BENCH, NEW DELHI

(By Video Conferencing)

Original Application No. 144/2020

(With report dated 25.01.2021)

Bhaskar Rao Vemuri Applicant

Versus

State of Andhra Pradesh Respondent

Date of hearing: 02.06.2021

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

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

ORDER

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

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

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

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

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

2. *The Chandrapadiya village is existing at a distance of about 300 mtrs from the industry.*

3. *The officials of Ground Water department have inventoried a total of 7 bore wells, including 2 bore wells belongs to the industry and 3 agricultural bore wells of Sri Vemuru Bhaskar Rao and 2 bore wells of Sri Nageswara Rao. The total depth of the bore wells ranges from 70 to 90 mtrs, and the present depth of water levels ranges from 7.43 to 11.65 mtrs below ground level.*

4. *A pumping test was conducted for 180 minutes (3 hours) by choosing the bore wells of the industry as pumping wells, and the surrounding agriculture wells as observation wells. The change in the depth of water level (drawdown) in the agricultural bore wells of Sri Vemuri Bhaskar Rao and Nageswara Rao in response to the pumping of bore wells in the industry is measured throughout the pumping period to know the impact. The static water levels in the observation wells before pumping are in the range of 7.43 mtrs to 11.65 mtrs after 180 minutes of pumping the water levels in the observation wells remained almost constant without any abrupt decrease, which indicates that the influence is negligible or nil.*

5. *No pipeline arrangement was observed from the industry to nearby agricultural bore wells for supply of water for industrial usage. The industry is drawing water from their own bore wells (Two) located within the premises and the industry is not purchasing water from outside.*

6. *The committee contacted the petitioner Sri Vemuru Bhaskar Rao over telephone and he informed that he is residing at Hyderabad and having about Ac.9.0 of agricultural lands towards North Side of the industry on his wife name. He also informed that at present they are getting sufficient water from their agriculture borewells due to the recent heavy rains in that area and the industry is not purchasing water from outside agricultural bore wells.*

7. ***ECs & Consent status : Consent obtained under the provisions of of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 from Pollution Control Board and from the MoEF&CC, GOI under Environment (P) Act,1984***

- *The industry obtained Consent for establishment (CFE) in name of M/s. Nutra Specialities Pvt. Ltd., from the Board vide order dt. 24.05.2006 to manufacture Solanesol-100 Kgs/month.*

- *The industry obtained CFE for expansion from the Board vide order dt.14.03.2007 for manufacturing of additional 8 Nos. of products.*

- *The industry obtained Environmental Clearance from the Ministry of Environment, Forest & Climate Change, Govt. of India vide EC order dated 02.02.2009 for expansion of bulk drug manufacturing unit with production capacity from 62 TPA to 142.32 TPA.*

- *The industry obtained CFE for expansion from the Board vide order dt.24.04.2010 to produce 15 Nos. of bulk drug products with a total production capacity of 36 TPA.*

- *The industry obtained CFE vide order dated 18.02.2012 for change of product mix without increase in pollution load and no increase in production capacity to produce 14 nos of bulk drug products with a total production capacity of 36 TPA.*

- *The industry obtained CFE vide order dated 08.02.2017 to manufacture various bulk drugs of 142.32 TPA.*

- *The industry obtained CFE for change of product mix vide order dt.08.02.2018 to manufacture 31 Nos. of bulk drugs with total production capacity of 395.25 Kgs/day or 142.32 Tons per Annum.*

- *The name of the industry has been changed from M/s. Nutra Specialties Pvt. Ltd to M/s. Venkata Narayana Active Ingredients Private Limited in the month of August, 2018.*

- *The industry obtained CFE for change of product mix vide order dt.17.09.2018 to manufacture 35 Nos. of bulk drugs with total production capacity 395.25 Kgs/day or 142.32 Tons per Annum.*

- *The industry obtained CFE vide order dt.27.09.2019 for change of product mix by arranging the products in Group A & Group B. The Group A will be remain same with existing 35 products and in Group B, 12 products will be existing products and added three more products without any increase in overall consented production capacity of 395.29 Kgs./day or 142.32 TPA. As per CFE order, the industry shall produce any one group either Group A or Group B at any point of time. But, the industry is not yet started operations of this product mix.*

- *Subsequently, the industry obtained CFO for expansion / change of product mix.*

- *The industry obtained Consent for Operation (CFO) vide order dt.14.12.2018, for which the industry obtained CFE for change of product mix vide order dt.17.09.2018 to manufacture 35 Nos. of*

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

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

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

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

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

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

10. ***Waste water generation & treatment :***
The industry is segregating effluents into Low TDS Process Effluent & High TDS Process Effluent and treating the two streams separately.

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

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

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

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

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

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

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

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

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

11. *Air Pollution:*

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

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

The industry has provided Two Nos. of Continuous Ambient Air Quality Monitoring (CAAQM) stations to monitor Ambient Air Quality parameters such as Particulate Matter, SO_2 & NO_x and connected to APPCB website. ***As per the monitoring data, there is no exceedance of standards were observed for the last six months as per norms stipulated.***

12. Solid Waste :

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

Action ***taken by the APPCB (Board):***

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

Conclusions:

1. *The industry is not receiving water from outside agriculture bore wells and drawing water from their Two bore wells located within the premises.*

2. *No depletion of ground water and influence to the nearby agriculture bore wells were observed due to drawing of water by the industry from their bore wells located in the industry premises.*

3. *The committee contacted the petitioner Sri Vemuru Bhaskar Rao over telephone and he informed that at present they are getting sufficient water from their agriculture borewells due to the recent heavy rains in that area and the industry is not purchasing water from outside agricultural bore wells.*

4. *Provided Zero Liquid Discharge system for treatment of effluents and no effluent discharges were observed outside the industry premises.*

5. *As per the records, during last six months i.e. from July 2020 to December 2020, the industry manufactured 11 Nos. of consented products and the industry manufactured an average of 185.76 Kg/day against the permitted capacity of 395.29 Kgs/day. The production quantity was within the permitted capacity.*

6. *The industry has obtained Environmental Clearance from State level Environment Impact Assessment Authority (SEIAA), AP vide order dated 08.12.2020 for the expansion of the production capacity from 142.32 Tons per Annum to 500 Tons per Annum.*

7. *The industry obtained CFE & CFOs from the A.P. Pollution Control Board for manufacturing of bulk drugs under the provisions of the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981."*

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

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

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

[1] The New Indian Express dated 11.05.2021 titled "Three workers die after toxic gas leak in Nellore's chemical factory" https://www.newindianexpress.com/states/andhra-pradesh/2021/may/11/three-workers-die-aftertoxicgas-leak-in-nellores-chemical-factory-2301185.html.
The Hans India dated 11.05.2021 titled 'Four died in gas leak incident at a Chemical factory in Nellore" https://www.thehansindia.com/andhra-pradesh/four-die-in-gas-leak-incident-at-a-chemical-factory-in-nellore-685842.

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

List for further consideration on 06.10.2021.

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

Adarsh Kumar Goel, CP

Sudhir Agarwal, JM

M. Sathyanarayanan, JM

Brijesh Sethi, JM

Dr. Nagin Nanda, EM

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

Annexure - II

72

State Level Environment Impact Assessment Authority (SEIAA)
Andhra Pradesh
Ministry of Environment, Forests & Climate Change
Government of India
D.No.33-26-14 D/2, Near Sunrise_Hospital, Pushpa Hotel Centre,
Chalamavari Street, Kasturibaipet, Vijayawad-520010

REGD.POST WITH ACK.DUE

Order No. SEIAA/AP / NLR/IND/04/2020/1780 08/12/2020 714

Sub : SEIAA, A.P. – M/s. Venkata Narayana Active Ingredients Private Limited (Formerly M/s. Nutra Specialties Private Limited) Change of product mix & Expansion of Active Pharmaceutical Ingredients at Sy. No. 69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District, Andhra Pradesh - Environmental Clearance - Expansion - Issued - Reg.

I. This has reference to your EC application submitted through online on 14.04.2020 (Proposal No.SIA/AP/IND2/**151499**/2020), seeking Environmental Clearance for manufacturing of **Active Pharmaceutical Ingredients Manufacturing Unit at Sy No. 69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District** in favour of **M/s. Venkata Narayana Active Ingredients Private Limited (Formerly M/s. Nutra Specialties Private Limited).** The nearest human habitation viz., Chandrapadiya (V) exists at a distance of about 0.35 km from the premises. The total area of the site is 33 Acres. The total cost of the project is Rs.40.0 Crores. The details of the production capacities of the project is as follows:

Active Pharmaceutical Ingredients expansion of
production capacity from 142.32 TPA to 500 TPA

List of Proposed products and Quantities:

S. No.	Proposed Product	Capacity (kg/month)
1.	Iron Sucrose	1000
2.	Iron Sorbitol	1000
3.	Olmesartan Medoxomil	500
4.	Boswellic Acid	500
5.	Capacitabine	100
6.	Tioconozole	200
7.	Ezitamibe	200
8.	Sertraline HCI	500
9.	Moxiflaxain	500
10.	Tetracaine Hydrochloride	500
11.	Nebivilol HCI	200
12.	Warfarine Sodium	500

13.	Vitamin K2/4	100
14.	Policosanol	500
15.	Teprenone	500
Total		**6800**

Name of the Byproducts:

S. No	Name of the Product	Name of By-Product	Kg/Month
1	Olmesartan Medoxomil	NaBr	170
2	Tioconozole	NaBr	53.25
3	Teracaine Hydrochloride	NaBr	171.25
4	VitaminK2/4	Potassium lodide	37.75
5	Teprenone	NaBr	435.75

