

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

I.A. No. _____ of 2025

IN

O.A. No. 144 of 2020

IN THE MATTER OF:

BHASKAR RAO VEMURI

**... ORIGINAL
APPLICANT**

VERSUS

**STATE OF ANDHRA
PRADESH**

...RESPONDENT

**VENKATA NARAYANA ACTIVE
INGREDIENTS PVT. LTD.**

...APPLICANT

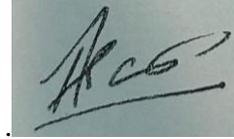
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**AFFIDAVIT ON BEHALF OF APPLICANT/ VENKATA
NARAYANA ACTIVE INGREDIENTS PVT. LTD.**

MOST RESPECTFULLY SHOWETH:

1. The present Affidavit is being filed in terms of Order dated 09.05.2025 passed by this Hon'ble Tribunal in the captioned Application being, I.A. No. 226 of 2021, 227 of 2021 and 228 of 2021 in O.A. No. 144 of 2020. It is submitted that the present affidavit is being filed in addition to the aforementioned interlocutory applications and the

contents thereof may be read as a part and parcel of the present Affidavit.

2. At the outset, it is respectfully submitted that Statutory Appeal bearing Civil Appeal No. 1940-1941 of 2022 titled as ***Venkata Narayana Active Ingredients Pvt. Ltd. versus The State of Andhra Pradesh and Ors.*** under section 22 of National Green Tribunal Act, 2010 was preferred before the Hon'ble Supreme Court of India, thereby challenging the Impugned final judgement and order dated 07.12.2021 passed by this Hon'ble Tribunal in O.A. No. 144 of 2020 and Impugned Order dated 17.02.2022 passed by this Hon'ble Tribunal in Review Application No. 3 of 2022 in O.A. No. 144 of 2020.
3. That pursuant to considering the arguments of the Applicant herein in the aforesaid Civil Appeals, that reasonable opportunity of hearing was not granted to the Applicant, the Hon'ble Supreme Court of India vide order dated 21.03.2025 was pleased to dispose of the Civil Appeal while *inter*

alia directing this Hon'ble Tribunal to consider the applications of the Applicant herein being I.A. No. 226, 227 and 228 of 2021 in accordance with law as expeditiously as possible. The Hon'ble Supreme Court also observed that the directions in the aforesaid two Impugned Orders may be kept in abeyance for three months. Relevant portion of the Order passed by the Hon'ble Supreme Court is reproduced hereinunder for kind perusal of this Hon'ble Tribunal:

“4. The directions contained in the impugned parent order are kept in abeyance for three months. The Tribunal is directed to consider the applications filed by the appellant being I.A. Nos. 226, 227 and 228 of 2021, in accordance with law, as expeditiously as possible, preferably within a period of eight weeks.

5. Should the application for intervention be allowed, it shall be open to the appellant to raise all other points available to it in law and seek revocation of the directions.”

4. It is humbly submitted that, the Applicant Company was incorporated on 05.09.2005 under the name of Neutra Specialities Pvt. Ltd. The name

was subsequently amended to Venkata Narayana Active Ingredients Pvt. Ltd. (name used in the proceedings before this Hon'ble Tribunal and Hon'ble Supreme Court of India). It is pertinent to mention here that the Applicant Company had sold its entire business undertaking to **Chieron Active Ingredients Pvt. Ltd.** with effect from 21.02.2025.

5. The Applicant company is an MSME Unit engaged in the manufacture Active Pharma Ingredients ("API") for Life Saving / Life Style Pharma Drugs, namely, Diabetes, Blood Pressure, Nerve Disorders due to prolonged diabetes etc., apart from APIs for local anaesthetics, blood thinners etc. The company supplies the APIs to major pharmaceutical companies. The factory unit is situated at Sy. No. 69, Chandrapadia Village, Vinjamur Mandal SPSR, Nellore District - 524228, Andhra Pradesh.
6. That the Applicant company is providing direct employment to various employees and deals with

more than 100 vendors and service providers thereby providing continuous indirect employment and business opportunities to its stakeholders.

7. The Applicant company had obtained the necessary consents, licenses, clearances, approvals and permissions from various authorities including Environmental Clearances from the State Environment Impact Assessment Authority, consent for establishment and operations from Andhra Pradesh Pollution Control Board ("APPCB")/ Central Pollution Control Board ("CPCB") and various other statutory authorities.
8. That on 20.06.2020, one Bhaskar Vemuri Rao Bhaskara ("Original Complainant in O.A. No. 144 of 2020") filed a complaint through an e-mail dated 20.06.2020 addressed to the Registrar General of the Hon'ble NGT alleging that the Applicant Company was purchasing water from Agricultural borewells and that the Applicant Company may damage the ground water table.

The Applicant Company was not aware of the same at that point of time. The said Bhaskara Rao Vemuri prayed for stopping the existing borewells and seize the power connections and levy penalties and compensate for the guava plantation. This e-mail dated 20.06.2020 was registered as **Original Application No. 144 of 2020** titled as **Bhaskar Rao Vemuri v. State of Andhra Pradesh.**

9. It is pertinent to state herein that the Original Complainant was pressurising the Appellant company to purchase his agricultural lands at a very high rate per acre. However, the Appellant company had shortlisted an alternate suitable land in the area, which was available at a much less rate than that demanded by the complainant. As such, the Appellant company rejected the offer of the complainant for buying his land. Thus, it is evident that the original complaint was motivated and not based on correct facts and was apparently filed to harass the Appellant company to submit

to the unreasonable demands of the complainant in the captioned O.A.

10. That by an order dated 27.11.2020, the Hon'ble NGT passed an *ex parte* order directing the APPCB and the District Magistrate to look into the allegations made by the Original Complainant and submit a factual and action taken report. It is pertinent to state that at this stage the Applicant Company was not impleaded by the Original Complainant, or by this Hon'ble Tribunal.

True Copy of the Order dated 27.11.2020 passed by the Hon'ble National Green Tribunal in O.A. No.144 of 2020 is annexed herewith and marked as **Annexure A-1**.

11. That on 25.01.2021, APPCB submitted a report dated 25.01.2021 before this Hon'ble Tribunal wherein with respect to the complaint filed by the Original Complainant it was categorically *inter alia* observed that no pipeline arrangement was observed from the Industry (Applicant Company)

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. It is further stated in the report by APPCB that committee contacted the Original Complainant, 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's 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.

12. The APPCB in its report dated 25.01.2021 concluded as following:

- (a) The Appellant company is not receiving water from outside agricultural bore-wells and was

in fact, drawing water from their own two bore wells located within their premises.

- (b) There is no depletion of groundwater.
- (c) The original applicant complainant also confirmed that the Review Applicant unit was not purchasing water from outside agricultural bore-wells.
- (d) There were no effluent discharges outside the industry premises.
- (e) The production quantity of the Appellant Company's unit was within the permitted capacity.
- (f) The Appellant Company had obtained environment clearance from State Level Environment Impact Assessment Authority ("SEIAA") for expansion of their production capacity.
- (g) The Appellant Company has obtained consent to establish and consent for operation from the APPCB.

True Copy of the APPCB report dated 25.01.2021 is annexed herewith and marked as **Annexure A-2.**

13. That despite of the best efforts, procedures and precautions being put in place by the Applicant Company, two incidents occurred in the factory unit, first is a fire accident in their reactor on 29.07.2020; and second a Gas leakage in a restricted production area on 11.05.2021.
14. It is respectfully submitted that the aforesaid two incidents, did not occur due to the non-compliance of conditions stipulated under the environmental laws, but purely due to human errors of the employees and as such, consequential human loss cannot be ascribed to pollution or other environmental damage. It is further submitted in this regard that in a report dated 07.03.2021, submitted by the Sub Divisional Police Office, Kavali Sub Division with respect to the gas leakage incident dated 11.05.2021, it was categorically observed that no

negligence was established on the part of the Applicant Company's authorities. The investigation concluded that the mishap was purely accidental, resulting from a chemical reaction, and accordingly classified the incident as a ***"Mistake of Fact."***

True Copy of the report dated 07.03.2021 submitted by the Sub Divisional Police Officer in Cr. Case No. 130/20 registered under section 285, 287,336,337,304-A IPC at P.S. Vinjamur is annexed herewith and marked as **Annexure P-3.**

15. It is humbly submitted that despite the management being fully equipped with safety and environment team, which regularly conducts trainings on periodical basis, the incident happened because of the operator error and not because of unsafe practices by the management. Further, to enhance the safety, the manufacturing unit stopped manual charging of chemicals into

the reactor and replaced it with powder charging and auto transfer of chemicals.

16. After the fire incident on 29.07.2020, the APPCB *inter alia*, directed the Applicant Company to close down the factory unit, and in that effect orders were issued by the Inspector of Factories, Nellore. As a corrective measure, the Industry unit stopped manual charging of chemicals into the reactor and replaced it with power charging and auto transfer of chemicals. Due to the fire accident four employees suffered injuries and were treated in the hospital. The costs of their treatment were paid by the Applicant Company. Out of the four employees, two employees died during their treatment. Compensation to the aggrieved families and employees were sufficiently paid by the Applicant Company in furtherance to the policies of the Company itself and not due to intervention or directions issued by any authorities.

17. That later, on 11.05.2021 another accident had occurred due to leakage of gas from the reactor during the manufacturing of product. The leakage was confined to a limited production space due to the opening of the wrong atmospheric vent of the reactor, due to human error and this led to release of harmful gas which affected the employees working in the production area near the gas release. The situation was controlled immediately by other employees who closed the vent and shifted the affected persons to a safe area. However, the leakage affected six employees and all of them were shifted to the hospital for treatment. Three of the employees died due to their exposure to the gas.

18. That as a corrective measure, the Applicant Company dismantled the GLR reactor and replaced it with a SLR reactor. The Applicant Company compensated the deceased persons' family as per calculation under the Workmen's Compensation Act.

19. That the APPCB further issued a consent order dated 15.06.2021, pursuant to which the Industry Unit resumed its operations.
20. That on 02.06.2021, this Hon'ble Tribunal after taking note of the report dated 25.01.2021 submitted by APPCB and the two accidents that occurred in the Industry called in for a fresh report from a Joint Committee comprising of the Regional Officer, CPCB, Chief Inspector of Factories Andhra Pradesh, Member Secretary State PCB and the District Magistrate, Nellore. The Committee was called upon to:
- (a) Provide the compliance Status of the Appellant Company under the various statutes and rules.
 - (b) Ascertain the extent of damage to the environment and individuals in the incident dated 11.05.2021 and the remedial action taken in terms of compensation for restoration of the environment and to the victims.

21. That vide report dated 04.10.2021, the Joint Committee *inter alia* observed certain non-compliances and violations, and recommended payment of compensation of Rs. 40 lakhs to the families of the two deceased employees and Rs.10,50,240/- in respect of the third employee, in addition to the proposed sum of Rs.40 lakhs. Further, the Joint Committee recommended payment of environmental compensation of Rs. 73.50 lakhs by the Applicant Company based on an alleged environmental compensation formula. Moreover, this environmental compensation amount was arrived at without considering the financial condition of the unit including the fact that they are a MSME.
22. That the Applicant Company filed an I.A. bearing No. 226-227 of 2021 *inter alia* praying for impleadment and for directions for reduction of the environmental compensation and the compensation payable to one of the employees to Rs.40 lakhs. It is submitted that the Applicant

Company in the aforesaid application had also filed a detailed Chart titled "***Status of the Compliance of the Observations made by the NGT's Inspection Committee in Part-A and Part- B of their Report - September 2021***" to show the (then) current compliance status with respect to the alleged observations/non compliances pointed out by the Joint Committee in their Report dated 04.10.2021. The Applicant Company in its IA also made a mention of compliances already made even before the Report dated 04.10.2021 was submitted.

True Copy of the detailed Chart titled "*Status of the Compliance of the Observations made by the NGT's Inspection Committee in Part-A and Part- B of their Report - September 2021*" is annexed herewith and marked as **Annexure A-4**.

23. It is humbly submitted that the Joint Committee, in its report, outlined certain possible causes for the gas leakage incident that occurred on 11.05.2021. However, while identifying these

causes, the Committee failed to invite objections by the Applicant Company. Additionally, the Committee erred in recording and evaluating certain facts, which ultimately led to inaccurate observations. Para Wise Objections to the observation of the Joint Committee made in **Para VI.b.ii “Possible causes for accident on May 11,2021 as per committee constituted by District Magistrate”** is as follows:

S.No.	Possible Causes as outlined in the Joint Committee Report in Para VI.b.ii	Objections/Explanation by the Applicant Company
1.	Suction and dump tanks are not provided.	The Applicant company provided the suction and dump tanks in compliance of Report dated 04.10.2021, before the date of Order dated 17.02.2022 passed by this Hon’ble Tribunal.

2.	<p>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.</p>	<p>The Applicant Company provided the Fumes/ Dust suction and vapour absorption system in compliance of Report dated 04.10.2021, before the date of Order dated 17.02.2022 passed by this Hon'ble Tribunal.</p>
3.	<p>The mother liquor generated during the</p>	<p>Since the reactor GLR 0101 was free after the reaction of Vildagliptin Batch <i>(as also recorded by</i></p>

<p>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</p>	<p><i>the Join Committee in the sequence of events in Para VI.b.i) was completed on 10.05.2021, the Applicant Company used the same reactor for neutralising the effluent which normally happens in ETP.</i></p>
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	<p>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.</p>	
4.	<p>On May 11, 2021, the workers in the morning shift experienced odour nuisance from reactor 0101 and workers near</p>	<p>The leakage of gas was confined to a restricted production area.</p>

	<p>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.</p>	
5.	<p>Batch manufacturing records, batch sheets and reactor labels are not maintained. At the time of shift</p>	<p>Batch manufacturing records, batch sheets and reactor labels were properly maintained.</p>

	change, batch information or data sheets was not exchanged between the shift in charges.	
6.	Personnel protective equipment like safety goggles gloves face masks is not provided to employees.	The Applicant Company provides suitable PPEs and training to all the hazardous operation persons. True Copy of details is annexed herewith and marked as Annexure P-5
7.	There was no VOC sensor with alarm in the production block which	The Applicant Company provided the VOC sensor, Alarm etc and submitted the compliance report to PCB, Vijayawada dated

	<p>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</p>	<p>09.09.2021 and PCB, Nellore dated 13.09.2021. Further, as per schedule, training conducted for all employees and contract labours SOPs also displayed and same thing submitted to Inspector of factories on 19.07.2021 and 03.08.2021 True Copy of log submitted to the Inspector of Factories is annexed herewith and marked as Annexure P-6</p>
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	<p>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</p>	
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<p>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.</p>	
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8.	<p>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.</p> <p>The unit has not obtained permission for shifting the reactor to Hyderabad and also</p>	<p>GLR was purchased and erected in the year 2010 and the Applicant Company was contemplating to change the reactor to SLR. After fulfilling all the change control forms and standard procedures and ascertaining the suitability and safety, the SLR was installed.</p>
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	information was not communicated to any of the regulatory Authorities.	
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24. It is respectfully submitted and is equally pertinent to mention at this juncture, that while the Joint Committee conducted their enquiry, they did not afford an opportunity to the Applicant Company to raise their objections or place explanation before the Joint Committee, and decided to proceed with their findings which in our respectful submissions were not coherent with the actual facts relating to both the accidents that occurred on 29.07.2020 and 11.05.2021 and the compliances as required by the respective statutes and rules their under. Later, on submission of the Report dated 04.10.2021, this Hon'ble Tribunal while relying on the findings of the Joint Committee, directed payment of compensation to the tune of Rs. 7.5 Crore.