This proposal has been referred to SEAC, A.P along with all the documents submitted by the proponent for their appraisal and for their specific recommendations on EC aspect. 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 application in its meetings held on **13.10.2020**. The project proponent and their Consultant M/s. SV Enviro Labs & Consultants have attended the Online meeting. The proponent submitted, revocation on stop production orders, Risk Analysis, CFO compliance to the Committee. After detailed deliberations the committee recommends to issue EC for Expansion of production capacity from 142.32 TPA to 500 TPA. Decision of SEIAA: A complaint has been received by SEIAA through mail lodged by kunamkrishnareddy7@gmail.com. The complaint was forwarded along with photos vide mail dated 26.09.2020 to Chairman, APPCB and Member Secretary, APPCB marking copies to SEAC members. Refer to SEAC to examine with respect to the complaint. The decision of SEIAA on the complaint has been considered has been duly discussed in the deliberations of the committee. Prior to the complaint, the issues like stop production orders and revocation orders by APPCB were duly considered. Based on which the committee has observed that there are no considerable issues in the complaint pertaining to issue of EC. Hence recommends issue of EC. The committee in the appraisal report clearly stated that they have approved the approved Form-I/II, PFR/DPR and EMP for compliance by the proponent. The State Level Environment Impact Assessment Authority (SEIAA), in its meeting held on **18.11.2020, 19.11.2020 & 24.11.2020** examined the proposal and the recommendations of SEAC and decided to accept SEAC recommendations aforesaid for strict compliance by the proponent and to issue EC. The SEIAA, A.P **hereby accords Environmental Clearance to the project** as mentioned at Para no. I 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:

III a Part A. Special Conditions:

1. The proposal shall not attract the following acts & Rules: Forest act 1980, Wild life (Protection) act,1972; CRZ notification, 2011; The eco sensitive areas as notified under EP act,1986; Critically polluted areas as notified by CPCB and also shall not harm live stocks and human beings and disturb their activities.
2. The industry shall adopt appropriate pollution control system to achieve Zero Liquid Discharge (ZLD) and ensure that there will be no discharge from the unit.
3. The industry shall segregate effluents into different streams i.e. High TDS and High COD, High COD and Low TDS, Low COD and High TDS, Low COD and Low TDS in case of the industry sending the effluent to CETP.
4. The industry shall implement monitoring of waste factors for different streams of effluent sand solid waste.
5. The industry shall establish suitable scrubbing system in consultation with the APPCB.
6. The industry shall provide effective solvent recovery system.
7. The industry shall provide hazardous waste container (drums) cleaning/washing system (Container detoxification).
8. The industry shall provide flow meter to measure quantity of stream consumed for MEE system.
9. The industry shall provide magnetic tamper proof flow meters to measure quantity of different streams of effluents generated and routed through the treatment systems.
10. The industry shall provide steam stripping system to handle volatile matterin the effluents.
11. The industry shall send hazardous waste to the authorized cement industries/ TSDF/ authorized recyclers by properly maintaining the system.

Part B. Specific Conditions:

1) Air & Noise Environment:

1. The emissions from the Bio Briquettes Boiler (capacity 1 x 4 TPH existing and 1 x 4 TPH proposed shall be routed through cyclones separator followed by bag filters with the stack type and height fixed in consultation with the APPCB. Adequate stack height shall be provided for D.G. Sets Existing - 1 x 500 KVA & 1 x 725 KVA and proposed – 1 x 1250 KVA as per CPCB norms.

2. The process emissions containing the HBr, HCl, NH3, HF, H2S and Mercaptans shall be routed through two stages scrubber system. The packing media in the scrubber is 25 mm poly propylene rings. Scrubbed liquid shall be treated and reused or subjected to MEE.

3. Strict measures shall be taken to control odour with appropriate odour abatement methods. Sub coolers for brine circulation shall be installed to reduce solvent evaporation losses into the atmosphere. All the solvent storage tanks shall be connected to vent condensers with chilled water circulation to minimize the solvent loss. The proponent shall install VOC meter in the plant

to monitor

4. 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 APPCB. The volatile vapours generated during process shall be routed through condensers and the condensate shall be reused in the plant.

5. The area of the greenbelt shall not be less than 33% of the total area of the site. Greenbelt with tall growing trees shall be developed along the boundary of the site.

6. Fugitive emissions from storage tanks shall be avoided by providing air condensers.

7. The proponent should provide appropriate PPE to the persons working in the unit and suitable to their work place environment.

8. The proponent shall establish adequate number of air monitoring stations, including one online station, in consultation with the APPCB and take appropriate measures to ensure that the GLC shall comply with the NAAQM norms notified by MoEF&CC, GoI on 16.11.2009.

9. Measures shall be taken to comply with the provisions made under "Noise pollution (Regulation and control) amendment rules 2010 dated 11-01-2010 issued by MoEF.

Water Environment:

1. The total water requirement shall not exceed 320.4 KLD which includes for Process & Washings – 34.4 KLD, Boiler – 68.0 KLD, Cooling tower - 180.0 KLD, Domestic use – 18.0 KLD & for Greenbelt – 20.0 KLD.

Waste water generation:

1. The total waste water generation is **112.8 KLD**, Out of that; 35.0 KLD is from Process & washings; 16.8 KLD is from Boiler; 45.0 KLD is from cooling tower; 30.0 KLD is from Scrubbing liquid; 16.0 KLD is from Domestic - After treatment in STP will be disposed to onland for irrigation.

2. Zero discharge concepts shall be adopted. High COD & Low TDS shall be sent to incinerator, Low COD & Low TDS shall be sent to conventional ETP and the Low COD & High TDS effluents are routed through Stripper with scrubber followed by MEE and rejects of MEE shall be sent to ATFD. The condensate of the MEE shall be sent to RO. The permeate from the RO plant shall be re-used in the plant and rejects to MEE. The domestic waste water shall be disposed into the septic tank followed by soak pit.

3. The proponent shall provide separate storm water drains and harvest the

rainwater from the rooftops to recharge the ground water.

4. Regular monitoring of ground water level and quality should be carried out by establishing a network of existing wells in and around project area in consultation with the competent Ground Water Department. Data thus collected should be sent at regular intervals to MoEF&CC, CGWA and CGWB, Southern, Region, Hyderabad.

5. Suitable conservation measures to augment groundwater resources in the area shall be planned and implemented in consultation with GWB. Suitable measures should be taken for rainwater harvesting.

6. In case of Ground water usage, Permission from the competent authority should be obtained for drawl of ground water, if any, required for this project.

Solid Wastes:

1. Hazardous waste generated from the industry such as organic residue, salts, spent solvents waste oils, used oils etc., shall be disposed as per the Hazardous and other Wastes (Management and Tran boundary movement) Rules, 2016 and its amendments thereof

2. The Solid waste from process and solvent & Organic residue – 6134.17 kg/day shall be sent to TSDF for incineration/Cement industries for processing; Carbon waste – 49.84 kg/day shall be sent to TSDF for incineration/Cement industries for processing; Salts from MEE system – 2101.94 kg/day shall be sent to TSDF for secured land fill; Stripper waste - 4144.2 kg/day shall be sent to Cement industries for co-processing; Mixed solvents - 45.0 TPM shall be sent to authorized recyclers/cement plants; Container and container lines of hazardous chemicals (after detoxification) - 60.0 Nos/month shall be sent to Authorized recyclers; Spent Oil – 500 LPA shall be sent to Authorized recyclers; ETP Sludge – 25.0 kg/day shall be sent to TSDF for secured land fill; Boiler Ash – 5.0 TPD shall be disposed to sold to Brick Manufactures.

3. The Organic and Inorganic solid wastes, Spent Carbon, process residues shall be sent to the authorized users or recyclers approved by the APPCB.

4. The proponent should strictly comply with the E-Waste Management Rules, 2016, and report compliance.

Environment:

1. The Project Proponent shall ensure that the transportation activity of the unit should not cause any inconvenience to the public and comply with the local norms, if any;

2. The project shall implement the commitments, if any, made in the public

hearing;

Part C: General Conditions:

1. **This order is valid for 7 years.**

2. No further expansion, increase in production; or change in product mix or technologies/land use shall be made without prior approval of the SEIAA.

3. The project proponent shall submit the copies of the ***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.

4. 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, A.P.

5. The ***Prior Environmental Clearance*** issued to this project along with the Approved Environmental Management Plan (EMP) and the Approved DPR should be uploaded in the project's web site and be made available in the public domain.

6. The PEC main contents be displayed on permanent boards at the main entry of the premises and at other prominent places.

7. The project proponent shall strictly adhere to its ***Environmental Policy*** approved by the SEIAA, and shall be made available in their web site.

8. A separate *"Environmental Management Unit"* (With a laboratory) shall be set up with all monitoring facilities.

9. A Separate Bank account need to be started for the budget allocated for the EMP and the amount committed should be deposited before the project obtains CFE/CFO as the case may be. The amounts allocated should not be diverted for any other purpose.

10. The funds earmarked for environmental protection measures (**Capital cost Rs.384.0 Lakhs & Recurring cost of Rs.79.5 Lakhs/annum)** should be kept in separate account and should not be diverted for other purpose. Year wise expenditure should be reported to the Ministry and its Regional Office located at Bangalore.

11. The proponent before starting the operations, shall obtain all other mandatory clearances from respective departments, including the CFE and CFO from the

APPCB.

12. The project proponent shall meticulously follow the ***Form-1/2*** of the application; and approved ***EMP,*** **for the purpose of all compliances.**

13. Four ambient air quality-monitoring stations should be established in the core zone as well as in the buffer zone. 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.

14. Data on ambient air quality should be regularly submitted to the Ministry including its Regional Office located at Bangalore and the State Pollution Control Board/ Central Pollution Control Board once in six months.

15. The project proponent shall ensure that no natural watercourse and/or water resources shall be obstructed due to any mining operations. Necessary safeguard measures to protect the first order streams, if any, originating from the mine lease shall be taken.

16. Personnel working in dusty/polluted areas should be provided with protective respiratory devices and they should also be provided with adequate training and information on safety and health aspects.

17. Occupational health check up program for the workers should be undertaken periodically. 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.

18. The project proponent shall submit ***Half-yearly*** reports on the status of compliance of the stipulated ***Environmental Clearance Condition***s including results of monitored data (both in hard copies as well as by e-mail) to the Ministry of Environment & Forests, its Regional Office, Chennai, SEIAA, A.P., Zonal Office of Central Pollution Control Board, Bangalore, and A.P. Pollution Control Board.