25. It is humbly submitted that the Hon'ble Supreme Court in ***Kantha Vibhag Yuva Koli Samaj Parivartan Trust v. State of Gujarat, (2023) 13 SCC 525*** has observed that the once the expert committee as formed by the Tribunal submits their final report before the court/tribunal, it is open for the parties to object the same, which is then adjudicated upon by the respective court/tribunal in light of the facts and circumstances. Relevant paragraph of the judgement is reproduced herein below for the ready reference of this Hon'ble Tribunal:

“17... On the other hand, the courts/tribunals themselves set up Expert Committees on occasion. These committees are set up because the fact-finding exercise in many matters can be complex, technical and time-consuming, and may often require the committees to conduct field visits. These committees are set up with specific terms of reference outlining their mandate, and their reports have to conform to the mandate. Once these committees submit their final reports to the court/tribunal, it is open to the parties to object to them, which is then adjudicated upon. The role of these Expert Committees does not

substitute the adjudicatory role of the court or tribunal. The role of an Expert Committee appointed by an adjudicatory forum is only to assist it in the exercise of adjudicatory functions by providing them better data and factual clarity, which is also open to challenge by all the parties concerned. Allowing for objections to be raised and considered makes the process fair and participatory for all the stakeholders.

18. Section 14 and Section 15 entrust adjudicatory functions to NGT. NGT is a specialised body comprising of judicial and expert members. Judicial members bring to bear their experience in adjudicating cases. On the other hand, expert members bring into the decision-making process scientific knowledge on issues concerning the environment. In Hanuman Laxman Aroskar v. Union of India [Hanuman Laxman Aroskar v. Union of India, (2019) 15 SCC 401], a two-Judge Bench of this Court noted that NGT is an expert adjudicatory body on the environment.”

26. It is respectfully submitted that the Joint Committee, in *Para VII* under the heading "*Damage Assessment and Calculation of Compensation,*" erred in recording that the Applicant Company had cleaned the reactor and

its surroundings prior to the Committee's inspection, making it difficult for the authorities to ascertain the root cause of the accident and assess the full extent of the damage. The accident occurred on 11.05.2021, while the Joint Committee visited the unit much later, on 10.08.2021. By that time, the GLR reactor (0101) had been moved outside the premises. It is further submitted that the GLR reactor had been procured back in 2010, and the Applicant Company had already planned to transition to an SLR reactor. After duly completing all required change control documentation, standard procedures, and confirming the suitability of the change, the SLR reactor was installed accordingly. The Joint Committee overlooked the fact that the decision to replace the GLR with the SLR reactor was part of a pre-existing plan and not influenced by the Committee's constitution or inspection.

27. With reference to the observation made by the Joint Committee regarding the compensation

awarded by the Applicant Company for the loss of life in the accident that occurred on 11.05.2021, it is humbly submitted that, after due consideration of the facts and circumstances pertaining to the families of the deceased, the Applicant Company paid a compensation of Rs. 40 lakhs each to the families of Late Shri P. Thirupataiah and Late Shri V. Thirupataiah. Additionally, the Company paid a compensation of Rs. 50,55,240/- to the family of Late Shri B. Srinu, taking into account his age and educational qualifications. It is pertinent to note that the compensation provided by the Applicant Company exceeds the amount payable under the Workmen's Compensation Act, as well as the guidelines laid down by the Hon'ble Supreme Court in Civil Appeal No. 6339 of 2019 and Civil Appeal No. 3483 of 2008.

28. It is further submitted that the Joint Committee in its report dated 04.10.2021, also took into account the environmental compensation paid by

the Applicant Company due to non-compliance with environmental norms in 2015. In this regard, it is appropriate to mention that all such non-compliances from 2015, which led to the payment of Rs. 37.20 lakhs as compensation, have since been permanently rectified by the Applicant Company.

29. By way of background, in 2015, the Pollution Control Board (PCB) introduced the requirement for an Online Continuous Effluent Monitoring System (OCEMS) and mandated that all industrial units comply with this directive. There was a delay in implementing the OCEMS at the Applicant Company's unit, primarily due to the lack of internet connectivity, as the manufacturing unit is located in a remote village approximately 70 kilometers from Nellore. Consequently, the Central Pollution Control Board (CPCB) issued a direction dated 27.07.2016, ordering the closure of operations until the online effluent monitoring system was installed and integrated with the CPCB website.

30. The Applicant Company took the necessary steps to install the required online effluent monitoring system and duly informed the Board of its compliance, requesting revocation of the closure order. However, the unit was unable to shut down operations in accordance with the closure directions of the Board. Subsequently, by order dated 18.07.2017, the closure order was revoked. Thereafter, CPCB issued further directions dated 09.04.2019, directing the unit to pay Rs. 85.50 lakhs as environmental compensation for the delay in implementing OCEMS. The Applicant Company filed an appeal before the Hon'ble National Green Tribunal, Southern Bench, which directed the CPCB to reconsider the matter. In compliance with the NGT's directions, CPCB revised the environmental compensation amount to Rs. 37.20 lakhs, which has since been paid by the Applicant Company.
31. Para Wise Objections to the observation of the Joint Committee made in **Para VII.b.**

“Environmental Compensation on account of Non Compliances” are as follows:

S.No.	Possible Causes as outlined in the Joint Committee Report in Para VII.b.	Objections/Explanation by the Applicant Company
1.	In the matter of Appeal No. 21 of 2019 in Hon’ble 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	The Non-compliance committed back in 2015 which led to the payment of Environmental Compensation of Rs.37.20 Lakhs was permanently rectified by the Applicant Company.

	<p>compensation was levied by CPCB from the appellant unit mainly for the reason for violation of closure directions issued by CPCB during 2017.</p>	
2.	<p>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</p>	<p>The Joint Committee has clearly misrepresented the factual position regarding the Appellant Company undertaking expansion activities without obtaining Environmental Clearances (EC). It is submitted that the Appellant Company had applied for the requisite ECs prior to</p>

	<p>activities were in progress.</p>	<p>initiating any expansion activities. However, due to procedural delays caused by the COVID-19 pandemic, the clearances were not granted in a timely manner. It is further relevant to note that, prior to obtaining the clearances, the company proceeded only with the construction of the expansion unit; no manufacturing or production activities were undertaken in the expanded facility. The construction was initiated based on the anticipation that the Environmental Clearance would be granted, following which</p>
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		the company intended to commence expansion-related operations.
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.	The recorded production quantity for the year 2018-19 was only 131 tons. A small quantity manufactured at the end of the financial year 2018-19 was, however, accounted for in the year 2019-20. It is solely due to the inclusion of this carryover quantity that the annual production for 2019-20 was mistakenly interpreted as 146 TPA, exceeding the permitted limit of 142.32 TPA. It is important to clarify that the Applicant Company has never

	<p>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.</p>	<p>exceeded the approved production capacity. Furthermore, the Company has since been granted approval to manufacture up to 500 TPA, a limit which remains unexhausted to date.</p>
4.	<p>Storm water drains were filled with effluent near scrubber section.</p>	<p>The Joint Committee has erroneously and blatantly recorded that the stormwater drains were filled with effluents. However, this claim is entirely false. It is submitted that during the Joint Committee's visit, the area experienced heavy</p>

		<p>rainfall, resulting in the stormwater drains being filled with rainwater. The Committee appears to have mistaken this rainwater accumulation for effluent discharge. This misunderstanding is further disproven by the fact that no groundwater contamination was observed by the Committee, which clearly indicates that the drains contained only clean rainwater, not industrial effluents.</p>
5.	<p>During committee inspection it was observed that hazardous wastes such as ETP</p>	<p>The Joint Committee has erroneously recorded that hazardous waste was dumped in the shed by the manufacturing unit. This</p>

	<p>sludge and ATFD salts were dumped in the shed and there was no provision for leachate collection.</p>	<p>observation is factually incorrect. The manufacturing unit collects all sludge and waste in a covered shed pit, ensuring it is securely stored. This waste is regularly transported by trolley and disposed of at designated sites duly approved by the government.</p> <p>Due to the COVID-19 outbreak, associated lockdowns, and the temporary unavailability of labor responsible for operating the trolleys and handling waste disposal, the pits were found to be full during the inspection.</p>
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		<p>However, it is important to note that the waste remained securely covered and stored within the shed, and was not left exposed.</p> <p>Furthermore, periodic inspections are conducted by the Andhra Pradesh Pollution Control Board (APPCB), and at no point has any objection been raised regarding the disposal of waste. This is because the unit, exercising due diligence, consistently stores the sludge and waste in a secure, covered shed and ensures its disposal at regular intervals.</p>
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6.	<p>Reactor 0101 where accident occurred on May 11, 2021 was dismantled and shifted outside the unit without informing to any Regulatory Authorities.</p>	<p>The (GLR) was purchased and installed at the unit in the year 2010. Subsequently, the Applicant Company considered replacing the GLR with a SLR. After completing all required change control forms, following standard procedures, and verifying the suitability of the replacement, the SLR was duly installed.</p> <p>It is submitted that there is no statutory requirement obligating the Applicant Company to inform the regulatory authorities of such changes in machinery. The unit is only</p>
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		<p>required to maintain internal change control documentation and adhere to established change control procedures, all of which were duly complied with prior to replacing the GLR with the SLR.</p> <p>Furthermore, it is submitted that the replacement constituted a routine maintenance activity, which does not necessitate prior intimation to the regulatory authorities.</p>
7.	The total area of the unit is 33 acres and one of the EC condition	At the time of the Joint Committee's inspection, the Applicant Unit had already developed 11 acres of green

	<p>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.</p>	<p>belt. Therefore, the observation that the 11-acre green belt requirement was not being complied with is entirely incorrect. Furthermore, based on the recommendations of the Joint Committee, the Applicant Company subsequently acquired an additional 5.26 acres of land for green belt development. It is pertinent to note that plantation activities have already been undertaken on this newly acquired land.</p>
8.	<p>The unit has installed flow meters at MEE feed, LTDS inlet,</p>	<p>The observation made by the Joint Committee is entirely incorrect. It is submitted that the</p>

	<p>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.</p>	<p>Applicant Company had already complied with the mandate under the APPCB circular by installing the air quality monitoring system as early as 2015. Although there was a delay due to technical issues and network unavailability, the requirement was ultimately fulfilled. The Applicant Company had also paid compensation in the past for the said delay.</p> <p>Furthermore, the installation of additional equipment such as meters, inlet and outlet strippers, etc., was never mandated by the APPCB, and therefore, the Applicant</p>
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		<p>Company was under no obligation to undertake such measures. However, once these additional requirements were suggested by the Joint Committee for safety purposes, the Applicant Company voluntarily complied with them.</p> <p>It is important to emphasize that these additional measures were not statutory obligations but were implemented solely in the interest of safety. The updates regarding these actions were duly communicated through a covering letter submitted to the PCB office</p>
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		in Vijayawada on 12.08.2021 and to the PCB office in Nellore on 24.08.2021.
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),	Pursuant to the visit of the Joint Committee, the Applicant Company had undertaken the odour emission audit by a third-party from Professors from IICT, Hyderabad, for identifying the gaps for odour emissions. As per the audit report December, 2021, the emission values are within the threshold limits.

<p>SPSR Nellore District and connected the same to the APPCB server. The average VOC values recorded is submitted.</p> <p>VOC values indicates that persistence of odour nuisance to the surroundings.</p> <p>The nearest habitation is at a distance of 300m from the unit. As per wind direction, the surrounding</p>	
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	village are susceptible to odour nuisance.	
10.	<p>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.</p> <p>APPCB again issued “Stop Production Order” on 26.05.2021 to the</p>	<p>It is submitted that the Joint Committee has erroneously recorded that the Applicant Company was not complying with the conditions set forth in the revocation order dated 08.09.2020. In fact, the Applicant Company received the revocation of the 'stop production order' only after fulfilling all the conditions outlined therein.</p> <p>The Applicant Company has been in compliance with these conditions, as</p>

<p>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.</p>	<p>evidenced by the subsequent grant of expansion approvals by the APPCB. It is respectfully submitted that, had the Applicant Company not complied with the stipulated conditions, it would not have been granted expansion approval by the APPCB in 2022. True Copy of Consent Order dated 12.09.2022 issued by APPCB is annexed herewith and marked as Annexure A-7. True Copy of Stop Production Order dated 18.08.2020 issued by APPCB is annexed herewith</p>
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		<p>and marked as Annexure A-8.</p> <p>True Copy of Revocation of 'Stop Production Order' dated 08.09.2020 is annexed herewith and marked as Annexure A-9.</p>
10.	<p>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.</p>	<p>It is submitted that the Joint Committee has erroneously recorded an observation against the Applicant Company, stating that the unit had obtained HARA and HAZOP reports for only 12 out of 35 products. This observation is entirely unfounded. The assertion that the Inspectorate of Factories had granted permission for only 12</p>

	<p>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 28 Report of the Joint Committee in the matter of OA No. 144/2020 (PB) 29 of 31 hydrochloride.</p>	<p>products is incorrect and misleading.</p> <p>It is submitted that the Inspectorate of Factories is not the competent authority for granting product-specific approvals. Its role is limited to ensuring the safety of equipment and workplace conditions; matters relating to environmental protection and product approvals do not fall within its jurisdiction. The Applicant Unit had obtained all necessary approvals for the 35 products from the Andhra Pradesh Pollution Control</p>
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	<p>3) Levetiracetam</p> <p>4) Risperidone</p> <p>5) Lacosamide</p> <p>6) Vildagliptin</p> <p>7) Moxifloxacin hydrochloride</p> <p>8) Loxoprofen sodium hydrate</p> <p>9) Voglibose</p> <p>10) Olmesartan medoxomil</p> <p>11) Linagliptin</p> <p>12) Warfarin sodium shall not be carried on unless HARA and HAZOP study report covering this products are prepared and</p>	<p>Board (APPCB), which is the only relevant statutory authority in this regard.</p> <p>Production of the 35 products commenced only after securing the requisite drug licenses and approvals from the APPCB.</p> <p>The Joint Committee has failed to provide any rationale or statutory basis for its claim that the Applicant Company was required to obtain product-wise approval from the Inspectorate of Factories. Such a requirement does not exist in any applicable regulation. Therefore, this observation represents an</p>
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	<p>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</p>	<p>incorrect and baseless attempt by the Committee to allege non-compliance on the part of the Applicant Company.</p>
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	<p>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”.</p> <p>The unit has failed to comply with the conditions given by APPCB and Inspector of</p>	
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	<p>factories in the CFO order and revocation orders respectively.</p> <p>Hence the committee has calculated EC as per CPCB formula.</p>	
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32. It is respectfully submitted that the values considered by the Joint Committee in the formula adopted for the computation of compensation are entirely unfounded. The Committee has failed to clarify how it arrived at the conclusion that the Applicant Company was in non-compliance for a period of 245 days. Moreover, the Joint Committee did not provide the Applicant Company with an opportunity to raise objections or respond to the observations made against it. As a result, the values inserted into the formula lack any reasonable basis or justification.