19. The proponent shall upload the status of compliance of the environmental clearance conditions including results of monitored data on their websites and shall update the same periodically.

20. Officials from the Regional Office of MOEF&CC, Chennai / The SEIAA, Andhra Pradesh through the Regional Offices of Andhra Pradesh Pollution Control Board, who would be monitoring the 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, Chennai.

21. SEIAA reserves the right to cancel the EC issued at anytime, if EC has been obtained by the proponent through suppression of any information or furnishing false information upon which the project is appraised.

22. Concealing the factual data in the compliance reports, or failure to comply with any conditions mentioned above may result in withdrawal of the EC and attract action under the provisions of Environment (Protection) Act, 1986.

23. The SEIAA reserves the right to alter/modify the above conditions or stipulate any further conditions from time to time, in the interest of environment protection.

24. 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.

MEMBER SECRETARY, SEIAA, A.P.	**MEMBER, SEIAA, A.P.**	**CHAIRMAN, SEIAA, A.P.**

Special Secretary To Govt

To

M/s. VenkataNarayana Active
Ingredients Private Limited,
Dr. S. Ramakrishna Reddy, Director,
Sy.No:69, Chandrapadiya(V),Vinjamur(M),
SPSR Nellore District-524228
Ph.9100056803

Copy to:

1. The Chairman, SEAC, A.P. for kind information.
2. The Member Secretary, APPCB for kind information.
3. The EE, RO: Nellore, APPCB for information.
4. The Regional Officer, MOEF&CC, GOI, Chennai for kind information.
5. The Secretary, MOEF&CC, GOI New Delhi for kind information.
6. Monitoring cell, MoEF&CC, GOI, New Delhi for kind information.
7. The District Collector, Nellore District, Andhra Pradesh for kind information.

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

P. Munaswamy Naidu

Senior Environmental Engineer
State Environment Impact
Assessment Authority
Govt. Of Andhra Pradesh

State Level Environment Impact Assessment Authority (SEIAA)
Andhra Pradesh
Ministry of Environment, Forests & Climate Change
Government of India
D.No.33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Chalamavari Street, Kasturibaipet, Vijayawad-520010

REGD.POST WITH ACK.DUE

Order No. SEIAA/AP/NLR/IND/04/2020/1780 **Dt.14.06.2021**

Sub: SEIAA, A.P. - M/s. Venkata Narayana Active Ingredients Private Limited (Formerly M/s. Nutra Specialties Private Limited) Change of product mix & Expansion of Active Pharmaceutical Ingredients at Sy. No. 69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District, Andhra Pradesh – Corrigendum to Environmental Clearance – Issued - Reg.

Ref: 1. EC Order No. SEIAA/AP/NLR/IND/04/2020/1780, dt.08.12.2020.
2. Proponent request letter dated 01.01.2021 through online.
3. SEIAA, A.P. meeting held on 27.05.2021.

I. The SEIAA, AP had issued Environmental Clearance vide reference 1st cited to M/s. Venkata Narayana Active Ingredients Private Limited (Formerly M/s. Nutra Specialties Private Limited) Change of product mix & Expansion of Active Pharmaceutical Ingredients at Sy. No. 69, Chandrapadiya Village, Vinjamur Mandal, SPSR Nellore District for Active Pharmaceutical Ingredients.

II. The project proponent vide reference 2nd cited requested through online on 01.01.2021 (SIA/AP/IND2/190900/2021) the SEIAA for EC corrigendum for appraised product mix and their capacities in the EC Order.

III. The SEIAA in the meeting held on 27.05.2021 observed that The project proponent submitted the application through online on 14.04.2020 and requested for Environmental Clearance for Change of product mix & Expansion of production capacity from 142.32 TPA to 500 TPA. After detailed deliberations, the SEAC recommended to issue EC for Change of product mix & Expansion of production capacity from 142.32 TPA to 500 TPA. The SEIAA agreed with the recommendations of the SEAC to issue EC . Accordingly the SEIAA, A.P. issued Environmental Clearance vide Order No. SEIAA/AP/NLR/IND/04/2020/1780, dt.08.12.2020 in favour of M/s. Venkata Narayana Active Ingredients Private Limited. While issuing the EC rather than mentioning the change of product mix and their quantities appraised and recommended by the SEAC, inadvertently, previous product mix and their quantities were mentioned in the EC order.

IV. In view of the above, the State Level Environment Impact Assessment Authority (SEIAA), decided to issue corrigendum as per the appraised product mix and their capacities in the EC Order recommended by SEAC and **hereby accords** Corrigendum to the **Environmental Clearance issued** vide order dated 08.12.2020. The products mentioned in the EC order dated 08.12.2020 shall be read as follows:

Sl.No.	Name of the Product	Product Capacity after CPM & Expansion (Kg/day)
1.	Sitagliptin phosphate	66.67
2.	Levetriracatam	466.67
3.	Lacosamide	66.67
4.	Risperidone	7.5
5.	Diacerine	8.33
6.	Vildagliptin	70
7.	Policosanol	3.33
8.	Warfarine sodium	20
9.	Tetracaine hydrochloride	25
10.	Olmisartanmedoxomil	110
11.	Boswellic acid	3.33
12.	Moxifloxacin hydrochloride	16.67
13.	Linagliptin	6.67
14.	Voglibose	1.67
15.	Teneligliptin	16.67
16.	Sevelamer Carbonate	8.33
17.	Pregabalin	8.33
18.	Colistimide	8.33
19.	Gabapantine	8.33
20.	Methylcobalamin	3.33
21.	L-MethylfolateCalsium	3.33
22.	Ferric Citrate	3.33
23.	Chlorozoxazone	8.33
24.	Nitrofurantoin Monohydrate	8.33
25.	Cinacalcet Hydrochloride	8.33
26.	SucroferricOxyhydroxide	8.33
27.	Dimethyl Fumarate	3.33
28.	Atovaquone	3.33
29.	Droxidopa	3.33
30.	Allyl Isopropyl Acetyl Urea	166.67
31.	Fexofenadine HCl	33.37
32.	Loxoprofen	200
33.	Loratadine	8.33
34.	Bepotastin	8.33
35.	AzilsartanMedoxomil	1.39
Total		**1393.89 kg/day (or) 500 TPA**

Name of the Byproducts:

Sl.No	Name of the Product	Name of By-Product	Kg/day	Kg/month
1.	Olmesartan Medoxomil	NaBr	40.08	1202.4
2.	Teracaine Hydrochloride	NaBr	9.77	293.1

V. All other information mentioned and conditions stipulated in the EC order issued vide reference 1st cited remain the same.

Sd/-	Sd/-	Sd/-
MEMBER SECRETARY,	MEMBER,	CHAIRMAN,
SEIAA, A.P.	SEIAA, A.P.	SEIAA, A.P.

To

M/s. Venkata Narayana Active Ingredients Private Limited,
Sri Varatharajan K,
Sy.No:69, Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District-524228
Ph.9100056807

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

P. Muna Swamy Reddy

SENIOR ENVIRONMENTAL ENGINEER (EC)

ANDHRA PRADESH POLLUTION CONTROL BOARD
D.No. 33-26-14 D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Chalamalavari Street, Kasturibaipet, Vijayawada – 520010.

Website :www.appcb.ap.nic.in

CONSENT ORDER FOR ESTABLISHMENT

Order No.174/APPCB/CFE/RO-NLR /HO/2011 **Dt.25.03.2021**

Sub: APPCB – CFE - **M/s. Venkata Narayana Active Ingredients Private Limited, Sy.No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District -** Consent for Establishment (CFE) 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) EC expansion order dt.08.12.2020 issued by SEIAA, A.P.
2) Industry's CFE application received through Single Desk Portal on 29.01.2021.
3) R.O's inspection report dt.19.02.2021.
4) CFE Committee meeting held on 04.03.2021.

1. In the reference 1st cited, the industry has obtained EC (exp) Order increasing the production capacity from 142.32 TPA to 500 TPA.

2. In the reference 2nd cited, an application was submitted to the Board seeking Consent for Establishment (CFE) for **EXPANSION** to produce the following products with installed capacities as mentioned below, with an additional investment of Rs.40 Crores.

As per CFE (CPM) order dt. 27.09.2019 :

S. No.	Name of the Products	Quantity (kg/day)
1.	Sitagliptin phosphate	3.33
2.	Levetriracatam	166.67
3.	Lacosamide	16.67
4.	Risperidone	4.0
5.	Diacerine	3.33
6.	Vildagliptin	5.0
7.	Policosanol	0.13
8.	Warfarine sodium	4.0
9.	Tetracaine hydrochloride	20.0
10.	Olmisartanmedoxomil	83.34
11.	Boswellic acid	0.1
12.	Moxifloxacin hydrochloride	3.33
13.	Linagliptin	6.66
14.	Voglibose	0.83
15.	Teneligliptin	0.33

16.	Sevelamer Carbonate	0.33
17.	Pregabalin	0.33
18.	Colistimide	0.33
19.	Gabapantine	0.33
20.	Methylcobalamin	0.16
21.	L-MethylfolateCalsium	0.33
22.	Ferric Citrate	0.15
23.	Chlorozoxazone	0.15
24.	Nitrofurantoin Monohydrate	0.15
25.	Cinacalcet Hydrochloride	0.06
26.	Sucroferric Oxy hydroxide	0.06
27.	Dimethyl Fumarate	0.06
28.	Atovaquone	0.06
29.	Droxidopa	0.06
30.	Allyl Isopropyl Acetyl Urea	33.34
31.	Fexofenadine HCl	16.67
32.	Loxoprofen	13.33
33.	Loratadine	8.33
34.	Bepotastin	1.67
35.	AzilsartanMedoxomil	1.67
	Total	**395.29 Kg/day (or) 142.32 TPA**

GROUP – B (OR)

1	Levetriracatam	166.67
2	Lacosamide	16.67
3	Risperidone	4.0
4	Vildagliptin	5.0
5	Warfarine sodium	4.0
6	Tetracaine hydrochloride	20.0
7	Olmisartan medoxomil	83.34
8	Moxifloxacin hydrochloride	3.33
9	Linagliptin	6.66
10	Voglibose	0.83
11	Allyl Isopropyl Acetyl Urea	33.34