33. It is respectfully submitted that the Joint Committee had assessed the compensation amount to be ₹73,50,000/- in relation to violations concerning Environmental Clearances. However, the Hon'ble Tribunal, while considering the Applicant Company's turnover—recorded as ₹150 Crore—directed an enhancement of the compensation to ₹7.5 Crore under the category of environmental loss, i.e., 5% of the turnover. It is respectfully submitted that although the turnover of the Applicant Company may be ₹150 Crore, this figure does not accurately represent the Company's actual profit. The Hon'ble Tribunal did not take into account the fact that the Unit is currently not in a financially robust position, and the imposition of such a substantial compensation amount could severely affect the financial health of the Applicant Company, potentially leading to its closure. For the ready reference of this Hon'ble Tribunal, the financial details for the last seven years preceding the date

of the NGT Order dated 17.02.2022 are provided below:

Financial Year	Turnover (In Crores) including other income	Profit /Loss (In Crores)
<i>FY 2016-17</i>	<i>115.29</i>	<i>1.52</i>
<i>FY 2017-18</i>	<i>102.03</i>	<i>-17.75</i>
<i>FY 2018-19</i>	<i>185.98</i>	<i>3.17</i>
<i>FY 2019-20</i>	<i>290.40</i>	<i>15.01</i>
<i>FY 2020-21</i>	<i>225.16</i>	<i>11.48</i>
<i>FY 2021-22</i>	<i>203.01</i>	<i>-33.96</i>
<i>FY 2022-23</i>	<i>165.34</i>	<i>-28.43</i>
<i>FY 2023-24</i>	<i>177.57</i>	<i>-14.64</i>

34. The Company has been operating at a loss for the past several years. In an effort to sustain the business, retain customers, and support its employees, the management has continued to run the Company despite these financial setbacks. Imposing any further financial burden is likely to cripple the industry. Therefore, it is most humbly prayed that the enhanced environmental compensation of ₹7.5 Crores be withdrawn, along with the originally recommended demand of ₹73.50 Lakhs, in the interest of justice.
35. It is respectfully submitted that relying solely on the turnover to assess the financial standing of an

enterprise and to determine its capacity to pay compensation is not an accurate approach. Instead, a comprehensive evaluation of the actual profits, losses, and revenue generation should be considered for such determinations. In this context, reference may be made to the judgment of the Hon'ble Supreme Court of India in ***Benzo Chem Industrial Private Limited v. Arvind Manohar Mahajan and Others***, 2024 SCC OnLine SC 3543, wherein the Court observed as follows:

“10. We could have allowed the appeal on this short ground, however, the further part of the order i.e. paragraph 15 makes an interesting reading. The learned NGT held that the appellant is liable to pay environmental damages. However, while computing the said damages, the only methodology that has been adopted by the learned NGT is that as per the information which is available in the public domain the revenue range of the appellant is between 100 Crores to 500 Crores. It is therefore found that the penalty of Rs. 25 Crores would be commensurated with the revenue. Firstly, there is a vast difference between 100 Crores and 500 Crores. Secondly, if the learned NGT had relied on the information available in

the public domain, then it would not be difficult for it to come out with the exact figure. In any case, the generation of revenue would have no nexus with the amount of penalty to be ascertained for environmental damages. It is further to be noted that the learned NGT found the appellant to be guilty of violations, the least that was expected from the NGT is to give a notice to the appellant before imposing such a heavy penalty.

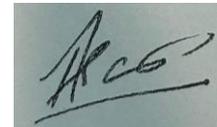
11. With deep anguish we have to say that the methodology adopted by the learned NGT for imposing penalty is totally unknown to the principles of law.”

36. It is humbly submitted that the Applicant Company faced severe challenges during the period from March 2020 to 2021 due to the COVID-19 pandemic, which led to a significant decline in revenue. In addition to the impact of COVID-19, the Company also had to contend with the present incident, further exacerbating the situation. As a result, revenues have continued to decline. In light thereof, it is prayed before this Hon'ble Tribunal that the status of compliances as on the Order dated 07.12.2021 passed by this Hon'ble Tribunal in O.A. No. 144 of 2020 and

Order dated 17.02.2022 passed by this Hon'ble Tribunal in Review Application No. 3 of 2022 in O.A. No. 144 of 2020 be reconsidered to the extent of computation of Compensation.

37. Lastly, it is submitted that none of the above aspects were considered by the Joint Committee while computing the compensation towards environmental loss. Further, this Hon'ble Tribunal was also not apprised of the aforesaid facts which has direct bearing to the observation and directions of this Hon'ble Tribunal on the issue of noncompliance on the part of the Applicant Company and computation of compensation to be paid thereof.

Filed by:



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

I.A. NO. _____ OF 2025

IN

ORIGINAL APPLICATION NO. 144 OF 2020

IN THE MATTER OF:

Bhaskar Rao Vemuri

Original Applicant

-Versus-

State of Andhra Pradesh

Respondent

**Venkata Narayana Active
Ingredients Pvt. Ltd.**

Applicant

AFFIDAVIT

I, Abhaya Kumar Srisimal S/o. Shri. Shankarlal aged about 70 years, residence at No.27, Mylai Ranganathan Street, T. Nagar, Chennai-600017, Director of M/s. Venkata Narayana Active Ingredients private limited do hereby solemnly affirm and state as under:-

1. That in the aforesaid official capacity, I am well conversant with the facts and circumstances of the case, therefore, I am competent to swear this affidavit.
2. That I have read the contents of the accompanying Interlocutory Application which has been drafted under my instructions and after having understood the contents thereof, I say that the facts stated therein are true to the best of my knowledge and belief.

3. That the annexures are true copies of their respective originals.

4. That the facts stated in the above affidavit are true to my

For Venkata Narayana Active Ingredients Pvt. Ltd.

S. Ramesh Kumar

Director



knowledge and belief; no part of the same is false and nothing material has been concealed therefrom.

For Venkata Narayana Active Ingredients Pvt. Ltd.

S. Abaya Kumar

Director

DEPONENT

VERIFICATION:

I, Abhaya Kumar Srisimal the above named deponent, do hereby verify that the facts stated in the above affidavit are true to my knowledge and belief, no part of it is false and nothing material has been concealed therefrom.

Verified at Chennai on this the 21st day of May, 2025.



For Venkata Narayana Active Ingredients Pvt. Ltd.

S. Abaya Kumar

Director

DEPONENT

R. Nedumaran
21/05/25
R, NEDUMARAN, B.Sc., B.Ed., B.L.,
ADVOCATE, NOTARY PUBLIC
COMMISSIONER OF OATHS
No: A-11, Venkatesan Salai,
Periyar Nagar, Chennai - 600 082.
Cell No: 9444230666 / 9884718086

Item No.03

Court No. 1

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

Original Application No. 144/2020

Bhaskar Rao Vemuri

Applicant

Versus

State of Andhra Pradesh

Respondent

Date of hearing: 27.11.2020

**CORAM: HON'BLE MR. JUSTICE ADARSH KUMAR GOEL, CHAIRPERSON
HON'BLE MR. JUSTICE SHEO KUMAR SINGH, JUDICIAL MEMBER
HON'BLE DR. SATYAWAN SINGH GARBYAL, EXPERT MEMBER
HON'BLE DR. NAGIN NANDA, EXPERT MEMBER****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. The above allegations need to be looked into by the Andhra Pradesh State PCB and the District Magistrate, Nellore and action taken as per law. The nodal agency for coordination and compliance will be the Andhra Pradesh State PCB.

A factual and action taken report may be furnished within one month 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 09.02.2021.

A copy of this order, along with a copy of the complaint be forwarded to the Andhra Pradesh State PCB and the District Magistrate, Nellore by email for compliance.

Adarsh Kumar Goel, CP

S.K. Singh, JM

Dr. S.S. Garbyal, EM

Dr. Nagin Nanda, EM

November 27, 2020
Original Application No. 144/2020
AB

True Copy

Joint Inspection Report on M/s. Venkata Narayana Active Ingredients Private Limited (Formerly M/s. Nutra Specialities Pvt. Limited) Situated at Sy No.69, Chandrapadiya Village, Vinjumur Mandal, SPSR Nellore District In Connection to the complaint Registered vide O.A. 144 of 2020 Before the Hon'ble National Green Tribunal, New Delhi based on complaint by email from Sri Vemuri Bhaskar Rao

Facts of case :

The Hon'ble National Green Tribunal, New Delhi registered O.A. 144 of 2020 based on complaint from Sri Vemuri Bhaskar Rao through email against M/s. Venkatanarayana Active Ingredients Private Limited (formerly M/s. Nutra Specialities Pvt. Ltd), Sy No.69, Chandrapadiya Village, Vinjumur Mandal, SPSR Nellore District.

Allegations of the complainant :

1. M/s. Venkata Narayana Active Ingredients Private Limited was established in the year 2007 for extraction of Tobacco Oil and within a short span of time, converted its line of activity to a bulk drug chemical unit near Chandrapadia Village (0.3 km), Vinjumur Mandal, SPSR Nellore District.
2. The industry is purchasing water from nearby Agricultural bore-wells and some of the farmers stopped agriculture and supplied water to the industry for their livelihood. The farmers are getting electricity at free of cost from the AP Govt. and selling water for commercial purposes.
3. The industry is using leased borewells 24 hrs to draw the water using electricity from factory along with the Govt. free power supply of 9 hrs.
4. The industry is increasing the existing production capacity from 142 TPA to 500 TPA, which may damage ground water table and even drinking water also. Nearby borewells dried-up and plantation was damaged heavily the past few years.
5. This activity is in violation of environmental norms resulting in fast depletion of ground water.
6. 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.

S. Narasimha Reddy
 ENVIRONMENTAL ENGINEER (FAC)
 A.P. POLLUTION CONTROL BOARD
 Regional Office
 NELLORE

Hon'ble NGT directions vide order dated 27.11.2020 :

The Hon'ble NGT, Principle bench, New Delhi directed "the above allegations need to be looked into by the A.P. Pollution Control Board and District Magistrate, Nellore and action taken as per Law. A factual and action taken report may be furnished within one month to the Hon'ble NGT. The nodal agency for coordination and compliance will be APPCB" vide order dated 27.11.2020 in OA No.144/2020.

Action taken in compliance to the Hon'ble NGT directions :

Subsequent to the Hon'ble NGT order, the Member Secretary, APPCB, Vijayawada has nominated Environmental Engineer, Regional Office, Nellore to represent APPCB for Joint inspection and instructed to take up the matter with the District Collector, SPSR Nellore District vide Memo dated 10.12.2020.

A joint inspection committee was constituted by the Collector & District Magistrate, SPSR Nellore district comprising with the following officials to verify the allegations made by the complainant :

1. The Superintendent Engineer, APSPDCL.
2. The Deputy Director, Ground Water Department, Nellore.
3. The Tahsildar, Vinjamur Mandal, SPSR Nellore District.
4. The Deputy Chief Inspector of Factories, Nellore.
5. The Environmental Engineer, Regional Office, Nellore.

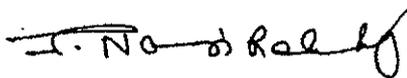
Observations of the Joint inspection committee :

The Committee comprising with the officials of the Dy. Chief Inspector of Factories, Nellore; the Deputy Director, Ground Water & Water Audit Department, Nellore; the Tahsildar, Vinjamur; the Executive Engineer (Operations), APSPDCL, Kavali & the EE (FAC), APPCB, RO, Nellore have inspected the industry and nearby bore wells on 07.01.2021 to ascertain the facts on the allegations made by Sri Vemuri Bhaskar Rao against M/s. Venkatanarayana Active Ingredients Private Limited.

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
CHANDRAPADIYA VILLAGE
VINJAMUR MANDAL
SPSR NELLORE DISTRICT


ENVIRONMENTAL ENGINEER (FAC)
A.P. POLLUTION CONTROL BOARD
Regional Office
NELLORE

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.

S. N. Reddy

ENVIRONMENTAL ENGINEER(FAC)
A.P. POLLUTION CONTROL BOARD
Regional Office
NELLORE

- 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.

ఆంధ్ర ప్రదేశ్ పరిశ్రమల శాఖ
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S. N. Reddy
 ENVIRONMENTAL ENGINEER (FAC)
 A.P. POLLUTION CONTROL BOARD
 Regional Office
 NELLORE

- The industry obtained Consent for Operation (CFO) vide order dt.14.12.2018, for which the industry obtained CFE for change of product mix vide order dt.17.09.2018 to manufacture 35 Nos. of bulk drugs with total production capacity 395.25 Kgs/day or 142.32 Tons per Annum with validity up to 31.03.2021.
- Recently, M/s. Venkata Narayana Active Ingredients Private Limited has obtained Environmental Clearance from State level Environment Impact Assessment Authority (SEIAA), AP vide order dated 08.12.2020 for the expansion of the production capacity from 142.32 Tons per Annum to 500 Tons per Annum.

8. **Manufacturing process:** The process involves synthesis of various raw materials followed by multiple process operations such as extraction, distillation, centrifuging/ filtration, drying etc.

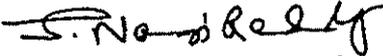
At present, the factory is producing 11 Nos. of products out of total consented products Viz., (1) Allyl Isopropyl Acetyl Urea, (2) Tetracaine Hydrochloride, (3) Levetiracetam (4) Risperidone, (5) Lacosamide, (6) Vildagliptin, (7) Moxifloxacin Hydrochloride, (8) Voglibose, (9) Olmesartan Medoxomil, (10) Linagliptin & (11) Warfarin Sodium. As per the records, during last six months i.e. from July 2020 to December 2020, the industry manufactured 11 Nos. of consented products and the industry manufactured an average of 185.76 Kg/day against the permitted capacity of 395.29 Kgs./day. The production quantity was within the permitted capacity.

9. **Water Consumption:**

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

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

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


ENVIRONMENTAL ENGINEER (CF)
A.P. POLLUTION CONTROL BOARD
 Regional Office
 NELLORE

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 1KL/hr) for organics recovery. The stripped effluents further sent to MEE of capacity 3 KL/hr for evaporation. The condensate from MEE is being sent to ETP for further treatment and the concentrate is being sent to ATFD (500 ltrs/hr). The ATFD salts are being sent to TSDF.

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

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

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

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

11. Air Pollution:

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

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

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

12. Solid Waste :

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

Action taken by the APPCB (Board):

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

Conclusions:

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

ENVIRONMENTAL ENGINEER (FAC)
A.P. POLLUTION CONTROL BOARD
Regional Office
NELLORE

I. N. Reddy
ENVIRONMENTAL ENGINEER (FAC)
A.P. POLLUTION CONTROL BOARD
Regional Office
NELLORE

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.