12	Loxoprofen	13.33
13	**Imidazole**	**20.0**
14	**DMDO-Cl**	**10.0**
15	**MCC**	**8.12**
	Total	**395.29 kg/day (or) 142.32TPA**

The industry shall manufacture products from either Group A or Group B with maximum production capacity 395.26 kg/day or 142.32 TPA

By-Products

S. No.	By -Products	Products from which by-products are generated	Quantity
1	Olmesartan Medoxomil	NaBr	157.23 kg/month
2	Teracaine Hydrochloride	NaBr	68kg/month

After Expansion:

S. No.	Product	Product Capacity (Kg/day)	Starting Raw Material	Raw material capacity qty (Kg/day)
1.	Sitagliptin phosphate	66.67	2,4,5 tri flouro phenyl acetic acid	62.37
2.	Levetriracatam	466.67	(s)-2-amino Butyramide HCl	466.67
3.	Lacosamide	66.67	D-Serine	47.621
4.	Risperidone	7.5	Rose 1	6.410
5.	Diacerine	8.33	Aloe emodine	6.576
6.	Vildagliptin	70	L-proline	30.434
7.	Policosanol	3.33	Extracted crude	24.975
8.	Warfarine sodium	20	4-hydroxyl cumarin	9.83
9.	Tetracaine hydrochloride	25	4-amino benzoic acid	13.157
10.	Olmisartanmedoxomil	110	DL-Tartaric acid	97.05
11.	Boswellic acid	3.33	Boswelliaserata gum	6.66
12.	Moxifloxacin hydrochloride	16.67	Gati Acid	13.336
13.	Linagliptin	6.67	Xanthan moiety	6.292
14.	Voglibose	1.67	Voglibose Crude	1.770

15.	Teneligliptin	16.67	4-oxopyrrolidine carboxylic acid	5.244
16.	Sevelamer Carbonate	8.33	Allyamine	3.165
17.	Pregabalin	8.33	Ter-butyl-3-(hydroxyl methyl)-5-methy hexanoate	13.015
18.	Colistimide	8.33	2-methyl imidazole	4.165
19.	Gabapantine	8.33	Gabapentine tech	8.768
20.	Methylcobalamin	3.33	Cyanocobaltamin	3.996
21.	L-MethylfolateCalsium	3.33	Folic acid	3.885
22.	Ferric Citrate	3.33	Ferric chloride	3.297
23.	Chlorozoxazone	8.33	4-chloro-2-aminophanol	5.206
24.	Nitrofurantoin Monohydrate	8.33	Urea	2.335
25.	Cinacalcet Hydrochloride	8.33	3-(3-Trifluoromethyl-phenyl)-propionaldehdye	6.941
26.	Sucroferric Oxyhydroxide	8.33	Ferric chloride	3.01
27.	Dimethyl Fumarate	3.33	Fumaric acid	2.973
28.	Atovaquone	3.33	Intermediate-1	1.665
29.	Droxidopa	3.33	Intermediate-1	5.994
30.	AllylIsopropyl Acetyl Urea	166.67	Dimethyl malonate	166.67
31.	Fexofenadine HCl	33.37	Fexofenadine HCl Crude	35.3722
32.	Loxoprofen	200	2-Phenyl propanoic acid	142.857
33.	Loratadine	8.33	Loratadine crude	8.5
34.	Bepotastin	8.33	Bepotastin crude	8.5
35.	Azilsartan Medoxomil	1.39	Benzo carboxylate	1.112
	Total	**1393.89 kg/day (or) 500 TPA**		

List of By-products :

S. No.	Name of the Product	Products from which by-product is generated	Qty (kg/month)
1	Olmesartan Medoxomil	NaBr	1202.4
2	Teracaine Hydrochloride	NaBr	293.1

2. As per the application, the above activity is to be located in the existing premises located at **Sy.No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District** in an area of 33.0 Acres

3. The above site was inspected by the Environmental Engineer, Regional Office: Nellore A.P Pollution Control Board on 08.02.2021 and observed that the site is surrounded by

North	**:**	Agriculture lands
South	**:**	Forest area
East	**:**	Vinjamur – Atmakur road
West	**:**	Forest area

4. The Board, after careful scrutiny of the application, verification report of Regional Officer and recommendations of the CFE Committee, hereby issues **CONSENT FOR ESTABLISHMENT FOR EXPANSION** to the project 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 as mentioned at para (1) only.**

5. This Consent order issued is subject to the conditions mentioned in the Annexure.

6. This order is issued from pollution control point of view only. Zoning and other regulations are not considered.

7. This order is issued subject to the final orders of the Hon'ble NGT or any Court of Law.

8. **This order is valid for a period of 7 years from the date of issue.**

Encl: Annexure

JOINT CHIEF ENVIRONMENTAL ENGINEER (UH-I) (FAC)

To

M/s. Venkata Narayana Active Ingredients Private Limited,
Sy.No.69, Chandrapadiyan(V),
Vinjamur (M), SPSR Nellore District.
ramakrishna@vnai.in

Copy to: 1. The JCEE, Z.O: Vijayawada for information and necessary action.
2. The EE, R.O: Nellore for information and necessary action.

ANNEXURE

1. The proponent shall obtain Consent for Operation (CFO) from APPCB, as required Under Sec.25/26 of the Water (P&C of P) Act, 1974 and under sec. 21/22 of the Air (P&C of P) Act, 1981, before commencement of the trail runs.

2. The applicant shall provide separate energy meters for Effluent Treatment Plant (ETP) and Air pollution Control equipments to record energy consumed. An alternative electric power source sufficient to operate all pollution control systems shall be provided.

3. The industry shall construct separate storm water drains. No effluents shall be discharged in to the storm water drains.

Water:

4. The source of water is Ground water and the maximum permitted water consumption is as following:

S. No.	Sources	Quantity in KLD		
		Existing as per CFE dt.27.09.2019	Proposed in Expansion	Total after expansion
1.	Processing, whereby water gets polluted and the pollutants are not easily bio-degradable.	13.80	20.6	34.4
2.	Industrial cooling	100.0	80.0	180.0
3.	Boiler Feed	42.0	26.0	68.0
4.	Domestic	8.0	10.0	18.0
5.	Gardening Purposes	10.0	10.0	20.0
	Total	**173.8 KLD**	**146.6 KLD**	**320.4 KLD**

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

5. The maximum waste water generation shall not exceed the following:

S. No.	Source	Quantity in KLD		
		Existing as per CFE dt.27.09.2019	Proposed in Expansion	Total after expansion
1.	Process & Washings	14.23 KLD	20.77 KLD	35 KLD
2.	Boiler Blow Down	11.8 KLD	5.0 KLD	16.8 KLD
3.	Cooling Tower Blow Down	35.0 KLD	10.0 KLD	45.0 KLD
4.	Domestic	6.0 KLD	10.0 KLD	16.0 KLD
5.	Gardening	---	---	---
	Total	**67.03 KLD**	**45.77 KLD**	**112.8 KLD**

Treatment & disposal:

S. No.	Effluent source	Treatment units	Treatment & Mode of final disposal
1.	Process effluents HTDS 35 KLD	**Existing:** Stripper (1 KL/hr-2 Nos.), MEE (3 KL/hr), ATFD (500 L/hr), **Proposed in the expansion** MEE-7 KL/hr	• 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 recycled. • Stripped effluents to forced evaporation in MEE followed by ATFD. • Condensate from MEE & ATFD shall be recycled after treatment in ETP along with other LTDS effluents. • ATFD salts to TSDF.
2.	LTDS effluents (Boiler & Cooling Tower Blow down) 61.8 KLD	**Existing:** ETP of 160 KLD (ETP 1- 100 KLD and ETP 2- 60 KLD) ETP 1 - 100 KLD capacity consisting of Collection tank cum Equalization tank, Flash mixer, Aeration tank, Secondary settling tank, Sand filter, UV purifier, Sludge tank, Filter press, RO Plant. ETP 2 - 60 KLD consists of Primary settling tank, equalization tank, Aeration tank, Secondary settling tank	• After treatment in ETP the effluent will be sent to RO Plant. • MEE condensate to ETP followed by RO • RO permeate used for greenbelt development, boiler & cooling towers with in industry premises. • RO rejects to MEE
3.	Domestic 16 KLD	**Existing:** Sewage Treatment Plant of 30 KLD	• After treatment in STP will be disposed to onland for irrigation

6. The ZLD system consisting of stripper, MEE, ATFD system with condenser and Biological ETP, RO plant shall be installed and commissioned. All the units of the ZLD system shall be impervious to prevent ground water pollution. The units of ZLD system shall be constructed above the ground level.

   Effluents shall not be discharged on land or into any water bodies or aquifers under any circumstances.

7. The industry shall provide digital flow meters with totalisers at the inlet and outlet of Stripper, MEE, ETP and RO.

8. The industry shall properly operate and maintain online real time monitoring system along with web camera facilities and shall ensure that it is connected to APPCB / CPCB websites as per CPCB directions.

9. Floor washing shall be admitted into the effluent collection system only and shall not be allowed to find their way in storm drains or open areas. All pipe valves, sewers, drains shall be leak proof.

Air:

10. The Air pollution Control equipment shall be installed along with the commissioning of the activity and shall comply with the following for controlling air pollution.

After Expansion :

S. No.	Details of Stack	Existing				Proposed in expansion	
		Stack 1	**Stack 2**	**Stack 3**	**Stack 4**	**Stack 5**	**Stack 6**
a)	Attached to	Boiler	D.G.Set	D.G.Set	Boiler	D.G.Set (new)	Boiler (new)
b)	Capacity	4.0 TPH	500 KVA	725 KVA	3.0 TPH*	1250 KVA	4.0 TPH
c)	Name of the Fuel	Coal/ Briquettes	Diesel	Diesel	Dismantled	Diesel	Coal/ Briquettes
d)	Stack height above ground	30 m.	4m.	4m.		7.10m above roof	30 m
e)	Air Pollution Control Equipment:	Cyclones fol by bag filter	Acoustic enclosures	Acoustic enclosures		Acoustic enclosures	Cyclones followed by bag filter

11. 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.