K. Bhaskar Reddy
K. Bhaskar Reddy,
 Executive Engineer(OP)
 APSPDCL, Kavali.

V.K. M. Sudhakar Rao
M. Sudhakar Rao
 Tahasildar,
 Vinjamur Mandal

R. Sobhan Babu
R. Sobhan Babu
 Deputy Director
 Ground Water & Water Audit
 department. Nellore

N. Siva Sankar Reddy
N. Siva Sankar Reddy,
 Dy. Chief Inspector of
 Factories (FAC), Nellore

G. Nagi Reddy
G. Nagi Reddy
 Environmental Engineer (FAC),
 APPCB, RO, Nellore

G. Nagi Reddy
ENVIRONMENTAL ENGINEER (FAC)
AP. POLLUTION CONTROL BOARD
 Regional Office
 NELLORE

To
The Sub Divisional Police Officer,
Kavali Sub Division,
Kavali.

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ANNEXURE-A-3

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Sir,

Sub : Cases - Criminal – Vinjamur P.S. – Request to issue proceedings to refer the case as Mistake of Fact – Regarding.

Ref : Cr. No. 130/20 u/s 285,287,336, 337, 304-A IPC of Vinjamur P.S.

This is a case of alleged negligent conduct with respect to combustible matter in connection with the machinery as to endanger to human life or to be likely to cause to injury that occurred on 29.07.2020 at 02.10 hours at Venkata Narayana Active Ingredients Private Limited Factory, ChandraPadiya village, Vinjamur Mandal and was reported on the same day at 13.00 hours where in the authorities of Venkata Narayana Active Ingredients Private Limited Factory, Chandrapadia village, Vinjamur Mandal who used to manufacture Pharmaceuticals delegated the work of purifying of Allyl Iso Propyl Acetyl Urea which is also called as Apronal at Stainless Steel Reactor-120 to their employees 1) Sd. Hafeez, Senior Chemist, 2) B. Ravindra Reddy, Operator(Brother of the Complainant), 3) N. Rajanikanth @ Rajani Kumar, Casual Labour and 4) S. Bhaskar, Casual Labour. On the instructions of above authorities, the injured persons filled up the reactor with 800 Ltrs Methanol through dedicated pipe line and later they all engaged in charging Allyl Iso Propyl Acetyl Urea 20 Kg Polythene bags in to the said reactor through manhole manually with jerk without using scoop and stirring motor by not wearing antistatic hand gloves. While the injured persons are engaged in charging 10th Allyl Iso Propyl Acetyl Urea 20 Kg Polythene bag, big flames came out and exploded in no time with deafening sound and the impact was such the walls and roof sheets of the clean room and air handling unit were badly damaged and collapsed. In the above incident the above four persons sustained severe burn injuries all over the body. On hearing the deafening sound and noticing the flames with smoke billowing from the factory, the co-employees in the factory extinguished the flames. Later the charred persons were rushed to ACSR Govt. General Hospital, Nellore through the company vehicle from where to KIMS hospital, Nellore for better treatment where 1) Hafeez and 2) Bhaskar were tested Covid-19 Positive. B. Ravindra Reddy remained at KIMS hospital and the remaining three injured persons were shifted to KMC & Apollo Hospitals, Chennai for better treatment.

On 29.07.2020 at 02.15 hours when the S.I of Police, Vinjamur PS was present at head quarters, he received a phone call from authorities of Venkata Narayana Active Ingredients Private Limited Factory, Chandrapadia village and informed him about the

mishap. Immediately he informed the matter to his immediate Officer Sri K. Ravi Kiran, the then Inspector of Police, Kaligiri besides informing to all the officers concerned. The S.I, Vinjamur P.S immediately secured his staff and swooped on to the scene of offence and learnt that by that time the four injured persons were shifted to Nellore through company vehicle by the Company authorities for getting treatment besides extinguishing the flames.

He posted the pickets in and around the factory to avert any untoward incidents by the employees as well as general public of surrounding villages. He also set up tape around the scene of offence and posted guard to it with his posse with instructions to safeguard the scene of offence besides securing the scene of crime from intruders, curious onlookers who are not officially connected. Meanwhile, the then C.I, Kaligiri and SDPO, Kavali has arrived and though situation is under control being monitored. The then C.I is also asked the Press and other Media to stay beyond the secured area. The then C.I had secured the eye witnesses and requested them to stay at earmarked place for examination. The Sub-Divisional Police Officer, Kavali supervised the security arrangements. The former C.I had cordon off the scene and surroundings, access and exit points effectively and ensured that no physical evidence should be disturbed from its original position.

Subsequently, the District Collector, Nellore and the Superintendent of Police, Nellore, Smt. Umadevi, RDO, Atmakur, Pollution Control authorities S/Sri G. Murali, E. Pramod Kumar Reddy, N. Siva Kumar Reddy and District Fire authorities E. Srikanth Reddy, K.V.K. Sudhakar, Inspector of Factories, Smt. Kanakadurga Bhavani, MPDO, Vinjamur, Srinivasulu Reddy, EOPRD and Narasimha Naidu, VRO, Vinjamur and other officials rushed to the vicinity and inquired in to the incident. The District Collector Nellore has extended immediate financial assistance of Rs.10,000/- to the every individual charred person. The Superintendent of Police, Nellore has monitored the Law and Order situation and issued suitable instructions to the former C.I in taking steps to deal with the situation. The District Collector, Nellore has also promised that a team will be constituted with the authorities of Factories, Industrial and Pollution Control Board authorities to inquire in to the Mishap.

I assumed the charge of Kaligiri Circle as per the memo vide C.No. 2001/A1/2020, Dated: 25.07.2020 of the IGP, SCZ, Guntur Range on transfer from C.C.S., Nellore and got relieved my Predecessor K. Ravi Kiran. Then immediately I visited the scene of offence and called on the kind Supdt., of Police, Nellore who is available at the scene of offence and seek instructions of my kind officer for proceeding further with the situation. I have noted down the instructions of my kind Officer. I got acquainted with the situation and occurrence.

While I am monitoring the situation, I came to know through the S.I. of Police, Vinjamur P.S that a case was registered u/s 285,287,336, 337 IPC at 13.00 hrs..in connection with the above mishap. On the instructions of the kind Sub-Divisional Police Officer, Kavali, I have visited Vinjamur P.S, received a copy of FIR from S.I of Police, Vinjamur P.S.. I have got acquainted with the facts of FIR and I took up investigation in to this case.

During the course of investigation on I have examined the scene of offence in the presence of the mediators and seized material objects from the scene of offence under the cover of a scene observation report duly attested by the mediators. The scene of offence was video graphed and drawn rough sketch. Then I visited KIMS hospital, Nellore on the same day at 16.30, hrs., where I found the injured employees 1) Sd. Hafeez, Senior Chemist, 2) B. Ravindra Reddy, Operator(Brother of the Complainant), 3) N. Rajanikanth @ Rajani Kumar, casual Labour and 4) S. Bhaskar, Casual Labour are undergoing treatment to their injuries in unconscious state. They are not in a position to depose their testimony and even unable to talk. Hospital authorities informed that the injured Hafeez & Bhaskar tested Covid-19 positive while Rajinikanth & Ravindar Reddy tested Negative.

Then I have examined the complainant as LW-1 in this case and recorded his statement u/s 161(3) Cr.P.C. and incorporated in my Part-II C.D. Later I left the hospital, visited the scene of offence and there I have secured direct witnesses and some of the co-employees in the factory, examined them as LWs 2 to 12 in this case, recorded their statements u/s 161(3) Cr.P.C. and incorporated the same in my case diary part-II. Later, It came to know that the injured Syed Hafeez, Rajanikanth and Bhaskar were shifted to Chennai for better treatment by the factory authorities.

On the same day i.e. on 29.07.2020 about 21.30 hours, the S.I. of Police, Vinjamur PS received death intimation of Syed Hafeez by phone from the Medical Officer, KMC hospital, Chennai and the same was intimated to me by SI over phone. Then I have instructed the S.I of Police, Vinjamur P.S to file an alteration memo before the Hon'ble Court by adding Sec.304-A IPC to the existing sections of law and asked him to send a copy of alteration memo to me for proceeding further investigation. Later I have received a copy of alteration memo at 22.00 hours and I have gone through the alteration memo.

On 30.07.2020 I visited KMC, Hospital, Chennai where the dead body of DI-Syed Hafeez was found in mortuary and I conducted inquest. During the inquest I have examined LWs 13 to 16 and recorded their statements u/s 161(3) Cr.P.C. After completion of inquest and other formalities the dead body of deceased was forwarded

to the Assistant Professor, Keelpauk Medical College, Chennai, handed over the dead body of the deceased along with the requisition to P.C.2941 with instructions to hand over the dead body of the deceased to the Medical Officer for organizing autopsy over the body of the deceased to know the exact cause of death of the deceased. I have further instructed to P.C.2941 to get conducted last rites to the deceased as per the guidelines of COVID-19. Accordingly on 31.07.2020 the dead body of deceased Hafeez who was affected with COVID-19 Positive was got buried by taking precautions as per the guidelines of COVID-19 at the Ameerunnisa Begum Sahiba's Endowments Burial Ground, 22, Peters Road, Royapettam, Chennai-600014.

On 03.08.2020 at 21.00 hrs., I have received a phone message about the death of D2- N. Rajanikanth @ Rajani Kumar while undergoing treatment at Appollo Hospitals, Chennai. I visited Chennai on 04.08.2020 and hold inquest over the dead body of the deceased D2 N. Rajanikanth @ Rajani Kumar. During the inquest I have examined LWs 17 to 19 and recorded their statements u/s 161(3) Cr.P.C. After completion of inquest and other formalities the dead body of deceased was forwarded to the Medical Officer, KMC Hospital, Chennai for autopsy through P.C. 2568. Asst. Professor, KMC Hospital, Chennai has conducted autopsy over the body of the deceased- 2 Rajanikanth and after concluding autopsy, P.C.2568 hand over the dead body of the deceased to its relatives under proper acknowledgement for conducting last rites.

On the same day i.e. 04.08.2020 as I came to know that the injured Suru Bhaskar who is getting treatment to his burn injuries at Apollo Hospital, Chennai came into conscious and doing well. I visited Apollo Hospital, examined the injured Suru Bhaskar as LW-19 in this case and recorded his statement u/s 161(3) Cr.P.C.

On 09.08.2020 I visited KIMs Hospital, Nellore examined the injured B. Ravindar Reddy as LW-20 in this case and recorded his statement u/s 161(3) Cr.P.C., as he gained consciousness.

My investigation disclosed that erstwhile the Chennai based people established a company in the name and style of Nutra Specialities Pvt. Limited in the year 2004-2005 at Chandrapadia Village, Vinjamur Mandal. The factory name was changed in the name and style of Venkata Narayana Active Ingredients Private Limited, Chandrapadia village, Vinjamur Mandal, SPSR Nellore District was registered as 2 M(1) factory with registration No.22694 which have license limits 7455.11 HP and 1000 workers. The factory authorities are used to manufacture bulk drugs (Active Pharmaceutical Ingredients). One production block is running with 32 Reactors. 25 KL Methanol was stored in underground tank in the factory where Nitrogen plant is working inside the premises which is used for purging (purifying) the Reactors.

Methanol(CH₃OH) @ Methyl or Wood alcohol is a colorless alcohol which is completely miscible with water and it is a good solvent but very toxic in nature and extremely flammable. It is easily ignited liquid which is a product of petroleum that burns and sometimes explodes in air. Methanol is used for purification of the pharmaceutical ingredients. The said Methanol has Lower Explosive Limit 6% and Upper Explosive limit 36%. When the atmosphere air is below 6% and above 36%, it could not be ignited. If the atmosphere air is in between 6% and 36%, it will be ignited.

Allyl Iso Propyl Acetyl Urea (C₉H₁₆N₂O₂)@ Apronal @ Apronalide which is used as a drug for Hypnotic/Sedative and in an analgesic that has been withdrawn in several countries due to side effect as patient development of thrombocytopenic purpura.

The deceased D-1 Syed Hafeez S/o Late Meer, 31 years, Muslim, Midthur village, Midthur Mandal, Kurnool District has been pursued B.Sc Degree. He married Mulla Ayesha about 4 years ago and the couple had blessed with two children. He was stayed in Muslim Street, L.R.Palli, Atmakur village and Atmakur Mandal since 1 year. He has been working in the Venkata Narayana Active Ingredients Private Limited, Chandrapadia village in Production Department since 1 year. His monthly salary is Rs.23,000/-.

The deceased D-2 Nuvula Rajani Kumar @ Rajanikanth S/o Ramanaiah, 33 yrs, Balija by caste, Pedda Abbipuram village, A.S.Pet Mandal married one Sravani about 1 year ago and his wife was conceived 8th month pregnancy. He has been pursued Degree. He has been working in the said factory as Contract Labour. His monthly salary is Rs.13,000/-

The injured person Suru Bhaskar S/o Venkatapathi, 37 years, Mutharasi by caste, Chinna Abbipuram, A.S.Pet Mandal (LW-19) having wife Srividya and two children. He is an illiterate. He has been working in the said factory as Contract Labour since 15 days. His monthly salary is Rs.11,000/-.

The another injured person Bayyapureddy Ravindra Reddy S/o Kota Reddy, 45 years, Kapu, Yarraballipalem, Vinjamur(LW-20) having a wife and two siblings viz., Sivathmika (17 yrs) and Madhulatha(15 yrs). He has been working in the said factory since 15 years as Production Helper. His monthly salary is Rs.15,000/-.

LW-1 is elder brother of the injured Ravindra Reddy who has been working in NDCC Bank, Vinjamur. LW-2 has been working as Shift Incharge in Venkata Narayana Active Ingredients Pvt. Ltd. Factory. Likewise LW-3 has been working as Sr. Executive and Supervisor. LW-4 has been working as Shift Supervisor, LW-5 has been working in Safety Department, LW-6 has been working as Sr. Executive. LWs.7 to 9 have been

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working as Casual Labours, L.W-10 has been working as Production Block Incharge, L.W-11 has been working as Health Assistant in Occupation Health Centre, L.W-12 has been working as Security Guard. Except L.W-1 all the above are employees Venkata Narayana Active Ingredients Pvt. Ltd. Factory, Chandrapadia village, Vinjamur Mandal, SPSR Nellore District. L.W-13 is wife, L.W-14 is brother, L.W-15 is mother, and L.W-16 is brother-in-law of the Deceased-1. LW-17 & 18 are the son-in-laws of the Deceased -2.

On 28.07.2020 at 21.00 hours, L.Ws.2 to 9, 11 and 12 together the deceased 1 & 2 and 2 injured persons are attended to night shift which is called as C-Shift Duty in Venkata Narayana Active Ingredients Private Factory, Chandrapadia, Vinjamur Village, SPSR Nellore District. The deceased and injured persons are delegated the duty of purification of Allyl Iso Propyl Acetyl Urea at Stainless Steel Reactor-0120 which is situated in Crystalliser Room-2 at the First Floor of Production Block. On the Northern side of the said room, Crystalliser Room-1 is situated which is having three reactors vide SSR-0112, GLR-0108, GLR-0104. On the Northern side of the said Crystalliser Room-1, three Air Handling Units (AHU) are situated.

While so, on 28.07.2020 at night, the deceased 1& 2 along with two injured persons shifted 11 ploythene bags and each bag contains 20 Kgs of Allyl Iso Propyl Acetyl Urea to their allotted Reactor SSR-0120. The above process took time from 22.00 hours to 24.00 hours. Later all of them filled the 800 Litres of Methanol in the Reactor through dedicated pipe line. Later on 29.07.2020 from 01.30 onwards, the above all engaged in charging Allyl Iso Propyl Acetyl Urea by pouring in to the said Reactor manually by opening one by one bag with a jerk. In between 01.45 hours to 02.15 hours on 29.07.2020, while they were charging 10th bag of Allyl Iso Propyl Acetyl Urea, all of sudden a fire was blown with a deafening sound and exploded in no time. The impact was such the walls of the said room and Air Handling Unit were badly damaged and collapsed. Under the heavy impact, the deceased 1&2 and two injured persons who are working near Reactor SSR-0120 caught fire and sustained severe burn injuries. Later the three injured persons managed to wriggle out by broke opening the Emergency Exit glass mirrors. But the deceased-1 who is in perplexed state standstill near the SSR-0120 Reactor. On hearing deafening sound and on noticing billowing fire from the Crystalliser Room-2, the scared L.Ws.2 to 9 rushed to mishap by which time they noticed the three injured persons are suffering with burn injuries. Then L.W-2 switched on the siren. On noticing absence of the deceased-1, L.Ws.2 and 4 entered in to the Cystalliser Room-2 and brought the deceased Hafeez out of the room. Later all the charred persons were got boarded in Bolero Van pertaining to the Company and shifted to Govt. General Hospital, Nellore by L.Ws.11 and 12. Later LWs.2 to 9 extinguished the flames. The four injured persons were again admitted to KIMS Hospital, Nellore for better treatment. While undergoing treatment the deceased-1 and the injured Bhaskar got

tested COVID-19 Positive. Later the deceased Hafeez, Rajanikanth and injured person Bhaskar were rushed to KMC Hospital, Chennai for treatment by retaining the injured person Raveendra Reddy at KIMS Hospital, Nellore. While undergoing treatment, the deceased-1 Hafeez breathed his last on 29.07.2020 at 20.50 hours. Again the charred persons Rajanikanth and Bhaskar were shifted to Apollo Hospital, Chennai for better treatment where the Deceased-2 Rajanikanth died on 03.08.2020 at 20.50 hours while undergoing treatment. The injured Suru Bhaskar and B. Ravindar Reddy recovered and discharged from the respective Hospitals.

The cause of accident to the best of my knowledge is that when the injured persons charging Allyl Iso Propyl Acetyl Urea bags manually without using scoop or stirring motor through Manhole which is having 20 Cms diameter directly without wearing antistatic hand gloves in to the reactor in which already 800 litres of Methanol was stored. From the charging of first bag of Allyl Iso Propyl Acetyl Urea, vapour cloud starts got out from the reactor Manhole and which was sucked by Air Handling Unit which got Circulated through all ducts besides extending all over the room. The Methanol has a nature of extending its vapour in between the atmospheric air 6% to 36% and it may not extend below 6% and above 36% which is also called as corporate risk. At that time, when the deceased Hafeez and three injured persons engaged in charging 10th bag, the sachet of Allyl Iso Propyl Acetyl Urea rubbed to the steel in the Reactor and generated electrostatic field and thereby ignited the vapour and exploded. For example if we leak a gas in the closed room, it could not be seen and if we lit fire, it can be exploded in fraction of seconds. Likewise it happened. After the accident, there is still 400 Ltrs of Methanol remained in the Reactor from that we can understand that only 200 Ltrs of Methanol from the Reactor was evaporated.

On 30-08-2020 I have forwarded the seized remnants from the scene of offence and Viscera of D-2 to FSL& RFSL respectively for chemical analysis through P.S. 2568 of Vinjamur P.S. and obtained FSL report on 07.11.20 In which the expert opined that "Methanol" flammable substance found in item No. 2. I received RFSL report on 09.12.20 in which expert opined that "Poisonous substance and ethyl alcohol commonly known as alcohol are not detected."

I have received the Post-Mortem certificates of both the Deceased from concerned in which the Medical officers opined that the cause of death of the deceased is burn injuries. I also received wound certificates of Injured Suru Bhaskar from the Medical Officer, Apollo Hospitals, Chennai and another injured Bayyapureddy Ravindar Reddy from the Medical Officer, KIMS Hospital, Nellore In which the Medical Officers opined that the injuries are Grievous in nature.

During the course of investigation as per the statements of witnesses LWs 1 to 18 and the Injured persons LWs 19 & 20, no negligence part of authorities of Venkata Narayana Active Ingredients Pvt. Ltd. Factory, Chandrapadia village, Vinjamur Mandal or other is proved and it is established that the mishap is purely accidental due to chemical reaction which led to the death of 2 persons and Grievous injuries to 2 persons. As such this is a fit case to treat as Mistake of Fact.

In the light of the above facts, I request my kind officer to issue proceedings to treat the case as Mistake of Fact.

Yours Faithfully,


Inspector of Police

Kaigiri Circle.

Enclosure:

C.D. file in Cr. No. 130/2020 in full shape.

PROCEEDINGS OF THE SUB-DIVISIONAL POLICE OFFICER, KAVALI

Present: Sri D. Prasad,

C.No.37/Ref-SDO.K/2021

Dated: 09.03.2021

Sub: - Police-Kavali Sub Division- Treating the Case as 'MF'
-Orders- Issued-Regarding.

- Ref:- 1. Cr No. 130/2020 U/s 285, 287, 336, 337, 304-A IPC of
Vinjamur P.S.
2. Report of Inspector of Police, Kaligiri Circle on 07.03.21
received in this Office on 09.03.2021.

* * *

ORDER: -

"Permitted to refer the Case as 'MF'. CI. is instructed to file final report
before the Hon'ble JMFC, Udayagiri and report RCS No.


Sub-Divisional Police Officer,
KAVALI.

To
The Inspector of Police, Kaligiri Circle, for urgent compliance.
Copy forwarded W/Cs to the Superintendent of Police, Nellore

True Copy

Status of the Compliance of the Observations made by the NGT's inspection Committee in Part-A and Part-B of their Report -September, 2021

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
A. Consent condition as per APPCB consent order 15.6.2021				
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	Complied -See Annexure Sec A-01 Expansion license got the Inspector of Factory department from 3335 HP to 7455.11 HP and 500 no. workers to 1000 no. workers on December-2019 and also latest order received on 14.10;2021. (Photocopy attached as Annexure-Sec A-01)

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
2	<p>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 outlet of Stripper, MEE, ETP and RO and maintain</p>	<p>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.</p>	<p>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. The committee submits to</p>	<p>Complied -See Annexure Sec A-02 The unit have installed flow meters at Raw water Inlet, MEE Feed, LTD inlet, Stripper inlet & Outlet, Boiler feed, Cooling tower feed and also installed at ETP inlet, RO inlet & Outlet. Same thing updated in PCB covering letter which is submitted to PCB, Vijayawada on 12/08/2021 and PCB,Nellor on 24/08/2021. Note: 1) ETP outlet connected with RO feed and MEE condensate connected with ETP inlet. 2) LTDS inlet (ETP feed) and HTDS inlet (Mee feed) flow</p>

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
	the records of effluents generated, treated, reused, etc.		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	meters connected with PCB server for online connectivity. (Photocopy attached as Annexure-Sec A-02)
3	HTDS effluent→14.23 KLD HTDS effluent shall be stripped off for organics recovery. Stripper distillate for separation of organic compounds followed by disposal to Cement Plants for coprocessing	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	Since flow meters were not installed at MEE outlet, the quantity of effluent generation could not be ascertained	Complied See Annexure Sec A-03 MEE outlet connected with ETP inlet so can be accounted the generation of quantity of effluents. (Photocopy attached as Annexure-Sec A-03)

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
	<p>& distilled effluents shall be recycled. Stripped effluents for forced evaporation in MEE followed by ATFD.</p> <p>Condensate from MEE & ATFD shall be recycled after treatment in ETP along with other LTDS effluents. ATFD salts to TSDF.</p>	<p>treated in MEE of capacity 3 KL/hr followed by 0.5 KL/hr. ZLD system is present MEE condensate is taken to biological ETP. ATFD salts is sent to TSDF</p>		
4	<p>LTDS effluents (Boiler Blow Down – 11.8 KLD + Cooling Tower Blow Down – 35 KLD</p>	<p>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</p>	<p>Since flow meters were not installed, the quantity of effluent generation could not be ascertained</p>	<p>Complied. See Annexure Sec A-03 (Same for A-04 also) The unit have installed flow meters at Raw water Inlet, MEE Feed, LTD inlet, Stripper inlet & Outlet, Boiler feed, Cooling tower</p>

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
		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.		feed and also installed at ETP inlet, RO inlet & Outlet. Same thing updated in PCB covering letter which is submitted to PCB, Vijayawada on 12/08/2021 and PCB,Nellore on 24/08/2021. Note: 1) ETP outlet connected with RO feed and MEE condensate connected with ETP inlet. 2) LTDS inlet (ETP feed) and HTDS inlet (Mee feed) flow meters connected with PCB server for online connectivity. (Photocopy attached as Annexure-Sec A-03)

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
5	One 4 TPH boiler and one 3 TPH boiler→ PM 10-115 mg/Nm ³	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/Nm ³ and found complying with APPCB stipulated standards of 115 mg/ Nm ³ .	Complied- See Annexure Sec A-05 We are carried out stack emission monitoring by authorised third party (Report attached as Annexure-Sec A-05)
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 properly working. The committee	Not complying	For control of chemical presence in environment we have taken steps like below. 1) All the reactors and Condensers vents connected with the scrubbers. 2) all solvent storage tanks connected with Nitrogen

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
		<p>monitored VOC concentration using hand held VOC meter and following values were recorded:</p> <p>Cooling tower, utility building→ 13ppm to 20 ppm</p> <p>Utility block entrance→ 8 ppm to 13 ppm</p> <p>Production block II→ 8 ppm to 10 ppm</p> <p>Inside production block-II→ 23ppm to 40 ppm</p> <p>VOC scrubber→ 2ppm</p> <p>ETP→ upto 5ppm</p> <p>New production block→ 2ppm to 3 ppm</p> <p>Spent solvent storage room→3 ppm</p> <p>Hazardous waste storage shed→ 13 ppm</p>		<p>blanketing.</p> <p>3) all liquid materials charging and pumping with closed pipelines only</p> <p>4) all solids charging in to reactors by using Powder Transfer System (PTS) only</p> <p>Now we are doing the odour emission audit by third party from IICT,Hyderabad professors for identifying the gabs for odour emissions.</p> <p>Note:</p> <p>1) we have installed AAQMS stations 4 numbers (2 numbers towards the Chandrapadia Village (North side), 1 number towards East side (Road side) and 1 number towards West side. and 2</p>

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
		<p>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 analyser 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: The above value indicates that there is odour nuisance to the surroundings.</p>		<p>numbers AAQMS stations connected with CPCB & APPCB servers for continues online monitoring.</p> <p>2) we have installed 2 numbers on VOC meters towards the Chandrapadia Village and 1 number in Chandrapadia Village panchayath office itself and all 3 connected with PCB server for continues monitoring.</p> <p>3) And installed Hydrocarbon detectors and Oxygen analysers in work place areas for identifying vapours. Photos attached as Annexure-3 Complied</p> <p>We are done the odour emission audit by third-party from</p>

S.No	Consent condition as per APPCB consent order 15.6.2021	Actual status as Mentioned in NGT Report	Compliance status as on date of committee inspection 10.08.2021 (as Mentioned in the inspection report)	Current Compliance status
				IICT,Hyderabad professors for identifying the gabs for odour emissions. Report is expected before 10th Dec2021.
7	Hazardous wastes	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	Complied- See Annexure Sec A-07 Provided leachate collection pits for Hazardous waste storage shed. (Photocopy attached as Annexure-Sec A-07)

Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
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.	Complied- See Annexure Sec-B-3 As per scheduled training conducted for all employees and contract labours. SOPs also displayed and same thing submitted to Inspector of factories on 19/07/2021 and 03/08/2021(Report attched Ref. APPCB RO report 13/09 (Pg.31 to 51))

Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
4	The industry shall provide oxygen analysers, multi gas detectors, hydrocarbon detectors , Volatile organic compound (VOC) detectors, smoke detectors in a strategic places and connected with audio and visual alarm so as to alert the workers whenever solvent vapours or toxic gases or smoke were observed in working areas.	Not provided at solvent storage area and solvent recovery plant area.	Complied -See Annexure Sec B-4 As per the Joint committee inspection dated 15/06/2021, completed the all compliances and submitted to Joint committee. Joint committee inspected based on compliances report and suggested some more areas to be installed for further improvements. Accordingly we have installed and same thing submitted the compliance report to PCB, Vijayawada dated 09.09.2021 and PCB, Nellore dated 13.09.2021. (Report attched Ref. APPCB HO Member SEc. dtt.12.08.2021 report (Pg.67 & 85))
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 provide effective training to the workers on its usage.	Not complied	Complied- See Annexure Sec B-5 (Report attched Ref. APPCB HO report (Pg.27))

Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
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.	Complied- See Annexure Sec B-6 We have prepared suitability of PPE's and train to all the hazardous operation persons. (Report attched Ref. APPCB RO report (Pg.67-137))
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	Complied. Unskilled and Untrained workers are utilized for the purpose of floor cleaning only
9	The management should extend the atmospheric vent pipe line of all reactors to the scrubber system	Not complied	Complied -See Annexure Sec B-9 All atmospheric vent pipe line of all reactors are connected to the scrubber system

Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
			(Report attached Ref. APPCB HO report (Pg.33))
10	The management should ensure adequate/effective ventilation at work place by circulation of fresh air and also ensure the proper/required air changes in all production blocks and clean rooms	Not working	Complied- See Annexure Sec B-10 Provided AHU's for effective ventilation at clean room areas. (Photocopy of AHU schematic flow attached as Annexure-Sec B-10)
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.	Complied -See Annexure Sec A-01 (same for Sec B12) Expansion license got the Inspector of Factory department from 3335 HP to 7455.11 HP and 500 no. workers to 1000 no. workers on December-2019 and also latest License