12. The industry shall properly operate and maintain the monitoring system to all the stacks / vents in the plant. Regular monitoring shall be carried out and report shall be submitted to the Regional officer.

13. The industry shall properly operate and maintain multi-stage scrubbers to the process vents to control the process emissions. The industry shall ensure that online pH measuring facility with auto recording system is connected to all the existing scrubbers.

14. The industry shall properly operate and maintain existing VOC monitoring system with auto recording facility and to provide another VOC meter.

15. The industry shall implement adequate measures to control all fugitive emissions from the plant.

16. The proponent shall ensure compliance of the National Ambient Air quality standards notified by MoEF, GoI vide notification No. GSR. 826 (E), dated. 16.11.2009 during construction and regular operational phase of the project at the periphery.

    The generator shall be installed in a closed area with a silencer and suitable noise absorption systems. The ambient noise level shall not exceed 75 dB(A) during day time and 70 dB(A) during night time.

17. The proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings.

18. The industry shall send the used / spent solvents to the recyclers (or) process them at their own solvent recovery facility within the premises.

19. 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) Closed centrifuges shall be used to reduce solvent losses.

    iv) All the solvent storage tanks shall be connected with vent condensers to prevent solvent vapours.

    v) The reactor vents shall be connected with primary & secondary condensers to prevent escaping of solvent vapour emissions into atmosphere.

Solid / Hazardous Waste:

20. The industry shall comply with the following for disposal of Solid waste:

S. No.	Description of Waste	Existing as per CFE dt.27.09.2019	Total after expansion	Disposal
1.	Solid Waste from process	740.82 Kg/day	6134.17 Kg/day	To TSDF for secured land fill
	Solid Waste from process and solvent & Organic residue	--		

2.	ETP Sludge	10.32 Kg/day	25.0 Kg/day	
3.	Salts from MEE system	135.48 Kg/day	2101.94 Kg/day	
4.	Carbon Waste	21.85 Kg/day	49.84 Kg/day	To TSDF for incineration/ cement industries for processing
5.	Solvent residue	218.7 kg/day	--	
5.	Spent Oil	120 LPA	500 LPA	Authorised reprocessors
6.	Stripper waste	238.9 Kg/day	4144.2 Kg/day	To cement units for co-processing
7.	Mixed Solvents	45 TPM	45TPM	To authorized recyclers / cement plants
8.	Container and container liners of hazardous chemicals (after detoxification)	30 Nos./month	60 Nos./month	disposed to Recyclers after complete detoxification
9.	Boiler ash	3.0 TPD	5.0 TPD	Disposed to brick manufacturers

21. The proponent shall place the chemical drums and / or any drums in a shed provided with concrete platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system. The industry shall provide containers detoxification facility. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to low TDS collection tank.

22. The following rules and regulations notified by the MoEF&CC, GoI shall be implemented.

a) Regulation of Persistent Organic Pollutants Rules, 2018.

b) Hazardous waste and other wastes (Management and Transboundary Movement) Rules, 2016.

c) Plastic Waste Management Rules, 2016.

d) Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989

e) Fly Ash Notification, 2016.

f) Batteries (Management & Handling) Rules, 2010.

g) E-Waste (Management) Rules, 2016.

h) Construction and Demolition waste Management Rules, 2016.

i) Solid Waste Management Rules, 2016.

j) The Public Liability Insurance Act, 1991 and its amendments thereof.

Other Conditions:

23. The industry shall obtain necessary amendment to the EC order dt.08.12.2020 and submit to the Board, before applying for CFO of the Board.

24. The industry shall comply with all the conditions stipulated in the EC order dt.08.12.2020 issued by SEIAA, A.P.

25. "The industry shall comply with the industry specific standards with respect to process emissions stipulated by the MoEF & CC, GoI, New Delhi from time to time."

S. No.	***Details of process emissions***	***Emission Control system***	***Emission Standard***
1	HCl	Multi stage water scrubbers and alkali scrubbers	35 mg/Nm^3
2	NH_3		30 mg/Nm^3
3	Sulphuric acid mist		50 mg/Nm^3
4	Chlorine		15 mg/Nm^3

26. The industry shall display online data outside the main factory gate on quantity and nature of hazardous chemicals being used in the plant, water & air emissions and solid waste generated within the factory premises, as per Hon'ble Supreme Court order.

27. The industry shall prepare a safety report and carry out an independent safety audit report of the respective industrial activities including chemical storages / isolated storages by an expert not associated with such industrial activity as required under Rule 10 of MSIHC Rules, 1989 and get it approved by the Factories Dept., and submit the compliance along with copy of the safety report, safety audit report and safety certificate at concerned Regional Office, APPCB.

28. The industry shall submit a copy of the NOC issued by the Andhra Pradesh State Disaster Response and Fire Service Dept., (APSDRFSD) at concerned Regional Office, APPCB.

29. The industry shall submit risk assessment report covering worst scenario clearly describing impact within the industry premises and outside the industry premises and emergency response system.

30. The industry shall inventorize the storage quantities of hazardous chemicals (raw materials), products, as per the hazard nature of reactivity / toxicity / flammability / explosive stored/handling in the premises as defined in the Management of Storage, Import of Hazardous Chemicals (MSIHC) Rules, 1989 and the details shall be furnished to the Factories Department and to the Regional Office, APPCB on monthly basis duly certifying the same.

31. The industry shall identify major accident hazard chemicals & list out the hazardous chemicals endangered to human health & environment and the details shall be furnished to the Factories Department and to the Regional Office, APPCB time to time duly certifying the same by the industry. Further the industry shall extend training to the working personnels while handling hazardous chemicals for prevention of accidents and necessary antidotes to ensure the safety, as per the MSIHC Rules, 1989.

32. The industry shall carryout calibration of safety equipments and leak detection systems at regular intervals and shall certify the same with the Factories Department. That certified copy shall be submitted to the APPCB, Regional Office. The industry shall install fluorescent Wind Vane at the highest point in the industry premises.

33. **The industry shall comply with the Technical suggestions at Chapter No. 7.3 & 7.4 for Hazardous Chemical handling industries by High Power Committee (HPC) of Govt. of Andhra Pradesh. The HPC report is available at www.ap.gov.in.**

34. The industry shall utilize DG power for captive consumption only & power shall not be supplied to grid and shall follow the amendments issued by MoEF & CC/CPCB from time to time on DG sets in respect of conditions & standards.

35. Green belt shall be developed all along the boundary & vacant spaces with tall growing trees with good canopy and it shall not be less than 33% of the total area.

36. The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Regional Office and Zonal Office of the Board.

37. **The industry shall submit compliance to the conditions stipulated in the EC and CFE orders to the concerned Regional Officer of APPCB every six months and shall upload the same at APPCB website viz.,** https://pcb.ap.gov.in/UI/Submission_Compliance_of_EC_CFE_CFO_Direction.aspx.

38. Concealing the factual data or submission of false information / fabricated data and failure to comply with any of the conditions mentioned in this order attracts action under the provisions of relevant pollution control Acts.

39. 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 revoke the order, to review any or all the conditions imposed herein and to make such modifications as deemed fit and stipulate any additional conditions.

40. 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 Water (Prevention and Control of Pollution)Act,1974 and Section 31 of the Air (Prevention and Control of Pollution) Act, 1981.

JOINT CHIEF ENVIRONMENTAL ENGINEER (UH-I)(FAC)

To

M/s. Venkata Narayana Active Ingredients Private Limited,
Sy.No.69, Chandrapadiya(V), Vinjamur (M),
SPSR Nellore District.
ramakrishna@vnai.in

ANDHRA PRADESH POLLUTION CONTROL BOARD
D.No. 33-26-14D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Challmavari Street, Kasturibaipet, Vijayawada – 520 010.
Phone No. 0866 – 2436216/17

RED CATEGORY

CONSENT & AUTHORIZATION ORDER

(Existing & Expansion)

Consent Order No: APPCB/VJA/NLR/10725/HO/CFO/2018- 31/07/2021

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

M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialties Pvt. Ltd.,)
Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District – 524 228, A.P.
Email: aditya@nutraforlife.com
(Hereinafter referred to as 'the Applicant') authorizing to operate the industrial plant to discharge the effluents from the outlets and the quantity of emissions per hour from the chimneys as detailed below:

i. Outlets for discharge of effluents:

Outlet No.	Outlet Description	Max Daily Discharge	Point of Disposal
1	Process effluents (HTDS)	35.0KLD	Shall be treated in neutralization tank, stripper, MEE, ATFD & biological ETP followed RO plant. • Stripper distillate shall be routed through M/s. APEMC so as to send to cement units for coprocessing / TSDF for incineration. • Stripper concentrate along with regeneration and blow downs for forced evaporation in MEE. • MEE condensate shall be sent to ETP for biological treatment. • MEE concentrate shall be disposed in ATFD. • ATFD salts shall be routed through M/s. APEMC so as to dispose to TSDF, Nellore. • ATFD condensate shall be sent to ETP for biological treatment. After treatment in ETP, the treated effluents shall be further treated in the RO Plant along

			with LTDS effluents and Domestic wastewater • RO permeate shall be recycled into process. • RO rejects shall be sent to the MEE for treatment. Thus maintain ZLD system
2	LTDS effluents	61.8 KLD	After treatment in ETP, the treated effluents shall be further treated in the RO Plant along with HTDS effluents. • RO permeate shall be recycled into process • RO rejects shall be sent to the MEE for treatment. Thus maintain ZLD system
3	Domestic wastewater	16.0 KLD	

ii.Emissions from chimneys:

Chimney No.	Description of Chimney
1	Common Stack Attached to 2 x 4.0 TPH Bio Briquettes Boiler
2	Stack Attached to 1 x 725 KVA D.G. Set
3	Stack Attached to 1 x 1250 KVA D.G. Set