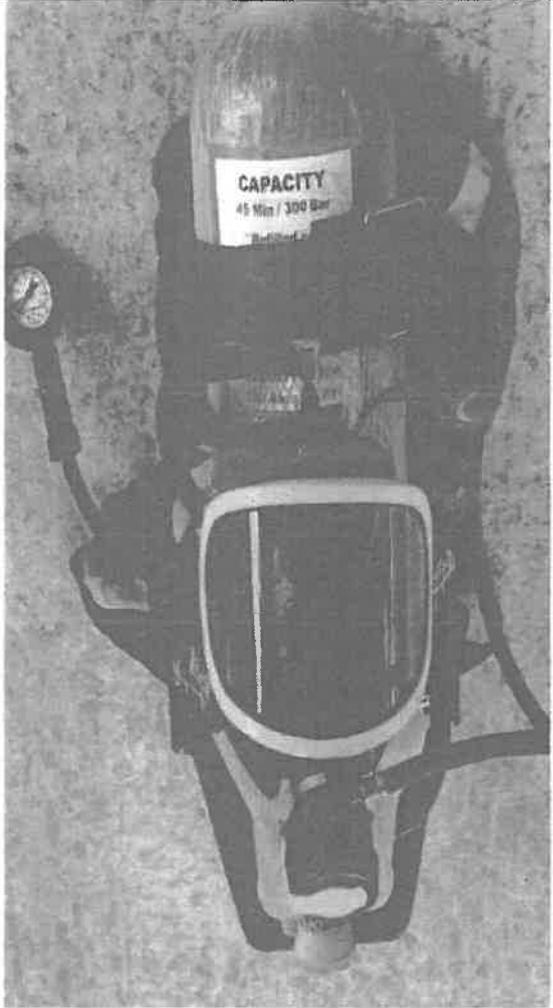
Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
			Dated.14.10.2021 is enclosed. (Photocopy attached as Annexure-Sec A-01)
13	The industry shall ensure the transfer of solvents by using pumps and closed conveyance instead of manual handling.	Not complied	Complied- See Annexure Sec B-13 Provided closed conditions for all the solvents pumping through closed loop pipelines. ((Photocopy attached as Annexure-Sec B-13))
14	Industry shall provide Colour coding and flow directions to the pipe lines carrying chemicals	Not complied	Complied - See Annexure Sec B-14 Provided colour coding system for all the solvents pumping through closed loop pipelines.B-14 (Photocopy attached as Annexure-Sec B-14)
15	Industry shall prepare on-site emergency plan	Complied.	--
16	The industry shall provide automatic steam cut-off valve in the old production block	Not complied.	Complied -See Annexure Sec B-16 Provided Solenoid valve for auto cut-off of steam. (Photocopy attached as Annexure-Sec B-16)

Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
17	Water seepage observed in Raw material storage shed	Not complied	Complied -See Annexure Sec B-17 Rectified and necessary precautions are taken to avoid of seepages in Raw material storage shed. (Photocopy attached as Annexure-Sec B-17)
18	Industry shall provide a dump tank at outlet end of the reactors	Not complied	Complied -See Annexure Sec B-18 Provided dump tank at outlet end of the reactors (Photocopy attached as Annexure-Sec B-18)
19	The industry shall provide dedicated stainless steel pipes for transfer of solvents in place HDPE pipes	Not complied	Complied -See Annexure Sec B-19 Provide dedicated stainless steel pipes for transfer of solvents in place HDPE pipes (Photocopy attached as Annexure-Sec B-19)
20	There is no proper means of access on the west side of old production block	Not complied	Complied -See Annexure Sec B-20 Provided emergency exit for access on the west side of old production block. (Photocopy attached as Annexure-Sec B-20)
21	Earth continuity jumpers shall be provided to the flanges of the all solvent carrying pipelines	Not complied	Complied -See Annexure Sec B-21 Provided SS pipes in place of HDPE pipes for

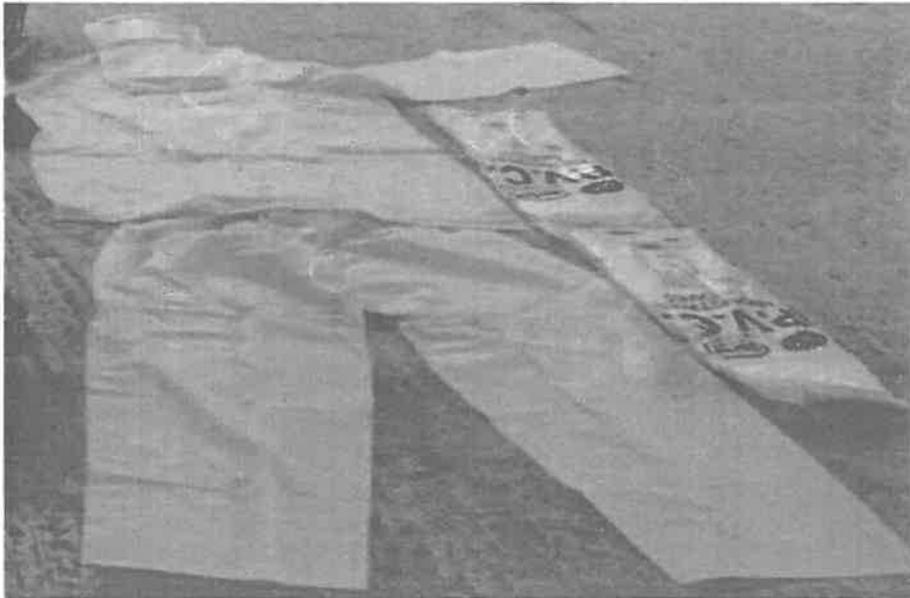
Sl.No	Observations	Status of Compliance as given by Inspector of factories	Current Compliance status
			transfer of solvents (Photocopy attached as Annexure-Sec B-21)
22	The industry shall Display SOP's for all critical operations	Not complied	Complied -See Annexure Sec B-22 Provided and same thing submitted the compliance report on 09.09.2021 and 13.09.2021 to PCB office. (Report attched Ref. APPCB RO report (Pg.55))
23	The minutes of safety committee meetings , mock drill reports shall be communicated to the factories inspectorate	Not complied	Complied -See Annexure Sec B-23 As per the scheduled we have conducted both safety committee meeting & mock drills periodically. (Report attached as Annexure-Sec B-23)
24	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	Complied -See Annexure Sec B-24 We displayed Form-11 in front of main gate security entry (Photocopy attached as Annexure-Sec B-24)

ANNEXURE-A-5

Annexure-4: Self Contained Breathing Apparatus(SCBA), Canister Mask, Chemical cartridges, fire suits



Hazardous chemical handling PVC suit(PPE)



	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	073

Date: 15/07/2021 Time from: 10:15 Time to: 11:30 Duration: 1.15 hours
 Document Title: storage and handling of hazardous chemicals. site Emergency response & responsibilities. OSEP, PSM-14 Elements PPE MATRIX
 Document Reference No.: EHS - 003.014
 Trainer Name: Ravendra Kumar. B Designation: Sr. Manager
 Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others
 Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion
 Training Evaluation : Questionnaire Oral Not applicable

S.No.	Employee code	Name	Department	* Remarks	Signature
19	1383	G. Krishna Mani	IT	Satisfactory	[Signature]
20	1764	B. Vaidhyanari	QA	Satisfactory	[Signature]
21	1656	M. Pavani	QA	Informative	[Signature]
22	1294	K. Perchala Lakshmi	PPIC	Satisfactory	[Signature]
23	1624	Sd. Kalyani	QA	Satisfactory	[Signature]
24	1511	P. (Raj) (4-1)	QA	Satisfactory	[Signature]
25	1190	J. Jagadeesh Babu	PR	Satisfied	[Signature]
26	1300	M. Venkatesh	QA	Satisfactory	[Signature]
27	1469	G. Gungabai	QA	Satisfactory	[Signature]
28	1647	Adinarayana M	QA	Satisfactory	[Signature]
29	1417	A.v. Sudheer	PR	Satisfactory	[Signature]
30	1337	P. Padmavathi	QA	Satisfactory	[Signature]
31	1832	M. Geetha	QA	Satisfactory	[Signature]
32	1319	A. Venkateswarlu	QA	Satisfactory	[Signature]
33	1660	N. Jyoti	QA	Satisfactory	[Signature]
34	1666	V. Sindhu	QA	Satisfactory	[Signature]
35	1162	G. Kavona Maheshini	QA	Satisfactory	[Signature]
36	1663	K. Sivan	QA	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature]
15/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	077

Date: 15/07/2021 Time from: 10:15 Time to: 11:30 Duration: 75 min

Document Title: Storage and handling of hazardous chemicals, site emergency response & responsibilities, OSEP, PSM-14 elements PPE MATRIX

Document Reference No.: EHS-003, 014

Trainer Name: Ravendra Kumar B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
1	1794	P. Murali Krishna	EHS	Satisfactory	PMK
2	1317	M. V. Murali	EHS	Satisfactory	M.V.M.
3	1285	K. Girish Kumar	Accounts	"	K.
4	1358	N. Katarina	coll.	"	N.K.
5	1834	K. Babu	Accounts	"	K. Babu
6	1798	Ch. Pradeep Kumar	Accounts	"	Ch. Pradeep
7	1110	P. Prasad Kumar	QA	Satisfactory	P.P.K.
8	1608	P. Srinivas	Products	"	P.S.
9	1338	V. Pragasathi	Production	Satisfied	V.P.
10	1615	K. Devareddy	QC	Satisfactory	K.D.
11	1791	K.V. Saiyakumar Reddy	Quality control	Satisfactory	K.V.S.R.
12	1540	R. Mohan	QC	Satisfactory	R.M.
13	1704	S. Akbar	QC	Satisfactory	S.A.
14	1528	C. Veerasubramanian	QC	Satisfactory	C.V.
15	1395	P. Srinivas Kumar	QC	Satisfactory	P.S.K.
16	1389	P. Srinivas Kumar	QC	Satisfactory	P.S.K.
17	1319	I. Subrahmanyam	QC	Satisfactory	I.S.
18	1654	S. Ashabee	QC	Satisfactory	S.A.

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

R. P. [Signature]
15/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	080 Page 1 of 1
	TRAINING RECORD	

Date: 15/07/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: storage and handling of Hazardous chemicals . Site Emergency response & responsibilities . OSEP , PSM - 14 Elements PPE MATRIX .

Document Reference No.: EHS - 003, 014

Trainer Name: Ravendra Kumar . S Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
55	1800	A. DEVARAJ	R&D	Informative	A. J. J.
56	1488	B. Ravi	QC	satisfaction	B. C. J.
57	1810	P. SUNEEL	AR&D	Satisfactory	P. S.
58	1517	K. PURUSHOTHAMAN	AR&D	Satisfactory	K. P.
59	1340	G. Srinivas	Prod	Satisfactory	G. S.
60	1106	K. Ghous Rahman	Prod	Satisfactory	K. G.
61	1574	M. Naveen	Prod	Satisfactory	M. N.
62	1689	V. Suresh	EHS	Satisfactory	V. S.
63	1522	B. Sekhar	PRO	Satisfactory	B. S.
64	1527	M. Md. Saik	PRO	Satisfactory	M. S.
65	1812	M. Naveen Kumar	Prod	Satisfactory	M. N.
66	1662	G. Kiran	Utility	Satisfactory	G. K.
67	1890	G. Srinivas	Prod	Satisfactory	G. S.
68	1778	M. Venkatesh Kumar	EHS	Satisfactory	M. V. K.
69	1696	Ch. Krishna Reddy	PD-II	Satisfactory	Ch. K.
70	1558	J. Suresh	QC	Satisfactory	J. S.
71	1589	P. Srinivas	QC	Satisfactory	P. S.
72	1270	M. Srinivas	Prod	Satisfactory	M. S.

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date: B. R. S. / 15/07/2021



VENKATA NARAYANA

VENKATA NARAYANA ACTIVE INGREDIENTS

TRAINING RECORD

Page
1 of 1

079

Date: 15/01/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: Storage and handling of hazardous chemical, site Emergency response & responsibilities, OSEP, PSM-14 Elements PPE MATRIX

Document Reference No.: EHS - 003, 014

Trainer Name: Ravendra Kumar. B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

 Class room / Personal Discussion / Audio / Visual Presentation / Group DiscussionTraining Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
37	1052	N. Nara Srinivas	Prod-D	Satisfactory	N. Nara
38	1456	Dr. Ramesh	REED	Informative	R. Ramesh
39	1714	P. Chaitanya	Wave house	Satisfactory	P. Chaitanya
40	1514	B. Jayarath Kumar	Engineering	Satisfactory	B. Jayarath
41	1687	P. Srinivasan	6.9 STORE	Satisfactory	P. Srinivasan
42	1291	R. Kiran Kumar	WH	Satisfactory	R. Kiran
43	1499	N. Srinivasan	Production	Satisfactory	N. Srinivasan
44	1617	D. Jayadeva Reddy	Engineers	Satisfactory	D. Jayadeva
45	1524	V. BALAJI	production	Informative	V. Balaji
46	1790	A. Suresha Reddy	EIP	Satisfactory	A. Suresha
47	1606	C. Karunakar	WH	Satisfactory	C. Karunakar
48	1318	S.V. Bharat	Electrical	Satisfactory	S.V. Bharat
49	1342	B. Srinivas	Boiler	Satisfactory	B. Srinivas
50	1054	S. Srinivasan	ISOLV	Satisfactory	S. Srinivasan
51	1777	J. Mahesh Babu	Electrical	Satisfactory	J. Mahesh
52	1465	B. Rama Chandra Reddy	OHC	Satisfactory	B. Rama
53	1472	D. Subhas Reddy	R/M	Satisfactory	D. Subhas
54	1196	V. Madhusudhan Reddy	REED	Satisfactory	V. Madhusudhan

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

R. Ravendra
15/01/2021

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	

Date: 15/07/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: storage and handling of Hazardous chemicals . Site Emergency response & responsibilities . OSEP , PSM - 14 Element , PPE MATRIX

Document Reference No.: EHS - 003, 014

Trainer Name: Ravendra Kumar B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
73	1652	B. Venkatesh	Engineering	Satisfactory	Venkat
74	1709	M. Lakshmi	PR-2	Satisfactory	Lakshmi
75	1816	G. Hari Kumar	PR-2/UTY	Satisfactory	Hari Kumar
76	1411	Y. Venkatesh Reddy	ec	SATIS	Y. Venkatesh Reddy
77	1532	G. Ashok	production	Satisfactory	G. Ashok
78	1813	K. Mahalingam	Production	Satisfactory	K. Mahalingam
79	1824	S. Suresh	Production	Satisfactory	S. Suresh
80	1214	D. Mohan Reddy	EHS	Satisfactory	D. Mohan Reddy
81	1604	A. Prasad	AND		A. Prasad
82	1084	R. Venkatesh	R&D		R. Venkatesh
83	1097	K. Mahalingam	Prod		K. Mahalingam
84	1596	R. Venkatesh	AND		R. Venkatesh
85	1690	B. Mahalingam	EHS		B. Mahalingam
86	1536	S. Firoz Basha	Production		S. Firoz Basha
87	1314				PS
88	1702	V. S. Yaswanth	Production		V. S. Yaswanth
89	1750	D. Jayashankar	Engineering		D. Jayashankar
90	1308	G. Prasad	WH		G. Prasad

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:


15/07/2021

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	082

Date: 16/07/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: Handling of Hazardous chemicals, PSM-14 Elements, site emergency response & responsibilities, PPE training