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

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

S.No	Name of Hazardous Waste	Stream	Quantity	Method of disposal
1.	Solid Waste from process and solvent & organic residue	28.1 of Schedule – I	6134.17 Kg/day	Shall be routed through APEMC so as to dispose to TSDF, Parawada for secured land-filling (as land fillable waste).
2.	ETP Sludge	35.3 of Schedule – I	25 Kg/day	
3.	Salts from Forced Evaporation system	- -	2101.94 Kg/day	
4.	Carbon Waste	28.3 of	49.4	

		Schedule – I	Kg/day	Shall be routed through APEMC so as to dispose to pre-processors / to authorized Cement industries for co-processing (as utilizable waste).
5.	Stripper distillate	- -	4144.2 Kg/day	
6.	Used Oil	5.1 of Schedule – I	500 LPA	Shall be routed through APEMC so as to send APPCB authorized agencies for reprocessing (as recyclable waste)
7.	Mixed Solvents	- -	45 TPM	Shall be routed through APEMC so as to send to preprocessors / authorized Cement industries for co- processing (as utilizable waste).
8.	Container and container liners of hazardous chemicals (after detoxification)	33.1 of	60 Nos./ Month	After complete detoxification, shall be routed through APEMC so as send back to suppliers / APPCB authorized parties (as recyclable waste)

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

S. No	Name of the Products	Quantity (kg/day)	Stating raw material	Qty. in kg/ day
1.	Sitagliptin phosphate	66.67	2,4,5 tri flouro phenylacetic acid	66.67
2.	Levetriracatam	466.67	(s)-2-amino butyramideHCl	466.67
3.	Lacosamide	66.67	D-Serine	66.67
4.	Risperidone	7.5	Rose 1	7.5
5.	Diacerine	8.33	Aloe emodine	8.33
6.	Vildagliptin	70	L-proline	70
7.	Policosanol	3.33	Extracted crude	3.33
8.	Warfarine sodium	20	4-hydroxyl cumarin	20
9.	Tetracaine hydrochloride	25	4-amino benzoic acid	25
10.	Olmisartanmedoxomil	110	DL-Tartaric acid	110
11.	Boswellic acid	3.33	Boswelliaserata gum	3.33
12.	Moxifloxacin hydrochloride	16.67	Gati Acid	16.67
13.	Linagliptin	6.67	Xanthan moiety	6.67
14.	Voglibose	1.67	Voglibose Crude	1.67
15.	Teneligliptin	16.67	4-oxopyrrolidine carboxylic acid	16.67
16.	Sevelamer Carbonate	8.33	Allyamine	8.33
17.	Pregabalin	8.33	Ter-butyl-3-(hydroxyl methyl)-5-methy hexanoate	8.33

18.	Colistimide	8.33	2-methyl imidazole	8.33
19.	Gabapantine	8.33	Gabapentine tech	8.33
20.	Methylcobalamin	3.33	Cyanocobaltamin	3.33
21.	L-MethylfolateCalsium	3.33	Folic acid	3.33
22.	Ferric Citrate	3.33	Ferric chloride	3.33
23.	Chlorozoxazone	8.33	4-chloro-2-aminophanol	8.33
24.	Nitrofurantoin Monohydrate	8.33	Urea	8.33
25.	Cinacalcet Hydrochloride	8.33	3-(3-rifluoromethyl- phenyl)-propionaldehdye	8.33
26.	Sucroferric Oxyhydroxide	8.33	Ferric chloride	8.33
27.	Dimethyl Fumarate	3.33	Fumaric acid	3.33
28.	Atovaquone	3.33	Intermediate-1	3.33
29.	Droxidopa	3.33	Intermediate-1	3.33
30.	Allyl Isopropyl Acetyl Urea	166.67	Dimethyl malonate	166.67
31.	Fexofenadine HCl	33.37	FexofenadineHCl Crude	33.37
32.	Loxoprofen	200	2-Phenyl propanoic acid	200
33.	Loratadine	8.33	Loratadine crude	8.33
34.	Bepotastin	8.33	Bepotastin crude	8.33
35.	Azilsartan Medoxomil	1.39	Benzo carboxylate	1.39
	Total	**1393.89 kg/day (or) 500 TPA**		**1393.89 (or) 500 TPA**

By-Products

	By product	Products from which by product are generated	After expansion	
			Kgs/day	Kgs/Month
1.	Olmesartan Medoxomil	NaBr	40.08	1202.4
2.	Teracaine Hydrochloride	NaBr	9.77	293.1

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

This combined order of Consent & Hazardous Waste Authorization shall be valid for a period ending with the **30th September, 2021.**

DR. B.MADHUSUDHANA RAO, JCEE(MSRB), O/o JOINT CHIEF ENVIRONMENTAL ENGINEER4-APPCB

To,

M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialties Pvt. Ltd.,)
Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District – 524 228, A.P.
Email: aditya@nutraforlife.com
Copy to:

1. The JCEE, ZO: Vijayawada for information
2. The EE, RO: Nellore for information.

SCHEDULE - A

1. Any up-set condition in any industrial plant / activity of the industry, which result in, increased effluent / emission discharge and/ or violation of standards stipulated in this order shall be informed to this Board, under intimation to the Collector and District Magistrate and take immediate action to bring down the discharge / emission below the limits.
2. The industry should carryout analysis of waste water discharges or emissions through chimneys for the parameters mentioned in this order on quarterly basis and submit to the Board.
3. All the rules & regulations notified by Ministry of Law and Justice, Government of India regarding Public Liability Insurance Act, 1991 should be followed as applicable.
4. The industry should put up two sign boards (6x4 ft. each) at publicly visible places at the main gate indicating the products, effluent discharge standards, air emission standards, hazardous waste quantities and validity of CFO and exhibit the CFO order at a prominent place in the factory premises.
5. Not withstanding anything contained in this consent order, the Board hereby reserves the right and powers to review / revoke any and/or all the conditions imposed herein above and to make such variations as deemed fit for the purpose of the Acts by the Board.
6. The applicant shall submit Environment statement in Form V before 30th September every year as per Rule No.14 of E (P) Rules, 1986 & amendments thereof.
7. The applicant should make applications through Online for renewal of Consent (under Water and Air Acts) and Authorization under HWM Rules at least 120 days before the date of expiry of this order, along with prescribed fee under Water and Air Acts and detailed compliance of CFO conditions for obtaining Consent & HW Authorization of the Board. The industry should immediately submit the revised application for consent to this Board in the event of any change in the raw material used, processes employed, quantity of trade effluents & quantity of emissions. Any change in the management shall be informed to the Board. The person authorized should not let out the premises / lend / sell / transfer their industrial premises without obtaining prior permission of the State Pollution Control Board.
8. Any person aggrieved by an order made by the State Board under Section 25, Section 26, Section 27 of Water Act, 1974 or Section 21 of Air Act, 1981 may within thirty days from the date on which the order is communicated to him, prefer an appeal as per Andhra Pradesh Water Rules, 1976 and Air Rules 1982, to Appellate authority constituted under Section 28 of the Water(Prevention and Control of Pollution) Act, 1974 and Section 31 of the Air(Prevention and Control of Pollution) Act, 1981.

SCHEDULE-B

1. The Board vide order dated 14.12.2018 issued CFO to the industry to manufacture Bulk drugs of 35 no. of products with a production capacity of 395.29 kg/day which was valid up-to 31.03.2021. Earlier, the issue of CFO (renewal) to the industry was placed in the CFO committee meeting held on 07.04.2021 and the committee recommended to reject the issue of CFO&HWA Order as there are 10 non- compliances. The committee also recommended that the industry shall comply with all the 10 non compliances and thereafter shall approach the Board for CFO (Renewal). The industry obtained CFE (Expansion) on 25.03.2021 (for

enhancement of the production capacity from 142.32 TPA to 500 TPA). The industry applied for CFO (Renewal and expansion), for a period upto 31.03.2026, for a total project cost of Rs.166 Cr (Existing and Expansion), with a total area of 33 acres. The issue of CFO to the industry was placed in the CFO committee meeting held on 19.05.2021 and the Committee observed the 14 non-compliances. The committee recommended to i) issue CFO & HWA to the existing products for a period upto 30.06.2021. ii) further extension of CFO for the existing products will be considered, based on the outcome of the Joint Committee report from the Collector, Nellore on the accident occurred in the industry on 11.05.2021. iii) CFO for the expansion products will be considered only after obtaining amendment to the EC order dt. 08.12.2020. The issue was again placed in the CFO Committee meeting held on 16.06.2021 and the Committee recommended "to defer the issue of CFO & HWA to the industry till next meeting and meanwhile, the RO, Nellore shall follow-up with the District Collector, Nellore and see that the District Collector sends a report on the findings of the Joint Committee, to APPCB. The CFO Committee will take a decision as per the findings of the District Collector, Nellore for extension of CFO". The issue was again placed in the CFO Committee meeting held on 23.07.2021 and the committee recommended to i) issue CFO & HWA to the industry for existing & expansion products for a period upto 30.09.2021. Further extension of CFO after 30.09.2021, for the existing & expansion products will be considered, ii) after verification of compliances on the recommendations of Part-A & Part-B of the Joint Committee report, by the same Joint Committee constituted by District Collector, Nellore District on the accident occurred in the industry on 11.05.2021 and iii) compliance of the recommendations of Hon'ble NGT committee report.

1. **The industry shall comply with the recommendations of Part-A & Part-B of the Joint Committee report, by the same Joint Committee constituted by District Collector, Nellore District on the accident occurred in the industry on 11.05.2021 and shall submit compliance report to the RO, Nellore and to the Joint Committee for re-verification of compliance.**
2. **The industry shall comply with the recommendations of the Hon'ble NGT committee report and shall submit compliance report to the RO, Nellore and to the NGT Committee for re-verification of compliance.**

Water Pollution:

3. The source of water being Ground water. The following is the permitted water consumption:

S. No	Purpose	Quantity (KLD)
1.	Processing, whereby water gets polluted and the pollutants are not easily bio-degradable.	13.80
2.	Industrial cooling	100
3.	Boiler Feed	42
4.	Domestic	8
5.	Gardening Purposes	10
	Total	**173.80 KLD**

4. Separate meters with necessary pipe-line shall be maintained for assessing the quantity of water used for each of the purposes mentioned above.
5. The industry shall provide magnetic digital flow meters with totalisers at the inlet and outlet of Stripper, MEE, ETP and RO and maintain the records of effluents generated, treated, reused, etc.