Document Reference No.: EHS-003, 014

Trainer Name: Ravendra Kumar B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
01	1758	K. Raghavendra Rao	Instrumentation	Satisfactory	K. Rao
02	1803	B. Sridhar Rao	QC	Satisfactory	B. Rao
03	1540	R. Mohan	QC	Satisfactory	R. Mohan
04	1677	V. Praveen	QA	Satisfactory	V. Praveen
05	1053	P. Bala	UTY	Satisfactory	P. Bala
06	1818	M. Vinod	Production	Satisfactory	M. Vinod
07	1581	A. Ramesh	Production	Satisfactory	A. Ramesh
08	1627	E. Raviteja	Production	Satisfactory	E. Raviteja
09	1655	I. Srinivas Kumar	AREP	Satisfactory	I. Srinivas Kumar
10	1705	D. Praveen	MB	Satisfactory	D. Praveen
11	1840	D. Chandrasekhar	SEP	Satisfactory	D. Chandrasekhar
12	1688	P. Ramalingam	BEAS	Satisfactory	P. Ramalingam
13	1182	P. Gopala Krishna	Prod	Satisfactory	P. Gopala Krishna
14	1517	K. PURVISHOTHAMAN	AREP	Satisfactory	K. PURVISHOTHAMAN
15	1503	P. Rajasekhar	EHS	Satisfactory	P. Rajasekhar
16	1290	C. Raju	QC	Satisfactory	C. Raju
17	1537	B. Kiran Kumar	PRO	Satisfactory	B. Kiran Kumar
18	1784	K. Mahesh	Production	Satisfactory	K. Mahesh

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

B. S. [Signature]
16/07/2021



VENKATA NARAYANA ACTIVE INGREDIENTS

TRAINING RECORD

083

Date: 16/07/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: Handling of Hazardous Chemicals, PSM - 14 Element, site emergency response & responsibility, PPE MATRIX

Document Reference No.: EHS - 003, 014

Trainer Name: Ravendra Kumar . P

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
19	1823	G. Ramesh Babu	Production		
20	1836	K. Mahendra	Engineering	satisfactory	[Signature]
21	1782	L. Prasad	Production	satisfactory	[Signature]
22	15148	B. Haribabu	Production	Satisfactory	[Signature]
23	1835	Ch. Venkateswara	Production	Satisfactory	[Signature]
24	1781	L. Venkateswara	Production	Satisfactory	[Signature]
25	1659	R. Chiranjeevi	warehouse	Satisfactory	[Signature]
26	1708	J. Narotham	Production	Satisfactory	[Signature]
27	1827	G. Venkateswara	Production	Satisfactory	[Signature]
28	1683	D. Venkateswara	QA	Satisfactory	[Signature]
29	1832	D. Madhan Kumar	production	Satisfactory	[Signature]
30	1555	N. Bhramadheja	SRP	Satisfactory	[Signature]
31	1680	P. Sreehari	EHS	Satisfactory	[Signature]
32	1509	S. Venkateswara	Production	Satisfactory	[Signature]
33	1719	M. Malathi	warehouse	Satisfactory	[Signature]
34	1801	Y. Prakash	Production	Satisfactory	[Signature]
35	1328	V. Pragnathi	Production	Satisfactory	[Signature]
36	1298	P. Mahesh	Production	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date: [Signature] 16/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	090	Page 1 of 1
	TRAINING RECORD		

Date: 18/07/2021 Time from: 10:00 Time to: 11:20 Duration: 90 mins

Document Title: PPE Matrix, PPE usage for Acids, Bases & Suitability of PPE for different Hazardous Chemicals.

Document Reference No.:
 Trainer Name: Ravendra Kumar. S. Designation: Sr. Manager
 Department: EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation: Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
01	1331	SK. Ichuor Ghavach	production	Satisfactory	[Signature]
02	1192	G. Srinivasulu Reddy	production	Satisfactory	[Signature]
03	1715	K. Yegannathan	SRP	Satisfactory	[Signature]
04	1414	M. Surendra Reddy	Production	Satisfactory	[Signature]
05	1548	B. Haribabu	Production	Satisfactory	[Signature]
06	1650	Sh. Akhul Chelu	production	Satisfactory	[Signature]
07	1832	D. Madhan Kumar	production	Satisfactory	[Signature]
08	1744	K. Praveenkumar	Production	Satisfactory	[Signature]
09	1543	B. Tiripally	Production	Satisfactory	[Signature]
10	1188	G. Han	Production	Satisfactory	[Signature]
11	1723	T. Srimanthi Kumar	Production	Satisfactory	[Signature]
12	1716	K. Nagaraj Reddy	production	Satisfactory	[Signature]
13	1542	K. Yella Reddy	Production	Satisfactory	[Signature]
14	1826	S. Udhayaraj	production	Satisfactory	[Signature]
15	1346	Y. Laxman Rao	PIB	Satisfactory	[Signature]
16	1349	G. Ramakrishna	Production	Satisfactory	[Signature]
17	1548	D. Mahendra	Production	Satisfactory	[Signature]
18	1417	A. V. Sudheer	production	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature]
18/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS TRAINING RECORD	Page 1 of 1
091		

Date: 18/7/2024 Time from : 10:00 Time to: 11:30 Duration: 70 mins

Document Title: PPE MATRIX, PPE USAGE For Acids, Bases & Suitability of PPE For Different Hazardous chemicals.

Document Reference No.:

Trainer Name: Ravendra Kumar. B Designation: Sn. Manager

Department : EH&S

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
19	1242	R. Nareem	Engineering	Satisfactory	[Signature]
20	1671	Sr. Karamulla	Engineering	Satisfactory	[Signature]
21	1675	Y. Inqulid	Engineering	Satisfactory	[Signature]
22	6001	G. Krishnakumar	Projects	Satisfactory	[Signature]
23	1777	J. Ghosh Babu	Electrical	Satisfactory	[Signature]
24	1801	Y. Srikumar	Production	Satisfactory	[Signature]
25	1821	P. Suresh Reddy	Production	Satisfactory	[Signature]
26	1250	K. Suresh Kumar	Production	Satisfactory	[Signature]
27	1617	D. Jayashree Reddy	Engineering	Satisfactory	[Signature]
28	1687	P. Srinivasa	Production	Satisfactory	[Signature]
29	1488	S. Manoj	Engineering	Satisfactory	[Signature]
30	1494	M. Balakrishna	Engineering	Satisfactory	[Signature]
31	1527	M. Anand Satish	Production	Satisfactory	[Signature]
32	1424	J. Chiranjeevi	Production	Satisfactory	[Signature]
33	1422	S. Srinivasulu	Production	Satisfactory	[Signature]
34	1653	G. Venkatesh	Engineering	Satisfactory	[Signature]
35	1227	R. Mahammed Yunus	Engineering	Satisfactory	[Signature]
36	1662	G. Pillay	Engineering	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date: [Signature] 18/07/2024

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page
	TRAINING RECORD : 084	1 of 1

Date: 17/07/2021 Time from : 10:15 Time to: 11:30 Duration: 75 mins

Document Title: Handling of Hazardous Chemicals, Acids, Bases suitability of PPE's & PPE Mater. OSEP.

Document Reference No.:

Trainer Name: Ravendra Kumar. B Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
1	1654	Sh. Ashabee	QC	Satisfactory	[Signature]
2	1790	A. Sneha Reddy	ETP	Satisfactory	[Signature]
3	1499	N. Srinivasan	Production	Satisfactory	[Signature]
4	1647	Adurayam.	QA	Satisfactory	[Signature]
5	1592	A. Thang Kumar	AREP	Satisfactory	[Signature]
6	1490	S.D. Arif	QA	Satisfactory	[Signature]
7	1516	V. Sathivel	TSD	Satisfactory	[Signature]
8	1365	Choffor. M	IT	Informative	[Signature]
9	1373	S. Jayaram	QC	Informative	[Signature]
10	1808	D. Sankar	ETP	-	[Signature]
11	1464	B. Vaishnavi	QA	Satisfactory	[Signature]
12	1755	D. Prithika	PB-2	Informative	[Signature]
13	1751	D. Sri Jay	Engineer	1	[Signature]
14	1864	Kanesh	EHS	Satisfactory	[Signature]
15	1246	K. Athar	Master	Satisfactory	[Signature]
16	1408	K. Lesthi	Prod	Satisfactory	[Signature]
17	1791	K.V. Satya Kumar Reddy	QC	Satisfactory	[Signature]
18	1036	V. Gopal Reddy	WH	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature] 17/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	085

Date: 17/07/2021 Time from: 10:15 Time to: 11:20 Duration: 75 mins
 Document Title: Handling of Hazardous chemicals, Acids, Base suitability of PPE & PPE MATRIX. OSEP.

Document Reference No.:

Trainer Name: Ravendra Kumar B

Designation: Sr. Manager

Department: EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation: Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
19	1464	G. Sreedhar	Warehouse	Satisfactory	[Signature]
20	1136	K. Srinivas	UTY	Satisfactory	[Signature]
21	1623	S. Maveen Reddy	Filtration	Satisfactory	[Signature]
22	1716	G. Vijay Kumar	Microbiology	Satisfactory	[Signature]
23	1849	P. Hemadri	QA	Satisfactory	[Signature]
24	1732	R. Hariharan	Engineering	Satisfactory	[Signature]
25	1603	N. Durga Rao	EHS	Satisfactory	[Signature]
26	1563	A. Mahendra Kumar	Engineering	Satisfactory	[Signature]
27	1250	K. Srinivas	Gasworks	Satisfactory	[Signature]
28	1612	D. Jayadevan Reddy	Engineering	Satisfactory	[Signature]
29	1569	M. Vijaya Sulekha	Engineering	Satisfactory	[Signature]
30	1514	B. Manuvarthi Kumar	Engineering	Satisfactory	[Signature]
31	1433	P. Choudhary	Projects	Satisfactory	[Signature]
32	1650	Se. Akhilesh Khodav	Production	Satisfactory	[Signature]
33	1644	K. Kishore Reddy	UTILITY	Satisfactory	[Signature]
34	1610	K. Venu	Engineering	Satisfactory	[Signature]
35	1272	KALMURISHA	Engineering	Satisfactory	[Signature]
36					

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature]
17/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	086

Date: 17/07/2021 Time from: 10:15 Time to: 11:30 Duration: 1 hr 15 min

Document Title: Handling of Hazardous Chemicals - Acids, Bases irritability of PPE's & PPE MATRIX - OSEP.

Document Reference No.:

Trainer Name: Ravendra Kumar . B Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
37	1598	D. Sathishwaran	Engineering	Satisfactory	D.S.
38	1829	K. Anurathu	of SD	Satisfactory	A
39	1604	G. Neelganga	QC	Satisfactory	G.N.
40	1621	H. Sujana	QC	Satisfactory	H.S.
41	1597	B. Parimala	QA	Satisfactory	B.P.
42	1666	V. Sindhu	QC	Satisfactory	V.S.
43	1773	S. Neelganga	QC	Satisfactory	S.N.
44	1258	Ch. Mathan	QA	Satisfactory	Ch.M.
45	1242	R. Nagesh	QC	Satisfactory	R.N.
46	1354	G. Rajesh Reddy	Engineering	Satisfactory	G.R.R.
47	1303	T. Sreeni	QC	Satisfactory	T.S.
48	1665	G. Ashok	Warehouse	Satisfactory	G.A.
49	1846	B. RAMESH	Production	Satisfactory	B.R.
50	1353	D. Maryadhin	QC	Satisfactory	D.M.
51	1225	R. Rana Krishnaiah	QA	Satisfactory	R.R.K.
52	1360	S. Krishna Prathap	QA	Satisfactory	S.K.P.
53	1821	P. Suresh Reddy	Project	Satisfactory	P.S.R.
54	1820	S. APPADURAI	Production	Satisfactory	S.A.

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

B. S. O
17/07/2021

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	

Date: 17/01/2021 Time from : 10:15 Time to: 11:30 Duration: 1.15 hrs

Document Title: Handling of Hazardous Chemicals . Acids , Bases sritability
OF PPE's & PPE MATRIX . OSEP.

Document Reference No.:

Trainer Name: Ravendra Kumar . B

Designation: Sr. Manager

Department : CHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
55	1638	Satish Ranga	Production	Informative	[Signature]
56	1505	G. Manikylaras	AD	Informative	[Signature]
57	1847	R. Saravanan	Production	Informative	[Signature]
58	1671	Sai Kanimulla	Engineering	Satisfactory	[Signature]
59	1653	G. Rangas Rao	Engineering	Satisfactory	[Signature]
60	1300	M. Venkatesh	RA	Satisfactory	[Signature]
61	1233	Y. Sankarajalw	Production	Satisfactory	[Signature]
62	1526	Budhvir Kumar Yadav	Production	Satisfactory	[Signature]
63	1934	E. Babu	Accounts	Satisfactory	[Signature]
64	1056	P. Yanduraj	Production	Satisfactory	[Signature]
65	1419	C. Chandrasekhar	QA	Satisfactory	[Signature]
66	1898	V. Redhmi Priyanka	Warehouse	Informative	[Signature]
67	1752	K. Kishnaveni	Warehouse	Satisfactory	[Signature]
68	1291	H. Penchalaiah	P.P.L.C	Satisfactory	[Signature]
69	1291	A. Kiran Kumar	WH	Satisfactory	[Signature]
70	1533	M.R. Sumas	Quality control	Satisfactory	[Signature]
71	1417	A.V. Sudeen	Production	Satisfactory	[Signature]
72	1672	Su. Shahidulla	Engineering	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

R. B. [Signature]
17/01/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	088

Date: 17/07/2021 Time from: 10:15 Time to: 11:30 Duration: 75 mins
 Document Title: Handling of Hazardous Chemicals. Acids, Bases irritability
 of PPE's & PPE MATRIX. OSEP.
 Document Reference No.:

Trainer Name: Ravender Kumar. B Designation: Sr. Manager
 Department: EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation Group Discussion

Training Evaluation: Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
73	1812	J. Gopala Krishna	Excitility	Satisfactory	[Signature]
74	1495	M. Mahesh	Engineering	Satisfactory	[Signature]
75	1563	Ch. Mahendra Kumar	Engineering	Satisfactory	[Signature]
76	1586	V. Sulekha	Adm/M.	Informative	[Signature]
77	1355	M. Ashok	Adman	Satisfactory	[Signature]
78	1477	V. Pali Reddy	HRE Admin	Satisfactory	[Signature]
79	1422	S. Srinivasaiah	EC	Satisfactory	[Signature]
80	1412	J. Madan	EHS	Satisfactory	[Signature]
81	1486	Ch. Venkateswary	EHS	Satisfactory	[Signature]
82	1639	K. Senthil Kumar	Eng	Satisfactory	[Signature]
83	1783	B. Raveen	FR-2	Satisfactory	[Signature]
84	1269	G. Kalyan Ram	HRE Adm	Excellent	[Signature]
85	1421	S. Manoj	Engineering	Satisfactory	[Signature]
86	1494	M. Balakrishna	Engineering	Satisfactory	[Signature]
87	1316	Ch. Srinivasulu	QC	Satisfactory	[Signature]
88	1356	Ch. Subbarao	Boiler	Satisfactory	[Signature]
89	1403	M. Balakrishna	Production	Satisfactory	[Signature]
90	1802	M. Naveen Chandra	ETP	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date: [Signature] 17/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	

Date: 17/07/2024 Time from: 10:15 Time to: 11:20 Duration: 75 mins

Document Title: Handling of Hazardous Chemicals, Acids, Bases sribility of PPE's & PPE MATRIX . OSEP

Document Reference No.:

Trainer Name: Ravendra Kumar. B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
91	1034	G. Maheswara Reddy	production	Satisfactory	
92	1340	B. Srinivas	Boiler	Satisfactory	
93	1848	S. Kyhore	production	Satisfactory	
94	1357	P. Ramakrishna	Production	Satisfactory	P.RK
95	1807	D. Venkata Kiran	production	Satisfactory	
96	1797	R. Durjaree	Engineering	Satisfactory	
97	1656	M. Pavani	QA	Informative	
98	1456	Dr. N. Ramesh	Rep	Informative	
99	1798	Ch. Pradeep Kumar	Accounts	Informative	

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

R. B.
17/07/2024

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	074

Date: 13/07/2021 Time from : 10:30 Time to: 11:15 Duration: 45 min

Document Title: Site Emergency Response and Responsibilities, Emergencies in Industries & OSEP

Document Reference No.: EHS-014

Trainer Name: Ravendra Kumar B Designation: Sr. manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
37	1331	Sh. Khushu Gharwal	production	Satisfactory	[Signature]
38	1403	M. Balakrishna	production	Satisfactory	[Signature]
39	1565	P. Ramaprasanna	production	Satisfactory	[Signature]
40	1473	Sh. Venkat Rao	production	Satisfactory	[Signature]
41	1349	G. Ramani	production	Satisfactory	[Signature]
42	1346	Y. Ramana Reddy	PE	Satisfactory	[Signature]
43	1772	Sh. Akhil Kumar	Engineering	Satisfactory	[Signature]
44	1422	S. Sreenivasulu	Engineering	Satisfactory	[Signature]
45	1464	G. Sreenivasulu	Warehouse	Satisfactory	[Signature]
46	1548	K. Mohan Babu	Production	Satisfactory	[Signature]
47	1676	Y. Venkateswara	warehouse	Satisfactory	[Signature]
48	1713	T. Panchala Krishna.	W.H	Satisfactory	[Signature]
49	1192	G. Srinivasulu Reddy	Production	Satisfactory	[Signature]
50	1723	T. Srinivasulu Kumar	production	Satisfactory	[Signature]
51	1110	G. Prem Kumar	QA	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature] / 13/07/2021

VENKATA NARAYANA ACTIVE INGREDIENTS

TRAINING RECORD

073



Date: 13/07/2021 Time from: 10:30 Time to: 11:15 Duration: 45 mins

Document Title: Site Emergency Response and Responsibilities, Emergencies in Industries & OSEP

Document Reference No.: EHS-014
 Trainer Name: Ravendra Kumar. B Designation: Sr. Manager
 Department: EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method: Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation: Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
19	1518	Ch. Narendra Reddy	R&D	Satisfactory	[Signature]
20	1172	M.V. Krishna Murthy	prod	satisfactory	[Signature]
21	1537	B. Kiran Kumar	production	Satisfactory	[Signature]
22	1581	A. Ramesh	production	Satisfactory	[Signature]
23	1267	D. Krishniah	production	Satisfactory	[Signature]
24	1420	J. Madhava Kumar	production	Satisfactory	[Signature]
25	1724	D. NAHESH	Production	Satisfactory	[Signature]
26	1233	Y. SANKARAJAM	Production	Satisfactory	[Signature]
27	1606	Ch. Karunakar	W.H	Satisfactory	[Signature]
28	1405	C.M. Deepa	EHS	satisfactory	[Signature]
29	1471	P. Murali	EHS	satisfactory	[Signature]
30	1402	D. Sai Sukumar	Production	satisfactory	[Signature]
31	1424	J. Chiranjeev	WH	Satisfactory	[Signature]
32	1542	K. Yella Reddy	Production	Satisfactory	[Signature]
33	1543	R. Tiripathi	Production	Satisfactory	[Signature]
34	1762	An. Anirash	Production	Satisfactory	[Signature]
35	1777	J Mahesh Babu	Electrical	Satisfactory	[Signature]
36	1716	K. Nagaraj Reddy	Production	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date: [Signature]
 13/07/2021

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	072

Date: 13/07/2021 Time from: 10:30 Time to: 11:15 Duration: 45 mins

Document Title: Fire Emergency Response and Responsibilities, Emergencies in Industry & OSEP

Document Reference No.: EHS-014

Trainer Name: Ravendra Kumar B

Designation: sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation: Questionnaire Oral / Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
01	1797	R. Durgareo	Utility	Sat. Satisfactory	R. Durgareo
02	1264	J. Sravan Kumar	warehouse	Satisfactory	J. Sravan Kumar
03	1598	D. Sathishwaran	Engineering	Satisfactory	D. Sathishwaran
4	1506	R. Udaya Kumar	Engineering	Satisfactory	R. Udaya Kumar
5	1730	G. Babji	TSD	Satisfactory	G. Babji
6	1761	Ch. V. Kishore	production	Satisfactory	Ch. V. Kishore
7	1595	S. Mukhesh	production	Satisfactory	S. Mukhesh
8	1480	M. Mahesh	production	Satisfactory	M. Mahesh
9	1495	M. Mahesh	Engineering	Satisfactory	M. Mahesh
10	1650	Sr. Abdul Kader	production	Satisfactory	Sr. Abdul Kader
11	1669	Sr. Ausgar. Ali	Production	Informative	Sr. Ausgar. Ali
12	1076	P. Yanduri	Production	Satisfactory	P. Yanduri
13	1818	N. VINOD	production	Satisfactory	N. VINOD
14	1242	R. Anvesh	Engineering	Satisfactory	R. Anvesh
15	1289	G. Anvesh	Engineering	Satisfactory	G. Anvesh
16	1554	G. Rajeswarthy	Engineering	Satisfactory	G. Rajeswarthy
17	1811	P. V. Kishore	Production	Satisfactory	P. V. Kishore
18	1822	M. Anvesh	ETP	Satisfactory	M. Anvesh

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

B. R. O.
13/07/2021



Date: 12/07/2021 Time from : 10:30 Time to: 11:15 Duration: 45 mins

Document Title: Storage and Handling of Hazardous Chemicals
Safe Handling of gas cylinder, Spill control management

Document Reference No.: EHS-003, 005, 013

Trainer Name: Ravendra Kumar.B

Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:

Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
1	1797	R. Durgarao	Utility		R. Durgarao
2	1264	J. Sreeramesh	Warehouse	Satisfactory	J. Sreeramesh
3	1598	D. Sathishwaran	Engineering	Satisfactory	D. Sathishwaran
4	1506	K. Udaya Kumar	Production	Satisfactory	K. Udaya Kumar
5	1730	G. Babji	TSD	Satisfactory	G. Babji
6	1761	Ch. V. Kishan	Production	Satisfactory	Ch. V. Kishan
7	1595	S. Murali	Production	Satisfactory	S. Murali
8	1480	M. Mahesh	Production	Satisfactory	M. Mahesh
9	1495	M. Mahesh	Engineering	Satisfactory	M. Mahesh
10	1650	Sk. Akash Chandra	Production	Satisfactory	Sk. Akash Chandra
11	1669	Sr. Anandhi	Production	Defective	Sr. Anandhi
12	1056	P. Yashwanth	Production	Satisfactory	P. Yashwanth
13	1818	N. Vinod	Production	Satisfactory	N. Vinod
14	1242	R. Rajesh	Engineering	Satisfactory	R. Rajesh
15	1239	G. Anandhi	Engineering	Satisfactory	G. Anandhi
16	1354	G. Rajesh Reddy	Engineering	Satisfactory	G. Rajesh Reddy
17	1811	P. V. Rajaraj	Production	Satisfactory	P. V. Rajaraj
18	1802	M. Nagesh Kumar	ETP		M. Nagesh Kumar

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature]
12/07/2021

 VNAI	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	070

Date: 12/07/2021 Time from : 10:30 Time to: 11:15 Duration: 45 mins

Document Title: Storage and handling of hazardous chemicals, safe handling of gas cylinders, Spill Control management

Document Reference No.: EHS-003, 005, 013

Trainer Name: Ravendra Kumar B Designation: Sr. Manager

Department : EHS

Training Type: cGMP / SOP / Retraining / External / Others

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation : Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
019	1518	Ch. Ravendra Reddy	R&D	Satisfactory	[Signature]
20	1172	M.V. Krishna Reddy	prod	Satisfactory	[Signature]
21	1537	B. K. Vinay Kumar	prod	Satisfactory	[Signature]
22	1581	A. Ramesh	prod	Satisfactory	[Signature]
23	1267	D. Krishnaraj	prod	Satisfactory	[Signature]
24	1120	H. Madhava Kumar	production	Satisfactory	[Signature]
25	1724	D. MAHESH	Production	Satisfactory	[Signature]
26	1233	Y. SANIKARAJA	Production	Satisfactory	[Signature]
27	1268	L. NARESH	Engineering	Satisfactory	[Signature]
28	1344	B. Subramanian	Engineering	Satisfactory	[Signature]
29	1685	B. Mahendra	Engineering	Satisfactory	[Signature]
30	1514	P. Praveen	QA	Satisfactory	[Signature]
31	1606	Ch. Karan Kumar	W/H	Satisfactory	[Signature]
32	1405	G. Deepak	EHS	Satisfactory	[Signature]
33	1471	P. Murali	EHS	Satisfactory	[Signature]
34	1471	B. Sai Subramanian	Production	Satisfactory	[Signature]
35	1124	J. Chaitanya Prasad	EHS	Satisfactory	[Signature]
36	1531	B. V. RAMANADAH	EHS	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature] /Date: 12/07/2021

	VENKATA NARAYANA ACTIVE INGREDIENTS	Page 1 of 1
	TRAINING RECORD	071

Date: 12/07/2021 Time from: 10:30 Time to: 11:15 Duration: 45 min

Document Title: Storage and handling of hazardous chemicals, Safe handling of gas cylinder, Spill control management.

Document Reference No.: EHS-003, 005, 013

Trainer Name: Ravendra Kumar B Designation: Sr. Manager

Department: EHS

Training Type: cGMP / SOP / Retraining / External / Others _____

Training Method:
 Class room / Personal Discussion / Audio / Visual Presentation / Group Discussion

Training Evaluation: Questionnaire Oral Not applicable

Attendance:

S.No.	Employee code	Name	Department	* Remarks	Signature
36	1545	B. Venkatesh	Production	Satisfactory	[Signature]
37	1542	K. Yella Reddy	Production	Satisfactory	[Signature]
38	1543	B. Tiripedy	Production	Satisfactory	[Signature]
39	1762	A. V. Anish	Production	Satisfactory	[Signature]
40	1777	J. Mahesh Babu	EPC&SA	Satisfactory	[Signature]
41	1716	H. Nagaraju Reddy	Production	Satisfactory	[Signature]
42	1331	SK. Khushi Ghawel	Production	Satisfactory	[Signature]
43	1403	M. Bala Krishna	Production	Satisfactory	[Signature]
44	1565	P. Ramarajayulu	Production	Satisfactory	[Signature]
45	1422	S. Sreemiva sulu	Engineering	Satisfactory	[Signature]
46	1464	G. Seenuhah	Warehouse	Satisfactory	[Signature]
47	1676	Y. Venkateswathi	Warehouse	Satisfactory	[Signature]
48	1713	T. Panchala Krishna	Warehouse	Satisfactory	[Signature]
49	1192	G. Srinivasa Reddy	Production	Satisfactory	[Signature]
50	1723	T. Srinanth Kumar	Production	Satisfactory	[Signature]
51	1258	N. Chaitanya Kumar	W/H	Satisfactory	[Signature]
52	1597	B. Parimala	QA	Satisfactory	[Signature]

* Trainee shall record the feedback on the training in the remark column as "Satisfactory or Informative"; if the trainee is not satisfied on the training conducted he / she shall get clarified from the trainer as required.

Evaluation by Trainer:

The participants understood the contents of the training: Yes / No

Comments:

Trainer's Sign. /Date:

[Signature]
12/07/2021

ANNEXURE-A-7

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

**RED CATEGORY
CONSENT & AUTHORIZATION ORDER**

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

12/09/2022

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

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

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

i. Outlets for discharge of effluents:

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

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

ii. Emissions from chimneys:

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

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

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

• Hazardous Wastes with Disposal Option:

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

• Hazardous Wastes with Recycling Option:

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

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

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

23.	Chlorozoxazone	8.33	4-chloro-2-aminophanol	5.206
24.	Nitrofurantoin Monohydrate	8.33	Urea	2.335
25.	Cinacalcet Hydrochloride	8.33	3-(3-rifluoromethyl- phenyl)-propionaldehyde	6.941
26.	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.	Allyl Isopropyl Acetyl Urea	166.67	Dimethyl malonate	166.67
31.	Fexofenadine HCl	33.37	FexofenadineHCl Crude	35.3722
32.	Loxoprofen	200	2-Phenyl propanoic acid	142.857
33.	Loratadine	8.33	Loratadine crude	8.5
34.	Bepotastin	8.33	Bepotastin crude	8.5
35.	Azilsartan Medoxomil	1.39	Benzo carboxylate	1.112
	Total	1393.89 kg/day (or) 500 TPA		

By- Products :

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

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

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

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

To

M/s. Venkata Narayana Active Ingredients Private Limited,

(Formerly M/s. Nutra Specialities Pvt. Ltd.,)

Chandrapadiya (V), Vinjamur (M),

SPSR Nellore District – 524 228, A.P.

Email: ramakrishna@vnai.in

Copy to:

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

SCHEDULE - A

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

remedial measures.

SCHEDULE-B

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

Water:

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

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

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

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

Air:

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

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

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

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

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

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

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

Solid Waste:

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

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

General:

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

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

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

Special Conditions:

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

SCHEDULE – C

[See rule 6]

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

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

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

Specific Conditions:

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

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

To

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

SPSR Nellore District – 524 228, A.P.

Email: ramakrishna@vnai.in



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.O.F.B.O. //



**JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II**



ANDHRA PRADESH POLLUTION CONTROL BOARD
D.No.33-26-14, D/2, Near Sunrise Hospital, Pushpa Hotel Centre,
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**Sd/-
CHAIRMAN**

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**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.O.F.B.O. //



**JOINT CHIEF ENVIRONMENTAL ENGINEER
UH-II**

BEFORE THE NATIONAL GREEN TRIBUNAL PRINCIPAL BENCH, NEW DELHI

OA NO. 144 of 20 20

In re:-

BHASKAR RAO VEHURI

.....APPLICANT

Vs.

STATE OF ANDHRA PRADESH

.....RESPONDENTS

KNOW ALL to whom these present shall come that I/We... ABHAY KUMAR.....
, the above
 named Respondents, do hereby appoint

ANSHUMAN SHRIVASTAVA, (MP/1136/2012)

(Hereinafter called the advocate/s) to be my Advocate in the above noted case authorise him:-

1. To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.
3. To file and take back documents, to admit and/or deny the documents of opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other Legal Practitioner authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.
8. And I/We the undersigned do hereby agree to rectify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes.
9. And I/We undertake that I/We or my/our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned to hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this... 21 day of ... May 2025

Accepted subject to the terms of the fees.

Advocate

Anshuman

Client

Client

For Venkata Narayana Active Ingredients Pvt. Ltd.

E. Abhay Kumar

Director