6. All the units of ZLD system consisting of stripper, MEE, ATFD system with condenser, Biological ETP and RO plant shall operated properly. All the units of the ZLD system shall be impervious to prevent ground water pollution. Effluents shall not be discharged on land or into any water bodies or aquifers under any circumstances.
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. All pipe valves, sewers, drains shall be leak proof.

Air Pollution:

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

Chimney No.	Parameter	Emission Standards
1	Particulate matter	115 mg/Nm3

9. The industry shall comply with ambient air quality standards of PM10 (Particulate Matter size less than 10mm) - 100 mg/ m3; PM2.5 (Particulate Matter size less than2.5 mm) - 60 mg/ m3; SO2 - 80 mg/ m3; NOx - 80 mg/m3, outside the factory premises at the periphery of the industry.Standards for other parameters as mentioned in the National Ambient Air Quality Standards CPCB Notification No.B-29016/20/90/PCI-I, dated 18.11.2009.

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

10. The industry shall comply with emission limits for DG sets of capacity upto 800 KW as per the Notification G.S.R.520 (E), dated 01.07.2003 under the Environment (Protection) Amendment Rules, 2003 and G.S.R.448(E), dated 12.07.2004 under the Environment (Protection) Second Amendment Rules, 2004. In case of DG sets of capacity more than 800 KW shall comply with emission limits as per the NotificationG.S.R.489 (E), dated 09.07.2002 at serial no.96, under the Environment (Protection) Act, 1986.
11. The industry shall properly maintain & operate the monitoring system to all the stacks / vents in the plant. Regular monitoring shall be carried out and report shall be submitted to the Regional office.
12. The industry shall properly maintain & operate multi-stage scrubbers to the process vents to control the process emissions. The industry shall provide online pH measuring facility with auto recording system to the scrubbers provided to treat the process emissions.
13. The industry shall properly maintain & operate VOC monitoring system with auto recording facility.
14. The industry shall implement adequate measures to control all fugitive emissions from the plant.
15. The proponent shall not use or generate odour causing substances or Mercaptans and cause odour nuisance in the surroundings.
16. The industry shall send the used / spent solvents to the recyclers (or) process them at their own solvent recovery facility within the premises.
17. The evaporation losses in solvents shall be controlled by taking the following measures:

a. Chilled brine circulation shall be carried out to effectively reduce the solvent losses into the atmosphere.
b. Transfer of solvents shall be done by using pumps instead of manual handling.
c. Closed centrifuges shall be used to reduce solvent losses.
d. All the solvent storage tanks shall be connected with vent condensers to prevent solvent vapours.
e. The reactor vents shall be connected with primary & secondary condensers to prevent escaping of solvent vapour emissions into atmosphere

Solid Waste:

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

S.No	Name of the Solid Waste	Quantity	Disposal
1	Boiler ash	3.0 TPD	To Brick Manufacturers

General:

19. The proponent shall place the chemical drums and / or any drums in a shed provided with concrete platform only. The Platform shall be provided with sufficient dyke wall and effluent collection system. The industry shall provide containers detoxification facility. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to low TDS collection tank.
20. Separate Bag filters shall be installed for each boiler as committed vide letter dated 05.09.2018.
21. The industry shall maintain the following records and the same shall be made available to the inspecting officers of the Board:

a. Daily production details.
b. Quantity of Effluents generated, treated, forced evaporated, condensate generated and recycled/reused.
c. Log Books for pollution control systems.
d. Characteristics of effluents, Ambient air quality and emissions.
e. Hazardous/non hazardous solid waste generated and disposed.
f. Inspection book.
g. Manifest copies of hazardous waste.

22. Green belt shall be developed in remaining area of 5 acres with tall growing trees with good canopy so that it shall not be less than 33% of the total area.

23. The industry shall install online monitoring systems and connect and maintain monitoring system to APPCB/CPCB websites as per CPCB directions dated 05.02.2014 & 02.03.2015 and guidelines issued regarding online monitoring systems from time to time.

24. The industry shall submit a copy of policy of Public Liability Insurance (PLI) duly indicating the amount contributed towards Environmental Relief Fund (ERF) to the RO once in six months.

25. The industry shall submit the information regarding usage of Ozone Depleting Substance once in six months to the Regional Office and Zonal Office of the Board.

The industry shall comply with standards and directions issued by CPCB / MoEF&CC as and when notifications are issued.

26. The industry shall submit compliance report on the conditions mentioned in the consent order every six months i.e., on 1st of January and July of every year to the Regional Office/ Zonal Office

SCHEDULE – C
[See rule 6 (2)]
[CONDITIONS OF AUTHORISATION FOR OCCUPIER OR OPERATOR HANDLING HAZARDOUS WASTES]

1. The authorised person shall comply with the provisions of the Environment (Protection) Act, 1986, and the rules made there under.
2. The authorisation shall be produced for inspection at the request of an officer authorised by the State Pollution Control Board.
3. The person authorised shall not rent, lend, sell, transfer or otherwise transport the hazardous and other wastes except what is permitted through this authorisation.
4. Any unauthorised change in personnel, equipment or working conditions as mentioned in the application by the person authorised shall constitute a breach of his authorisation.
5. The person authorised shall implement Emergency Response Procedure (ERP) for which this authorisation is being granted considering all site specific possible scenarios such as spillages, leakages, fire etc. and their possible impacts and also carry out mock drill in this regard at regular interval of time;
6. The person authorised shall comply with the provisions outlined in the Central Pollution

Control Board guidelines on “Implementing Liabilities for Environmental Damages due to Handling and Disposal of Hazardous Waste and Penalty”.

7. It is the duty of the authorised person to take prior permission of the State Pollution Control Board to close down the facility.
8. The hazardous and other waste which gets generated during recycling or reuse or recovery or pre-processing or utilisation of imported hazardous or other wastes shall be treated and disposed of as per specific conditions of authorisation.
9. An application for the renewal of an authorisation shall be made as laid down under these Rules.
10. 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.
11. Annual return shall be filed by June 30th for the period ensuring 31st March of the year.
12. The industry shall not store hazardous waste for more than 90 days as per the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.
13. The industry shall store Used / Waste Oil and Used Lead Acid Batteries in a secured way in their premises till its disposal to the manufacturers / dealers on buyback basis.
14. The industry shall maintain 7 copy manifest system for transportation of waste generated and a copy shall be submitted to concerned Regional Office of APPCB. The driver who transports Hazardous Waste should be well acquainted about the procedure to be followed in case of an emergency during transit. The transporter should carry a Transport Emergency (TREM) Card.
15. The industry shall maintain proper records for Hazardous and Other Wastes stated in Authorisation in Form-3 i.e., quantity of Incinerable waste, land disposal waste, recyclable waste etc., and file annual returns in Form-4 as per Rule 20 (2) of the Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016.

DR. B.MADHUSUDHANA RAO, JCEE(MSRB), O/o JOINT CHIEF ENVIRONMENTAL ENGINEER4-APPCB

To,
M/s. Venkata Narayana Active Ingredients Private Limited,
(Formerly M/s. Nutra Specialties Pvt. Ltd.,)
Chandrapadiya (V), Vinjamur (M),
SPSR Nellore District – 524 228, A.P.
Email: aditya@nutraforlife.com

Signed by Dr.
B.madhusudhana Rao
Date: 31-07-2021 13:56:11
Reason: Approved

ANDHRA PRADESH POLLUTION CONTROL BOARD
D.No.33-26-14, D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
Chalamalavari street, Kasturibaipet, Vijayawada – 520 010

Phone: 0866-2463200
Grams : Kalusya Nivarana
Website :https://pcb.ap.gov.in

Regd. Post with Ack. Due

Order No.71/APPCB/UH-II/TF/NLR/2020- **Dt. 08.09.2020.**

REVOCATION OF STOP PRODUCTION ORDER

Sub: **APPCB – UH-II - TF -** M/s. Venkata Narayana Active Ingredients Private Limited, Sy. No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District – Industry request for revocation of stop production order – **Revocation of Stop Production Order** - issued - Reg.

Ref:
1. CFO Order No. APPCB/ VJA/ NLR/ 10725 /HO/ CFO/ 2018 Dt.14.12.2018, which is valid up to 31.03.2021
2. Fire accident occurred on 29.07.2020.
3. Stop Production Order No.71/APPCB/UH-II/TF/NLR/2020, dt.18.08.2020.
4. Proceedings of the Collector & District Magistrate, Nellore vide Rc.D2/1511/2020 Dt.31.08.2020.
5. Industry's request letter dated 31.08.2020.
6. The officials of RO, Nellore inspected the industry on 31.08.2020.

* * *

WHEREAS you are operating a unit in the name & style M/s. Venkata Narayana Active Ingredients Pvt. Ltd (Formerly Nutra Specialties Pvt. Ltd), Sy No.69, Chandrapadiya (V), Vinjamur (M), SPSR Nellore District which is involved in manufacturing of bulk drugs and intermediates.

WHEREAS vide reference 1st cited, the industry has obtained CFO order dt.07.03.2018 valid up to 31.07.2023.

WHEREAS vide reference 2nd cited, fire accident was occurred on 29.07.2020 at early hours of about 2.10 AM at clean room (Finished Product) at SS Reactor No.120 of 5 KL capacity during final process of the Allyl Iso Propyl Acetyl Urea (AIPAU).

WHEREAS the Board vide reference 3rd cited, issued Stop Production Order to the industry on 18.08.2020.

WHEREAS vide reference 4th cited, the District Collector, Nellore has issued proceedings to the industry for restart the operations on 31.08.2020 to the following conditions:

- The factory shall restart the manufacturing process only after obtaining revocation of prohibitory orders from the Factories Department, A. P.
- The factory shall restart the manufacturing process only after obtaining revocation of Stop Production order from the A P Pollution Control Board.
- The factory shall comply all the recommendations within 30 days time as requested by the management.

WHEREAS vide reference 5th cited, the industry requested to the Board for revocation of the stop production order for restart its operations.

WHEREAS vide reference 6th cited, the officials of RO, Nellore inspected the industry. The RO has stated in his report that based on report of the District committee the District Collector has issued proceedings to the industry to restart operations. Also RO reported that the industry is having ETP followed by MEE & ATFD for treating the waste water to meet the ZLD system & two stage scrubber provided in the process section to control the process emission and bag filters provided to the 4 TPH boilers to control Air pollution, which are in operating condition. The Industry has also installed two CAAQM stations & also installed online VOC system which are connected to the APPCB & CPCB websites.

WHEREAS the industry has obtained the revocation of the prohibitory order from the Factories Dept. dt.04.09.2020.

In view of the facts mentioned above, the Board hereby issue **Revocation of Stop Production order** with the following directions under Sec.33 (A) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec.31 (A) of Air (Prevention & Control of Pollution) Amendment Act, 1987:

1. ***Industry shall comply all the recommendations of the district collector's committee within one month .***
2. ***The industry shall ensure that no contaminated water joins the stream running through the industry. The industry shall explore the possibility of diverting the stream to avoid contamination, after obtaining all the necessary permissions.***
3. ***Industry shall not undertake any expansion works until it obtains the permissions from the MoEF & APPCB.***
4. ***Industry shall comply the directions issued by the Hon'ble NGT, Southern Zone, Chennai on 28.08.2020 in appeal No.21/2019(SZ), I. A No.40/2019 on the payment of Environmental compensation of 37.02 Lakhs which is imposed by CPCB under Section 5 of the E (P) Act, 1986 for which industry has already deposited 50% of the amount. Copy of the order is herewith enclosed for kind perusal.***
5. ***The industry shall not manufacture new products and not exceeding the permitted quantity, other than those mentioned in the CFO.***
6. ***The industry shall ensure the transfer of solvents by using pumps and closed conveyance instead of manual handling within 1 month.***
7. ***The industry shall maintain SOPs and checklists in the manufacturing process.***
8. ***The industry shall operate the two stage scrubbers for scrubbing of process emissions at all emission sources. The industry shall properly maintain online pH meters to the scrubbers.***
9. ***The industry shall provide containers detoxification facility in a shed within one month. Container & Container liners shall be detoxified at the specified covered platform with dyke walls and the wash wastewater shall be routed to the ETP.***
10. ***The industry shall provide online pH meter with data logger to scrubber within 1 month.***
11. ***The industry shall store the drums containing chemicals/solvents under a roof on elevated platform with provision to collect leakages/spillages in the collection pit within 1 month.***
12. ***Green belt of adequate width and density shall be maintained along the boundary of the industry with minimum area of 33% of total area within 6 months.***
13. ***The industry shall comply with the Standard Operating Procedure (SoP) and Checklist of Minimal Requisite Facilities for Utilization of Spent Solvent for Recovery of Solvent specified for Solvent Recovery Units issued by CPCB.***
14. ***The industry shall follow the SOP for Safe and Scientific Spent Solvent Handling, Processing and Storage.***
15. ***The industry shall comply with CPCB directions dated 05.02.2014 / 02.03.2015 and guidelines issued regarding online monitoring systems issued from time to time. The online monitoring system shall be calibrated periodically as per equipment suppliers manual / CPCB guidelines before starting the production.***
16. ***The industry shall not cause odour nuisance to the surroundings.***
17. ***The industry shall dispose off the hazardous waste generated during fire accident (such as spoiled batch/ left over solvent/Residue) to TSDF Nellore immediately.***

You are hereby directed to note that, should you misuse this order and violate any one of the conditions mentioned above, your unit will be closed under Sec.33 (A) of Water (Prevention and

Control of Pollution) Amendment Act, 1988, and under Section 31 (A) of Air (Prevention & Control of Pollution) Amendment Act, 1987, in the interest of Public Health and Environment and you will be also liable for prosecution in the Court of Judicial Magistrate First Class under Sec.41 (2) of Water (Prevention and Control of Pollution) Amendment Act, 1988 and under Sec.37(1) of 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 and with fine.

This Order comes into effect from today i.e. 08.09.2020.

Sd/-
CHAIRMAN

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

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

JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II

GOVERNMENT OF ANDHRA PRADESH
Factories Department

From
Sri K.ParameswaraRao,
B.Tech, B.L, MBA, MIE
Deputy Chief Inspector of Factories
Nellore.

To
Sri.Sudugu Rama Krishna Reddy,
Occupier,
Sri.Dr.Balasubrahmanian,
Manager,
VenkataNarayana Active Ingredients Pvt Ltd.,
Sy.No.69, Chandrapadiya (V),
Vinjamur (M),
SPSR Nellore (Dt).

Lr.No.A/DYCIFN-ADMN0ACCD/08/2020-SUVR(A)-DYCIF-NLR /2020, Dated:04.09.2020

Sir,

Sub:-Factories Act, 1948 and A.P. Factories Rules, 1950 –Accidents – Fire accident occurred in M/s.VenkataNarayana Active Ingredients Pvt Ltd, (formerly M/s. Nutra Specialties Pvt. Ltd.,) Sy.No.69, Chandrapadiya Village, Vinjamuru Mandal, SPSR Nellore (Dt) on 29.07.2020 at 02.10 a.m. due to explosion of vapour cloud in the clean room-2 – Prohibitory Orders – **REVOKED**-orders issued-Regarding.

Ref:-1.Prohibitory orders issued by Inspector of Factories, Nellore vide No.A/IFNLR /1/ 2020, Dt:29.07.2020.

2.Preliminary enquiry report of Inspector of Factories, Nellore vide Lr.No.A/IFNLR/1/2020, Dt: 29.07.2020.

3.Lr.No.Rc.D2/1511/2020, Dt:29.07.2020 by constituting joint inspection committee, received through email from the District Collectorate, Nellore on 31.07.2020.

4.Joint inspection Committee report Dt:18.08.2020 submitted to the District Collector, Nellore.

5.Industry`s compliance report submitted to the District Collector, Nellore on 19.08.2020.

6. Lr.No.Rc.D2/1511/2020, Dt:22.08.2020 received through email from the District Collectorate, Nellore on 23.08.2020 by directing the joint inspection committee to verify the compliance.
7. Detailed enquiry report submitted by the Deputy Chief Inspector of Factories, Nellore vide Lr.No.A/DYCIFN-ADMN0ACCD/08/2020-SUVR(A)-DYCIF-NLR/2020, Dated:25.08.2020 to the Director of Factories, A.P, Vijayawada.
8. Show cause notice along with Inspection orders issued to the management vide Lr.No.A/DYCIFN-ADMN0ACCD/08/2020-SUVR(A)-DYCIF-NLR/2020, Dated:25.08.2020 by the Deputy Chief Inspector of Factories, Nellore.
9. Joint inspection committee report Dt:28.08.2020 on the compliance verification submitted to the District Collector, SPSR Nellore District.
10. Lr.No.Rc.D2/1511/2020, Dt:31.08.2020 received through email from the District Collectorate, Nellore duly permitting the management to restart the factory subject to conditions to obtained revocation orders from Factories Department and APPCB.
11. Compliance report on the prohibitory orders received from the management Dt:31.08.2020.
12. Lr.No.A/DYCIFN-ADMN0ACCD/08/2020-SUVR(A)-DYCIF-NLR /2020, Dated:02.09.2020 submitted to the Director of Factories, A.P, Vijayawada.
13. Lr.No.A/DYCIFN-ADMN0ACCD/08/2020-SUVR(A)-DYCIF-NLR /2020, Dated:03.09.2020submitted to the Director of Factories, A.P, Vijayawada.
14. Memo.No.LAE05-12021(34)/68/2020-BSEC-DOF, Dt:04.09.2020 of the Director of Factories, A.P, Vijayawada.

****

With reference to your compliance report vide in the reference 11th cited, duly enclosing HARA and HAZOP study reports issued by the third party competent agency along with the compliance report on its recommendations and in accordance with the orders received from the Director of Factories, A.P, Vijayawada vide in the reference 14th cited, the **PROHIBITORY ORDERS** issued in the reference 1st cited are hereby **revoked** with effect from **04.09.2020** for restoring the operations of the factory along with usage, handling, transferring of solvents, chemicals in the factory **except the operations of clean room-2** subject to the following conditions.

1. The reactors shall be brought into use only after complying with the recommendation that an alarm should provide to blow if the temperature/pressure of reaction mass cross the prescribed limit for the products where exothermic reactions are involved and all the remaining items shall be complied with in 30 days of the date of revocation order and the compliance has to be reported.
2. All the workers shall be adequately trained on the standing operational procedures before commencing the operations in the factory and the details of the trainings conducted shall be submitted.
3. The operations/ processes pertaining to the 12 products for which the HARA & HAZOP reports submitted now are only permitted.
4. The Adequacy of PPE required for safely carrying out the normal operations as per the standard operating procedures and Emergency operations as per the onsite emergency plan shall be ensured before commencing the operations/processes

The operation of clean room-2 shall be permitted only after submitting the fitness certificates of all the equipments installed in the factory for further service issued by the expert third party.

However the management is advised that the process of the plant and machinery in the factory shall be carried out in a safe manner so as to avoid any risk of bodily injury to any person employed thereon and the process shall be carried out under adequate supervision.

These above orders are issued without prejudice to any other orders issued or proposed to be issued and the action taken or proposed to be taken in this matter by this office for the non-compliance of the provisions of act and rules and made there under.

Yours faithfully,

Signed by K Parameswara
Reason: Approved
Date: 04-09-2020 15:40:28

Dy. Chief Inspector of Factories,
Nellore

Copy submitted to the Director of Factories, A.P, Vijayawada.
Copy submitted to the District Collector & Magistrate, SPSR Nellore District.